

On Aug 13, 2022, at 12:17, Marjorie Gang [REDACTED] wrote:

Hello Ione Smith. I recently watched the recording of your presentation at a Denman Island Local Trust Committee special meeting. You referred to a portion of the proposed agriculture policies in the Islands 2050 IT policy revision, particularly these:

"4.4. Agricultural Land Stewardship Policies

Commitments of Trust Council

4.4.1 Trust Council commits to take a precautionary approach to the stewardship of agricultural lands in the Trust Area, in cooperation with First Nations, Indigenous Knowledge Holders, other government agencies, and the public, and on the basis of the best available area-based mapping, science, social science, local knowledge, and Indigenous ways of knowing. (new)

4.4.2 It is Trust Council's policy that agricultural activity in the Trust Area should be small-scale, sustainable, regenerative, supportive of local climate action and food security, respectful of Indigenous harvesting areas, and protective of the environmental integrity of the Trust Area. (new, 4.1.2, 4.1.3)

Directive Policies for Local Trust Committees and Island Municipalities

4.4.3 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, identify and preserve appropriate areas for agricultural land to support small-scale, sustainable, regenerative agriculture, while carefully considering downstream impacts, wildlife habitat, and adjacent properties. (4.1.3, 4.1.4, 4.1.6)

4.4.4 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, direct the location and construction of roads and utility corridors to minimize fragmentation of agricultural lands. (4.1.7 simplified)

4.4.5 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, encourage sustainable farming and consider land uses and activities that support the economic viability of farms without compromising the agricultural capability of agricultural land. (4.1.5, 4.1.8)

Coordination Policies for Trust Council

4.4.6 Trust Council shall coordinate with, and advocate to, the provincial government to ensure:

- that where a road must sever agricultural land to provide access to lands beyond, the road is built to the minimum standard necessary to service that land; (4.1.10)
- that farming in the Agricultural Land Reserve in the Trust Area does not adversely impact Indigenous food security and traditional harvesting practices, cultural heritage, or the environmental integrity of protected area networks in the Trust Area; (new)
- that legislation, guidelines, and incentives are established to support local farmers in adopting the highest standards of environmental protection of ecosystems, wildlife habitats, and native species diversity, in accordance with the Islands Trust Object; (new)
- that support is given to small-scale sustainable farmers to reduce greenhouse gas emissions emanating from agriculture and adapt to climate variability in the Trust Area; (new)
- that a separate farm class to provide property tax incentives be retained; (4.1.12)
- that the threshold for farm income necessary for farm class status is appropriate to the small scale of sustainable agriculture within the Trust Area; and (4.1.12)
- that the total land area subject to the farm class may include land that is left uncultivated to protect environmental integrity. (4.1.12)

I wonder whether you're aware of the referral response to these policies received by the Islands trust from the Agricultural land Commission containing these criticisms as well as others:

"Commitments of Trust Council (page 22)

4.4.2 It is Trust Council's policy that agricultural activity in the Trust Area should be small-scale, sustainable, regenerative, supportive of local climate action and food security, respectful of Indigenous harvesting areas, and protective of the environmental integrity of the Trust Area. (new, 4.1.2, 4.1.3)

ALC staff response:

ALC staff note that all types of agriculture, including conventional or intensive agriculture, are permitted in the ALR as per the Farm Practices Protection Act. It may be also be advantageous to provide a definition for regenerative agriculture in the Policy Statement."

and

"Directive Policies for Local Trust Committees and Island Municipalities (page 22)

4.4.3 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, identify and preserve appropriate areas for agricultural land to support small-scale, sustainable, regenerative agriculture, while carefully considering downstream impacts, wildlife habitat, and adjacent properties.

ALC staff comments:

ALC staff are pleased to see preserving agricultural land as a directive policy, however ALC staff note that all types of agriculture (not just regenerative agriculture) are permitted in the ALR as per the Farm Practices Protection Act. ALC staff understand that there may be agricultural lands that are outside of the ALR, and their use may be limited beyond that which is outlined in the ALC Act and its regulations. It may be helpful to identify when the Policy Statement is contemplating non-ALR agricultural land."

[2021-10-14_ALC.pdf](#)

as well as these:

[2021-10-19_MIN AFF.pdf](#)

Comments from the Ministry of Agriculture,
Food and Fisheries:

They have the same concerns as from ALC. "The Farm Practices Act allows tree cutting, land clearing, use of tractors, pesticides, other possibly "non-sustainable" practices if necessary for successful farming. The revised policy contains "Ambiguity around restrictions relating to First Nations. [The}same concerns [exist] with policies that affect aquaculture. "Overall, this section appears to strive for a vision of agriculture that does not reflect the current realities of the agricultural sector in B.C."

The policies to which you referred in your presentation haven't been passed and are unlikely to be passed due to these responses from the Agricultural Land Commission and the Ministry of Agriculture, Food and Fisheries.

The Farm Regulation Implementation Project was promoted to the Denman Community in 2010. Initially there was a steering committee mostly of resident volunteers. Most of the initial steering committee resigned when they realized that their advice wasn't to be heeded. The LTC advertised for volunteers for a new steering committee that was to lead the project. Finding no volunteers, the LTC "...requested staff to prepare a staff report on Farm Plan Implementation presenting options for process given that we do not have a steering committee."

"The most recent resolution represents an alternative to the course of action [to] implementation of the Farm Plan guided by an advisory steering committee comprised of community stakeholders, due to an insufficient number of responses to the call for volunteers to sit on this committee."

Our community doesn't want this, especially not the farmers. It's entirely a staff-driven initiative.

You should probably be aware of all of this.

Sincerely,
Marjorie Gang
Denman Island

