

From: Hedy Dyck - BCLNA [hdyck@bclna.com]
Sent: May-21-10 10:42 AM
To: Living Water Smart ENV:EX
Subject: Industry submission re Water Act from BCLNA
Attachments: BCLNA Submission re Water Act Modernization _2_.pdf

Please find attached a submission from the BC Landscape & Nursery Association with regards to this issue. It is our understanding that April 30, 2010 was a 'soft' deadline and that several of the ag industry groups are just completing their submissions as we are.

Thank you very much for the opportunity to provide this input.

If you have any questions, please advise.

Hedy I. Dyck

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Water Act Modernization Submission

April 30, 2010

BC Landscape & Nursery Association
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BCLNA – Water Act Modernization

This document outlines the importance of water to the BC horticultural nursery industry and the impact of the proposed Water Act Modernization to this industry.

The BCLNA supports the BC Agriculture Council's Water Policy for Agriculture and this brief is in addition to their submission.

Nursery Industry Overview

The nursery industry provides environmental and agricultural plants for commercial and consumer use. Nursery production facilities are spread throughout BC including the Interior, North, Vancouver Island, the Okanagan & Kootenays as well as the Lower Mainland.

The industry generates over \$183 million in wholesale revenue, employing 1,650 full-time and 1,510 seasonal employees. There are approximately 350 nurseries in BC with 9,000 acres (3,742 hectares) of growing area.

The landscape and garden retail industries are part of the nursery value chain, employing an estimated further 13,500 workers.

In BC, homeowners spend \$247.5 million dollars on nursery and floriculture products including seeds, vegetable and fruiting plants, trees and shrubs, with a further \$541 million spend on garden supplies and services, and a further \$203 million on horticultural services.

Ensuring homeowners, public and private spaces in BC have access to healthy plants is critical to the long-term success of the Government of BC's environmental initiatives, including 'Trees for Tomorrow' to reduce greenhouse gases in the atmosphere.

Water plays a critical part in the propagation and production of plants to the standard required for good plant health, along with growing medium, plant nutrients, heat and light.

Watering of plants in nurseries is currently performed with a variety of methods, including trickle irrigation, capillary mats, misting, as well as overhead sprinkling. Water sources include city water, wells, as well as waterways. Watering is scheduled either through timers or computers for optimal water retention with minimal water evaporation during hot weather, and also to cease watering during the rainy seasons.

Many nurseries growers have benefitted from the Environmental Farm Planning Program, which enables them to upgrade the water practices to minimize usage with partial funding provided by the federal government. The BCLNA encourages the BC government to encourage further adaptations to minimize water use and maximize

BCLNA – Water Act Modernization

efficiencies with the development of additional cost-shared funding programs to augment federal monies to assist producers to transition to more efficient systems.

While adequate water is critical, good drainage is also a necessity to ensure that disease pathogens in the soil can not move into the plants through standing or moving water.

The quality of water is important, as salinity, alkalinity and purity are critical to plant health. Municipalities should not be allowed to discharge untreated effluents into waterways in BC.

Goal One:

Protect Stream Health and Aquatic Environments

Agriculture must be considered a priority user of water, to provide food and to sustain a healthy green environment. Issues of drought planning management and priority of water rights need to be clarified. Resources need to be provided to develop the infrastructure for provincial water including:

- Mapping and categorization of water resources
- Development of drought management plans
- Research to discover 'new' water sources, whether by efficiencies of existing sources or new

Goal Two:

Improve Water Governance Arrangements

The Government of BC must maintain the responsibility for water licensing, governance and enforcement of the Water Act. Its obligation should be to provide data and information of snow pack, water levels and flow rates and work with stakeholders to develop a mechanism to base allocations of water on science, with goals to adequately address water needs over the long term.

Regionally, water use should be delegated to municipalities or regional districts to enable agricultural producers and other shareholders to collectively decide how best to organize the usage of water. However, the rights of agriculture to water resources should be entrenched provincially.

The nursery industry in BC has a major concern that the Department of Fisheries and Oceans and Fish Habitat regulations supersede the Water Act and the industry's need for water. It is imperative that the Ministry of Environment's Water Act has 'teeth' to

BCLNA – Water Act Modernization

adequately enforce water policies and ensure agriculture's right to water is respected. The current system of multi- jurisdictional overlap must be streamlined.

An assured, affordable and adequate water supply is needed to support agriculture and the land included in the Agricultural Land Reserve. Water can not be treated as a marketable commodity, as it is a limited resource, both underground, as well as over ground in many jurisdictions.

Goal Three:

Introduce More Flexibility and Efficiency in the Water Allocation System

Water allocation for the nursery industry must be flexible. Unlike crops that are “one product – one season” to harvest (such as wheat), one plant may be marketed in up to 7 different sizes with the duration of the production period up to 10 years. All stages and sizes require various amounts of moisture. A nursery may have up to 3,000 different varieties of plants (in up to 7 different sizes, of varying ages), grown in containers, as well as out in the field, requiring different amounts of water depending on the requirements and type of plant. The ‘one size fits all’ allocation formula with regards to water allocation will not fit the nursery industry.

As consumers make the shift to more drought tolerant, hardier plants, water requirements may diminish, although initial propagation and production of plants will continue to require significant amounts of water to bring them to a marketable size.

Goal Four:

Regulate Ground Water Extraction and Use

Further research is required to accurately establish (and predict) size, recharge capabilities and discharge requirements of aquifers. Decisions to manage ground water effectively should be based on unbiased scientific findings.

First in Time First in Right (FIT FIR) must apply to protect the investment of water users who have already discovered, developed and maintained this water source. Protection of rights to groundwater needs to be addressed.

BCLNA – Water Act Modernization

The BCLNA supports the position of the BC Agriculture Council on remaining water issues.

The BCLNA appreciates the opportunity to provide its perspective to the Ministry of Environment's public consultation process regarding the modernization of the Water Act.

Respectfully submitted.



Ruth Olde
President



Sandy Mathies
Vice-President