

2021

BCCA AGM



**BCCOOP**

Building BC's  
Co-operative  
Economy

# Government Relations Policy Issues

Submitted by BCCA Membership

For Discussion at the Annual General Meeting,  
June 4th, 2021



Building BC's  
Co-operative  
Economy

503-535 Thurlow Street  
Vancouver, BC V6E 3L2  
604.662.3906  
[www.bcca.coop](http://www.bcca.coop)

## Contents

- **Issue 1:** Securities Exemption for Co-ops, BC Co-operative Association
- **Issue 2:** Equitable access to EV purchase incentives, Modo
- **Issue 3:** Community Service Coop's eligibility to be granted charitable status, Foodlands Co-operative of BC
- **Issue4:** ICBC Peer to peer insurance rates, Kootenay Carshare Co-operative
- **Issue 5:** PPA for Renewable Energy on Government Buildings, Vancouver Renewable Energy Co-operative
- **Issue6:** Senior health - long term care, assisted living, ageing-in-place, homecare: co-operative governances and ownership, Sunshine Coast Alliance for Senior Care Co-operative

## **Issue 1: Securities Exemption for Co-ops, BCCA**

### **Member organization:**

BCCA

### **Policy issue:**

Co-operative securities exemption

### **Background:**

- Securities regulations are necessary to protect investors from misrepresentation and fraud, but should not create administrative and cost burdens that make it too expensive for co-operatives to raise small amounts of capital from their members to support business start-up and expansion and the jobs they create. There is no historical case of securities fraud perpetuated by co-operatives in Canada or BC in the last 30 years.
- The accounting costs necessary to file a registration and prospectus with the Alberta Securities Commission, combined with ongoing legal costs necessary to make changes to filings or offerings, are too high for small co-operatives that require small amounts of capital (less than \$10 million).
- Sections of the Securities Act require applicants to register and file a prospectus or Offering Memorandum with the BC Securities Commission. Co-operatives are member owned organizations and do not have the capital or internal resources required completing the filings necessary to raise small amounts of investment capital.

### **Recommended action:**

- Provide an exemption from in the BC Securities Act for applicants that meet the criteria of a "co-operative" as defined by the BC Co-operatives Act.
- Review the BC Securities Act & Regulation and the BC Securities Commission Rules and Forms for unnecessary red tape such as cost and administrative burdens for job creators and policies that discourage local investment.

### **Policy authority:**

- The BC Ministry of Finance has legislative authority for the BC Securities Act.
- The British Columbia Securities Commission is an agency under the jurisdiction of the Ministry of Finance with regulatory authority to interpret and enforce BC securities legislation.

## Issue 2: Equitable access to EV purchase incentives, Modo Co-operative

### Member organization:

Modo Co-operative

### Policy issue:

Equitable access to EV purchase incentives

### Background:

- The BC provincial government and the federal government offer purchase incentives in the form of rebates to buyers of electric vehicles (EV). The values are \$3,000 and \$5,000 respectively. This \$8,000 total rebate, in combination with lower costs for power and maintenance, allow the total cost of ownership (TCO) for an EV to be competitive with an internal combustion engine (ICE) vehicle.
- The BC government allows any single individual to exercise 10 such rebates in a lifetime. Modos, with its 24,000 users and 12,000 member-owners, is treated for this purpose like any single individual.
- The federal government allows any single individual to exercise 10 such rebates per year. Again, Modos is treated like any single individual.
- Modos has approx. 700 vehicles in its fleet, causing the rebates to have very limited value. Without access to the rebates, the TCO for an EV is too high and acts as a significant impediment of fleet conversion away from ICE vehicles.
- Upon request, the BC government has agreed to lift Modos's lifetime access to 50 rebates. Better but still severely inadequate.
- A letter to then federal Minister of Transport Marc Garneau (see attached) got a friendly but unhelpful reply.
- A very high percentage of Modos members do not own a car and choose to use those that belong to the co-operative of which they are a member-owner. They are not afforded equitable access to EV incentives in the way that car owners in the more traditional sense are. In a year, 12,000 individual car owners can easily access one rebate each (total value \$96 million) but 12,000 member-owners of a carsharing co-op can collectively access only 10 in total (total value \$80,000).

### Recommended action:

A "co-operative carsharing exemption" that lifts the cap on the number of provincial and federal EV rebates available to qualified co-op carsharing operators.

### Policy authority:

- BC Ministry of Energy, Mines and Low Carbon Innovation – Minister Bruce Ralston
- Transport Canada – Minister Omar Alghabra

**Issue 3: Community Service Coop's eligibility to be granted charitable status,  
Foodlands Co-operative of BC**

**Member organization:**

Foodlands Co-operative of BC

**Policy issue:**

Community Service Coop's eligibility to be granted charitable status.

**Background:**

Foodlands has been declined charitable status. We believe that putting land in trust for community benefit and food security is charitable but the Charities Directorate deems otherwise. We have contracted Margaret Mason to pledge our case but after two year of deliberation we have been declined.

**Recommended action:**

That the purpose of putting foodland/farmland into trust for community access and food security be considered charitable

**Policy authority:**

CRA- Charities Directorate.

**Issue 4: ICBC Peer to peer insurance rates,  
Kootenay car Share Co-operative**

**Member organization:**

Kootenay Carshare Cooperative

**Policy issue:**

ICBC Peer to peer insurance rates

**Background:**

- In September 2019, ICBC introduced the ability for peer to peer vehicle sharing through a blanket insurance policy that is held by a third party operator. As a rural carshare, this model of carsharing would allow us to move into the small communities throughout our region. However, the insurance charges \$17/day for any booking. Our model charges drivers by the hour and by the KM so if someone needs to borrow a truck for 2-3 hours to get wood or go to the transfer station making it an affordable solution. The \$17/day impedes our ability to have this model be viable for many types of trips.
- We have only just begun this conversation with ICBC and have yet to find the right person to talk to about changing the policy to allow an hourly insurance rate compared to the day rate. Any support or guidance on this challenge would be most appreciated

**Recommended action:**

We would like the policy to have an option for a hourly charged insurance or some smaller division of insurance instead of only a per day option

**Policy authority:**

*ICBC*

**Issue 5: PPA for Renewable Energy on Government Buildings,  
Vancouver Renewable Energy Co-operative**

**Member organization:**

VREC

**Policy issue:**

**Background:**

- Renewable Power Purchase Agreements are an effective way for the BC Government to reach its climate. Under a PPA a solar energy system is installed on a government building at no cost to the government. They do use the electricity generated by the system but at a lower rate than they would from a utility. The system is owned by the local community through a co-op, increasing local buy-in and a local sense of ownership, as well as local jobs. This model has already been used in BC on non-government buildings.
- We have written one letter to staff for the environment minister.

**Recommended action:**

The BC government should require that all government agencies consider buying electricity through renewable energy PPAs when they are procuring power.

**Policy authority:**

Ministry of Finance, Ministry of Energy..., Ministry of the Environment

**Issue 6: Senior health - long term care, assisted living, ageing-in-place, homecare: co-operative governances and ownership,  
Sunshine Coast Alliance for Senior Care Co-op**

**Member organization:**

SCASCC

**Policy issue:**

A new approach senior health - long term care, assisted living, ageing-in-place, homecare: co-operative governances and ownership putting seniors, residents, families, workers/professionals and community in the driver seat.

**Background:**

- co-operative was established to attempt to buy out the contract for a private-for-profit LTC "Trellis," (Silverstone Capital) proposed for the Sunshine Coast. Widespread opposition to the project and concerns from seniors and families as well as workers about the existing models of the LTC prompted us - mainly current and retired health care professionals as well as seniors with direct family experience in LTC and governance experience in the sector, to propose a multistakeholder alternative. Prior to Covid we were focused on lobbying our MLA Nicholas Simons as well as the Coastal Health Authority and the Ministry of Health. We approached stakeholders in the community including shishalh First Nation to invest in the project - buying out the contract and assuming responsibility for construction and operation of the facility.
- We assumed Covid might bring a rapid end to the Trellis proposal however that has not been the case.
- The Trellis project has continued despite Covid and at this time we have not had an opportunity to present an alternative model to the health authorities
- In the meantime, the feedback we have received from the community has been focused on building alternatives to long-term care including co-operative, affordable assisted living, ageing-in-place communities.
- We have several potential partners with land for development on the Coast and hope to proceed if the circumstances present themselves and provided we can locate the seed money to hire a staff person and formally establish ourselves as a community service co-op.
- Among the many other projects we are looking at: establishing a worker-owned homecare agency in partnership with the shishalh First Nation and Capilano University in Sechelt BC

**Recommended action:**

- We are asking the Ministry of Health to examine the possibility of conducting a pilot project in co-operative senior care. Either LTC or assisted living (as currently exists in Saskatchewan)
- We believe senior health would be better served by a model that puts seniors at the centre of care - and the best way to do that is to truly empower seniors, families, workers and other stakeholders in co-operative governance model.
- Many opportunities exist: such as re-purposing Shorncliffe Long Term Care on the Sunshine Coast - and including a co-op governance model - a co-management agreement between Van Coastal Health (the owner/operator) and ourselves or a co-op of people in the facility recognized by the health authority as key stakeholders and not merely "residents".

**Policy authority:**

Ministry of Health, Vancouver Coastal Health Authority