

**From:** Thistle Consulting Services \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*  
**Sent:** Monday, March 14, 2011 11:44 PM  
**To:** Living Water Smart ENV:EX  
**Subject:** Comments on British Columbia's New Water Sustainability Act

March 14, 2011

Please accept these as our comments on British Columbia's New Water Sustainability Act, which the Government is presently considering.

Many concerns have been expressed by residents in the mid Vancouver Island region regarding the lack of information and understanding about the groundwater and aquifers that supply our water needs. As well, the failure of the BC government to ensure that our local government follows due process, and meets provincial regulatory requirements, has proven to be a very difficult problem as residents attempt to plan for community, residential and development needs in the region.

The lack of opportunity to participate in decision-making related to water protection and provision has led to poor practices and inappropriate development approvals - endangering the long-term interests of residents and viability of local aquifers. Management of our local water resources has been neglected, raising concerns that preferential treatment is relegated to special interests meeting behind closed doors. Public awareness and involvement is minimal. The importance of this public resource as it affects rural prosperity, agricultural and food security bottom lines is given passing consideration.

In short the water regulatory framework and enforcement has poorly served local residents, watersheds and the carrying capacity of essential ecological systems.

At a provincial level we would also note our strong objection and opposition to any and all attempts to commodify BC's water resources, to make them market-friendly or to permit water licenses to be transferable. All such changes will lead to a de facto quota system, privatization, export and the control of local water resources by outside interests.

We would finally support those recommendations put forward by the University of Victoria POLIS Water Sustainability Team. The four key aspects provide a solid basis by which the public interest might be assured, and we have copied them here to emphasize essential elements that a modern Water Sustainability Act requires:

- The priority of environmental flows over other non-essential human uses, and the need for clear binding and legally enforceable rules, as opposed to guidelines.
- An allocation system that embeds the public trust to build resilience and avoid conflict.
- Commitment to shared watershed governance to ensure those who are affected have a say in relevant decisions. Support for co-governance and substantive local participation on key water (and other resource) decisions must be enabled.
- Accountability and oversight to provide British Columbians with transparency and confidence that what is promised will be done.

We would appreciate being kept informed as additional opportunities arise to participate and contribute to water sustainability and stewardship matters in British Columbia.

Thank you.

Laurie Gourlay  
(250 722-3444)

President, Mid Island Sustainability & Stewardship Initiative  
P.O. Box 333, Cedar, B.C., V9X 1W1 <[www.missimidisland.com](http://www.missimidisland.com)>  
<[info@missimidisland.com](mailto:info@missimidisland.com)>

\*\*\*\*\*