



National Farmers Union in New Brunswick - Union nationale des fermiers au Nouveau-Brunswick

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Submission to

Government of New Brunswick Agricultural Land Policy Consultation

Presented to

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We need the Lands Protection Act to protect us from the incredible wealth of people who live just beyond our borders and see our land as nothing more than a commodity to be bought and sold, like silver or gold.

Horace Carver, Q.C. | Lands Protection Act Commissioner, PEI (2013)

Introduction

The National Farmers Union in New Brunswick (NFU-NB) appreciates the opportunity to add our voice to the Agricultural Land Policy consultations. We view the creation of an Agricultural Land Policy as an opportunity to outline what kind of agricultural and rural landscapes we want to promote in New Brunswick. There are many examples from across the country that we highlight below that may offer some ideas and best practices going forward, including PEI, BC and Saskatchewan. British Columbia implemented the Agricultural Land Reserve (ALR) in 1973. The ALR has allowed BC to actually increase their total number of farms since it was implementedⁱ, while still maintaining an average farm size of 130 acres. Over the same period New Brunswick lost over 33% of its farms, in keeping with the overall trend of a 30% loss of farms across the country. A strong Agricultural Land Policy can work to maintain and revitalize the farming community in Canada. The NFU-NB is pleased to contribute to a policy that will preserve and improve farmland, and promote family farms and vibrant rural communities.

“Canadian food land must be owned and controlled, as much as possible, by the citizens who live on and work that soil, with prohibitions enacted on foreign, corporate, investor, and absentee ownership. Additionally, new ways of getting land into the hands of those who want to farm are required, such as community-owned land trusts, debt-free or interest-free land transfer mechanisms, and government agencies that support seller-finance options. Controls should be placed on the conversion of food land to other uses such as subdivisions, quarries, golf courses, etc.”

Resetting the Table: A People's Food Policy for Canada, (April 2011)



In this submission we will address the following points. Recommendations will be offered throughout the document and are all summarized on page 12 for easy reference.

1.0 Farmland must be recognized for its inherent value as a living resource.....	4
2.0 Agricultural land must remain in the hands of those who work it.....	4
2.1 Corporate/vertical ownership	4
2.2 Foreign investment and foreign ownership	5
3.0 Agricultural land must be protected from development/encroachment.	7
3.1 Topsoil harvesting/mining.....	8
3.2 Topsoil preservation/regeneration	8
3.3 Reciprocal respect for agricultural set-back distances.....	9
4.0 Fair taxation and costing for agricultural land	9
4.1 Changes to the FLIP program	9
4.2 Other tax incentives to keep farmland in production	10
5.0 Access to Crown land.....	10
6.0 The precautionary principle must be applied to agricultural land to protect it from mining and other resource extraction that could damage its agricultural potential.....	11
Summary of Recommendations from the National Farmers Union in New Brunswick to the Agricultural Land Policy Consultations	12
References and additional resources	14



1.0 Farmland must be recognized for its inherent value as a living resource.

The members of the generation which is in power must not treat the earth as something given by their parents, but rather as something borrowed from their children. (National Farmers Union, Policy G-6 1)

The NFU views land as a natural resource and not a commodity to be exploited. We stress that the subject of land abuse is an acute national problem and must be dealt with in depth in the immediate future by developing a national soil conservation program. The NFU must continue to pressure governments to provide incentives for farmers to practise good soil conservation. (National Farmers Union, Policy 6-11)

Farmland is not something that is separate from all other land, it is inherently tied to the forests, to the streams, rivers and lakes. The proper management of farmland is challenging to undertake without also considering how the lands surrounding the farmland are to be cared for and managed. With less than 5% of New Brunswick lands classified as agricultural land it is essential to ensure that these lands are well cared for, going beyond keeping them in agricultural production but looking to be a leader in sustainable and regenerative farming practices that reduce soil erosion, compaction, and maintain high levels of organic matter in the soil to ensure good water absorption and water holding capacity.

Recommendation 1.0: That farmland has inherent value as part of a larger ecosystem; therefore the protection of farmland inherently includes the protection of surrounding forests and waterways. This overarching principle should guide the Agricultural Land Policy and resulting regulations.

2.0 Agricultural land must remain in the hands of those who work it.

We believe provincial governments should enact legislation restricting agricultural land ownership to actual farmers to ensure that agricultural resources remain in the control of agricultural producers.

We believe that those people who work the land should have control over the management of their food production unit. We view with alarm the encroachment of industrial corporations into the business of primary food production through direct ownership, vertical integration and contract farming.

National Farmers Union Policy, G-4 and G-5

2.1 Corporate/vertical ownership

Increasingly in New Brunswick we are seeing a trend towards corporate ownership of land. In 2013, the deal to trade over 15,000 acres of Crown land with Oxford Frozen Foods is a recent and widely known example of this. Oxford Frozen Foods prides themselves on operating “the largest vertically integrated fruit farm in the world.”ⁱⁱ Vertical business models are closed loop businesses where the primary product needed to operate the business is produced by the company or a subsidiary company. While vertically integrated companies argue



that it is the best way for a processing company to guarantee supply, it also gives them market dominance, allows for price setting, and can lead to industry monopoly. A provincial processing facility for NB grown wild blueberries is much needed to get more NB product to both foreign and local markets. However, looking beyond GDP alone, the industry will really only thrive if mechanisms are put in place to allow smaller producers to stay competitive and receive a fair price for their product.

Recommendation 2.1: That the land use policy seeks to encourage a diversity of thriving farm businesses rather than vertical business models. The policy shall limit the amount of Crown land made available to vertically integrated companies for their own primary production and processing to avoid corporate monopoly of a certain market.

2.2 Foreign investment and foreign ownership

In May 2015 the National Farmers Union produced a follow-up report called *Losing Our Grip: 2015 Update*, which focuses on how corporate farmland buy-up, rising farm debt, and agribusiness financing of inputs threaten family farms.

One example given in the *Losing Our Grip: 2015 Update* explains how agricultural land in New Brunswick is being purchased by Bonnefield Financial Inc, a farmland investment fund, that purchases “farmland for farming” as per their trademarked phrase. Since 2010, they have offered three separate Limited Partnership Offerings, in which each investor must invest a minimum of \$150,000. The company notes that its investors include “some of Canada’s largest pension funds.”ⁱⁱⁱ Their goal is to buy up farmland that preferably has no buildings, other than grain storage facilities where wheat, canola, lentils, corn and soy can be grown. Their strategy includes only buying land from farmers when they can immediately lease the land back to the original owner or another farmer. While Bonnefield calls this method “progressive, growth-oriented”, it is a return to tenant farming, which is something many farm families moved to Canada to escape over the last 200 years. The five year leases shift the production-related and commodity price risks back onto the farmer, while offering a steady rate of return to investors. While selling farmland to investment groups may be an appealing short-term solution to combat rising farm debt, it is a threat to the future of agriculture in the province, and does not address the root causes behind rising farm debt.

In Saskatchewan, where farmland is protected by the *Saskatchewan Farm Security Act*, and managed by the *Farm Land Security Board* there continues to be a rise in foreign ownership of farmland. The Act restricts farmland ownership of more than 10 acres of farmland to Canadians, residents of Canada and Canadian-owned companies that are not publically traded, unless the applicant is granted an exemption by the Board. There were too many loopholes that still made it possible for pension funds, investment firms and foreign companies to buy farmland in Saskatchewan. In 2015, an amendment was passed to strengthen this act.^{iv} The changes include:

- Expanding the definition of “land holding” to include any kind of financial interest in the land, not just title. This means that someone who is a resident Canadian cannot act as a front for a foreign owner that provides all the money and gets all the financial benefit from the land.



- The list of ineligible purchasers of farmland has been expanded to explicitly exclude pension funds. The basic list of ineligible purchasers is in the Act itself, and the amendments enable expansion of this list through regulations. This means that the government has the ability to quickly add ineligible types of entities if they appear on the scene without having to amend the Act.
- The Farmland Security Board has increased powers of investigation to enforce the Act and Regulations.
- The onus is on the purchaser/owner to prove it/he/she is in compliance instead of on the Board to prove they are not.
- Fines for violations are increased to up to \$50,000 for an individual and up to \$500,000 for any person other than an individual based on the definitions provided in the Act, and administrative penalties have been brought in.

The implications of these changes are:

- Canadian residents and Canadian-owned entities (corporations, co-ops, etc.) can own as much farmland as they want because there is no cap on total amount of any eligible purchaser's land holdings in Saskatchewan.
- The demand for farmland is limited by preventing pension funds and foreign entities from buying farmland which is seen as an economic disincentive to farmland investment companies. By removing this element of speculation, this may keep land prices down and reduce the attractiveness of farmland investment companies to investors. However, it will not necessarily reduce the amount of land investment companies can still buy up.
- The definition of "resident Canadian" has moved from the Act into the Regulations. This is helpful because it also allows for relative ease in amending the definition should more loopholes become apparent, as long as the amendments do not further weaken the definition of resident Canadian.
- The cost of enforcing the law is reduced and the Board will have stronger tools to go after anyone who tries to go around the law.

These changes came after nearly 30 years of the Act being in force and as mechanisms to maintain the original intent of the Act, while responding to current realities that could not have been foreseen in 1988.

In PEI, the current land restrictions allow private owners to own up to 1000 acres, and corporations up to 3000 acres. Enforcement mechanisms were included though the fines were relatively low and Irving was charged \$13,000 for owning 5,600 acres in 2008 after being given years to bring their holdings into alignment under the regulation.^v The Report of the Commission on the Lands Protection Act, published in June, 2013, also offers helpful recommendations on how to keep the Act relevant today, thirty years after it was originally passed.

To ensure that NB farmers remain empowered stewards of the lands they work, as well as to offer a longer term reward for good land stewardship it is important to restrict farmland ownership by investment companies, and foreign and absentee landowners.

Recommendation 2.2.1: That the Policy include an inventory of the ownership and control of farmland within its boundaries, and maintain a running inventory by requiring all changes in land tenure and land use to be reported as they occur.



Recommendation 2.2.2: That the Agricultural Land Policy keep farmland in the hands of the people who actually work the land by banning corporate farmland speculation and investment, including pension funds. And that the list of banned entities that can purchase or own farmland be in the Act, but with a provision to add further entities in the regulations as they become relevant.

Recommendation 2.2.3: That the Agricultural Land Policy include specific provisions that limit farmland ownership to Canadians and residents who are actively involved in the operation of the farm-business, and to Canadian-owned companies working in the province.

Recommendation 2.2.4: That the Agricultural Land Policy include a provision in the case where concentration of ownership appears to be undesirable, so that regulation may be introduced to limit farm size that may be owned or controlled by any individual farmer, farm corporation or cooperative farm based on any of the following criteria: a given number of acres, potential productivity of the soil, industry standards for efficiency, negative environmental impact, or a concentration of ownership results in industry monopoly.

3.0 Agricultural land must be protected from development/encroachment.

When land is transferred in the marketplace, competition for that land drives prices up. In times when prices for farm commodities rise, buyers of farm land tend to capitalize gains made in the price of farm products into the value of the land. This has the effect of automatically increasing the cost of production. As land values rise, it becomes more difficult for new and young farmers to enter farming. (NFU Policy)

Only 5% of the total land in NB is classified as farmland. As the trend for urbanization continues in NB, the pressures for cities and urban centres to expand puts further demand on agricultural lands. Farmers can often get a better price by subdividing their land or selling it for non-farming purposes. On PEI during both the consultations for the Task Force on Land Use Policy and during the consultations in the Report of the Commission on the Lands Protection Act, it was frequently heard that:

“farmers feel forced to sell land to provide their retirement funds.” And the report goes on to say that “Agricultural land cannot serve as a pension plan. Other tools need to be developed to address succession planning and retirement planning within the agricultural industry. Commissioner Carver has proposed a Farm Land Trust; this initiative and others should be explored.”^{vi}

The proposed Farm Land Trust would be a privately financed version of the former PEI Land Development Corporation, a body that was publically financed through federal and provincial funds from 1969 until 1990 when the Act was repealed. The Land Development Corporation would buy farmland from farmers looking to get out at a fair price, and then lease or rent the farmland back to new entrants or other farms looking to expand their operations. The terms of the lease, or lease-to-own would be much more amenable than those of a bank for the new farmer. And the exiting farmer would still receive a fair price for the land, lessening the financial pressure to sell it for non-agricultural purposes and ensuring that it would remain as farmland. A privately financed version of the same could pose further risks as it would most likely be a for-profit body,



rather than a public service and would need to be established with great care to ensure that it was actually working beneficially for farmers and to ultimately maintain ownership of farmland by those who farm it.

In PEI, one recommendation to protect against development was to build more densely populated areas rather than to continue to expand urban areas and subdivisions into areas where there were no services including grocery stores. This recommendation could easily be applied to New Brunswick as well.

Recommendation 3.0.1: All land that is classified as farmland must be protected as farmland with limited options to change the land zoning. Appeals to change zoning must be heard by a provincial board mandated by the Policy to protect agricultural land. Provisions must be set out detailing the procedures in the case of the subdivision of farmland, even if for continued agricultural purposes.

Recommendation 3.0.2: Municipalities, LSDs and the province identify common use corridors for public utilities and subsurface resource infrastructure.

3.1 Topsoil harvesting/mining

There have been many reports in previous years about topsoil preservation and how best to approach it. Topsoil harvesting should be prohibited on agricultural lands in the province, to that end, sod farming is also a method of topsoil harvesting that should be carefully examined. To meet developmental and landscaping needs, a more robust, provincial compost program needs to be implemented with a minimum requirement of compost to be applied to all new landscape projects, particularly in urban areas. Topsoil also needs to be saved from all new construction or development projects so to be used again in future earthworks.

Recommendation 3.1: Prohibit topsoil mining in New Brunswick and seek other solutions to meet urban and industrial topsoil needs.

3.2 Topsoil preservation/regeneration

Preserving the topsoil currently available in New Brunswick through the promotion of best practices and by providing incentives or tax breaks for farmers who are implementing excellent topsoil preservation techniques on their land. Gary Martens, retired professor, University of Manitoba, suggests establishing a property's baseline organic matter using scientific soils analysis and historical knowledge, then adjusting property taxes based on the following: if still 50% of original OM – base line tax rates, if higher than 50% of original OM, decrease the fee, if less than 50% of original OM, increase the fee. This idea is further explored below in Section 4.1 Changes to the FLIP program.

Recommendation 3.2: The Agricultural Land Policy and resulting regulations must actively promote and reward sustainable and regenerative farming practices.



3.3 Reciprocal respect for agricultural set-back distances

A clear map of agricultural land and common corridors for surface and subsurface utilities needs to be established and regularly updated so it can be available to municipalities and other relevant bodies, businesses, housing developments etc. All other developments adjacent to farmland should be equally subject to the same set-back distances farmers must respect to roadways, watersheds, and adjacent infrastructure. For example, in some jurisdictions it is prohibited to spread manure at certain times of year when too much runoff or smell would result. To prevent these types of complaints that may impede good farm practices, buffer areas between farms and housing areas should be maintained. For example, forested buffer zones should be the responsibility of the adjacent landowner, if they are purchasing land next to a farm.

Recommendation 3.3: Reciprocal respect and enforcement of set-back distances to protect farmers from complaints as well as negative environmental impacts.

4.0 Fair taxation and costing for agricultural land

According a survey conducted last spring by the National New Farmer Coalition one of the biggest barriers to new entrant farmers is the cost of land. To encourage a new generation of farmers all efforts need to be made to keep agricultural land prices affordable while rewarding good environmental stewardship.

4.1 Changes to the FLIP program

The FLIP program was designed to keep farmland in production by providing financial incentive to keep farmland active, and to keep a registry of all farmland available for lease or sale for new or current farmers who were looking to expand their farm. Since this program is currently voluntary, not all farmland is registered, rendering the land inventory incomplete. The program also now has the category of “changing status”. For example, allowing the land to revert back to forest is actually a way for landowners to exempt themselves from all back taxes accrued on the land, if they continue to own the property for at least another fifteen years. This seems contradictory to the original intent of the program and to the preservation of limited NB farmland.

Recommendation 4.1.1: A complete overhaul of the Farmland Identification Program that includes annual renewal, as well as changing the benefit from a tax deferral to a tax reduction. For example, a standard reduction to half of the provincial tax rate of \$1.4573 per \$100.00 of assessed value of registered farmland and farm outbuildings, could be the baseline tax rate for all farmland. To receive an increased reduction or complete elimination of all taxes on farmland, the owner must demonstrate that good soil conservation practices are regularly undertaken. This would provide incentive even for farmland owners who are leasing out their land to neighbours to continue good soil improvement practices. To discourage absentee ownership, we further recommend that land in the FLIP program must be owned or must be farmed by New Brunswick residents to receive any tax reduction.



The FLIP program currently allows up to two lots to be subdivided on the land for immediate family members who are also working on the farm. Two challenges identified with this provision are that according to the National New Farmer Survey, 68% of new entrant farmers did not grow up on a farm, and only 15% of new entrant farmers are farming on the family farm.^{vii} This means that succession planning will look different in coming years and the FLIP program needs to take into account farm succession plans where the person or persons working on or taking over the farm may not be immediate family members.

Recommendation 4.1.2: Re-evaluate the criteria around subdividing lots off of agricultural land while under the FLIP program to meet the new realities of farmers.

4.2 Other tax incentives to keep farmland in production

Directly related to point **3.0 Agricultural land must be protected from development and encroachment** a Land Development Corporation or a Farmland Trust should be established that would be able to purchase farmland at a fair price from farmers and lease it back to new entrants or farmers wishing to expand. A higher tax rate could be implemented for out of province owners, to discourage absentee ownership of farmland.

Recommendation 4.2: Establish a program similar to the former Land Development Corporation in PEI.

5.0 Access to Crown land

With limited farmland available in the province and given that the landscape of NB is well suited for the production of many forest crops, including maple syrup, blueberries and Christmas tree farms, it is essential that an Agricultural Land Policy consider access to Crown land for farmers. In the 2011 Census of Agriculture, only 119 farmers leased a total of 19,592 hectares from the government. The 2013 exchange of Crown Land for land previously owned by Oxford Frozen Foods that was not suited to wild blueberry production was a highly contentious issue for many reasons. While 3,900 acres was made available this fall by lottery to farmers and the process was significantly improved from previous years, there still needs to be a clear process that is effectively communicated to farmers on how to apply for Crown lands. Given that not all currently available agricultural land in the province is being used, Crown lands should be available to farmers living in areas where no other agricultural land is available for sale or lease or that that land is unsuitable for the desired type of production, with priority given to blueberry and maple syrup producers.

Recommendation 5.0.1: A clear policy and process must be defined for accessing Crown land, so that farmers can easily become aware of parcels approved for lease which are already identified as suitable for a certain type of agricultural production, and determine how to request a Crown land lease and receive a response in a timely manner.



Recommendation 5.0.2: To appoint a DAAF staff person to assist farmers with the process of identifying, applying for and transitioning to a Crown land lease.

6.0 The precautionary principle must be applied to agricultural land to protect it from mining and other resource extraction that could damage its agricultural potential.

The Precautionary Principle has been formally adopted by Canada in several international treaties, including the 1992 United Nations Conference on Environment and Development (UNCED) in 1992, also known as the Rio Earth Summit. Principle #15 of the Rio Declaration, which Canada signed, states:

"In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation."^{viii}

Recommendation 6.0.1: That the Precautionary Principle be the overarching principle that informs the Agricultural Land Act and regulations, especially with regard to a request to use farmland for other purposes, including surface and sub-surface resource extraction.

Any act or policy is only as strong as the political will to maintain it. In BC, recent changes Agricultural Land Reserve including the structure of the Board, how requests to change land status are handled and the expansion of its mandate from: "to preserve agricultural land; to encourage farming on agricultural land in collaboration with other communities of interest; and to encourage local governments, first nations, the government and its agents to enable and accommodate farm use of agricultural land and uses compatible with agriculture in their plans, bylaws and policies" to also include "economic, cultural and social values; regional and community planning objectives; and other prescribed considerations"^{ix} will open the door for other land uses to prevail over the preservation of agricultural land.

Recommendation 6.0.2: That the board or commission established to implement the Agricultural Land Policy be given a clear mandate to preserve agricultural land, similar to the original mandate of the ALR in BC.



Summary of Recommendations from the National Farmers Union in New Brunswick to the Agricultural Land Policy Consultations

Recommendation 1.0: That farmland has inherent value as part of a larger ecosystem; therefore the protection of farmland inherently includes the protection of surrounding forests and waterways. This overarching principle should guide the Agricultural Land Policy and resulting regulations.

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Recommendation 2.2.1: That the Policy include an inventory of the ownership and control of farmland within its boundaries, and maintain a running inventory by requiring all changes in land tenure and land use to be reported as they occur.

Recommendation 2.2.2: That the Agricultural Land Policy keep farmland in the hands of the people who actually work the land by banning corporate farmland speculation and investment, including pension funds. And that the list of banned entities that can purchase or own farmland be in the Act, but with a provision to add further entities in the regulations as they become relevant.

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Recommendation 2.2.4: That the Agricultural Land Policy include a provision in the case where concentration of ownership appears to be undesirable, so that regulation may be introduced to limit farm size that may be owned or controlled by any individual farmer, farm corporation or cooperative farm based on any of the following criteria: a given number of acres, potential productivity of the soil, industry standards for efficiency, negative environmental impact, or a concentration of ownership results in industry monopoly.

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Recommendation 3.0.2: Municipalities, LSDs and the province identify common use corridors for public utilities and subsurface resource infrastructure.

Recommendation 3.1: Prohibit topsoil mining in New Brunswick and seek other solutions to meet urban and industrial topsoil needs.

Recommendation 3.2: The Agricultural Land Policy and resulting regulations must actively promote and reward sustainable and regenerative farming practices.



Recommendation 3.3: Reciprocal respect and enforcement of set-back distances to protect farmers from complaints as well as negative environmental impacts.

Recommendation 4.1.1: A complete overhaul of the Farmland Identification Program that includes annual renewal, as well as changing the benefit from a tax deferral to a tax reduction. For example, a standard reduction to half of the provincial tax rate of \$1.4573 per \$100.00 of assessed value of registered farmland and farm outbuildings, could be the baseline tax rate for all farmland. To receive an increased reduction or complete elimination of all taxes on farmland, the owner must demonstrate that good soil conservation practices are regularly undertaken. This would provide incentive even for farmland owners who are leasing out their land to neighbours to continue good soil improvement practices. To discourage absentee ownership, we further recommend that land in the FLIP program must be owned or must be farmed by New Brunswick residents to receive any tax reduction.

Recommendation 4.1.2: Re-evaluate the criteria around subdividing lots off of agricultural land while under the FLIP program to meet the new realities of farmers.

Recommendation 4.2: Establish a program similar to the former Land Development Corporation in PEI.

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Recommendation 6.0.1: That the Precautionary Principle be the overarching principle that informs the Agricultural Land Act and regulations, especially with regard to a request to use farmland for other purposes, including surface and sub-surface resource extraction.

Recommendation 6.0.2: That the board or commission established to implement the Agricultural Land Policy be given a clear mandate to preserve agricultural land, similar to the original mandate of the ALR in BC.

Conclusion

The National Farmers Union in New Brunswick expresses its appreciation in for this Agricultural Land Policy Consultation process and looks forward to continuing to help shape a policy that will protect farmland for all New Brunswickers for years to come.

Respectfully submitted,

Ted Wiggans, NFU-NB President
On behalf of the NFU-NB Board of Directors



References and additional resources

Losing our Grip: 2015 Update. National Farmers Union. May 2015 <http://www.nfu.ca/issues/losing-our-grip-2015-update>

Examples from Prince Edward Island:

The Gift of Jurisdiction: Our Island Province, Report of the Commission on the Lands Protection Act. Horace B. Carver, Q.C. June 30, 2013 http://www.gov.pe.ca/photos/original/FEMA_LPA_EN_13.pdf

Report of the Task Force on Land Use Policy. January 2014
http://www.gov.pe.ca/photos/original/fema_TFreport14.pdf

NFU-PEI Submission on the Development of the PEI water Act. November 2015.
<http://www.nfu.ca/policy/submission-development-pei-water-act>

Examples from British Columbia:

Bill 24: 2014, Agricultural Land Commission Amendment Act. https://www.leg.bc.ca/Pages/BCLASS-Legacy.aspx#%2Fcontent%2Flegacy%2Fweb%2F40th2nd%2F3rd_read%2Fgov24-3.htm

NFU Submission to Premier Clark Re: Bill 24, 2014 Agricultural Land Commission Amendment Act. April 2014.
<http://www.nfu.ca/blog/Bill24/504>

Examples from Saskatchewan:

The Saskatchewan Farm Security Act, <http://www.qp.gov.sk.ca/documents/English/Statutes/Statutes/S17-1.pdf>

Bill 187: An Act to amend the Saskatchewan Farm Security Act,
<http://docs.legassembly.sk.ca/legdocs/Bills/27L4S/Bill27-187.pdf>

ⁱ Statistics Canada. In 1976 BC reported 19,432 farms and in 2011 reported 19,759. New Brunswick had 4,551 farms in 1976 and 2,611 farms in 2011, staying with the Canada-wide trend of 338,552 farms in 1976, down to 205,730 in 2011.

ⁱⁱ http://oxfordfrozenfoods.com/security_of_supply. Accessed December 4, 2015

ⁱⁱⁱ *Farmland Sale – Leasebacks with Bonnefield*, Bonnefield.

http://bonnefield.com/uploads/pdfs/Bonnefield_Sale_Leaseback_Brochure.pdf Accessed December 4, 2015

^{iv} Bill no. 187: An Act to amend *The Saskatchewan Farm Security Act*.

<http://docs.legassembly.sk.ca/legdocs/Bills/27L4S/Bill27-187.pdf> Accessed December 11, 2015

^v CBC News. Irving fined under P.E.I. land act, March 11, 2008.

<http://www.cbc.ca/news/canada/prince-edward-island/irving-fined-under-p-e-i-land-act-1.734448>

^{vi} PEI Report of the Task Force on Land Use Policy January 2014

^{vii} 2015 National New Farmer Survey. Reminationsongermination.com Accessed December 11, 2015

^{viii} *Principle #15 of the Rio Declaration, United Nations Conference on Environment and Development (UNCED), 1992.*

^{ix} Bill 24: 2014, Agricultural Land Commission Amendment Act. https://www.leg.bc.ca/Pages/BCLASS-Legacy.aspx#%2Fcontent%2Flegacy%2Fweb%2F40th2nd%2F3rd_read%2Fgov24-3.htm Accessed Dec 11, 2015