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April 27, 2018

File No.: 0400-30

via e-mail: [ALR\\_ALCRevitalization@gov.bc.ca](mailto:ALR_ALCRevitalization@gov.bc.ca)

Jennifer Dyson  
Minister's Advisory Committee  
Revitalization of ALR and ALC  
c/o Ministry of Agriculture  
PO Box 9120 Stn Prov Govt  
Victoria BC V8W 9B4

Dear Jennifer Dyson:

**Re: Agricultural Land Reserve and Agricultural Land Commission Revitalization**

Thank you for the opportunity to comment on the revitalization of the Agricultural Land Reserve (ALR) and Agricultural Land Commission (ALC). The Agricultural Land Reserve is an important asset in the Islands Trust Area. By supporting food security and protecting farming opportunities for current and future farming families, the ALR helps sustain the character of our islands and the health of our communities.

The Islands Trust Council supports the preservation of the ALR and its management by an independent and adequately funded ALC. Under the *Islands Trust Act*

*The object of the Trust is to preserve and protect the Trust Area and its unique amenities and environment for the benefit of the residents of the Trust Area and of British Columbia generally, in cooperation with municipalities, regional districts, improvement districts, other persons and organizations and the government of British Columbia.*

The ALR forms part of the unique amenities of the Trust Area and both the ALC and the Islands Trust share a responsibility for the protection of farmland and farming activities on the islands. Thirteen and a half per cent of the Islands Trust Area land base is within the ALR, and 37 per cent of the ALR in the Trust Area is forested.

Lands within the ALR in the Islands Trust Area face intense development pressures. The ALC should be mandated and funded to conduct thorough permit application reviews and timely enforcement of infractions. We would also like to see the ALC reinvigorate proactive work such as:

- regional-level land use planning;
- analysis of permitted uses; and
- the preservation and encouragement of agricultural farm uses.

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Compared with many farms in British Columbia, the farms in the Islands Trust Area may challenge conventional notions of what 'agriculture' is, what normal farm practices are, and what viable farming operations can look like. The ALC should therefore have the ability to be responsive to the sometimes unique situations of our islands. In brief, the Islands Trust Council holds that agricultural policies applied to the Trust Area should be appropriate to the nature of agriculture practices within the Trust Area. We would like you to be aware that, although we do not have a policy position on this matter, we are hearing concerns about the potential impacts of cannabis production facilities on Agricultural Reserve Land.

The Islands Trust Council encourages agricultural management practices that are compatible with sustaining wildlife habitat. Notably, 19 per cent of the Islands Trust Area's sensitive ecosystems are within the ALR. Trust Council has policy direction that the natural wetlands of the Trust Area, including those in the ALR that have not been altered in the past for agriculture, should not be drained, filled, or degraded.

As you consider the actions required to revitalize the ALR and the ALC, we request that you also consider the need for quality information about the changing state of agriculture. After 2006, Statistics Canada changed the way in which it manages the Census of Agriculture data and is no longer able to provide information by custom geographic areas. Our inability to access island specific or Trust Area specific information hampers our ability to assess the changes and needs of agriculture on our islands. We would also benefit from greater knowledge about the role that the ALC and ALR can play in reducing barriers to First Nations food gathering and food sovereignty.

The Islands Trust Council looks forward to collaborating proactively with the ALC to preserve and protect agricultural land in the Trust Area. We hope to meet with the ALC at our June Council meeting on Saturna Island to discuss issues of importance in our region. We are hopeful there may be discussion at that time about:

- policies to sustain and encourage small farms in the islands;
- farm worker housing issues;
- enforcement of infractions; and
- a possible review of the ALR boundaries within the Islands Trust Area to assess whether farmed areas currently outside the ALR should be added to the ALR.

On that last point, Trust Council has a policy position that encourages the ALC to approve applications from property owners for inclusion of land with potential for agriculture into the ALR.

Thank you for considering this input. The Islands Trust Council is a federation of local government bodies representing 26,000 people living within the Islands Trust Area and about 10,000 non-resident property owners. The Islands Trust Council establishes overall policy direction for the Islands Trust, and has a protocol agreement and letter of understanding with the ALC. Local trust committees and Bowen Island Municipality contribute to the protection of agricultural lands in the Islands Trust Area in three key ways: through land use designations; through the development of community land use plans and regulatory bylaws that support sustainable agriculture, minimize adverse effects and protect soils; and through participation in food and agricultural studies.

The Islands Trust is responsible for preserving and protecting the unique environment and amenities of the Islands Trust Area through planning and regulating land use, development management, education, cooperation with other agencies, and land conservation. The area covers the islands and waters between the British Columbia mainland and southern Vancouver Island. It includes 13 major and more than 450 smaller islands covering 5200 square kilometres.

We appreciate your consideration of this input. There are many First Nations who have asserted Aboriginal interests in the Trust Area and many who have established harvesting rights. Although we copy First Nations on all correspondence such as this, we have not directly heard their positions on the Agriculture Land Reserve. Given our commitment to establishing and maintaining a mutually respectful relationship with First Nations, we offer the Islands Trust position while being ready to respectfully consider their positions.

You will also be hearing from the Trust Fund Board, a separate statutory body within the Islands Trust.

Yours sincerely,



Peter Luckham  
Chair, Islands Trust Council  
[pluckham@islandstrust.bc.ca](mailto:pluckham@islandstrust.bc.ca)

cc: Agricultural Land Commission  
Islands Trust Area MLAs  
Cowichan Tribes  
Esquimalt First Nation  
Halalt First Nation  
Homalco First Nation  
Hul'qumi'num Treaty Group  
K'omoks First Nation  
Klahoose First Nation  
Laich-kwil-tach Treaty Society  
Lake Cowichan First Nation  
Lyackson First Nation  
Malahat Nation  
Musqueam First Nation  
Nanwakolas Council  
Pauquachin First Nation  
Penelakut Tribe  
Qualicum First Nation  
Scia'new (Beecher Bay) First Nation  
Semiahmoo First Nation  
Shíshálh (Sechelt) First Nation  
Snaw-naw-as (Nanoose) First Nation  
Snuneymuxw (Nanaimo) First Nation  
Songhees First Nation  
Squamish First Nation  
Stz'uminus (Chemainus) First Nation  
Te'mexw Treaty Association  
Tla'amin (Sliammon) First Nation  
T'Sou-ke (Sooke) First Nation  
Tsartlip First Nation  
Tsawout First Nation  
Tsawwassen First Nation  
Tseil-Waututh (Burrard Inlet) First Nation  
Tseycum First Nation  
We Wai Kai (Cape Mudge First Nation)  
Wei Wai Kum (Campbell River First Nation)  
Bowen Island Municipal Council  
Trust Fund Board  
Islands Trust Council  
Islands Trust website