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January 15 , 2018

File Number: 0420-20

via e-mail: env.ag.reg.reviews@gov.bc.ca

The Honourable George Heyman
Minister of Environment and Climate Change Strategy
Room 112 Parliament Buildings
Victoria, BC V8V 1X4

Dear Minister Heyman:

Re: Revisions to the Agricultural Waste Control Regulation (AWCR)

I am writing to you in regards to the proposed revisions to the Agricultural Waste Control Regulation (AWCR) under the *Environmental Management Act* (EMA). In general, we are supportive of the proposed revisions and appreciate your Ministry's efforts to regulate agricultural waste to ensure clean and safe drinking water and healthy waterbodies and fish.

We would appreciate further consideration of stream setbacks. We recognise that the provincial Riparian Areas Regulation (RAR) presently does not apply to agricultural areas, but, from a land use planning perspective, it would be preferable if the RAR and AWCR were better aligned regarding stream setbacks, especially for fish bearing or potentially fish bearing streams. Ideally, setbacks under the AWCR will be similar or better than the RAR.

We also encourage the Province to increase its education programs to help farmers better appreciate the negative environmental and human health impacts associated with poor manure management and soil erosion and runoff.

We also appreciate an increase in provincial resources for monitoring of groundwater and freshwater quality in the Islands Trust Area to support assessment of impacts from agricultural practices. Every passing month presents a lost opportunity to collect data that would support future investigations.

Thank you for considering this input. The Islands Trust Council is a federation of local government bodies representing 25,000 people living within the Islands Trust Area and about 10,000 non-resident property owners. 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.

Yours sincerely,

Peter Luckham
Chair, Islands Trust Council
pluckham@islandstrust.bc.ca

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Preserving **Island** communities, culture and environment

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

The Honourable George Heyman

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cc: 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
Islands Trust Council
Islands Trust website