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Water Sustainability Act
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British Columbia Ground Water Association
Review Comments and Recommendations on the
WATER SUSTAINABILITY ACT PROPOSAL
NOVEMBER 13, 2013

To whom it may concern;

The BC Ground Water Association (BCGWA) was established in 1970 as an organization for those working in the groundwater industry. Since that time we have been involved more or less in the process of development of reasonable regulations to protect groundwater as a public resource for the benefit of all. We have been involved since the mid 1990's on provincial government activities intended to better manage the resource including the *Ground Water Advisory Board* and the *Living Water Smart – Water Act Modernization Process etc.* We wish to express our pleasure that the MOE is proceeding with the *Water Sustainability Act* creation and offer our full support.

We respectfully offer the following Recommendations:

1. We see the creation of the WSA as part of the governance process whereby it is the framework for following **Regulations**. We see the Regulations as being a vital part of the process and feel strongly that the current momentum should be maintained for their creation. We welcome the opportunity to review the Regulations and work with the MOE on the final product that will address our mutual concerns for this precious resource.
2. We have a concern that the separate management depth of 600 meters to Saline Groundwater may not be sufficient as the geology in BC can be quite variable when compared to our neighbours to the east. We recommend that a greater depth be considered.

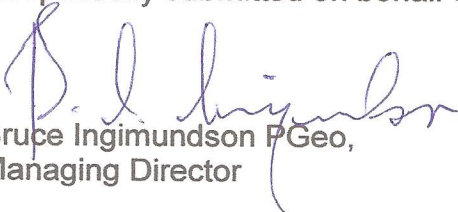
3. The management of the intrusion of salt (sea) water regulations must be strengthened. This should include restrictions on near shore wells drilled to purposely intercept sea water except in cases where risk to other wells and aquifers is shown to be negligible, since the negative impact on near by freshwater aquifers and wells can be very significant.

4. We are concerned that the ground disposal of waste water is not adequately managed in BC. We recommend that strict regulations be forthcoming to protect natural groundwater from the intentional intrusion of waste waters such as road runoff and untreated commercial waste water. All waste water must be treated to meet groundwater quality standards before injection into an aquifer and done only under an MOE permit process.

5. It is imperative that sufficient funding be established and upheld to manage and protect our groundwater resources. This funding must include providing sufficient Ministry staff to properly manage the requirements of the **Act** and enforce subsequent **Regulations**.

6. We further recommend that funding be made available to provide for well owner education such as the highly successful *Well Owners Workshop* program of recent. There is a significant value in educating the public about the value of our precious resource leading to groundwater protection and sustainability.

Respectfully submitted on behalf of the BCGWA:


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