

Schedule 19 to the Minutes of the Public Hearing meeting of Richmond City Council held on Monday, June 18, 2018.

**Mayor and Councillors**

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**From:** Linda Delli Santi <Linda@bcgreenhouse.ca>  
**Sent:** Monday, 18 June 2018 15:14  
**To:** CityClerk; Mayor and Councillors  
**Subject:** BC Greenhouse Growers' Association submission to the proposed Bylaw Amendment 9861 and/or 9890 (Agricultural Buildings and Greenhouse Regulations)  
**Attachments:** BCGGA response to City of Richmond proposed Bylaw Amendment 9861 and-or 9890.docx

Richmond City Mayor and Councillors;  
Please find attached the BC Greenhouse Growers' Association submission to the proposed Bylaw Amendment 9861 and/or 9890 (Agricultural Buildings and Greenhouse Regulations).  
Regards

*Linda Delli Santi*  
Executive Director  
BC Greenhouse Growers' Association

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Visit our website at [www.bcgreenhouse.ca](http://www.bcgreenhouse.ca)





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June 18, 2018

Sent via email: [cityclerk@richmond.ca](mailto:cityclerk@richmond.ca) , [mayorandcouncillors@richmond.ca](mailto:mayorandcouncillors@richmond.ca)

Mayor and Council  
City of Richmond  
6911 No. 3 Road  
Richmond BC V6Y 2C1

Re: Proposed Amendment Bylaws 9861 and/or 9890 (Agricultural Buildings and Greenhouse Regulations)

Dear Mayor and Council,

We acknowledge and recognize the challenges faced by a number of municipalities with regard to the increased interest in medicinal cannabis and possibly recreational cannabis production on farmland with the impending and uncertain Federal Legislation.

The BC Greenhouse Growers' Association (BCGGA) represents 60 vegetable greenhouses in BC, producing on 750 acres. Greenhouse vegetable production is a major sector of the British Columbia Agricultural economy. The BC greenhouse vegetable industry contributes over \$350 million annually in farm cash receipts to the BC economy and exports over \$200 million of greenhouse vegetable products (tomatoes, peppers, cucumber, and lettuce) annually. The Fraser Valley in BC is the second largest greenhouse vegetable producing region in Canada behind Leamington Ontario.

The proposed amendment bylaw 9861 and the Richmond Agricultural Advisory Committee option 2, proposed amendment bylaw 9890 have been put forward to preserve and protect the long term viability of high quality agricultural soils for future soil based agriculture.

The BCGGA respectfully submits that greenhouse vegetable agriculture is an accepted and viable method of producing food for British Columbians, Canadians and the World, both now and for the

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future. With greenhouses able to produce between 10 – 20 times more food than the same footprint in soil based agriculture, we believe with world population growth and increasing encroachment on agricultural lands that greenhouses will be large contributors in feeding the growing world population.

It is wrong to restrict the structure of greenhouses; there are always innovations in growing methods and new technologies, who of us knows what the future will bring? An example of a new technology being introduced in greenhouses currently is an induction tape in the concrete that moves carts from the production greenhouse to the grading and packing warehouse automatically, reducing the need for human involvement and creating efficiencies. This new innovative use of automation requires more concrete on the floor of a greenhouse and warehouse than previously used. The proposed amendment bylaws would not permit this adoption of new and innovative technologies.

There is mention of concerns for the possible impact greenhouses may have on the future soil-based farming of a parcel; there is no mention of the science behind those possible impacts. Greenhouse owners, when looking for land to purchase for a greenhouse expansion look for a large parcel of flat land with uncomplicated access to services such as water and natural gas and also proximity to market. The land is then laser leveled with minimal topsoil disruption. Concrete post supports and work pathways are poured in the greenhouse and slabs in the grading and packing areas and the warehouse. This concrete allows for the movement of equipment for production and harvesting needs as well as safeguards the food safety standards in the grading and packing areas and the warehouse. Food Safety requirements include a need for a cleanable surface that also ensures the ability to control rodents. This certainly allows the topsoil to be available for future soil-based farming, the soil has not been removed and the concrete can be removed if the greenhouse is ever decommissioned.

There is a discussion in the staff report of impermeable surfaces having an impact on storm water drainage, many municipalities require a storm water management plan when planning to build a greenhouse. This storm water management plan addresses on-site drainage and any possible impacts to the agricultural capability of the soil surrounding the greenhouse.

The staff report mentions that if a farmer wishes to construct a building that would not comply with the new bylaw amendment they could apply to rezone the property, which would be reviewed by staff and brought forward to Council for consideration. The BCGGA respectfully submits that the permitting process for a new greenhouse is onerous enough already without adding another unnecessary layer.

The BCGGA strongly supports the conclusions of the Richmond Agricultural Advisory Committee that the Bylaw Amendments should not be passed. We believe that the Bylaw Amendment will not solve the challenges faced by Richmond (and other municipalities) with regard to the increased interest in medicinal cannabis and possibly recreational cannabis production on farmland with the impending and



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uncertain Federal Legislation. We do not believe this bylaw amendment is necessary to protect soil based agriculture for the future.

There needs to be more discussion and consultation with agricultural stakeholders to help shape the future of regulations that affect sustainable agricultural land use.

The BC Greenhouse Growers' Association and its' members remain available to take part in any further discussion.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Armand VanderMeulen'.

Armand VanderMeulen  
President, Chair, BC Greenhouse Growers' Association

Cc. Premier John Horgan  
Honourable Lana Popham, Minister of Agriculture  
Honourable Carole James, Minister of Finance  
Dr. Andrew Weaver, BC Green Party Leader  
Andrew Wilkinson, Leader of the BC Legislative Official Opposition  
Jennifer Dyson, Chair, Agricultural Land Commission