



Salt Spring Island Agricultural Alliance

PO Box 828, Ganges
Salt Spring Island BC V8K 2W3
<http://plantofarm.org>

Tel: (250) 537-5511

22 June 2021

Islands Trust Council, Islands Trust Staff & SSI Local Trust Committee

We are the major agricultural organizations on Salt Spring Island, working together through the Salt Spring Island Agricultural Alliance to encourage increased availability of locally-produced food and the protection and enhancement of agriculture and agricultural land.

We are writing in response to the current process of developing a new Islands Trust Policy Statement Bylaw. We wish to provide advice now, early in the process, in order to ensure that the Policy Statement you ultimately adopt continues to reflect the importance of agriculture and local food production as essential elements of the character of the Gulf Islands, important contributors to the preservation of land and economic viability and entirely compatible with the important goals of enhanced attention to reconciliation and climate action.

Overall Position

We wish to state clearly that we support the Trust in its efforts to view the Policy Statement and all of its activities through the lens of reconciliation and the lens of climate change. These are fundamental issues and – in our view – are entirely compatible with the Trust actively supporting small and medium -scale agriculture and the protection of agricultural land.

We recognize that the Trust – and therefore your Policy Statement – deals every day with these and other complex and interconnected issues and that the process of updating that document is inherently challenging. We are committed to working with you to ensure that the final document strikes the right balance in promoting the Trust’s objectives and helping guide the Trust to make decisions that are in the best interests of our islands from a long-term perspective.

We see several positive aspects to the second draft of the Policy Statement, some of which reflect the work we have been doing through the development of an updated Area Farm Plan. This includes attention both to climate change mitigation and the protection of land.

However, there are other elements of the draft Policy Statement that trouble us and that we believe may lead to an overly simplistic zero-sum view of important issues such as environmental protection, climate change and reconciliation. In our view, the draft risks unnecessarily pitting agriculture against climate action and reconciliation. In the process of doing so, the document significantly degrades agriculture as a desirable and encouraged activity on the islands.

Recommended Changes to the Second Draft

Specifically, we are concerned that the draft removes the current Policy Statement’s reference (section 4.1.1 in the current document) to agriculture as a “... valuable activity in the Trust Area.” We are also

concerned that the draft removes the current Policy Statement's reference (section 4.1.11 in the current document) to encouraging the addition of private lands with agricultural value to the Agricultural Land Reserve.

Agriculture as a Valuable Activity

We recognize that the term 'traditional,' used in section 4.1.1 of the current policy statement to describe agriculture, is not appropriate in the context of reconciliation. However, we strongly encourage the Trust to retain the remainder of that statement and simply edit it to eliminate this one inappropriate word.

We suggest this because agriculture has been a vital element of the Gulf Islands' economic, social and cultural fabric for more than 150 years. While this is a brief period relative to the long history of First Nations stewardship of the islands, it remains central to their rural character and sustainability.

By protecting and encouraging agriculture on the Islands, the Trust is recognizing this history, protecting the character of the islands and acknowledging the longstanding cultural and economic contribution of local agriculture. Since 20 per cent of Canada's – and 33 per cent of Salt Spring Island's – greenhouse gas emissions are attributed to our food system, an increase in local food production using regenerative agricultural practices – and the substitution of local products for imports – is a key element of climate action and should be actively encouraged.

We request that, instead of deleting the current reference to agriculture as a valuable activity, this section of the Policy Statement be updated and retained.

Protection of Agricultural Land

Section 4.1.11 of the current Policy Statement says that Trust Council encourages the addition of private lands to the Agricultural Land Reserve. We suggest that this statement be retained, as the protections that come with inclusion in the ALR further both environmental protections and First Nations interests.

Agriculture is unique as a land use that both protects land and provides sustainable economic activity. This key difference between agriculture and many other land uses means that agriculture rarely alters land irreversibly.

Agricultural activity on the islands tends to be small-scale and much of it is conducted using regenerative agricultural practices. While it is true that agricultural activity may change the land in some ways, the footprint of small and medium -scale, regenerative agriculture is relatively light in comparison with most other land uses, particularly those associated with other types of economic activity.

We share the Trust's concern for protecting natural environments and suggest that agricultural land can play a key role in providing buffers between developed areas and natural areas, while also providing habitat for many species. We believe it would be a mistake for the Trust to take positions that suggest agricultural activity on the islands is contrary to environmental priorities. Quite the opposite is the case and we encourage the Trust to recognize this in its updated Policy Statement.

First Nations governments – unlike private landowners – have the ability to apply directly to the Agricultural Land Commission for exclusion of their lands from the ALR. Therefore, by encouraging the

Agricultural Land Commission to approve applications from private landowners for inclusion, the Trust is effectively protecting lands in the event that they later come under the ownership of a First Nations government, without in any way impeding the ability of First Nations governments to make future decisions about their lands.

In sum, when the Trust encourages the inclusion of privately-held lands in the Agricultural Land Reserve, it is helping protect land from irreversible alteration and is preserving our islands' rural character, while at the same time providing opportunities for sustainable economic activity.

Recommendations

We ask that 4.1.1 of the current Policy Statement be revised and retained in the new Policy Statement with wording such as the following:

Trust council recognizes that agriculture is a valuable activity that contributes to the islands' rural character and that local food production can play a positive role in protecting land and reducing greenhouse gas emissions.

Further, we ask that 4.1.11 of the current Policy Statement be retained in the new Policy Statement, with minor revisions:

Trust council encourages the Provincial Agricultural Land Commission to approve applications from property owners for inclusion of their land with potential for agriculture in the Agricultural Land Reserve.

Conclusion

In our view, the Trust Policy Statement is an important document and it is essential that it reflect the Trust's understanding of the complexity of issues as well as the important role agriculture and the protection of agricultural land play in fulfilling the Trust's protect and preserve mandate.

Thank you.



Anne Macey, President, Salt Spring Island Agricultural Alliance

Island Natural Growers
Salt Spring Island Farmers' Institute
Salt Spring Island Community Market Society
Salt Spring Island Community Economic Development Commission
Salt Spring Island Farmland Trust
Salt Spring Abattoir Society
Salt Spring Poultry Club
Transition Salt Spring