

December 10, 2025

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

Sent via email: PermittingSolutions@gov.bc.ca

Subject: BCAC Response Regarding the Wetland Identification and Delineation Manual

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.

While we are supportive of the Ministry's initiative to develop a Wetland Identification and Delineation Manual that reflects our province's distinct geographic and climate conditions, we are concerned by the applicability of the current draft to "...areas managed for agricultural activities..." under Section 9.2. The technicality of the draft manual as well as its applicability to farmlands throughout B.C. would place an undue burden on farmers who may be farming on lands that historically included wetland features. Further, it is important to note that the evaluation systems employed by other jurisdictions address this risk: for example, the Ontario Wetland Evaluation System Southern Manual states that "often wetlands will border on agricultural fields, pasture or urban development where a portion of the wetland has been drained or converted to alternate human uses [and] areas that no longer meet the definition of a wetland... should not be mapped as wetland". The B.C. manual makes no such allowances.

We believe Section 9.2 should be amended to remove the reference to areas managed for agricultural activities as an atypical situation for assessing the presence of wetlands, thereby requiring the presence of characteristics that meet the normal standards of wetlands for the area concerned to be evaluated as wetland. Alternatively, Section 9.2 should be amended to reflect terms similar to those in the Ontario Wetland Evaluation System, specifically that "in the event that the former wetland has been effectively drained, wetland vegetation is no longer present and a new smaller functioning wetland remains, it is the latter that should be used to establish wetland size" and that abandoned farmland that meets the definition of wetland at the date of evaluation may be evaluated but not farmland that is actively farmed.

The added cost, time, and limited access to professionals is unequitable for smaller communities and organizations, particularly those in rural and remote areas of B.C. Were the Government of B.C. to proceed with implementation of the manual as currently drafted, the Ministry and its counterparts in the B.C. Ministry of Agriculture and Food would need to dedicate significant resources to training and awareness-building activities to allow for farmers and ranchers to better understand the manual, how it may apply to their farm operations, and when to engage the services of a qualified professional.

Even with training support, however, maintaining the applicability of the manual to even those lands that are actively being farmed, that have been effectively drained, and where wetland vegetation is no longer present could negatively impact the food security of many communities in B.C. Only 5% of our province'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, evaluating historic wetlands, even in situations where other provinces do not, could inadvertently exacerbate the land constraints facing food production for British Columbian communities or at least substantially add to regulatory backlogs.

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