

October 3, 2025

Ministry of Water, Land, and Resource Stewardship
Government of British Columbia
PO BOX 9012 STN PROV GOVT
Victoria, BC V8W 9L6

Sent via email: PermittingSolutions@gov.bc.ca

Subject: BCAC Response to Riparian Areas Protection Regulation Enhancements

To Whom It May Concern,

On behalf of farmers and ranchers in British Columbia, thank you for your Ministry's efforts to improve permitting requirements under the *Riparian Areas Protection Regulation* (RAPR) and other relevant legislation. Water is the cornerstone of agricultural production, and a policy environment that supports reliable access to quality water for farmers is essential to the food security of our communities.

BC Agriculture Council (BCAC) is the unified voice of B.C.'s agriculture industry, representing over 20,000 farm families and 96% of farmgate sales in the province through our 29 member associations. We work to advance policies that support a strong and competitive agriculture sector across B.C. We continue to appreciate the opportunity to participate in the Premier's Task Force on Agriculture and Food Economy, and we are pleased to see the Ministry of Water, Land, and Resource Stewardship is taking steps to deliver on the Task Force's recommendation earlier this year to improve permitting requirements in several important areas.

Regarding amendments to RAPR, we strongly support exemptions for low-risk activities from RAPR requirements, including repairs and reconstruction of existing structures, riparian restoration projects, danger tree removal, invasive species removal, and the clean-up of contaminated sites. In particular, danger tree removal and invasive species removal can be imperative to public safety and, in the case of the latter, to protecting agricultural production across our province. While the environmental objectives of RAPR are important, these other, potentially conflicting needs should take priority.

BCAC also supports amendments to RAPR that introduce flexibility for low-risk activities in Streamside Protection and Enhancement Areas (SPEAs). There is already federal legislation – both the *Fisheries Act* and *Species at Risk Act* – that prohibit the deposit of deleterious substances into watercourses and other streamside activities that could impact habitats. Greater clarity regarding which low-risk activities can be performed in SPEAs would be achieved by aligning the restrictions in RAPR with this federal legislation.

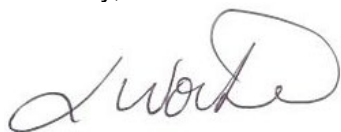
Regarding the Province's intent to explore definitions under RAPR, we would urge caution as there is some risk this will lead to inconsistent definitions for the same term across various legislation, further complicating compliance and enforcement in future. For example, in this consultation, the Province has contemplated defining "ditch" under RAPR, whereas ditch is already defined in Section 1 of the *Drainage, Ditch, and Dyke Act*. There is also some risk of creating inconsistencies with definitions already used by other levels of government; for example, the Province has also mentioned potentially defining "surface flow of a stream" but Environment and Climate Change Canada already reports hydrometric data as

“stream flow” and so any definition under RAPR that conflicts with this could lead to confusion among stakeholders.

If any additional terms were to be defined in RAPR, BCAC would agree that there is some need for a clear definition of “riparian restoration”. This would serve to reduce risks that an activity intended as riparian restoration is inadvertently interpreted as interference with a riparian area or stream.

In case of any need for additional information or details in this response to the Ministry’s consultation, please do not hesitate to contact BCAC’s Executive Director, Danielle Synotte, via email at dsynotte@bcac.ca or via telephone at 604-854-4454. We look forward to responding to the other consultations on natural resource permitting improvements in due course.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J. Woike', with a large, stylized loop at the end.

Jennifer Woike, President
BC Agriculture Council