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September 17, 2026

Via email: [AF.Minister@gov.bc.ca](mailto:AF.Minister@gov.bc.ca)

Honourable Lana Popham  
Minister of Agriculture and Food  
PO Box 9012 Stn Prov. Govt.  
Victoria BC V8M 9L6

Dear Minister Popham:

**Re: New Regulation Encouraging More Food Processing in Agricultural Land Reserve (ALR)**

I am writing on behalf of Islands Trust Council to communicate our support for the concerns raised by the Union of BC Municipalities (UBCM) regarding the Ministry of Agriculture and Food's proposed regulatory changes to encourage additional food processing within the Agricultural Land Reserve (ALR).

Islands Trust Council recognizes the importance of agriculture, local food production, and food security in the Islands Trust Area. Farmland and farming activities also contribute to the distinct character and economic resilience of island communities. At the same time, the Islands Trust Area encompasses more than 450 islands and includes communities with very different land-use, servicing, and infrastructure circumstances. Local trust committees and island municipalities therefore need sufficient tools to determine whether particular land uses are appropriate in particular locations.

Of particular concern is the proposed five percent rule and the apparent limitation it would place on a local trust committee/island municipality's ability to prohibit food processing that meets the requirements of the rule. As UBCM has noted, local governments/Islands Trust bodies may need to further regulate food-processing activities based on local land-use considerations, including adjacent uses, setbacks, and the capacity of existing infrastructure. There may also be circumstances within the Islands Trust Area where these local factors make a particular parcel unsuitable for more intensive food processing.

Islands Trust Council therefore supports UBCM's request that local governments/Islands Trust bodies retain the ability to prohibit and/or further regulate food-processing uses in the ALR.

This ability is important to ensure that provincial agricultural policy can be implemented in a manner that recognizes local circumstances and existing community planning frameworks.

Islands Trust Council also shares UBCM's concerns regarding the enforcement and capacity implications of the proposed changes. Complaints regarding food-processing activities may come directly to local governments/Islands Trust, particularly where local governments/Islands Trust have adopted additional regulations. The Province is encouraged to more closely consider the financial, administrative, and enforcement capacity required of both local governments/Islands Trust and the Agricultural Land Commission before proceeding with the proposed changes.

These considerations are particularly important in the Islands Trust Area, where infrastructure and servicing capacity can vary significantly between islands and communities. Ensuring that local trust committees/Island municipalities retain meaningful land-use planning authority will ensure that local land use bylaws reflect local circumstances including environmental, infrastructure, and community circumstances of individual locations.

Islands Trust Council's Policy Statement, approved by the Minister of Housing and Municipal Affairs, includes the following commitments of the Islands Trust Council:

- 4.1.1 Trust Council recognizes that agriculture is a traditional and valuable activity in the Trust Area.
- 4.1.2 Trust Council shall consult with the Ministry of Agriculture, Fisheries and Food and the British Columbia Land Reserve Commission to request that agriculture policies applied to the Trust Area are appropriate to the nature of agriculture within the Trust Area, including, but not limited to, the smaller island scale of agricultural activities.
- 4.1.3 It is Trust Council's policy to encourage agricultural management practices that are compatible with sustaining wildlife habitat.

We respectfully ask that the Ministry of Agriculture and Food consider these concerns before proceeding with the proposed regulatory changes and, in particular, reconsider the proposed limitation on the ability of local governments/Islands Trust bodies to prohibit food-processing uses that meet the five percent rule. We also encourage the Province to assess the enforcement and capacity implications of the proposed changes for local governments, Islands Trust and the Agricultural Land Commission.

Islands Trust Council appreciates the opportunity to contribute to this discussion and looks forward to working with your Ministry to support agriculture and food security while respecting local government/Islands Trust planning responsibilities and the unique circumstances of island communities.

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***Preserving and protecting over 450 islands and surrounding waters in the Salish Sea***

Bowen Denman Hornby Gabriola Galiano Gambier Lasqueti Mayne North Pender Salt Spring Saturna South Pender Thetis

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Patrick', with a long horizontal flourish extending to the right.

Laura Patrick  
Chair, Islands Trust Council

cc: Honourable Christine Boyle, Minister of Housing and Municipal Affairs  
Islands Trust Area Members of the BC Legislative Assembly  
Bowen Island Municipal Council  
Islands Trust Council

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