

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 Wetland Professional Accountability

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* as well as to improve the policy environment for wetland management. Water is the cornerstone of agriculture, and farmers in many regions of the province play a critical role in restoring and maintaining wetlands.

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 define the term "qualified professional" in both the Act and the *Water Sustainability Regulation* as they relate to wetlands. A narrow definition of this role could create bottlenecks in the permitting process as the demand for these services may exceed the supply of those professionals meeting the definition. Further, a narrow definition carries substantial risk of excluding those with valuable field experience, drive up costs, and increase the regulatory burden for local governments and others actively engaged in wetland management, all without meaningfully supporting environmental protection.

Were the Government of B.C. to proceed with a definition in the Act and the Regulation, it is important that any definition remains broad, practical, and inclusive of not only formal qualifications but also demonstrated experience. Such a flexible approach would contribute to affordability, limit unnecessary delays, support decisions that reflect regional environmental conditions, and avoid the fragmentation of existing qualifications that somewhat overlap such as professional agrologists or foresters.

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 weeks.

Sincerely,



Jennifer Woike, President
BC Agriculture Council