

December 18, 2019

Honorable Minister Popham,

On February 22, 2019, when Bill 52 came into effect, none of us knew each other.

On May 10, 2019, Changes to Bill 52, started by Meghan McPherson, was started and has grown to 3475 members, consistently adding over 100 members per week.

On May 29, 2019 The **BC Chamber of Commerce** took an “unprecedented step of writing you on a single resolution related to Bill 15, The Agricultural Land Commission Amendment Act.” And they highlight two policy recommendations as follows:

1. Explicitly recognize and include farmers and ranchers as defined persons under all ALC and ALR legislation;
2. Reconsider how to allow owners of ALR land to apply for exclusions independently, while also enabling or mandating the alignment of broader land use plans AND/OR enable an appeal process for rejected applications that are not accepted to be applied for to the ALC; On June 17, 2019, the District A Farmers Institute had an extraordinary meeting at the Rusted Rake Eatery to discuss changes to the ALCA with the passing of Bills 52 and the Ministers Revitalization mandate.

On July 4, 2019, Ministry of Agriculture **extended the grandfathering period** for manufactured homes for immediate family members in the Agricultural Land Reserve (ALR) to February 2020.

In August 2019, we began a **Petition to Repeal Bill 52** and it is now over 31,000 signatures and still growing. In this petition, we asked the BC government to:

- Restore the right of farmers to represent themselves directly to the ALC.
- Restore the right of farmers to have two dwellings, unconditional to farm use.
- Give equal opportunities for all farmers to diversify and sell value added farm products independent of alcohol production.
- Encourage the revitalization of the Farmer’s Institutes of BC.

Between September 19, 2019 (Merville) - November 14, 2019 (Kamloops) The Ministry of Agriculture and ALC held eight Engagement meetings throughout the province. At these meetings, we were assured that ALC bylaw enforcement is complaint driven. On November 14, 2019, Jennifer Dyson, ALC Chair, is quoted as saying “**We're not looking for that. We're not knocking on doors. There is no drone or helicopters looking for these kinds of things.**”. The notice of intent for the MDA Ltd contract for radar satellite surveillance came out on the BC Bids website on November 13, 2019.

On September 27, 2019, the **UBCM Resolution B168** Agricultural Land Reserve Use Regulation “**to reinstate the previous provisions of the legislation which facilitated the**

construction of additional dwellings for farm help, manufactured homes for immediate family members, accommodation above an existing farm building, or a second single family dwelling.” was endorsed, almost unanimously.

On November 20, 2019 the **BC Cattlemen’s Association submission** on *Supporting BC Farmers & Ranchers engagement* that urges you to consider how regulatory overburden and the lack of financial supports are suppressing a generation of agricultural entrepreneurs.

“This a time when ranching families need the Ministry and the Province to stand up for agriculture, not regulate farm families out of business.”

The BC Cattlemen’s Association has established the following founding principles for their engagement:

- 1) Provide ranchers/farmers with protection and support to carry out agricultural activities;
- 2) There should be no further infringement on private property rights;
- 3) The province needs to manage with a goal of making agriculture more profitable; and
- 4) Bonafide operations must be allowed to diversify income (through a variety of means) as long as the productive capacity of the land is not diminished.

I am aware of the similarities of all three of these recent requests of the Minister. UBCM, Cattlemen’s Association, Farmers Institutes, are all asking for the same changes and for support.

The Ministry of Agriculture needs to allow for flexibility and adaptability. One size fits all does not support farming in BC. If people can make a sustainable amount of money on their farms, farming as an occupation becomes viably passed down to the next generation. This increases the likelihood that ALR land will be farmed in perpetuity.

ISSUE #1: SUPPORTING FARMERS AND RANCHERS IN THE ALR TO EXPAND AND DIVERSIFY THEIR BUSINESSES

We recommend that businesses which produce value-added products be permitted.

This includes all **cottage industries** which are current illegal and/or not permitted (such as the sale of baked goods, fruit pies, jams, dehydrated fruits and vegetables, vinegar, roasted coffee or dried tea, dried herbs and yarn, and other processed wool products).

Livestock Farmers with **Class D & E slaughter licenses** need to be able to operate a farm to table eatery or food stand to sell their value added products, like wineries and breweries are able to do. BC Cattlemen's Association states "In the livestock sector, profit margins are too thin to support expansion of the farm operation and allow for ranch succession without diversified farm income."

ISSUE #2: ENSURING FLEXIBILITY FOR RESIDENTIAL OPTIONS WHILE PRIORITIZING AGRICULTURE IN THE ALR

The removal of an additional dwelling for family members recently done by the MoA appears to be based on a fundamental misunderstanding of farm labour and economics. The costs of labour, geographical distance of many farms, and the nature of farm tasks make it necessary (not just preferable) to have labour on site both when developing a farm and maintaining a farm.

Furthermore, the restriction of additional dwellings to family members was an anachronistic policy preference based on now obsolete birthrates and on a historical socio-economic context that has passed. The idea that there are a multitude of geographically intact and bound nuclear families whose many children will sort out who takes over the farm, does not relate to factual statistics related changing family or farming dynamics today.

Secondary dwellings not only assist farmers in running a farm by housing family and farm help, they are essential to keeping many farms afloat. Rental income is historically reliable and consistent. Long and short term rental options provide stable rental income that allow farmers to remain economically viable regardless of fluctuating markets. If farmers do not have this stable rental income they will need to find work off the farm, thereby reducing farming operations.

ISSUE #3: STOP THE REGULATORY BURDEN ON FARMERS

BC Cattlemen's Association states "There have been numerous regulatory reviews over the last decade that are oppressing farmers and ranchers (i.e., Open Burning, Ag Waste, Groundwater Licensing, FRPA, Species at Risk, Meat Processing, Grizzly Bears, Carbon Tax, etc.). The added layers of regulatory burden are crushing BC ranch families and their businesses."

"There has been a paradigm shift in the role of government in agriculture. Over the last forty years, since the reserve was established, there has been a move away from providing experts and professional advisors to a shift in regulatory requirements for "hiring Qualified Professionals (QP). This new requirement comes at great cost to the producer. It is not just the cost - though the cost of services for one QP often exceeds the annual income of a rancher - it is the sheer amount of times a QP is required for what have been normal farming activities."

As the President of the Sunshine Coast Farmers Institute, I have tried to get support for our rural and remote farmers through Ministry of Agriculture programs and even our local agrologist. And I have been told they are too busy. The most recent

A perfect example is the recent limit on gravel driveways. The idea that gravel is counterproductive to farming ignores the animal husbandry needs of livestock. As a sheep and goat farmer, if I did not provide a clean dry gravel surface for my animals to walk on they would suffer from hoof rot and foot rot.

CONCLUSION

The government states in this call for engagement that "These legislative changes aim to further encourage farming and ranching in British Columbia and strengthen the independence of the ALC so it can better fulfill its mandate of encouraging farming and protecting farmland."

However, the recent legislative changes in Bills 52 and 15 are having the opposite effect on farming in BC.

When drafting regulations concerning farm businesses, farmers or dwellings, a diversity of opinions is necessary from those with experience farming in all regions of BC. This is part of a normal democratic checks and balances process. It appears to me that you have relied on

opinions from the elite whose income is primarily derived from non-farming careers or academics that are lower mainland based. I strongly caution that the omission of the voice of the modest farmer or the family farmer is to the detriment of food security in BC.

I sincerely hope that the MoA can shift the focus from punitive and discriminatory measures and begin to support the people throughout our province who are working hard to increase food security, restore food producing ecosystems and preserve small scale farming businesses in BC.

Signed,

Raquel Kolof

President

Sunshine Coast Farmers Institute