

**Ministry of Agriculture and Food**  
**INFORMATION NOTE FOR MINISTER FOR MEETING**

Ref: 197590

Date: May 26, 2022

**Title:** Minister Lana Popham Meeting with Tantalus Labs

**Issue:** On March 28, 2022, the Minister's Office received an email correspondence, and attached letter from Dan Sutton, CEO of Tantalus Labs. In the letter, Mr. Sutton requested a meeting with Minister Popham to discuss several issues facing the Province's legal cannabis sector. Mr. Sutton is seeking Ministry of Agriculture and Food (AF) support for a 'made-in-British Columbia (B.C.)' approach to cannabis products that would see the sector receive the same incentivization's as alcohol, such as enhanced purchasing, marketing, and tax-benefits. A meeting has been scheduled for June 22, 2022. Mr. Sutton sent a similar letter and request to the Cannabis Legalization Secretariat (CLS), and previously met with Executive Director Mary Shaw of the CLS on April 4, 2022.

**Background:** Tantalus Labs is a large-scale, licensed cannabis producer located in Maple Ridge, B.C. They hold all three classes of Health Canada cannabis licenses; a standard cultivator, processing, and sales license. They operate a 75,000 square-foot greenhouse and processing facility that is located on the Agricultural Land Reserve (ALR), and employ approximately 70 staff on any given day. Tantalus Labs is a member of the recently formed Cannabis Cultivators Association of B.C. (CCABC), where Mr. Sutton has frequently interacted with AF-staff regarding the Metro-Vancouver Air-Emissions Bylaw Proposal. AF-staff have worked closely with Mr. Sutton over the past two years to navigate this issue, as well to address odour complaints that Tantalus Labs have received from the public and local government. AF-staff have toured Tantalus Labs in both 2018 and 2020.

**Discussion:** In his letter, Mr. Sutton cites concern about the viability of B.C.-owned cannabis producers in the current regulatory and market environment. He points to industry consolidation and ownership shifting to entities based outside B.C., resulting in production relocating to out-of-province facilities, and B.C. jobs being lost. He references the closure of Tilray's Nanaimo operations and the associated 170 job losses as an example of this. The closure of Tilray's Nanaimo operations was due to a merger with a multi-national cannabis corporation named Aphria, and subsequent business decisions made by Aphria, citing operational efficiencies and cost savings. While consolidation is occurring, it is not clear whether or to what extent this is problematic or representative of broader industry trends, as B.C. is also seeing larger companies lose market share to smaller firms. Additional data is needed to better understand cannabis labor market and production trends in the province, where Stats Canada has indicated that there were at least 4,800 people directly employed in the B.C. cannabis sector in December 2021 (up from 3,200 in December 2020).

Mr. Sutton also references the Cannabis Business Transition Initiative (CBTI) that was funded as a Labor Market Partnership (LMP) by the B.C. Ministry of Social Development and Poverty

Reduction (SDPR). The goal of the project was to support the transition of illicit cannabis producers into the new legal framework. The initiative ran over a two-year period from July 15, 2019-July 9, 2021, with nearly \$900,000 in funding being issued by SDPR. At the end of the initiative, 13 cannabis producers had received new licenses, and an estimated 102 jobs were created or retained during the program's operation. The number of producers granted licenses through the program was much lower than anticipated, with contributing factors such as strict Federal regulations, high capital-costs, and an inaccessibility to processing being driving forces behind the low transition rates for the area.

Mr. Sutton is further interested in B.C. developing supports that favor B.C. owned and operated cannabis businesses, similar to those provided to the liquor industry (purchasing, marketing, and mark-up). The Province's support for B.C. liquor manufacturers is often a source of contention for out-of-province and international manufacturers, their suppliers, and agents. Since the 1980's, B.C. has been subject to complaints from trading partners where supports for B.C. liquor manufacturers, in particular wineries, have contravened free trade agreements. The LDB wholesale mark-up on wine is 89 percent, compared to 15 percent for cannabis. The LDB offers several supports for B.C. based wineries, which cumulatively resulted in B.C. foregoing \$184.7M in revenue in FY 2020/21. The LDB is currently not considering offering similar services that are granted to alcohol to the legal-market cannabis sector.

AF staff are currently verifying BuyBC's legality and alignment within the marketing restrictions of the Federal *Cannabis Act* with support from the CLS. The CLS has confirmed a meeting with Health Canada officials to occur on June 17, 2022, where they will discuss AF's desire to apply the BuyBC logo and branding to legal cannabis products and verify its alignment with Federal Regulations. AF is also working closely with processors, and small-scale cultivators in regions such as the Central Kootenays, to support economic opportunities related to cannabis production, and to re-vitalize a localized cannabis economy within the new legal framework.

**Suggested Response:**

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Contact: Rajiv Dasanjh, Team Lead & Emerging Markets Specialist, [Rajiv.Dasanjh@gov.bc.ca](mailto:Rajiv.Dasanjh@gov.bc.ca)

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**Ministry of Agriculture and Food**  
**BRIEFING NOTE FOR MINISTER FOR INFORMATION**

Ref: 196046

Date: May 18, 2022

**Title:** B.C. Society for the Prevention of Cruelty to Animals (BC SPCA) Farm Compliance Inspections

**Issue:** The B.C. Breeder and Feeder Association (BCBFA) expressed concerns with the BC SPCA's intention to conduct unannounced inspections of commercial farms.

**Background:**

In a letter to the Ministry dated June 23, 2021, the BC SPCA advised it was planning to complete unannounced compliance inspections of commercial turkey, pork, eggs, chicken, and beef farms. The BC SPCA indicated that they would advise each commodity board of its intention to conduct the unannounced compliance inspections through a personalized letter. Previously, the BC SPCA only inspected a farm after receiving an animal welfare complaint about that farm.

Section 15.1 of the *Prevention of Cruelty to Animals Act* (PCAA) allows a BC SPCA authorized agent to enter any premises or vehicle where an operator is engaging in a regulated activity for the purpose of determining whether the PCAA and its regulations are being complied with. This can occur without a warrant if it is during normal business hours and the premises to be inspected is not a dwelling house.

Of the six commodity groups chosen by the BC SPCA, it planned to inspect two farms per commodity group for a total of twelve inspections by the end of 2021. Completion of the inspections were delayed because of wildfires, landslide/floods and Avian Influenza (AI) emergencies. The inspection pilot was completed with 10 out of 12 farms attended. BC SPCA decided to forego the two additional farms this spring due to AI.

The BC SPCA shared that in November 2021 it attempted to conduct inspections and were denied entry at two farms.<sup>s.13</sup>

s.13

Details of the inspections will be provided to the Ministry in a final report. The BC SPCA is in the final stages of completing the report and are hoping to submit to the Ministry soon and meet to review the report's findings.

On September 7, 2021, the BCBFA wrote to the Ministry expressing concern with the BC SPCA's intention to conduct unannounced inspections of commercial farms. While the BCBFA

understands that the BC SPCA has the legislative authority to carry out the unannounced compliance inspections, they have concerns about the process – which may include concerns about biosecurity, privacy, farming expertise and communication gaps.

BCBFA requested a meeting with the Minister to discuss BC SPCA's Farm Inspection Pilot. The meeting was delayed due to the November 2021 landslide/floods events and has recently been rescheduled for June 22, 2022.

### **Discussion:**

The BC SPCA has the legislative authority to undertake unannounced inspections of farm operations and operators are required to allow BC SPCA inspectors to access their farms during business hours. The purpose of these inspections is for the BC SPCA to assess whether any animals may be in distress. During the inspection, the BC SPCA inspectors are restricted to the following activities listed in PCAA s. 15.2:

- Being accompanied by an expert (e.g., a veterinarian);
- Requiring a person to produce relevant records or things in the person's possession or control;
- Inspecting, copying or removing relevant records or things;
- Requiring a person to demonstrate a skill, operate a thing or carry out a procedure;
- Making records in respect of a person, place or thing; and
- Taking samples and performing analyses and tests.

The BC SPCA advised that a veterinarian with experience in the species or commodity being inspected would be present at each inspection. Given it was the first time that the BC SPCA exercised its inspection authority, a ministry staff person attended the inspections as a neutral observer. The neutral observer provided a report to the ADM following each inspection. Overall, the inspections took place without incident, outside of inspections that producers refused.

Despite the broad authority under the PCAA, the BC SPCA advised that its inspectors would enter a property only if it had the consent of the owner or operator. While the inspections were unannounced, inspectors were flexible and worked with the operator to minimize disruption of regular farming activities.

The importance of biosecurity protection on farms was recognized. Inspectors, ministry staff and veterinarians attending the inspections observed all necessary biosecurity protocols, including showering in and out of the operation, and bringing and utilizing all necessary personal protective equipment (PPE). All of the safety protocols related to COVID-19 were also followed.

In relation to privacy, all parties understood the need to respect a farmer's privacy, and the BC SPCA advised that it will not publish the name or any identifying information of any farmer or

farm operation. Certain aggregate data may be reported, such as the percentage of farms that denied access to inspectors, without naming or identifying them. All information gathered during an inspection will stay between the inspector and the operator.

Commodity boards were not required to provide membership information such as names and locations to the BC SPCA. The BC SPCA could only demand records in the course of inspecting the premises of a regulated activity.

The BC SPCA took steps to facilitate effective communication by meeting with the commodity boards (August 4 and September 22) to provide an overview of the unannounced commercial farm inspections and respond to questions. The BC SPCA also provided to the British Columbia Agriculture Council (BCAC) an overview of the inspection process (Appendix A) and sample checklists for beef cattle (Appendix B). The BC SPCA also engaged with the Ministry to discuss the unannounced commercial farm inspections.

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### **Suggested Response:**

- I know there has been apprehension among some farmers regarding the pilot initiative.
- The intent of the inspections was not to target farmers but provided an opportunity to work together to promote and enhance animal welfare.
- Protecting animal care and welfare is a shared goal, and the BC SPCA and farmers both have important roles to play to achieve that goal.
- Ensuring that animals are not in distress is a priority for the Ministry, the BC SPCA and farmers.
- The BC SPCA only entered a property with consent of the owner and worked with the farmer to minimize any disruption of farming activities.
- A veterinarian with experience in the species or commodity being inspected accompanied the BC SPCA during the inspections. A Ministry staff person also attended the inspections as a neutral observer.
- The BC SPCA has met with commodity boards to provide an overview of the unannounced commercial farm inspections and responded to questions.

Contact: Jacqueline Cushing, Senior Policy Analyst, 778-974-2976

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**Ministry of Agriculture and Food**  
**BRIEFING NOTE FOR MINISTER FOR INFORMATION FOR MEETING WITH**  
**THE MINISTER OF LAND, WATER AND RESOURCE STEWARDSHIP ON THE**  
**MINISTRY TRANSITION ON JULY 11, 2022**

Ref: 197923

Date: June 15, 2022

**Title:** Ministry of Agriculture and Food (AF) and Ministry of Land, Water and Resource Stewardship (LWRS) Transition Discussion

**Issue:** Identify potential areas of overlap, priority files, legislation, and implications that could result from transition of some work from AF to LWRS.

**Background:**

The Honourable Minister Josie Osborne requested a meeting with the Minister of Agriculture and Food to discuss Ministry transition. The meeting is scheduled for July 11, 2022.

LWRS was established on April 1, 2022. Minister Osborne is the Minister of LWRS and Minister responsible for Fisheries. Fin Donnelly is the Parliamentary Secretary for Fisheries and Aquaculture. Further details on the creation of LWRS and the roles it has are outlined in Appendix A.

Reconciliation and Land Use Planning

All Ministers, through their mandate letter, must create opportunities for Indigenous peoples to be full partners in our economy and provide a clear and sustainable path for everyone to work towards lasting reconciliation.

LWRS plays an important role in reconciliation through its coordination role in the natural resource sector because its mandate letter (see Appendix A) directs it to:

- a. develop a path forward with First Nations to build a co-managed land and resource regime that will ensure natural resources are managed effectively now and into the future,
- b. continue to modernize land use planning for ecosystems, rivers, lakes, forests, land and waters by involving First Nations, local communities, and industry by confirming social choice through inclusive processes, and
- c. increase the Province's capacity to manage for cumulative effects through integration of science-based land, aquatic, resource, geographic data and Indigenous knowledge so evidence-informed policy and decisions can be made by statutory decision makers.

The *Agricultural Land Commission Act* and its regulations permit land in the Agricultural Land Reserve (ALR) to be used for mining, forestry, oil and gas activities. Other non-farm use activities are permitted on the ALR if the Agricultural Land Commission (ALC) approves the non-farm use applications. The Oil and Gas Commission has delegated authority to approve oil and gas activities on the ALR.



The Crown has a duty to consult with Indigenous peoples with regard to their Aboriginal title and rights in relation to ALC's land use decisions. The ALR is made up of Crown and fee simple land. The ALC relies on government's Crown land tenure consultation process to discharge the duty to consult, but it does not have a protocol/framework to discharge the duty to counsel for fee simple land (i.e., non-Crown owned land). s.13

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### Fish and Aquaculture

Prior to LWRS's establishment, the fisheries file was held by AF. AF was responsible for policy, intergovernmental relations, food safety, and sector development (including funding program administration and sector outreach) for aquaculture, commercial fisheries, and seafood processing. With the creation of LWRS, policy, intergovernmental relations, funding program administration and select sector outreach on the fisheries file moved to LWRS. LWRS is also the lead on provincial salmon strategy and the liaison for the federal salmon strategy.

AF's Aquaculture and Marine Fisheries (AMF) team, a part of the Industry Development Unit in the Extension and Support Services Branch retained the sector development work that AF was previously responsible for. The AMF team works in a sector development capacity providing industry outreach and engagement, implementing and administering funding programs and providing subject matter expertise specific to marine fisheries, aquaculture, seafood processing and climate change (i.e., ocean acidification and hypoxia).

### Ministry of Forests and Range Act

AF and LWRS share responsibility over one piece of legislation, the *Ministry of Forests and Range Act* (MFRA). Under the MFRA, AF is responsible for encouraging a vigorous, efficient and world competitive ranching sector in British Columbia, while LWRS is responsible for planning the use of the forest and range resources of the government, so that the production of timber and forage, the harvesting of timber, the grazing of livestock and the realization of fisheries, wildlife, water, outdoor recreation and other natural resource values are coordinated and integrated, in consultation and cooperation with other Ministries and agencies of the government and with the private sector.

### Watershed Security Strategy and Fund

LWRS is the lead for government's Watershed Security Strategy and Fund (WSS+F), the goal of which is to ensure our water and watersheds are respected and valued. AF works with the agriculture sector to promote water conservation (e.g., irrigation design, water cycling) and provides expertise and support to Ministry of Forests water allocation staff during water scarcity events. Apart from this work related to water quantity, AF also works with the agriculture sector and natural resource ministries to promote farm practices that help improve water quality for drinking water and ecosystems. These practices include nutrient management, riparian management, regenerative agriculture, etc.

## Discussion:

In relation to specific files, potential areas of overlap between the Ministries include:

- a. Reconciliation and Land Use Planning,
- b. Fish and Aquaculture,
- c. *Ministry of Forests and Range Act*, and
- d. Watershed Security Strategy and Fund.

### Reconciliation and Land Use Planning

LWRS's service plan and mandate letter both indicate areas of potential overlap and/or collaboration between the Ministries. With the LWRS Service Plan, overlap with AF may occur in relation to Goal 1, which states that LWRS will develop a path forward with Indigenous peoples, through partnerships and engagement, which includes the alignment of natural resource sector laws. At this point it is unknown what role LWRS will play in aligning natural resource sector laws whilst each Ministry is aligning its laws with the UN Declaration. On this basis, LWRS may wish to share how it envisions the implementation of Goal 1 as AF is already undertaking work in this area.

For the LWRS Mandate Letter, overlap with AF may exist as LWRS works on delivering commitments that include developing a path forward with First Nations to build a co-managed land and resource management regime and to continue the modernization of land use planning. If that land use planning applies to the ALR, it is essential that AF and LWRS to work together.

Also, LWRS has created a Cumulative Effects solutioning team in response to the *Yahey* decision, regarding the Blueberry River First Nations,<sup>s.12</sup>

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AF staff are monitoring potential impacts to legislation that AF has responsibility for.

There is an opportunity for LWRS and AF to assist the ALC and the Oil and Gas Commission with considering cumulative effects in their decision-making about land use on fee simple land.<sup>s.16</sup>

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s.16 The LWRS mandate indicates they may be able to assist with increasing capacity and developing a path forward in these areas.

### Fish and Aquaculture

As the new Ministry works to develop policy, the policy needs to be informed by current best practices and by collaborating directly with the sector. Typically, policy staff at LWRS would

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work with government agencies such as the federal government and AF's AMF team would work directly with the relevant industry groups in this area. The potential overlap between the files could occur when the LWRS's FAWS team connects directly with industry, or the AMF team connects directly with the federal government.

Next steps in the transition process could include confirming roles and responsibilities between AF and LWRS. In addition, next steps could involve establishing a codified mechanism or process for the LWRS FAWS and AF AMF teams to collaborate, which is a piece that staff have indicated is missing in the transition plan.

#### Legislation

AF and LWRS have shared responsibility for the MFRA, and will need to continue to work together to ensure that LWRS's land use planning of government's range resources for grazing supports AF's responsibility to encourage a robust ranching sector in B.C.

#### **Suggested Response:**

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Contact: Arlene Anderson, Director of Policy and Legislation, 778-698-5170

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### Details related to the creation of LWRS and its roles

The February 8, 2022, Speech from the Throne announced that the provincial government would launch a new ministry. The announcement was made after more than a year of planning by the Lands and Natural Resource Operations Secretariat with participation from natural resource ministries and in consultation with First Nations.

Through Order in Council (OIC) #92, dated February 22, 2022, the new LWRS Ministry took effect April 1, 2022. An OIC #95 dated February 25, 2022, appointed Josie Osborne as Minister of LWRS and Minister responsible for Fisheries and appointed Fin Donnelly Parliamentary Secretary for Fisheries and Aquaculture. The appointments took effect April 1, 2022. At that time, the Ministry of Agriculture, Food and Fisheries (AFF) became the Ministry of Agriculture and Food (AF).

The Service Plan for LWRS outlines that the role of the Ministry is to work with other natural resource sector ministries to achieve British Columbia's goals of reconciliation with Indigenous peoples, economic recovery and environmental stability. LWRS responsibilities include the effective development of land and marine use policy and planning as well as developing a new vision for land and resource management with First Nations that will embrace shared decision making on the land base as part of reconciliation with Indigenous peoples in B.C.

The Mandate Letter for LWRS includes increasing the Province's capacity to manage for cumulative effects, development of the Watershed Security Strategy and Fund and continuing the modernizing of land use planning.

## Appendix B: Minister Speaking Points

### Salmon Farming and Transition Plan:

- On June 22, 2022, Minister of Fisheries and Oceans Canada made an announcement regarding federal aquaculture licence renewals and sector transition planning. The announcement specified:
  - DFO will be undertaking consultations between now and December 2022 on a final decision related to whether DFO should reissue marine finfish licences in the Discovery Islands
  - Licences for 15 sites in the Discovery Islands which cultivate Atlantic salmon were allowed to expire on June 30, 2022, and no new salmon will be permitted to be transferred into the area. Two facilities which culture small numbers of Pacific Chinook will be permitted to continue to hold the salmon currently in their facilities until January 2023 or until the fish have grown to harvestable size, whichever happens first.
  - A two-year renewal of licences for marine finfish aquaculture facilities outside of the Discovery Islands (i.e. coast-wide). These licenses include stronger requirements for aquaculture facilities, including the implementation of standardized reporting requirements and sea lice management plans, as well as wild salmon monitoring.
  - DFOs intention to draft and share a framework for transitioning from open-net pen salmon aquaculture and their intent for a plan to rely on consultations input from the Government of British Columbia, First Nations, industry, local governments, stakeholders, and British Columbians. The feedback received during these consultations will be incorporated into a final transition plan, expected in spring 2023.
- The Province has now also implemented its Salmon Aquaculture Policy whereby “Effective June 2022, the Province will grant *Land Act* tenures only to fish farm operators who have satisfied DFO that their operations will not adversely impact wild salmon stocks (i.e. hold valid aquaculture license), and who have negotiated agreements with the First Nation(s) in whose territory they propose to operate”
- Decisions by DFO have the ability to make sweeping impacts to the salmon farming industry, Indigenous and rural communities that rely on this sector and seafood processing capacity on the coast.
- AF staff continue to play a critical role in industry outreach and operational activities that support increased sector competitiveness.

### Commercial Fish Harvest and DFO licence buy back:

- B.C.’s commercial fishing sector landed 172,070t in 2020 worth a landed value of \$298M. This sector is critically important to employment and food security for Indigenous and coastal communities in B.C. The composition of B.C.’s fish and invertebrate landings has changed in recent decades due decreases in stocks and political priorities. As this sector is

heavily reliant on export markets, it has been impacted greatly by interruptions of global supply chains and increased operating costs throughout the COVID-19 pandemic and now with the Russian invasion of the Ukraine.

- DFO has allocated \$93M to the Pacific Salmon Commercial Licence Retirement Program (LRP) (July 2022-March 2025) which is intended to provide commercial salmon licence holders the opportunity to retire their licences on a voluntary basis. An additional \$8.36M will be available from the Pacific Salmon Treaty Mitigation Program funding for troll licence retirement.
  - DFO's allocation for a buy back is significantly lower than what has been proposed by industry. Further the program will only support licence holders and not for career fish harvesters that lease licences or fish a First Nation owned licence.
  - There are many within industry that are impacted by this buyback that won't have access to retirement funds.
- AF staff continue to play a critical role in industry outreach and operational activities that support increased sector competitiveness.

#### DFO Blue Economy Strategy and Coastal Marine Strategy (business development focus):

- The federal government's Blue Economy Strategy is being led by Fisheries and Oceans Canada. Its focus is to grow sustainable industries working in and around marine and coastal environments. The federal government held public engagement on the Blue Economy Strategy in early 2021 which heard the need for science, conservation, and greater involvement of Indigenous communities in the monitoring and management of marine resources.
- DFO will continue to work with federal partners and others to advance work and B.C. will continue to monitor this file. DM Halls has given direction for LWRS to lead BC response to the blue economy strategy.
- LWRS is mandated to development of a Coastal Marine Strategy in partnership with First Nations, federal and local governments. The intent is protected coastal habitat while growing coastal economies in B.C. and work is underway on a draft Intentions Paper with possible public engagement in early fall 2022.

#### Wild Salmon Strategy:

- Wild salmon are culturally, socially, and economically important to the Province of B.C., and are of critical importance to Indigenous communities. The Province of B.C. elevated to the priority of protecting wild salmon, starting in 2018 with the creation of the Wild Salmon Advisory Council. Further, B.C. and federal governments funded the BC Salmon Restoration and Innovation Fund (BCSRIF) in 2019. The B.C. government has pledged to invest an additional \$42.85M to continue the BCSRIF program. Salmon stocks have continued to decline and in summer 2021 the Federal government committed to \$647M to protect salmon through the Pacific Salmon Strategy Initiative.

- LWRS will continue the implementation of the Wild Salmon Strategy and lead work with the federal government to develop new strategies to protect and revitalize B.C.'s wild salmon populations building on past successes. DRIPA Action Plan commits to developing new strategies to protect and revitalize wild salmon populations in B.C. with First Nations and the federal government, including the development and implementation of a cohesive B.C. Wild Salmon Strategy. Over the coming months, LWRS will continue to work on doubling BCSRIF, working to provide an update on progress to date to protect wild salmon, and continue to work with DFO and Indigenous Organizations on a common strategy to wild salmon with provincial focus on watersheds.

#### Watershed Security Strategy and Fund

- AF staff are participating in a Cross Ministry Team for the WSS+F that is accountable to the BC Water Committee (of executive directors), which receives direction from the ADM Water Forum.
- The Cross Ministry Team advises on the development of the strategy and fund, as well as an implementation plan that includes co-implementation with Indigenous peoples. AF is committed to supporting the project's success.
- The WSS+F is scheduled to launch in the spring of 2023.

#### Reconciliation and Land Use:

- The decision-making framework for the ALC is defined in s. 6 of the Agricultural Land Commission Act (ALCA) and does not include economic and social factors, including First Nations considerations. As such, First Nations considerations are not explicitly part of the ALC mandate. AF is working to address this issue through aligning the ALCA with the UN Declaration of the Rights of Indigenous Peoples, with engagement with Indigenous right holders and partners on this project anticipated to start in Fall 2022.
- The ALC relies on government's Crown land tenure consultation process to discharge the duty to consult, and does not have a protocol/framework to discharge the duty to counsel for fee simple land. The Provincial path forward for reconciliation must include guidance and support for entities, such as the ALC and the OGC, with decision making authority on the land.
- In order to better understand the cumulative effects of land use decisions on the ALR, AF is exploring ways to increase understanding of current land use of agricultural lands, including accelerating the completion of Agricultural Land Use Inventories (ALUI) and increasing and improving the coverage and accessibility of land use information on the ALR.

Ministers' Advisory  
Group on  
Regenerative  
Agriculture and  
Agritech

Conflict of  
Interest and  
Conduct  
Guidelines

*A practical guide to navigating conduct; and the real, potential and perception of conflict of interest during your term as a Member of the Ministers' Advisory Group on Regenerative Agriculture and Agritech*

May 25, 2022

Content derived from:

<https://www2.gov.bc.ca/gov/content/bcpolicysectorboardapplications/learn/board-member-information#conduct>



# Ministers' Advisory Group on Regenerative Agriculture and Agritech

## Conduct Guidelines

***Government appointees are expected to meet high standards of conduct which enhance and maintain public confidence in the operation of B.C.'s public agencies, boards and commissions. They must act to instil public confidence in their actions and decisions.***

- These guidelines apply to anyone appointed by the provincial government to any agency, board or commission operating in B.C., unless:
  - they are already subject to ethical guidelines created by government specifically for their particular agency, board or commission, or
  - are appointed to act as a consequence of being a government employee.
- The provincial government respects the independence of its agencies, boards and commissions. It also expects all government appointees to agencies, boards and commissions to act in accordance with these guidelines.
- Specific agencies, boards or commissions may have their own distinct needs, guidelines or standards. If no such standards yet exist, public bodies are required to design their own.
- The chair or registrar of an agency, board or commission, or government itself may take action if these guidelines are breached. Such action may include dismissal, suspension, reprimand, warning or other sanction applied to an individual board member.
- When and where appropriate, appointees or their chair or registrar may seek the opinion of provincial government staff with whom their particular board works, for clarification or resolution of any matter.

# Ministers' Advisory Group on Regenerative Agriculture and Agritech

## Other Guidelines

***While acting as a member of an agency, board or commission, appointees are expected to abide by the following:***

### **Integrity**

- Appointees are expected to act at all times in good faith and with honesty and due diligence, for the public interest.

### **Participation and preparation**

- Appointees are expected to regularly attend meetings and to adequately prepare for the duties expected of them.

### **Behaviour**

- The conduct and language of appointees must be free from any discrimination or harassment prohibited by the Human Rights Code.
- Appointees' conduct should reflect social standards of courtesy, respect and dignity.

### **Confidentiality**

- Appointees must not reveal or divulge confidential information (defined as that which cannot be obtained from other sources) received in the course of their duties.
- Confidential information must not be used for any purpose outside that of undertaking the work of the agency, board or commission to which they have been appointed.

### **Public commentary**

- Appointees must comply with the public comment protocols established by their particular agency, board or commission.
- If none exist, appointees must refer to the chair for guidance before making public comment on agency, board or commission matters.

### **Private gain**

- Agency, board or commission work should not result in any personal or private financial or other substantive gain for public appointees. (Private gain does not include honouraria for service on an agency, board or commission.)

### **Duty to inform**

- Appointees must inform the chair of their agency, board or commission of any circumstance that may have a negative or harmful effect on their respective abilities to perform the duties required of their appointments.

## Ministers' Advisory Group on Regenerative Agriculture and Agritech

# Conflict of Interest

- Appointees must avoid any conflict of interest that might impair or impugn the independence, integrity or impartiality of their agency, board or commission. There must not be perception of bias, based on what a reasonable person might perceive.
- Appointees who are in any doubt must disclose their circumstances and consult with their chair or registrar.

### **In practical terms, appointees should ensure that:**

- All personal financial interests, assets and holdings are distinct from and independent of any decision, information or other matter that may be heard by or acted upon by their particular agency, board or commission.
- Activities undertaken as a private citizen do not create or appear to create a conflict with any responsibilities held as a member of an agency, board or commission.
- Activities undertaken as a member of an agency, board or commission do not create or appear to create a conflict with any activities undertaken as a private citizen.
- They remain impartial at all times toward individuals who deal with their agency, board or commission and as a member avoid taking any action that may result in preferential treatment for any individual.
- Personal employment is not dependent on any decision, information or other matter that may be heard by or acted upon by the agency, board or commission.
- Other memberships, directorships, voluntary or paid positions or affiliations do not create or appear to create a conflict with work undertaken in the course of performing their duties as public appointees.
- Actions taken in the course of performing duties as public appointees neither cause nor suggest the reality or perception that their ability to perform or exercise those duties has been or could be affected by private gain or interest.

## Ministers' Advisory Group on Regenerative Agriculture and Agritech

# Types of Conflict of Interest

- **Real Conflict of Interest**
  - A conflict of interest exists where an appointee's actions or conduct could undermine or compromise the public's confidence in the appointee's ability to discharge work responsibilities or the trust that the public places in the Province of BC.
- **Potential Conflict of Interest**
  - A potential conflict of interest arises where an appointee has private interests such that, while no conflict of interest has yet arisen, a conflict of interest would exist were the appointee to become involved in discharging responsibilities in the future that could be influenced by the private interest.
- **Perceived Conflict of Interest**
  - A perceived conflict of interest can be said to exist where an appointee's private interests would appear to a reasonable person to conflict with their job duties **even though there may not be an actual conflict of interest.**

# Ministers' Advisory Group on Regenerative Agriculture and Agritech

## Duty to Inform

***Appointees must inform the chair of their agency, board or commission of any circumstance that may have a negative or harmful effect on their respective abilities to perform the duties required of their appointments.***

### **How do I inform?**

- Inform the Board Chair(s)
- In a timely manner
- In writing (email is appropriate). Include:
  - A list of your duties or responsibilities as it pertains to a real or perceived conflict of interest
  - A list of any personal interests that you think might be in conflict with your duties
  - Some steps you could take to make sure your duties and personal interests do not come into conflict

### **What happens after I inform?**

- The Board Chair(s) will direct you on the course of action. This may include a members' recusal from certain discussions or decisions.
- The Board Chair(s) will document the course of action and inform the MAGRAA Secretariat
- The MAGRAA Secretariat will retain all documentation
  - If a recusal is directed, the MAGRAA Secretariat will note any recusal in the record of actions and decisions
- The specific nature of the conflict of interest is confidential

# Ministers' Advisory Group on Regenerative Agriculture and Agritech

## Recusal

***A Member or an Interested Person of the Ministers' Advisory Group on Regenerative Agriculture and Agritech (MAGRAA) could benefit or be perceived to benefit financially from the actions of the MAGRAA***

**Activities that may give rise to a conflict of interest, include:**

- Pursuing personal gain as a priority over the interests of the Province of BC in the context of serving on the MAGRAA
- Influencing the Province of BC via the MAGRAA to allocate funds to an organization where a MAGRAA Member or an Interested Person works or is involved
- Influencing or participating in a decision of the MAGRAA that will directly or indirectly result in a MAGRAA Member's own financial gain
- Sharing or disclosing confidential information in whole or in part to interested parties or using privileged information inappropriately

**Who is an Interested Person?**

- An Interested Person is any person who is or was in a position to exercise substantial influence over the affairs of the MAGRAA

***At any given time a MAGRAA Member must put the interest(s) of the Province of BC first, if not possible you must recuse yourself if:***

- Mother, brother benefits...
- Your association/business benefits...
- Perceived or potential of benefits...

# Ministers' Advisory Group on Regenerative Agriculture and Agritech

## Rules of Thumb

- MAGRAA Members must not disclose any confidential information in whole or in part they have acquired in connection with their position as member, particularly information that might be detrimental to the Province of BC.
- Confidential to Province of BC: Advice to Minister, Program Options, etc.
- MAGRAA Members should avoid the disclosure of the differences of opinion within the MAGRAA.

*If in doubt seek guidance from the Co-Chairs or Secretariat*

- Confidentiality is not the same as secrecy
- Balance with transparency and accountability

**Ministry of Agriculture and Food**  
**BRIEFING NOTE FOR MINISTER FOR INFORMATION FOR MEETING JUNE 14, 2022**

Ref: 197690

Date: June 2, 2022

**Title:** Meeting with Lax Kw'alaams representatives to discuss the *Lax Kw'alaams Economic and Infrastructure Development* proposal

**Issue:** Infrastructure needs and funding request for seafood processing in the Lax Kw'alaams community

**Background:**

British Columbia (B.C.)'s seafood sector is socially and economically important to Indigenous and rural coastal communities. In 2020, B.C.'s seafood sector had a harvest volume of 272,000 tons worth \$1.62B which represents a 4 percent and 10 percent decrease respectively from 2019. Significant portions of declines in harvest and value can be correlated to the COVID-19 pandemic.

In addition to impacts of the COVID-19 pandemic, B.C.'s processing sector has experienced several changes in recent decades. The sector can no longer rely on high volumes of salmon and herring to process and must pivot to other species. The capacity and gaps of B.C.'s seafood processing sector are largely unknown at this time. Increasing uncertainty surrounding access to raw materials has prevented many in the sector from having funds or the willingness to invest in newer, more effective technologies.

Lax Kw'alaams (pronounced "La-kwa-lahms"), formerly known as Port Simpson is located on B.C.'s northwest coast, north of Prince Rupert. Lax Kw'alaams Band has a total population of over 4000 and approximately 700 members living on Reserve. Lax Kw'alaams are the descendants of the Nine Tribes of the Tsimshian. The Nine Tribes have lived in their territories for more than 10,000 years and their traditional language is Sm'algyax.

**First Nations Considerations:**

Members from the Lax Kw'alaams community will be presenting a proposal for economic and infrastructure development. The Lax Kw'alaams Band owns and operates their fishery and processing plant, the Coast Tsimshian Fish Plant (CTFP). The CTFP employs up to 150 community members over their 10-month season and is mostly involved in groundfish fisheries as salmon returns and opening opportunities have declined. Approximately 100 members are additionally engaged in commercial fishery harvesting roles.

**Discussion:**

The CTFP plays a critical role in the community for members of the Lax Kw'alaams Nation and provides important fish processing capacity on B.C.'s northwest coast. The capacity provided



by the CTFP has become increasingly important since several facilities have closed or moved out of Prince Rupert and Port Edward in the last two decades.

Representatives from the Lax Kw'alaams community will be presenting their *Lax Kw'alaams Economic and Infrastructure Development* proposal. The overall objective of proposed activities is to update and increase processing capacity for the CTFP, an Indigenous owned and operated fish plant on the North Coast. s.16; s.17

s.16; s.17

Project Budget	
Item	Cost
s.16; s.17	
-	-
-	-
-	-
-	-
-	-
-	-
-	-

Those involved with this proposal shared a previous version with staff at the Ministry of Jobs, Economic Recovery, and Innovation in 2021. They were also scheduled to meet with Parliamentary Secretary Fin Donnelly in December 2021, but the meeting did not occur. Further, the fish meal line (table above) component of the proposal was presented to the Fisheries and Aquaculture Clean Technology Adoption Program<sup>s.16; s.17</sup>

s.16; s.17

#### Suggested Response:

s.13

Contact: Darah Gibson, Industry Specialist, Marine Fisheries & Seafood, 250 893-0260

ED MR ADM AL DM PP

**Ministry of Agriculture and Food**  
**INFORMATION NOTE FOR MINISTER FOR MEETING**

Ref: 197832

Date: June 29, 2022

**Title:** Minister's Meeting with MLA Brittny Anderson, and Cannabis Industry Representatives

**Issue:**

- Minister's Lana Popham and Mike Farnworth previously met with MLA Brittny Anderson on March 10, 2022, to discuss the economic opportunities that the legal cannabis market could have for rural areas of the province, and particularly in the Central-Kootenay Regional District (CKRD).
- In this meeting, MLA Anderson raised a key-challenge that there was a lack of cannabis-processing accessibility in the Central Kootenays. MLA Anderson has requested a follow-up meeting to discuss how the Ministry of Agriculture and Food (AF) can support cannabis-processing in her riding and has invited industry representative Shannon Ross from Antidote Processing to also attend.
- This online meeting is scheduled to occur on July 12, 2022, from 10:00am – 11:00am.

**Background:**

- As of April 28, 2022, there were 228 legal-market cannabis licenses activated by Health Canada in the province.
- Of the total 228 licenses, 19 have been granted as standard processing licenses, and an additional 84 of the total licenses have been granted as a class that includes varying abilities to process cannabis, and/or a micro, or standard cultivation license.
- In B.C., many cannabis processors are located in the Central Okanagan, Lower Mainland, and southern Vancouver Island regions.
- Cannabis producers also ship their cannabis to be processed and sold in other provinces.
- Cannabis producer and processor relationships are largely determined by a grower's ability to produce a product of exceptional quality and potency, as well as industry networking throughout the country.
- Of the 103 licenses in B.C. that have varying capabilities to process cannabis, only 2 are located in the greater Central Kootenay area. Moreover, these 2 licensees only have the capacity to support their own cultivation operations with processing (less than 10 percent of the market), and could not support a regional processing-hub in the region at this time.

**Discussion:**

- In 2018 and prior to cannabis legalization, the CKRD estimated that 2000 cannabis operations were known to be licensed under the previous medical production model as regulated by Health Canada.
- Revenues recirculating from the cannabis sector prior to legalization were believed to support a diversity of jobs, businesses, and an overall economy in the area.
- The Cannabis Business Transition Initiative (CBTI) was initiated and funded as a Labor Market Partnership (LMP) by the B.C. Ministry of Social Development and Poverty

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**CONFIDENTIAL**

Reduction (SDPR), and the program was delivered by Community Futures Central Kootenay (CFCK), based in Nelson.

- The goal of the project was to support the transition of illicit cannabis producers into the new legal framework.
- The initiative ran over a two-year period from July 15, 2019 - July 9, 2021, with nearly \$900,000 in funding being issued by SDPR.
- At the end of the initiative, 13 cannabis producers had received new cultivation licenses, and an estimated 102 jobs were created or retained during the program's operation.
- The number of producers granted licenses through the program was much lower than anticipated, with contributing factors such as market-saturation, low profitability, strict Federal regulations, high capital costs, and an inaccessibility to processing being driving forces behind the low transition rates for the area.
- Shannon Ross, previously hired as a business advisor and key person for the CBTI, founded Antidote Processing in 2021 along with three other partners (See Appendix A).
- Antidote Processing seeks to establish itself to offer unique services that may align with current AF goals and objectives where there are opportunities for partnership, such as offering extension-related supports for regenerative agricultural practices and enhancing pathways to market for producers under a regional branding strategy.
- The Ministry is looking into the use of the BuyBC Program for the cannabis sector. It is very complicated. AF staff are working with the Cannabis Legalization Secretariat and Health Canada.

**Suggested Response:**

s.13

Contact: Rajiv Dasanjh, Team Lead/Emerging Markets Specialist, Industry Development Unit

DIR MR          ADM AL          DM PP

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**CONFIDENTIAL**

**Ministry of Agriculture and Food**  
**BRIEFING NOTE FOR MINISTER FOR INFORMATION**

Ref: 198047

Date: June 28, 2022

**Title:** Pre-Meeting Briefing on BC Ferries and Tour of Sysco-BC's Vancouver facilities

**Issue:** Sysco-BC discussion on bringing more B.C. foods to BC Ferries and potential tour of Vancouver facilities

**Background:**

Sysco is a multinational broadline distributor that sources, markets, and distributes food products to restaurants, healthcare, lodging, education and other foodservice clients in B.C. Sysco-BC Region ('Sysco') has distribution facilities in Victoria, Vancouver, and Kelowna. Sysco also operates Freshpoint Fresh Cuts in Vancouver which processes, wholesales and distributes fresh produce products. Sysco carries established food and beverage brands, as well as its own private 'Sysco Brand Family' label products.

Being listed with a broadline distributor like Sysco is a primary channel for B.C. food and beverage suppliers to sell products into institutional and other foodservice markets. In 2020-21, Feed BC worked within a formal partnership with Sysco's Kelowna facilities to increase the use of B.C. products in the Interior Health Authority and beyond, and to coach B.C. suppliers interested in selling to institutions. s.21

s.21

**Discussion:**

BC Ferries' Onboard Foodservice Operations

s.21

s.21

s.13

s.13

BC Ferries' Food and Beverage Division makes overall menu and purchasing decisions for the onboard foodservices, including cafeterias, Pacific Buffet, cafés and other outlets. s.21

s.21

s.21

Some BC Ferries' food service outlets have been reduced or closed during the pandemic, and re-opening plans are not yet publicly available. BC Ferries began piloting B.C. craft beer, wine, cider and other alcoholic beverages in 2019, and expanded sales in May 2022. s.21

s.21

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#### BC Ferries and Feed BC

Feed BC is interested in exploring opportunities to bring more B.C. products to BC Ferries. In September 2021, former DM Tom Ethier sent a letter introducing Feed BC to Douglas Scott, DM of Crown Agencies Secretariat (CAS) and seeking an opportunity to present to the Ministry of Transportation and Infrastructure (MOTI) and BC Ferry Authority. ADM Arif Lalani followed up in November 2021 with CAS and MOTI staff for an introduction to BC Ferries procurement department for a Feed BC presentation. AF staff followed up again in June 2022 as a meeting with BC Ferries has not occurred.

The Minister had also indicated an interest in promoting B.C. products on BC Ferries vessels through a Buy BC retail kiosk concept. s.21  
s.21

#### **Suggested Response:**

s.13

Contact: Stacie Irwin, Value Chain Specialist, 236 478-4027

DIR   LB                      ADM   AL                      DM   PP                      \_\_\_\_\_

**Ministry of Agriculture and Food**  
**BRIEFING NOTE FOR MINISTER FOR INFORMATION FOR MEETING WITH MINISTER**  
**ENERGY MINES LOW CARBON INNOVATION**

Ref: 198048

Date: August 26, 2022

**Title:** Future of the BC Food Security Fund - UPDATE

**Issue:** s.12  
s.12

**Background:**

Following the 2017 decision to proceed with the Site C Project (Site C, the Project), Government announced its intention to implement three initiatives to mitigate concerns stemming from the decision to continue with it (Continuation Measures):

- The **Indigenous Clean Energy Procurement Program (ICEPP)** – a competitive procurement process for energy from Indigenous peoples-led projects and options for delayed delivery of power until BC Hydro required new energy and/or capacity.
- The **Peace River Legacy Fund (PRLF)** – joint exploration by local governments, residents, and Treaty 8 First Nations on the creation of a fund to address long term environmental, social and/or economic issues in the Peace region.
- The **BC Food Security Fund (BCFSF)** – support for farming and enhancing agricultural innovation and productivity throughout rural British Columbia (B.C.).

Ministry of Agriculture and Food (AF) staff had been working collaboratively with Ministry of Energy, Mines and Low Carbon Innovation (EMLI) since 2017. s.12; s.13

s.12; s.13

As part of the Site C Agricultural Mitigation and Compensation Plan, BC Hydro established a \$20 million BC Hydro Peace Agricultural Compensation Fund (PAC). Distribution of the Fund began in 2019, with 72 projects approved and valued at ~ \$1.7M. The intent of the PAC is to provide the Peace Region with financial supports to reduce local economic instability resulting from the loss of farming operations resulting from Site C.

The intent of the BC Food Security Fund is to increase food security across the province by enhancing agricultural innovation and productivity. It was acknowledged that the province would need to invest in the agricultural sector at a provincial scale to offset the loss of agriculture production and associated food security.

**First Nations Considerations:**

AF is currently supporting the B.C. Indigenous Advisory Council on Agriculture and Food (IACAF) and other Indigenous partners to identify opportunities to strengthen Indigenous food systems and increase Indigenous participation in the agriculture and food sector. IACAF is a key AF deliverable within the *Declaration on the Rights of Indigenous Peoples Act and Draft Action Plan*: Action 4.48:

- New Co-develop and implement an Indigenous Agriculture and Food Systems Strategy with the BC Indigenous Advisory Council on Agriculture and Food (IACAF).
- Work in partnership with Indigenous peoples to strengthen and rebuild resilient, sustainable Indigenous agriculture and food systems that support self-determination and empower Indigenous peoples to achieve their food security, food sovereignty and economic development objectives.

Indigenous Food Security across the province, but especially in the north has been identified as a priority issue for AF and ICAF to try to address.

**Discussion:**

Food security within B.C. is at the forefront of B.C. communities and the agriculture sector. The COVID-19 pandemic, several record setting forest fire season and the impact of the atmospheric river has exposed the vulnerability of the food supply chains, food security and food sovereignty across the province and western Canada.

The development of Site C in the Peace Region is estimated to permanently displace approximately 3,800 hectares of Class 1 to 5 agricultural lands (land capable of crop production) in the Agricultural Land Reserve (ALR). This is significant loss of production capacity for B.C.'s agriculture sector.

The BSFSF would directly support the implementation of Minister mandate priorities that include:

- Expand the Grow BC, Feed BC and Buy BC programs to encourage greater food security and local business growth.
- Take steps to make B.C. a leader in food security and the emerging agri-tech sector, helping B.C. companies that are bringing innovation and agriculture grow, hire more workers and position our province as an agri-tech leader, while protecting farmland in the ALR.
- Develop a new Regenerative Agricultural Network, which will create jobs for workers, opportunities for farmers and greater food security by bringing together natural systems of production with agri-tech ologies that enhance production.

s.12; s.13

### **Suggested Response:**

s.13

Contact: Brent Barclay, Director- Regional Development, 250 961 8490

ED MR ADM AL A/DM AL

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s.12 ; s.13

## MINISTRY OF ENERGY, MINES AND LOW CARBON INNOVATION

### BRIEFING NOTE FOR DECISION

**PREPARED FOR:** Honourable Bruce Ralston, Minister of Energy, Mines and  
Low Carbon Innovation  
Honourable Lana Popham, Minister of Agriculture and Food

**ISSUE:** s.12

### BACKGROUND:

Following the 2017 decision to proceed with the Site C Project (Site C, the Project), Government announced its intention to implement three initiatives to mitigate concerns stemming from the decision to continue with it (Continuation Measures):

- The Indigenous Clean Energy Procurement Program (ICEPP) – a competitive procurement process for energy from Indigenous peoples-led projects and options for delayed delivery of power until BC Hydro required new energy and/or capacity.
- The Peace River Legacy Fund (PRLF) – joint exploration by local governments, residents, and Treaty 8 First Nations on the creation of a fund to address long term environmental, social and/or economic issues in the Peace region.
- The BC Food Security Fund (BCFSF) – support for farming and enhancing agricultural innovation and productivity throughout rural British Columbia (BC).

s.12

### DISCUSSION:

In 2021, Government announced its decision to continue Site C with an approved budget of \$16 billion (B), and a one-year delay to the in-service date. s.12  
s.12

Since then, Government has supported British Columbians through the pandemic with continued investments in measures, activities, and programs. There were significant costs incurred through the Province's response to wildfires and flooding in 2021/22. s.13; s.16  
s.13; s.16

### Indigenous Clean Energy Procurement Program (ICEPP)

BC Hydro's Standing Offer Program (SOP) encouraged the development of small clean or renewable energy projects and had become an economic development vehicle for First Nations. As an outcome of Phase 1 of the Comprehensive Review of BC Hydro, government indefinitely suspended the SOP and engaged with Nations on the impact of that decision. s.12; s.16

s.12; s.16

The Indigenous Clean Energy Opportunities (ICEO) is a collaborative process between EMLI and the First Nations Leadership Council (FNLC). Through the ICEO process, EMLI is engaging and collaborating with First Nation rights holders and organizations on seeking new Indigenous opportunities in the clean energy sector.

s.13

### Peace River Legacy Fund (PRLF)

s.13; s.16; s.18.1

In May 2019, the then-Minister of EMLI asked the Chief of Saulteau First Nation (SFN), and the Mayor of Dawson Creek to undertake a community-led process to develop a proposal for a PRLF through the establishment of a regional steering committee that would work in collaboration with First Nations, local governments, stakeholders, and residents. The recommendations from the Phase 1 Workplan, developed jointly between local governments and Indigenous Nations, included the creation of the Peace River Trust with joint governance by Indigenous and non-Indigenous residents of the Peace region, and that the Trust be capitalized by a "significant portion of the Site C [and possibly other Peace River] water rents".

The development of Phase 2 of the PRLF Workplan would increase the collaboration between the two groups at a time when tensions between the two could otherwise rise. s.16

s.16

continued

development of the PRLF Workplan by local governments and the Nations could showcase successful collaboration between the two groups on effecting outcomes in their joint interest.

s.16

### BC Food Security Fund (BCFSF)

As a condition of its Environmental Assessment Certificate, BC Hydro's \$20 M Peace River Agricultural Compensation (PAC) Fund is aimed at offsetting lost sales and stimulating agriculture enhancements in the Peace region. As of March 2022, approximately \$1.7 M of the PAC has been allocated to 73 projects. In addition to the PAC, and to further address concerns raised about BC's food security, Government in 2017 committed to establishing the BCFSF that was envisioned to provide broad Province-wide benefits by supporting farming and enhancing agricultural innovation and productivity. s.12; s.13

s.12; s.13

### **OPTIONS:**

s.12; s.13

Page 08 of 10 to/à Page 09 of 10

Withheld pursuant to/removed as

s.12 ; s.13

**RECOMMENDATION:**

s.12; s.13

Approved / Not Approved

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Honourable Bruce Ralston  
Minister of Energy, Mines and  
Low Carbon Innovation

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Date

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Honourable Lana Popham  
Minister of Agriculture and Food

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Date

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