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January 23, 2023

**Agricultural Land Commission, Attn: Mike Bandy**  
**201-4940 Canada Way**  
**Burnaby, BC, V5G 4K6**  
[ALC.Referrals@gov.bc.ca](mailto:ALC.Referrals@gov.bc.ca)  
Phone: 604-660-7000

Dear Mr. Bandy:

**Re: Surrey Board of Trade Support for the Proposed ALR Inclusion of Federal Lands in Surrey, British Columbia (192 Street and 36 Avenue)**

The Surrey Board of Trade is contacting you about the following consideration by the Agricultural Land Commission and the public hearing taking place on the evening of January 23, 2023:

Acting under section 17(1) of the [Agricultural Land Commission Act](#) (ALCA), the Agricultural Land Commission is initiating a proposal to include 123.6 ha (~305 acres) of land within the City of Surrey into the Provincial Agricultural Land Reserve. The subject land comprises five contiguous properties owned by the Government of Canada. Approximately 89 ha (~220 acres) of the lands are currently leased to local agricultural producers for field crop production. The Government of Canada is considering disposition of the properties, which may leave the lands vulnerable to future changes in land use. Given the longstanding agricultural use and productivity of the properties, the Commission considers that the lands may be suitable for inclusion to the ALR. The ALR designation would apply a layer of provincial land use legislation (the ALCA and ALR Regulations) to the lands to preserve their availability for current and future agricultural use.

**SURREY BOARD OF TRADE PERSPECTIVE**

The Surrey Board of Trade supports keeping the subject land at 192 Street and 36 Avenue for agricultural (food) production. While we are supportive of the need to intensify and create industrial lands (employment lands), we recognize and appreciate that at the same time we need to harness and sustain local food production. Given the unique nature of this piece of land, using it for anything other than agricultural purposes will be an economic and food security disaster for British Columbia.

1. The 89-hectare field at 192 Street and 36 Avenue is about two-thirds of a property owned by the Federal Government and has been leased by Surrey's Heppell's Potato Farm for the last 50 years. The land produces between 30 million and 50 million servings of vegetables each year, which in early spring and late fall are often the only locally grown field vegetables available in BC grocery stores.
2. The land is elevated and sandy. It drains very well, allowing farmers to plant and harvest when conditions are rainy and wet, giving residents and businesses the opportunities to enjoy produce when other farms are not able to plant and harvest during the challenging seasons. The land has the right balance of sunshine, temperatures and drainage. Its hilltop location means the



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land is not vulnerable to flooding and less vulnerable to frost. It receives more sunshine and less rainfall than Abbotsford and Chilliwack and drains much better than low lying Surrey, Richmond and Delta soils.

3. During last year's abnormally cold and wet spring, Heppell's was able to plant and harvest potatoes before other farmers were able to get onto muddy fields to cultivate them. As a result, the field produced several crops of potatoes, about 70% of BC's domestic harvest from May to August 1, as well as the first local parsnips, carrots and cabbage. Climate change and supply chain issues challenge the availability of imported food. BC needs to protect its ability to feed itself.

4. The Surrey Board of Trade is supportive of Simon Fraser University's Agriculture Technology Innovation Centre. AgTech is an important economic priority for the BC Government to create jobs and enhance food security. Local farm and food production partnerships with economic drivers with universities are already occurring.

5. Agriculture lands are also employment lands. The overwhelming advantages of Surrey's farming industry make the economic potential lucrative, making it a future powerhouse in the national and global food market.

6. Indigenous dialogues have occurred and will continue to occur.

Canada is the fifth-largest food producer in the world. In 2021, the whole agriculture and agri-food system employed 2.1 million people and provided 1 in 9 jobs in Canada, according to Statistics Canada. The agriculture industry generated \$134.9 billion (around 6.8%) of Canada's gross domestic product (GDP). The food production from the subject land at 192 Street and 36 Avenue provides a stable source of employment, plays an important role in local economies, contributes to innovation in the food system, responds to increased demand for exports, contributes to food affordability, and addresses consumer demand.

According to a Canadian Chamber of Commerce statement, generally, Canadians have an overwhelmingly optimistic view of the industry, whether it is in terms of its environmental impact or as an economic driver. For instance, recent polling by Grassroots Public Affairs reveals that 76% of Canadians consider agriculture to be very important to Canada's economy. At the same time, just over two-thirds recognize its positive effect on the environment. This demonstrates that more work is needed in promoting the sector's contributions to the fight against climate change while working hard to meet our economic and food security targets. In terms of greenhouse gas emissions, Canada's agriculture and agri-food sector is among the greenest in the world, contributing to just over 8% of Canada's overall domestic emissions, in comparison to a global average of 23%. Whether through carbon sequestration or nitrous oxide emission reductions, the sector continues to lead the way in environmental stewardship. Canadians should be proud to know that their food is produced sustainably and in an environmentally conscious manner without hampering economic activity. Heppell's Potato Farm and other Surrey farm producers are examples of sustainable food production practices benefiting our economy.



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At the same time, however, we do want to note that the agriculture sector is severely hampered by extraneous regulations and relative lack of recognition by the government as an environmental and economic leader. Federal government departments such as Health Canada and Environment and Climate Change Canada, continue to impose regulations that inhibit the sector's economic competitiveness and growth potential. Canada's government departments should work with industry to evaluate the impact of those regulations and ensure alignment with economic and environmental objectives. The BC and Federal Governments should also work with industry to implement a net-zero transition strategy that creates jobs for all Canadians, promotes innovation, and establishes a business environment conducive to investment. To that end, the agriculture sector must be a key partner in advancing a net-zero strategy.

BC's and Canada's agriculture and agri-food supply chain needs to remain resilient and needs to continue to be a driver of Canada's economy. We urge the Agriculture Land Commission to keep the subject land for food production.

MORE INFORMATION: <https://www.alc.gov.bc.ca/proposed-alr-inclusion-of-federal-lands-in-the-city-of-surrey/>

If you have any questions, please contact me at 604-634-0342 or at email: [anita@businessinsurrey.com](mailto:anita@businessinsurrey.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'A Huberman', with a stylized flourish at the end.

H. Captain (Navy) Anita Huberman  
President & CEO, Surrey Board of Trade