



'voice for the BC landscape horticulture industry'

November 1, 2013

The Honourable Mary Polak
Minister of Environment
Government of British Columbia
Victoria, BC V8W 9E2

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BCLNA Submission regarding Water Sustainability Act

The BC Landscape & Nursery Association applauds the work of the Ministry of Environment, the Ministry of Agriculture, their directors and officials with their engagement of stakeholders within the agricultural industry to provide thorough discussions and communication on this important issue. The BCLNA has played a consistent and active role in this process, providing written remarks at the start, engaging in long term involvement in the BC Ag Council's Water Committee to encouraging and working with the industry to develop water efficiency plans through the Environmental Farm Planning process. BC nursery growers continue to work towards water efficiency, understanding that water is a precious resource.

Living plants require water to grow, clean the air and produce oxygen. The Province's Air Action Plan for 'Trees for Tomorrow' to support and develop urban forests to minimize climate change is contingent on water for its success, from plant's inception until they become established in the landscape. Plants produced by this industry are grown for harvests of fruit, vegetables, nuts as well as aesthetics and environmental benefits, with the commonality that all require water throughout the growing and ripening process, benefiting the air, health and pleasure of the citizens of BC.

The proposed Water Sustainability Act is significant and comprehensive. Horticultural crops require a secure source of good quality water to ensure plant health, build and maintain soils, complete the production cycle and grow to successful plantings in the commercial and private garden setting.

The BCLNA supports the intention of the proposed legislation, with these additional comments:

1. FitFir

BCLNA supports 'first in time, first in right' (FiTfir), as many agricultural producers have built their operations on their assurance that they have the quantity and quality of water they require for the business they are running.

2. AWR Jurisdiction should be separate from WSP

The Agricultural Water Reserve (AWR) process should be removed from jurisdiction under the Water Sustainability Plan (WSP). Recognising the existing commitment to agriculture under the ALR the AWRs should be developed under a separate policy stream to ensure that water for agricultural land is retained on a timely basis and not delayed by conflicting needs of municipalities, developers and other

non-agriculture parties. Water for agriculture and AWR's should be included in WSPs but should not be dependent on a WSP for its existence. At a minimum the existing water use for agriculture should be enshrined in interim AWRs while WSPs and the future needs of agriculture are negotiated.

3. Agriculture and Ministry Representation on WSP committees

Where Water Sustainability Plans are undertaken, an agriculturist, representatives from mainstream or commercial agriculture and a BC Ministry of Agriculture official should be required to participate as stakeholders on regional committees.

4. Support of Water Use Planning with caveat

The BCLNA supports the Water Use Planning process where it ensures there is sufficient water allocated to AWRs for all potentially cultivated agricultural land, not just land that is currently in use.

5. Municipal Water issue needs to be addressed

The issue of municipal control over water rights, pricing and resources needs to be resolved. Municipal power to expropriate water licenses, power over pricing of ag water by volume and reluctance to supply infrastructure to farm gates are just a few of the conflicting interests allowed in current legislation.

Where municipalities are the water provider, they must be required to provide the agricultural users on their system with a designated amount of water, based on FitFir and as reserved under applicable AWRs. The growing need for potable water for some agriculture sectors and the high price of municipal water for high volume ag users needs to be addressed both in the WSA and the Municipal Act if affordable food pricing is to be achieved.

Water provided by municipalities should be priced at a comparative rate to other agricultural water pricing.

6. Measuring & Reporting must be reasonable and convenient

Measuring and reporting water use, or implementing water use efficiency measures should be closely monitored to ensure that the costs are not excessive and do not pose a financial hardship to the user. Simple online estimating tools should be developed that allow for annual reporting and monthly estimating. Self-reporting should be enabled and the need for "consultants" or "accreditation" avoided.

7. Defining Household Need and Domestic Animals

The BCLNA supports defining maximum Essential Household Need during times of shortage to 250L/Day or less and also notes the need to restrictively define "domestic animals".

8. Water Currently in Ag should be Protected for future Ag Needs

When water is freed up under an agriculture licence after a review or through use of more efficient irrigation methods the water should be protected for agriculture and kept within the appropriate AWR.

9. Ensure Resources are in place to resolve and monitor issues

It is the BCLNA's perception that the MOE and MOA are not sufficiently funded to have the appropriate resources to monitor and resolve current water issues let alone the new requirements coming under the WSA. Proper resources will be essential to the success of the WSA and AWRs.

10. Cost to administer WSA should be net zero revenue

The cost to administer the Water Sustainability Act should be on a net zero/cost recovery basis, and not be a new revenue source for BC general revenues (or any local, regional, provincial or federal government). There should be no new or modified costs; all fees and costs should be open and transparent with accountability .)

All users of water included under the WSA including BC Hydro and Oil and Gas should be paying fees in support of the WSA.

The BCLNA supports the intent and objective of the proposed legislation. However, the viability of agriculture, food security and success of the urban forest to mitigate global warming and greenhouse gases must be placed as a very high priority for the long term success of the province for many reasons.

The BCLNA also encourages the BC Ministry of Agriculture to continue access to funding for water efficiency through the EFP program. This funding enables producers to be more efficient of water usage while increasing production to sustain the agricultural industry as well as for the public good.

The BCLNA represents over 650 nursery growers, garden retailers, landscapers and other allied industry stakeholders, providing advocacy, education and many programs for its members with the goal to increase professionalism in the industry.

If you have any questions, please contact the writer, or Hedy Dyck, Chief Operating Officer at the BCLNA.



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