

August 25, 2026

Honourable Lana Popham
Minister of Agriculture and Food
By email: AF.Minister@gov.bc.ca

RE: UBCM Response to Disussion Paper on encouraging food processing inside the Agricultural Land Reserve

Thank you for the opportunity to provide feedback on the Ministry of Agriculture and Food's "Disussion Paper on encouraging food processing inside the Agricultural Land Reserve."

The UBCM membership has a mixed perspective on the use of Agricultural Land Reserve (ALR) land. On the one hand, the membership has endorsed multiple resolutions calling on the Province to ensure that farming is the primary use of ALR lands. This includes decisions on resolutions related to vacation rentals in the ALR (2025 NR87), events in the ALR (2024 NR70), subdivision of ALR lands (2020 NR58) and a moratorium on use of ALR lands for cannabis (2018 B71).

Conversely, the UBCM membership has demonstrated support for various processing functions on ALR land, including small-scale farm-to-table restaurants (2025 NR88), agri-industrial activities (2023 NR61), food supply (2022 NR8) and breweries, distilleries and meaderies (2017 B101). As well, there is a lengthy history of resolutions focused on food security in BC.

With such diverse interests and concerns, UBCM has focused our feedback on two key points:

1. Ensuring local governments retain the ability to prohibit and/or further regulate land use in the ALR; and
2. Recognizing the significant challenge of further demands for enforcement, either at the local/regional level or by the Agricultural Land Commission (ALC).

UBCM has focused on similar points in relation to past agricultural policy changes in relation to cannabis production and residential use in the ALR.

Prohibit and/or Further Regulate

After discussions with Ministry staff, it is UBCM's understanding that the proposed "5 percent rule" would follow the structure of the existing "50 percent rule" wherein local governments would not have the ability to prohibit food processing that met the

requirements of the 5 percent rule but would be able to further regulate using zoning and other land use planning tools.

Given that food processing could be considered an industrial activity, local governments will likely want to consider further regulation based on land use considerations, such as adjacent uses or available setbacks. In addition, although the discussion paper states that parcels would be required to be serviced in order to access the 5 percent rule, local governments will likely want to examine the capacity of local infrastructure before allowing more intensive use of ALR land.

As there could be many instances in which the combination of adjacent uses, the capacity of existing infrastructure and other local factors would make a parcel unsuitable for food processing, UBCM would ask that the Ministry reconsider the ability of local governments to prohibit this use of ALR land.

Enforcement

The discussion paper states that the ALC would have the authority, upon complaint, to verify that rules are followed and, if not, to assess penalties. However, the reality is that complaints and concerns would very likely come to local governments directly. In addition, if a local government opts to further regulate any aspect of the 5 percent rule they would need to review any complaints as potential bylaw infractions.

As the addition of food processing under the 5 percent rule will create a need for additional enforcement, UBCM would ask the Ministry to consider the financial and capacity impacts that this will have on both local governments and the ALC. This seems especially important given that the ALC has recently highlighted internal capacity issues, and it is not clear that they would be able to effectively enforce an additional layer of legislation in the ALR.

Finally, UBCM would like to request that the consultation period for the discussion paper be extended by at least one month as local governments, ALR land owners, farmers and ranchers continue to respond the current Provincial state of emergency due to unprecedented wildfires and the resulting evacuations.

With gratitude,

A handwritten signature in grey ink, appearing to be 'Cori Ramsay', is positioned to the right of a vertical line.

Councillor Cori Ramsay
UBCM President