

December 10, 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 Regarding Managing All Wetland Classes

To Whom It May Concern,

On behalf of British Columbia's farmers and ranchers, BC Agriculture Council (BCAC) appreciates the efforts by the Ministry of Water, Land, and Resource Stewardship to improve permitting under the *Water Sustainability Act*. Water is the cornerstone of agriculture, and farmers in many regions of the province play a critical role in restoring and maintaining wetlands. As such, we are keenly interested in any changes to the policy environment that may affect the availability of water for agricultural production or the role of farmers and ranchers in wetland management.

BCAC is the unified voice of our province's agriculture industry, representing over 20,000 farm families and 96% of farmgate sales in B.C. through our 29 member associations. We work to advance policies that support a strong and competitive agriculture sector across B.C. Given the importance of sustainable watershed management to agriculture, we are pleased to see that several of the recommendations from the Premier's Task Force on Agriculture and Food Economy relate to this topic and that the Ministry is seeking input from the public and relevant organizations on related themes, including the conservation of wetlands.

We are concerned by the proposal to expand the scope of protected wetland classes under the Act to include bogs and shallow-open water wetlands. Doing so may unintentionally capture productive farmlands, thereby limiting the viability of some farm operations and their capacity to support the food security of their communities. Furthermore, the expansion of protected wetland classes to include features such as ponds and small lakes may have the unintended consequence of affecting farmers' ability to manage water storage they have installed on their farms with government support. As such, including ponds and small lakes may in fact run counter to the Premier's Task Force recommendation to "prioritize a province-wide effort to slow and hold water by building water storage".

Expanding the scope of wetlands under the Act would create substantial new regulatory and operational burdens for farmers and ranchers. In particular, increasing the number of land features classified as wetlands would significantly broaden the area requiring permits, studies, and compliance reviews. In practice, this reduces the amount of land available for farming and introduces delays, uncertainty, and added costs for producers. For B.C.'s food system to remain resilient, regulatory frameworks must avoid inadvertently shrinking the agricultural land base through overly broad classification criteria.

To provide further context regarding the land constraints facing our sector, only 5% of B.C.'s total land mass has been set aside for agricultural production, forming the basis of the Agricultural Land Reserve. However, due to geographic limitations and other factors, only a little over half of these lands are actively

farmed. 79% of farms in B.C. are smaller than 70 acres in size, compared to a national average farm size of 809 acres. Further, farm operations in B.C. are already required to institute riparian setbacks along watercourses, which also restricts the amount of farmland that can actively be farmed. As such, expanding the wetland classes that must be managed according to the Water Sustainability Act would inadvertently exacerbate the land constraints facing food production for British Columbian communities or at least add to regulatory backlogs.

In our view, the Act's existing definition of wetlands as swamps, marshes, or fens is reasonable and reflects the important role these features play in watershed health. The connection of ponds and small lakes to wetland systems may, in many cases, be tenuous at best. It is therefore our recommendation that the definition of wetlands remain in the Act as currently prescribed.

In case of any need for additional information or details regarding our submission in response to this consultation, please do not hesitate to contact Danielle Synotte, BCAC's Executive Director, via email at dsynotte@bcac.ca or via telephone at 604-854-4454.

Thank you once again for this opportunity to contribute the perspective of B.C. farmers and ranchers! We look forward to responding to other Ministry consultations regarding permitting improvements in the coming days.

Sincerely,



Jennifer Woike, President
BC Agriculture Council