

From: Glen Lucas [glucas@bcfga.com]
Sent: April-28-10 11:44 AM
To: Living Water Smart ENV:EX
Cc: Cairns, Randy ENV:EX
Subject: BC Fruit Growers' submission
Attachments: BCFGAs Water Policy - Position Statement April 28 2010.pdf

Sirs/Madams:

Attached is the submission of the BCFGAs on Water Act Modernization.
Could you please reply to let me know if this is the proper place to deliver the submission?

Thanks,
Glen

--

Glen Lucas
General Manager
BC Fruit Growers' Association

250-762-5226 ext. 23
glucas@bcfga.com
www.bcfga.com

From: Denise MacDonald
Sent: April-30-10 1:49 PM
To: Slater.MLA, John LASS:EX
Cc: Living Water Smart ENV:EX
Subject: BCFGAs Water Policy submission

Dear Mr. Slater,
Here is the final submission from the BCFGAs if you haven't already received it from Glen Lucas, our general manager.
A strong message coming out the Agriculture and Environmental Partnership Committee meeting (held yesterday in Merritt) was to slow down and not fast track this MWA process.
I am sure you will hear from your staff in short order.
Sincerely,
Denise MacDonald
BCFGAs Water Committee chair

BC Fruit Growers' Association
Position Paper on
Modernization of the Water Act



BC Fruit Growers' Association, 1473 Water Street, Kelowna, BC V1Y 1J6
www.bcfga.com

April 28, 2010

Introduction

The BCFGA welcomes the opportunity to present the position of the tree fruit industry on the Modernization of the Water Act. Our association represents 800 tree fruit growers. Our mission is

To foster a positive business environment for the long-term prosperity of the tree fruit industry.

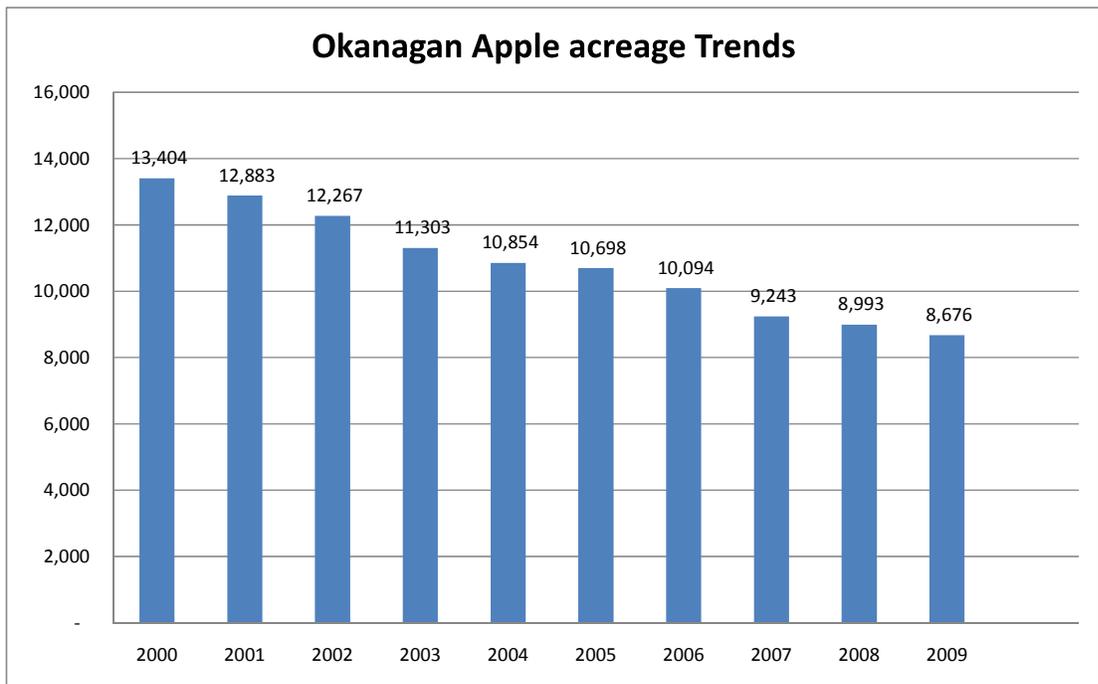
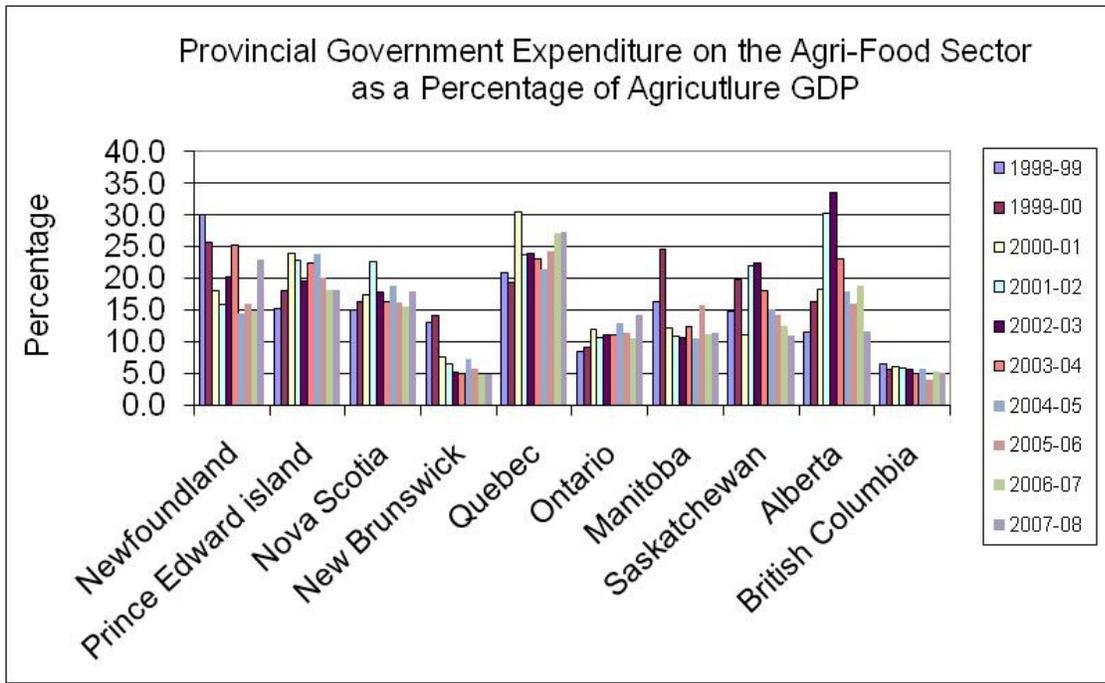
The focus of our brief is to represent the interests of the tree fruit industry in a secure, adequate and affordable water supply for our orchards.

The Tree Fruit Industry

1. The competitive advantage of the tree fruit industry is our intensive management and the dry, northern climate. New varieties of apples and cherries, developed at the federal research station in Summerland, are gaining widespread acceptance throughout the world. It is estimated that 80 percent of new cherry plantings in the world are of Summerland varieties.
2. The industry generates \$130 million in wholesale revenue.
3. The industry directly employs 1,505 person years of employment, at the grower, packer and processor level.
4. The industry has invested \$103 million and the government \$51 million to date in renewal of orchards through the replant program. The Replant Program has improved the revenues of the industry by an estimated \$24 million per year and remains a key example of an industry-government partnership.
5. Environmentally, our industry is advanced - we utilize highly-efficient irrigation systems to conserve and manage water, Integrated Pest Management and other innovations such as area-wide programs for codling moth and starling control (a pest of tree fruit and grapes).
6. Challenges for the industry include low levels of funding for agriculture programs in relation to other developed countries, and BC lags far behind other provinces. This underfunding creates a competitive disadvantage and places financial pressure on growers.

In addition to non-competitive agricultural programming, the tree fruit industry is subject to the highest labour, environmental, and food safety standards in the world.

Diminishing tree fruit acreage is the result of the lack of competitiveness in agriculture programs and increased regulatory costs.



While the industry is implementing a strategy to effectively deal with competitive issues, water is an essential ingredient for industry success. A secure, adequate and affordable water supply is needed for the survival of the tree fruit industry.

Water – Policy Development

1. The BCFGA appreciates and supports the recent development of policy on water. We have participated and contributed to policy, including:
 - a. Living Water Smart, BC's Water Plan
 - b. Agriculture and BC's Water Plan, BC Ministry of Agriculture and Fisheries
 - c. Okanagan Sustainable Water Strategy, Action Plan 1.0
2. We support and agree with the policy statements on agriculture in the Living Water Smart Document:
 - a. Government will require more efficient water use in the agriculture sector.
 - b. Government will secure access to water for agricultural lands.
3. Management tools are needed to support any water policy. Hydrometric monitoring and data collecting is critical at high, medium and low elevation levels and should remain a provincial responsibility. In light of climate change and increasing concern globally on the condition of the environment it should be a priority for both the federal and provincial governments.
4. The BCFGA recommends that the province create a Ministry of Water that brings all ministries together on water issues. The Ministry of Water could manage the provinces water resources in a sustainable manner to meet the broad range of competing demands and values. Success of the Ministry of Water will require comprehensive water data collection and analysis, efficient water license management and education of all stakeholders. Adequate funding to this ministry is as fundamental to the wellbeing of our society and environment as it is to agriculture, health, and education.

Water Policy – position statement

- The BC Water Act is our first and legal water management document that the industry has acknowledged and has depended on over the last 100 years. The industry recognizes the historical significance of First in Time First in Right (FITFIR) in providing water security to the agricultural industry.

- To address issues surrounding and consider changes to FITFIR, it is important to engage all stakeholders in an education process that helps license holders understand how it will play out in a drought situation.
- The BCFGA supports the concept of an agriculture water reserve goes beyond what the current act allows. The reserve would be a pool, where water conserved by agriculture can be held for future allocation. The reserve would protect agriculture from the claw back of unused allocations. To address periods of drought, there would need to be links between the agriculture water reserve and the drought management plan.
- The BCFGA position on ranking of the respective purposes for which water is used is, from highest rank to lowest rank: domestic waterworks and fire suppression, irrigation for agriculture, conservation, industrial, and landscape and outdoor recreation irrigation.
- While conservation licenses are not used widely by the Ministry of Environment, the BCFGA recognizes the importance of ensuring the health of the ecosystems and the natural elements. The industry will strive to work with conservation efforts while there is a collective stewardship responsibility across all ministries and the First Nations.
- Department of Fisheries and Oceans needs to be incorporated into the BC Water Act in a clear and transparent form so all stakeholders know at what level the DFO will engage in a stressed watershed.
- Agriculture water licenses attached to land should not be used in a way that will eventually lead to water being traded causing the commoditization of water. An assured, adequate, and affordable water supply to support the Agriculture Land Reserve policy.
- Groundwater legislation is recommended in priority areas. Further studies need to be done in order to draft science based regulations and best management practices for the watershed that aim to ensure sustainable withdrawal and recharge of the aquifer.
- Drought Management Plans and Water Use Plans need to be developed on a watershed basis, involving all water users, and funded by the province. In high water stressed areas, there should be agreement prior to extreme drought conditions that all license holders will share in reducing water use. Individual water purveyors would be subject to the regional water use plan and Agriculture Water Reserve.
- The BCFGA recommends that the province create a Ministry of Water that brings all ministries together on water issues. The Ministry of Water could manage the provinces water resources in a sustainable manner to meet the broad range of competing demands

and values. Success of the Ministry of Water will require comprehensive water data collection and analysis, efficient water license management and education of all stakeholders. Adequate funding to this ministry is as fundamental to the wellbeing of our society and environment as it is to agriculture, health, and education.

- The Act should enable the creation of a provincial fund to provide the water purveyors with monies to compensate those farms that suffer losses because of efforts in adaptation and mitigation forced by drought conditions.
- Finally, the BCFGA would like to be involved through BCAC on future consultation and final agreements needed on the Modernization of the Water Act when draft legislation is created.

Respectfully submitted, BCFGA

