The BC Agriculture Council (BCAC) appreciates the opportunity to provide a response to the January 31\textsuperscript{st} 2011 \textit{Report of the British Columbia Task Force on Species at Risk}\textsuperscript{1}. The BCAC represents the collective interests of BC’s primary agriculture producers, representing an estimated 14,000 farmers and ranchers from across the province through their membership in sector farm organizations (Appendix A).

\textbf{BC Agriculture Background and Economic Challenges:}

British Columbia has a strong agricultural heritage that was built on the province’s unique climatic, geographic and demographic diversity. Agriculture’s true contribution is often overlooked because of the diverse nature and scope of this important industry. With well over 200 different crops and livestock produced on BC’s farms and ranches, the agriculture and agri-food industry is a significant contributor and a stabilizing factor providing jobs and opportunity in many of the province’s rural and regional economies.

Agriculture plays a significant and important role in the provincial economy overall, with the many activities associated with the production, processing, distribution and sale of food providing employment for over 290,000 people, representing 14\% of the provincial workforce and generating over $35 billion in revenue. The sector is, however, facing major economic challenges – having now experienced a negative net farm income situation for five consecutive years according to Statistics Canada\textsuperscript{2}.

\textsuperscript{1} Task Force Report – \url{http://www.env.gov.bc.ca/sartaskforce/Documents/SpeciesAtRisk_report.pdf}
\textsuperscript{2} Source: Statistics Canada – \url{http://www40.statcan.ca/l01/cst01/agri02j-eng.htm}
Meeting BC’s Future Food Security Needs:
Meeting the future food security needs of the province will depend upon our ability to address the economic pressures facing agriculture and to maintain farmland over the long-term. This is a societal interest that cannot be taken for granted. By 2030, BC’s population is expected to grow by 30% to 5.5 million people – further increasing development pressures on farmland and, at the same time, increasing the need to have a productive agricultural land-base. BC faces the unique situation of having less than 5% of the total provincial land-base with the potential for agricultural production, which led to the establishment of the Agricultural Land Reserve (ALR) in the 1970’s (Figure 1) to enable and accommodate farm use on this limited land-base.

Figure 1: BC’s Agricultural Land Reserve
Significant steps have also been taken to ensure that the environmental integrity of BC’s agricultural land is protected over the long-term. Through initiatives such as the Environmental Farm Plan (EFP) program and the beneficial management practices being implemented on BC farms, the agriculture sector is identifying and reducing environmental risks on farms and is establishing itself as being on the leading edge in the management of its natural resources.

The contributions provided to society from agriculture also go far beyond maintaining an agricultural land-base for future generations. BC’s farming and ranching landscapes provide for protection of open space, clean air and water, wildlife corridors and habitat, conservation of biodiversity, as well as tourism and recreational opportunities.

Addressing BC’s food security needs in the face of a changing climate is presenting further challenges. While some research suggests that BC may experience improved agricultural capability as a result of climate change, increased uncertainty and costs associated with weather damage for BC’s agricultural operations is also likely. BC also imports significant amounts of food from areas which have recently experienced drought and other production challenges, further demonstrating the need to maintain an adequate agricultural production capacity in British Columbia.

**BC Agriculture and Species at Risk:**

It is important for the BCAC to put the above in context, because agriculture makes much more than just an economic contribution to the province. The Task Force report’s Conservation Vision (p. 15) eloquently states that...*The people of the province are enjoying a thriving resource-based economy that is living within its ecological means, equitably balancing the interests of First Nations, communities, private land owners, industries and the general public.* The BCAC has no quarrel with this statement, but would note that while agriculture and food production is really an essential part of each of the “interests” listed it is not clearly identified as a priority consideration. This is something that needs to change as we collectively develop public policy on issues that impact on our ability as a society to maintain the long-term productive capacity of BC’s limited farmland.

Secondly, BC agriculture has in recent years been under severe economic pressure, just as the Task Force emphasizes that threats to BC ecosystems and habitats have increased. It has, in fact, often been stated within the agriculture community that BC farmers and ranchers should also be listed as a “species at risk”. Noting this is not in any way intended to belittle or dismiss the important public goal of protecting the province’s endangered species. It is, however, of critical importance to the agriculture community that in “balancing the interests”, significantly more emphasis be put on the huge societal contributions made by BC’s farmers and ranchers.

The importance of making this recognition could not have been demonstrated more clearly than in the debacle that occurred earlier this year when Fisheries and Oceans Canada (DFO) conducted consultations on the Draft Recovery Strategy for the Salish Sucker and gathered
public input for development of an Action Plan for the Salish Sucker and Nooksack Dace. Attached (Appendix B) is a copy of the BCAC letter sent to DFO after receiving numerous angry complaints from farmers whose land was potentially implicated by these initiatives. It is, incidentally, the view of the BCAC that any attempt to work cooperatively with landowners to meet species at risk goals was significantly set back as a result of this process.

In response to the letter, DFO participated in a dialogue session hosted by the BCAC and Fraser Valley Regional District, with the primary objectives of increasing the understanding of the SARA process for aquatic species and identifying options and solutions for moving forward with species recovery that would satisfy interests of agriculture and local government.

The ensuing report\(^3\) identified a number of priorities, not the least of which was to lobby the federal government to amend the federal *Species at Risk Act* in order to, among other things, better facilitate voluntary stewardship measures to be taken by landowners to restore critical habitat on their property (page 8). The BCAC is not suggesting that private landowners be absolved of responsibility of the conservation of species, but they must be engaged in the process without the threat of losing control of their own land.

The BCAC supports the primary thrust of the Task Force report, which is also to implement a voluntary stewardship approach. Moreover, the Task Force acknowledges that efforts to protect species’ habitats on private land are actually discouraged by “layers of punitive regulation arising from uncoordinated ministry requirements.” The BCAC would add to this by noting that there are also uncoordinated and sometimes conflicting federal and provincial objectives in the process. We fully agree with the Task Force that this negative approach needs to become both positive and proactive, and must also fully address farmers’ and ranchers’ needs in the process.

The BCAC is also in support of developing a range of funding mechanisms to provide consistent support to conservation efforts – but is concerned, judging from the Provincial Government’s track record of support for agriculture, that funding levels will be inadequate. The second concern is the reference to “development cost charges”, which have at least in some municipalities significantly taxed farming operations. As indicated previously, BC agriculture is under severe financial pressure and simply cannot afford to be taxed any further.

The more specific recommendation to begin immediately to prepare a performance-based incentive program to encourage owners of private/leased lands to take positive action to protect at-risk species and ecosystems, based upon the existing Environmental Farm Plan (EFP) model is also very encouraging. But, again, the success of any such initiative is dependent upon

\(^3\) Dialogue Session on Aquatic Species at Risk in the Fraser Valley – http://www.bcac.bc.ca/userfiles/file/20110531%20SARA%20Workshop%20Summary%20Report%20FINAL%20FINAL.pdf
having adequate resources behind it – the BCAC administers the existing EFP program through its subsidiary, ARDCorp, and would be pleased to have further discussions with the Ministry of Environment on this initiative.

With respect to the Task Force recommendation to employ the “inter-ministry resource management coordination process” for implementing area-based conservation priorities established under the Conservation Framework, it is not clear to the BCAC whether this process receives input from the Ministry of Agriculture and/or Agricultural Land Commission. Substantive input from these agencies in all areas that include agricultural land is essential.

It is also not clear from the Task Force report precisely what will be done to update the Canada-British Columbia Agreement on Species at Risk (2005). It is imperative in this process that the socio-economic and sustainable development clauses (Sections 2.5 and 2.6) of the Agreement are fully maintained and/or strengthened. From the perspective of the BCAC, consideration of these issues on agricultural land means fully meeting the needs of farmers and ranchers who are dependent on the land for their livelihood.

The BCAC appreciates the opportunity to share its views and concerns with the Ministry of Environment and would welcome the opportunity to further discuss the Ministry’s approach to managing species at risk in British Columbia.

Respectfully submitted,

BC Agriculture Council
### Appendix A – BCAC Member Organizations:

<table>
<thead>
<tr>
<th>Organization Name</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>B.C. Cattlemen’s Association</td>
<td>cattlemen.bc.ca #4-10145 Dallas Drive, Kamloops, BC V2C 6T4</td>
</tr>
<tr>
<td>B.C. Chicken Growers Association</td>
<td>bccchicken.ca Box 581, Abbotsford, BC V2T 6Z8</td>
</tr>
<tr>
<td>B.C. Cranberry Growers Association</td>
<td>bccranberrygrowers.com 21538-87B Ave, Langley, BC V1M 2E6</td>
</tr>
<tr>
<td>B.C. Blueberry Council</td>
<td>bcbblueberry.com #140 - 32160 South Fraser Way, Abbotsford, BC V2T 1W5</td>
</tr>
<tr>
<td>B.C. Broiler Hatching Egg Producers</td>
<td>bcbhec.com 180 - 32160 South Fraser Way, Abbotsford, BC V2T 1W5</td>
</tr>
<tr>
<td>B.C. Egg Producers Association</td>
<td>bcegg.com 150-32160 South Fraser Way Abbotsford, BC V2T 1W5</td>
</tr>
<tr>
<td>B.C. Fruit Growers’ Association</td>
<td>bcfga.com 1473 Water St, Kelowna, BC V1Y 1J6</td>
</tr>
<tr>
<td>B.C. Grain Producers Association</td>
<td>bcgrain.com Box 6004, Fort St. John, BC V1J 4H6</td>
</tr>
<tr>
<td>B.C. Grape Growers Association</td>
<td>grapegrowers.bc.ca 451 Atwood Rd., Grand Forks, BC V0H 1H9</td>
</tr>
<tr>
<td>BC Greenhouse Growers’ Association</td>
<td>bchggreenhouse.ca #108 - 7565 132nd St, Surrey, BC V3W 1K5</td>
</tr>
<tr>
<td>B.C. Landscape &amp; Nursery Association</td>
<td>bcnna.com #102-5783 176A St, Surrey, BC V3S 6S6</td>
</tr>
<tr>
<td>B.C. Milk Producers Association</td>
<td>bcmilkproducers.ca 3236 Beta Ave, Burnaby, BC V5G 4K4</td>
</tr>
<tr>
<td>B.C. Pork Producers Association</td>
<td>bcpork.ca PO Box 8000-280 Abbotsford, BC V2S 6H1</td>
</tr>
<tr>
<td>B.C. Potato &amp; Vegetable Growers Association</td>
<td>bcveg.com PO Box 18585, Delta, BC V4K 4V7</td>
</tr>
<tr>
<td>B.C. Poultry Association</td>
<td>#230-32160 South Fraser Way, Abbotsford, BC V2T 1W5</td>
</tr>
<tr>
<td>B.C. Turkey Growers Association</td>
<td>bcturkey.com #106 19329 Enterprise Way, Surrey BC V3S 6J8</td>
</tr>
<tr>
<td>B.C. Wine Grape Council</td>
<td>bcwgc.org Box 1218, Peachland, BC V0H 1X0</td>
</tr>
<tr>
<td>Certified Organic Associations of B.C.</td>
<td>certifiedorganic.bc.ca #202 - 3002 32nd Ave, Vernon, BC V1T 2L7</td>
</tr>
<tr>
<td>F.A.R.M. Community Council</td>
<td>forums.bcac.bc.ca 11260 McBride Timber Road North, Prince George, BC V2N 6K2</td>
</tr>
<tr>
<td>Fraser Valley Bush Bean Growers Association</td>
<td>bcveg.com #207-15252 32nd Ave, Surrey, BC V3S 0R7</td>
</tr>
<tr>
<td>Fraser Valley Cole Crop Growers Association</td>
<td>bcveg.com #207-15252 32nd Ave, Surrey, BC V3S 0R7</td>
</tr>
<tr>
<td>Fraser Valley Corn Growers Association</td>
<td>bcveg.com #100, 32160 South Fraser Way, Abbotsford, BC V2T 1W5</td>
</tr>
<tr>
<td>Fraser Valley Strawberry Growers Association</td>
<td>bcstrawberries.com #100, 32160 South Fraser Way, Abbotsford, BC V2T 1W5</td>
</tr>
<tr>
<td>Horse Council of British Columbia</td>
<td>hcbc.ca 27336 Fraser Highway, Aldergrove, BC V4W 3N5</td>
</tr>
<tr>
<td>Okanagan Kootenay Cherry Growers Association</td>
<td>bccherry.com R.R. #5, S76, C2, 37070-149 Street, Oliver, BC V0H 1T0</td>
</tr>
<tr>
<td>Raspberry Industry Development Council</td>
<td>bcraspberries.com #130 - 32160 South Fraser Way, Abbotsford, BC V2T 1W5</td>
</tr>
<tr>
<td>United Flower Growers’ Co-op</td>
<td>ufgca.com 4085 Marine Way, Burnaby, BC V5J 5</td>
</tr>
</tbody>
</table>
Appendix B – BCAC Letter to Fisheries and Ocean Canada:

February 11, 2011

Rebecca Reid
Regional Director
Oceans Habitat Enhancement Branch
Fisheries and Oceans Canada
Suite 200 - 401 Burrard St
Vancouver, BC V6C 3S4
rebecca.reid@dfo-mpo.gc.ca

Dear Ms. Reid:

The BC Agriculture Council (BCAC) is writing to convey significant concerns that have arisen in the recent land owner meetings and stakeholder workshops on the draft recovery strategy for the Salish sucker and the development of the Nooksack dace and Salish sucker action plan.

The BCAC has received numerous phone calls and emails from farmers and farm organization representatives who attended these meetings, expressing a wide range of concerns – the most disconcerting being the conflicting messages that were presented to meeting participants. It was clearly stated by Fisheries and Oceans Canada (DFO) representatives at some of the meetings that a cooperative stewardship approach would be taken to meet the recovery strategy objectives while, at other meetings, participants were told that setbacks of up to 30 metres from the creeks in question would ultimately be mandatory.

In representing the farmers whose livelihood is entirely dependent upon the land directly implicated in this process, the BCAC is willing to work with DFO but cannot support the implementation of stringent measures that would require the removal of large tracts of productive agricultural land from use by its lawful owners. Adopting a stewardship approach that will meet both farmers’ and DFO’s needs is the only acceptable means of moving forward on this issue. The BC Environmental Farm Plan (EFP) program, which identifies a farm’s environmental strengths, prioritizes environmental risks and takes advantage of tools and techniques available to manage those risks, has demonstrated the success of adopting a voluntary and cooperative approach to environmental stewardship.

Since its inception, the EFP program has in the Fraser Valley and Metro Vancouver regional districts alone been responsible for over 1,200 environmental farm plans covering over 33,000 hectares of farmland. It has brought about, through partial funding from the federal-provincial Growing Forward program and the former Agriculture Policy Framework, an estimated $9 million in on-farm investments towards the improvement of environmental management and adoption of best management practices in this region. The program has resulted in real, on the ground, outcomes that have over time significantly moved industry standards with respect to
environmental protection, and has helped instil a broad environmental ethic within the farm community.

The EFP program has provisions for facilitating improvements in nutrient management, riparian health, and a guide has also been established to develop an on-farm biodiversity plan. While the framework is in place to implement voluntary measures, it must be stressed that these efforts will not be effective if full compensation for any decreases in usable farmland, farm productivity, and loss of crops is not provided.

There are a number of other issues the BCAC would like to bring to DFO’s attention with respect to the Salish sucker recovery strategy and development of the joint action plan:

1. It is important that the “baseline activity” designation on all agricultural lands, whether it is in or outside of the Agricultural Land Reserve (ALR), be designated very broadly as “agriculture”, as opposed to specifying any particular type of agricultural production. Farmers frequently rotate crops from one year to the next for a variety of reasons, including economic, agronomic and environmental, and such rotations are part of normal farming practices. Farmers must also be able to exit one sector entirely and commence production in another – as they often have no choice for economic reasons.

2. Most, if not all, of the agricultural land in question is part of the ALR, which is a provincial zone in which agriculture is recognized as the priority use and is encouraged, and non-agricultural uses are controlled by the Agricultural Land Commission. The Agricultural Land Commission Act sets the legislative framework for the establishment and administration of the agricultural land preservation program.

3. The socio-economic and sustainable development clauses (Sections 2.5 and 2.6) of the signed 2005 Canada/BC Agreement on Species at Risk need to be fully adhered to under the action plan. From the perspective of the BCAC, consideration of these issues on agricultural land means meeting the needs of the farmers who are dependent on this land for their livelihood.

4. During the meetings it was mentioned repeatedly that much of DFO’s data is incomplete. A full land use and habitat inventory needs to be conducted to obtain an accurate overview of the situation, as it is impossible to assess the full impact of the action plan without this data. Developing this completed inventory needs to be the first step in the process.

5. Significant concern has been expressed over the apparent inequity between critical habitat determination in rural (and mostly agricultural) areas and urban areas – critical habitat should be applied consistently between rural and urban areas.

6. It is very unclear how the action plan for these two fish species will interconnect and interact with possible future species at risk recovery efforts. Farmers in the impacted
areas are very concerned that future species at risk action plans would place further restrictions on agricultural land-use activities.

Agriculture is certainly willing to work with DFO on voluntary measures to help the recovery efforts of these two fish species. The BCAC would request DFO’s participation on this issue at the upcoming meeting of the Partnership Committee on Agriculture and the Environment, which was established several years ago to provide a forum to address and resolve issues such as this. An overview and update on the consultations on the Recovery and Action Plans for Nooksack Dace and Salish Sucker and a discussion on proposed outcomes stemming from the process would be timely and appreciated. The meeting is scheduled for March 8th 2011 in Richmond and we look forward to your participation. Thank you for your consideration.

Yours truly,

Garnet Etsell
Chair

p.c.: The Honourable Ben Stewart, BC Minister of Agriculture
The Honourable Murray Coell, BC Minister of Environment
The Honourable Steve Thomson, BC Minister of Natural Resource Operations
Ed Fast, MP, Abbotsford
The Honourable Chuck Strahl, MP, Chilliwack – Fraser Canyon
Mark Warawa, MP, Langley
Richard Bullock, Chair, Agricultural Land Commission
Karen Calla, Pacific Regional Manager, Fisheries and Oceans Canada
Brad Fanos, Manager, Fisheries and Oceans Canada
Nadine Pinnell, Species at Risk Recovery Planner, Fisheries and Oceans Canada

The BC Agriculture Council (BCAC) is the umbrella organization that represents over 12,000 farmers and ranchers from across the province through their membership in farm sector organizations. The Council fosters cooperation and a collective response to issues that affect the future of agriculture in British Columbia.