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Subject: BCGPA WAM submission
Attachments: BCGPA-Water Act Submission#2.pdf

See attached the BCGPA's Position Paper on the Modernization of the Water Act.

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BC Grain Producers Association Position Paper on Modernization of the Water Act

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Prepared for:

Water Act Modernization Submission

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Introduction

The BCGPA welcomes the opportunity to present the position of the Grain & Oilseed Industry on the Modernization of the Water Act. Our association represents over 300 producers.

The purpose of the BC Grain Producers Association (BCGPA) is to improve the viability of the grains and oilseed industry in the BC Peace River region. The association and its members maintain sustained liaison with other agencies to benefit the field crop industry. The association encourages all farmers to participate within their industry so that their voices may be heard.

The focus of our brief is to represent the interests of the grain and oilseed industry to ensure secure, adequate and affordable water supply for our farms and rural residencies.

The Grain & Oilseed Industry

More than 90% of all grains & oilseeds produced in BC are grown in the BC Peace River Region. Growing grain in a northern climate requires good selections of varieties, excellent nutrients and intensive management to keep the crop ahead of environmental impacts. Even though we get the water our crops require through precipitation, some experiments have been made with field scale irrigation in our area. Future water requirements for this type of management will need to be determined if this will go mainstream.

In order to keep our crops healthy and thriving a weed management and crop protection strategy is needed, and yes, this requires access to water. Most farmers apply crop protection practises where they assess the need to spray thoroughly as well as use nozzles and equipment for more efficient water use; the need for water is essential for the survival of our crops.

With water use come responsibilities and farmers are committed to using water wisely and efficiently through the latest technologies. They select products where water requirement can be minimized and research Best Management practises and varieties.

Water – Policy Development

The BCGPA appreciates and supports the recent development of policy on water. Ie. Living Water Smart, BC's Water Plan.

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.

1. Management tools are needed to support any water policy. In the north we lack a good inventory of water sources and its potential to supply water in the future. Data collection and Hydrometric monitoring will be crucial and should remain a provincial responsibility.

2. The establishment of regional water shed plans should be a priority.
3. Regulate groundwater extraction in priority areas defining a tiered system and priority allocations (with large industrial withdrawals being under the most scrutiny)
4. The BCGPA recommends that the province create a "Body" or Ministry which coordinates all levels of government and inter government agencies on water issues. This Ministry 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

- We support the concept of an agriculture water reserve, with unused allocations remaining in that pool.
- The BCGPA position on ranking of the respective purposes for which water is used, to set priorities as follows: Highest Priority to lowest priority: domestic water supplies, fire suppression and public safety, use within agriculture, industrial and recreational uses.
- Agriculture water licenses attached to land should not be used in a way that will eventually lead to water being traded as a commodity.
- 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.
- Of utmost importance to Peace River Farmers and agriculture industry as a whole is maintaining the First-In-Time First-In-Right (FITFIR) water Continuation of the FITFIR model, along with government's protection of water for food production on all farmlands. This includes land within and outside the ALR and will validate the Province's commitment to food security.

Proposed Guiding Principles

- Modernization of the water act should not segregate or accommodate specific cultural groups. Water is a public trust and the modernized *Water Act* should respect that.
- We support a science based approach to affect decision making, however it is only acceptable if the science is reliable, unbiased, relevant and impartial.
- The BC Grain Producer's Association supports all 4 goals as outlined in the discussion paper.

Goal One: Protect stream health and aquatic environments

- Objectives need more clarification and parameters included. Clearer definition is needed as to what the environmental flow needs are in specific areas and streams, and what is encompassed in "stream health" that will affect water users. Regional standards would be more applicable.
- Water allocation plans should be developed for when there are water shortages, conflicts among users, drought and where large unlicensed use is occurring. Having a plan in place for situations like this ensures all users are aware and understand what measures will be taken.
- The third objective (p.22), "Habitat and riparian area protection provisions are enhanced", needs to have more information and details provided. Farmers work hard to protect streams and aquatic environments. Buffer zones, erosion control, riparian area management and enhancing wildlife habitat through the *Environmental Farm Plan* program are just some of the examples of work done by the farming industry. It is critical for the Province to continue to fund programs of this nature for the agriculture sector.

Goal Two: Improve water governance arrangements

- The BCGPA is supportive of the goal and objectives listed in general as long as the Province takes ownership of responsibility in regards to water. The modernization of the *Water Act* is an opportunity for the Province to work with local and regional watershed groups, to set priorities and guidelines, inform water users of these and stick to them. Water users need to know what to expect from water governance arrangements.

Goal Three: Introduce more flexibility and efficiency in the water allocation System.

- Page 11, Objective Four (p.27) addresses drought and water users' obligation to conserve water during times of drought or when stream health is threatened. Full transparency of drought plans that have been put in place is critical for all water users to understand and respect the preplanned measures so that should a situation arise, they can plan accordingly.

Goal Four: Regulate groundwater extraction and use

- The BCGPA encourages efficient use of ground water and we feel strongly that the key to managing ground water comes from having the information to make rational decisions. That is why government must ensure that a regional or watershed approach is taken in ground water extraction assessment. The right information must be gathered so that cost effective management strategies can be implemented. In addition to a watershed approach to ground water management, the FITFIR allocation system should be applied. Many agriculture producers have devoted a great deal of time and expense to developing sustainable and proper wells, relying on ground water from aquifers to meet their water needs. We support a process that would identify priority areas and look at monitoring ground water extraction from large users.
- It is important that if the Province regulates ground water, that existing agriculture wells are “grand fathered” into the system, and that new wells will be able to do the job that they are drilled for. Current ground water users should have some protection from new wells being drilled that have an impact on existing wells flow rates and/or water quality.
- An area not covered in the *Discussion Paper* is the practice by the oil and gas industry of deep injection of fresh water into wells for oil and gas extraction. Water used in this manner does not go back into the cycle of natural purification, it is contaminated. Understanding that fresh water is a resource needed by everyone that is sometimes scarce and in high demand; oil and gas companies should be limited in using fresh water for deep injection, if at all. It should be mandatory to use either “grey water” recycled, or non-treated water if potable water is in short supply or this industrial use will contribute to non-sustainable supplies in the future.
- Additionally, individuals should not be permitted to establish new wells within an aquifer for the purpose of selling water to oil and gas companies. The provincial government should not have, nor should they continue to delegate, authority over water to the Oil and Gas Commission, but restore that authority to the Ministry of Environment.

Conclusion

In summary, the BCGPA is supportive of modernizing the *Water Act* with minor adjustments to recognize current, present day challenges and issues. Our main concern is that a modernized *Water Act* recognizes the importance of water for agriculture and guarantees water security for farmers.

Respectfully submitted,

BC Grain Producers Association