



Islands Organic Producers Association

www.iopa.ca

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Chairperson

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Submission to the Provincial Farm Assessment Review Panel

Dear Panel,

Island Organic Producers' Association (IOPA) was founded in 1990 and is a non-profit association of organic growers and producers on Vancouver Island and the Gulf Islands. Our central mandate is threefold: to maintain written standards for organic farming in this bio-region; to administer a fair and strict process to assess the operations of organic producers; and to award certified organic status to those who qualify. We also work to promote and strengthen sustainable agriculture and to establish a cooperative relationship among organic producers. We believe organic agriculture is both a philosophy and a way of farming: the process is as important as the product, and the quality and sustainability of life is paramount. IOPA is accredited by the Certified Organic Associations of British Columbia (COABC). COABC subscribes to and administers the BC Certified Organic Program provided by the British Columbia Ministry of Agriculture, Fisheries and Food (BCMAFF). The COABC is the administrator of the Organic Regulations pursuant to the Agri-Food Choice and Quality Act of BC. IOPA has adopted the COABC standards and the incoming National Standards, and requires all producers to comply with these rules. In certain areas, IOPA has adopted rules which are more restrictive. These differences are clearly noted and IOPA members must follow these rules. [http://www.iopa.ca/](http://www.iopa.ca)

In June 2009, the Canada Organic Regime will be the regulatory minimum for the organic industry. The Canada Organic Production Systems General Principles and Management Standards can be found at http://www.tpsgc-pwgsc.gc.ca/cgsb/on_the_net/organic/032_0310_2006-e.pdf (an updated version will become available in December 2008).

What is Organic Agriculture? A holistic system of production designed to optimize the productivity and health of diverse communities within an agro-ecosystem, including soil organisms, plants, livestock, and people. The principle goal of organic agriculture is to develop productive enterprises that are sustainable and harmonious with the environment.

Practices are selected to restore and sustain ecological stability within the enterprise and the surrounding environment. The fertility of soil is maintained and enhanced by a system that promotes optimal biological activity within the soil and conservation of soil resources. Weed, pest and disease management is attained by an integration of biological, cultural and mechanical control methods that include minimized tillage and cultivation, crop selection and rotation, water management, and the promotion of biological diversity. Petrochemical pesticides, herbicides and fertilizers are not used.

Under a system of organic production, farm animals are provided with living conditions and stocking rates appropriate to their needs and a high quality diet of organically grown food. Ethical animal husbandry practices facilitate low stress and promote good health.

The International Federation of Organic Agriculture Movements (IFOAM) has established principles to guide organic agriculture: *The Principle of Health: Organic Agriculture should sustain and enhance the health of soil, plant, animal and human as one and indivisible. The Principle of Ecology: Organic Agriculture should be based*

on living ecological systems and cycles, work with them, emulate them and help sustain them. The Principle of Fairness: Organic Agriculture should build on relationships that ensure fairness with regard to the common environment and life opportunities.

The Principle of Care: Organic Agriculture should be managed in a precautionary and responsible manner to protect the health and well-being of current and future generations and the environment. “

Local Organic Farming Means Local Food Security, Healthy Food, Environmental Benefits and Growing the Local Economy.

IOPA farmer members sell their products directly to consumers at community markets, through box programs and farm stands; and to wholesalers, grocery stores and restaurants.

Customer demand for local certified organic products is strong and local organic farmers cannot meet current demands. More and more people are making, or want to make healthy choices in their selection of food for themselves and their families. They care about the environment and they want to support local farmers, and their first choice is “local and certified organic”.

We believe an increase in the number of small and mid-size organic farms could make a positive impact towards improving local food security. Many of our members are “market garden farmers”, producing food for themselves and their family, and also producing a sufficient quantity for commercial sales. Certified Organic produce is sold at premium prices, therefore making it financially possible to operate on a small scale, however there are many challenges that farmers and potential farmers face.

Vancouver Island and the Gulf Islands have a favourable climate for growing local produce twelve months of the year. There is plenty of arable land that is not being farmed and much land is under utilized.

Organic produce is grown without the use of harmful chemicals like pesticides, herbicides and fungicides. Food is produced and packaged on small or mid-size farms, rather than in huge factory-type operations, thereby eliminating the risk of large scale contamination of products during harvesting and preparation for sale.

Locally grown produce is fresher, tastier and has retained more of the nutrients of the product.

Organic farming is sustainable agriculture and we employ the practices and adhere to the philosophies of the local, provincial, national and international organic regimes and movements. We make a positive contribution to the environment, in local and global terms.

The general public and our customers tell us they want their food produced locally, reducing greenhouse gas emissions, cutting the financial costs of transportation, and to support local farmers.

Local food production grows the local economy, revenues and expenditures remain within the community. Local farmers employ people to work their farms, farm development costs and off-farm inputs are generally purchased locally. Outside transportation financial costs are taken out of the local food equation, meaning the farmer and the consumer are benefiting.

It is our belief that the serious challenges (to increasing local organic food production) of accessing suitable land, high costs of farmland and marginal incomes for farm operators and their workers can be overcome with strong and committed leadership from governments at all levels, community activists and the farming and food communities.

Farmers for the Future

A 2006 [Statistics Canada Report](#) titled [Agriculture Community Profiles](#) states that out of 991 farms in the Capital Region (south of Duncan, west to Port Renfrew, peninsula area and southern gulf islands), 663 had total gross

receipts of under \$10,000 and 119 were in the range of \$10,000 to \$24,999. The same Region had 1430 farm operators, 855 male and 575 female, with an average age of 55.3 years. The total farm area of the 991 farms was 33,514 acres, 27,105 acres were owned by the farm operators, and the farm area for the remaining acres were either leased, rented, or had other arrangements.

Farming may be thought of as a "life-style" that you love or hate, the farmer may feel proud of the great crop of potatoes, farm workers may enjoy the camaraderie of the farm community, we may look forward to market day and the pleasure of selling our beautiful vegetables directly to the happy customer; but the bottom-line reality is that the farmer operator must make the business run on a profit, and the workers must make a living wage.

The StatsCanada Report underlines the challenges that we all need to address if we are going to grow farms in our communities to feed the people in those communities.

If there is going to be a local farm solution to address local food security issues, climate change realities and to put fresh, nutritious, tasty food on the local family table; then we need to get land and money into the hands of young people wanting to farm.

Farm Classification for small and mid-size farms could make a difference towards making land available for land-less farmers and helping land-owning farmers that are on the financial edge.

Landowners that do not wish to farm, may see a financial incentive to lease out their property to a farmer in order to obtain a reduction in land taxes. Landowners may start small-scale farming, continue farming or expand their production, if the financial burdens are lessened.

Small-scale organic farms can be very productive per acre: the soil is healthy, the land is farmed efficiently and intensively, and premium prices can be obtained, however we must do more to create opportunities to make land available for farming.

There is a need for greater financial remuneration for farmers and farm workers if farming is going to be an occupational choice of younger people, particularly for those who wish to raise families as farmers and farm workers.

There is a need to reform the farm assessment tool as a means for farmer succession planning, putting more money in farmers' pockets, increasing local food production, and improving the local economy.

Farm Classification Process Must Be Fair

Small-scale market garden farmers, working a less than 1.98 acre piece of property, face land tax disincentives towards agricultural production. Although the \$10,000 threshold although is not unachievable, it is often unrealistic without hired help and developmental costs, leaving little if any financial gains. A landowner farmer with 2.0 acres needs only to have gross sales of \$2500 to qualify for farm status, resulting in unfairness and impediments to small scale commercial food production for those with under 1.98 acres.

The process of determining farm status designation penalizes certified organic farmers by not recognizing the standards and regulations and philosophy that governs certified organic farming in the province and regions.

The current assessment process for classifying farmland does not recognize and include treed areas, wetlands, rock outcroppings, waterways and natural areas that are connected and integral to the farm operation. Standards and policies that apply to certified organic farmers make it a requirement and expectation that natural ecosystems be protected and enhanced.

In the context of organic agriculture, such areas are essential to the larger ecological health and overall productive capacity of the farm. Adjacent forests, for example, are invaluable to a farm in numerous ways: they act as buffers from noise and wind and provide erosion control, they enrich the soil and provide atmospheric benefits, they provide habitat for wildlife that might otherwise eat the crops, they serve to clean and filter waterways often used for irrigation, they can provide forest fines, mulch and airborne micro-organisms for

compost, there can be a sustainable harvest of wood to provide for farm buildings and fencing, they serve as habitat for pollinators, beneficial predators like owls and other organisms beneficial to the farm, and they help moderate seasonal extremes of rainfall and temperature.

For the purposes of tax assessment, the decision to exclude forests - or other natural/wild systems like waterways or wetlands - that are incorporated into an organic farm as part of the farmed acreage is unfair because it ignores the value and inter-connectedness of this land to the agricultural production.

For this reason, it is profoundly unfair to not include areas of the farm that are reserved for natural or wild systems. These areas are very important parts of the farm and must be valued as such.

Failure to do so has the effect of putting organic farms at another disadvantage when competing with conventional agricultural and turns the tax system into a penalizing force against organic farms.

Certified organic farms employ buffer zones from adjacent conventional farms to protect organic crops from petrochemical based contamination and from chemically treated fence posts as required by provincial and regionally based Standards.

The dimension of an organic farm is not a calculation of tilled acres. It is the sum of the land that is being managed and protected in order to harvest agricultural products in a sustainable manner.

Organic agriculture not only produces healthy food in a healthy way, it produces ecological goods and services for society that isn't being recognized by the taxation system.

Not All Farm Products Are Treated Equal

If the farmer saves any potatoes or garlic for next years' seed, it's not being valued as farm production for assessment purposes. If the farmer was just below the threshold for farm classification, it would make better economic sense to sell the garlic, and buy seed at a (likely) higher price.

In order to increase income levels, some organic farmers produce on-site "value added" products from primary agricultural products produced on their farm. Those products include: jams, pickles, dried products, home canning and baked goods.

The primary agricultural products used in the value added product cannot be included as farm income for assessment purposes, nor can the income from the sale of the value added product be included.

In order to encourage innovation, generate competitiveness, improve local food security and increase incomes for farmers, the assessment process for farm classification must be amended accordingly.

IOPA Recommendations for Farm Classification Improvements

Recommendation #1

Local Food Production Incentive(LFPI): (a) Notwithstanding the general provisions of Regulation 411/95 and the Assessment Act; and in the interest of fostering local food production, the taxation assessment system should provide incentives to owners of land, where the owner or lessee has produced primary agricultural products for direct or *indirect human consumption. The owner must make application for farm classification, and the products must have been sold within 160 kilometres of the land. The LFPI will apply to farms of less than 1.98 acres. The annual gross income requirement for the LFPI designation should be \$2500 or 1% of the assessed residential land value at the date of application for farm classification, whichever is the greater amount; and as revised every two years.

**For example, insects are raised for biological pest control for use in the production of fruit and vegetables*

(b) Primary Agricultural Products used under the LFPI for seed stock or value-added products will be credited towards the annual gross income requirement based on the unprocessed farm gate price of the product.

Recommendation #2

Standards for the Classification of Land as a Farm: the Regulation and relevant policies be amended to recognize and define with clarity how the application of provincial and regional Certified Organic production standards and policies apply to the total land area that is covered by the Certified Organic farmer's Farm Plan; and that the application of CO Standards and Policies will not restrict the classification of land as a farm. Land reserved for wildlife or buffers or related organic farming use that is part of the overall organic farm management plan should be counted as farm land when such a designation benefits the farmer.

Recommendation #3

Sustainable Agriculture Assessment Program: Owners of land classified as Farm pursuant to the Regulation may make application to have the land assessed for sustainable agricultural practices. Sustainable Agricultural Practices will be defined at a minimum by the Standards and Policies published by the Certified Organic Association of BC (COABC). Additional Sustainable Practices will be measured by the amount of "carbon usage" for agricultural production on the farm. Farm assessment will be decreased by 25% for land that is farmed in accordance with COABC Standards and Policies. Assessment reductions will also be applied on a sliding scale for reduced carbon usage.

Respectfully submitted on behalf of the Islands Organic Producers Association.

Sincerely,

A handwritten signature in black ink, appearing to read 'Randy Pearson', with a long horizontal flourish extending to the right.

Randy Pearson, Chair, IOPA

cc. IOPA Board of Directors.