

May 27, 2019

The Honourable Lana Popham  
Minister of Agriculture  
Parliament Buildings, Room 325  
Victoria, BC V8V 1X4

**Re: Local Government Consultation on Bill 15**

Dear Minister Popham,

I write to you regarding Bill 15, the *Agricultural Land Commission Amendment Act*, and the lack of consultation with local governments on this impactful piece of legislation. Understanding your previously declared conflict of interest, I have written Minister Doug Donaldson a separate letter regarding the lack of consultation in advance of recent regulatory amendments impacting cannabis production in the ALR.

The overall lack of consultation on matters related to the ALR is cause for concern for our members. Although I understand that the changes proposed in Bill 15 do not directly impact the *Local Government Act*, consultation is expected well in advance of any regulatory or policy change that impacts local governments. As such, I ask why local governments were not consulted at any point prior to the introduction of Bill 15 in the Legislature?

While Bill 15 contains a number of proposed changes that will impact local governments, the most concerning is the removal of a private property owner's ability to directly petition the ALC for land removal from the ALR. This policy change will require local governments to petition on behalf of private property owners, putting more administrative pressure on local governments. UBCM would appreciate clarification regarding the rationale for this policy shift.

The recent lack of engagement with local governments is perplexing, especially considering that local governments were engaged as part of the stakeholder consultations related to the revitalization of the ALC and ALR. These types of collaborative processes are supported by UBCM as a means to the development of effective policies and regulations.

I appreciate your recent efforts to contact me regarding this file, and wanted to formally list our concerns for your consideration. UBCM welcomes your response to the questions posed in this letter, as well as an opportunity to discuss how local governments can be better engaged on this file as it moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arjun Singh', written in a cursive style.

Arjun Singh  
President, UBCM

**cc:** *Jennifer Dyson, Chair, Agricultural Land Commission*

*Tara Faganello, Assistant Deputy Minister, Local Government Division, Ministry of  
Municipal Affairs and Housing*

*Lorie Hrycuik, Executive Director, Corporate Governance, Policy & Legislation  
Branch, Ministry of Agriculture*