

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 the Wetland Mitigation Hierarchy

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. For these reasons, we are keenly interested in any changes to the policy environment that may affect the availability of water or land 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 acknowledge that the mitigation hierarchy proposed in the Ministry's recent consultation is already endorsed by B.C.'s Environmental Mitigation Policy, we are concerned by its potentially required application to wetland management under the Water Sustainability Act. Although the Ministry's intent to streamline permitting and eliminate ambiguity is appreciated, requiring the application of the mitigation hierarchy may actually serve to delay permitting and increase uncertainty among farmers and ranchers about the steps necessary to comply with the Act.

Specifically, there is considerable variability across B.C.'s geographic regions and even among wetland features themselves. As such, opportunities to implement all or even some of levels of the mitigation hierarchy may be obvious in some situations and impossible in others, sometimes even on the same farm property. This variability would likely result in inconsistent outcomes for those seeking permitting approvals in relation to wetlands, and this inconsistency can undermine confidence in the permitting process itself.

A more appropriate approach, given the special status of wetlands, may be set out clearer expectations than the mitigation hierarchy offers. Without clear expectations, the required application of the hierarchy places an unfair burden on agricultural producers. It would leave farmers and ranchers responsible for considering and implementing mitigation steps without any yardstick to measure their efforts against.

Otherwise, the mitigation hierarchy can certainly serve as a guideline for farmers and ranchers, especially if investments are made in raising awareness of it among producers.

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