



#201 - 909 Island Highway
Campbell River, BC
Canada V9W 2C2

Tel: 250 286-1636
Fax: 250 286-1574

1-800-661-7256
www.salmonfarmers.org

November 15, 2013.

Honorable Mary Polak
Minister of Environment
PO Box 9047 Stn. Prov. Govt.
Rm. 247, Parliament Buildings
Victoria BC, V8W 9E2

Dear Minister Polak,

Thank-you for the opportunity to provide feedback on the Water Sustainability Act for B.C. – Legislative Proposal. As a key economic driver in the province of British Columbia and an important player in building sustainable coastal communities, policy and legislative changes affecting our farmers are deeply important for all British Columbians. The salmon farm industry has made significant investment in British Columbia to become B.C.'s largest agricultural export. A key to the success and development of our sector is based upon the access to a freshwater supply to produce the highest quality smolts for saltwater grow out.

In reviewing the proposed legislative changes, we have several recommendations which we believe will further enhance this legislation while also ensuring it serves the needs of our unique industry. For your information, we have attached a summary of our recommendations along with our comments on each of the noted sections of the act. As you will read, our comments reflect the unique challenges and opportunities of our industry operations and informs the rationale behind our recommendations.

Our five recommendations are:

1. Ensure the aquaculture industry has access to healthy water as a priority user
2. Include explicit reference to aquaculture as a food producer
3. Ensure no periodic reduction or suspension of water for our hatcheries
4. Ensure agricultural water reserves apply to aquaculture
5. Ensure strong provincial oversight of this new legislation rather than relying on regional management

Along with our comments we have included general information on our industry freshwater facilities, their requirements for freshwater, advancements made and our commitment to protecting B.C.'s fresh water moving forward.

Please do not hesitate to contact us should you have any questions about this submission.

Sincerely,

A handwritten signature in blue ink that reads "Mary Ellen Walling".

Mary Ellen Walling
Executive Director , BC Salmon Farmers Association

BC Salmon Farmers Association Submission on the Water Sustainability Act for B.C. – Legislative Proposal

Introduction

The BC Salmon Farmers Association appreciates the opportunity to provide feedback on the Water Sustainability Act for B.C. – Legislative Proposal. A key to the success and development of our sector is based upon the access to a freshwater supply to produce the highest quality smolts for saltwater grow out.

Recommendations

In reviewing the proposed legislative changes, we have several recommendations which we believe will further enhance this legislation while also ensuring it serves the needs of our unique industry. In this submission we have provided our comments on what we believe are the pertinent sections of the act as they pertain to aquaculture. We have also provided information on our industry's history with freshwater use and its importance in our success. This history and our comments on the proposed legislation have informed our five recommendations, which are:

1. Ensuring secure access to healthy water (good quality and adequate quantity) as a priority user
2. Explicit reference to aquaculture as a food producer
3. No periodic reduction or suspension of water as this would have huge economic and fish health and welfare ramifications.
4. Agricultural water reserves apply to aquaculture
5. Strong provincial oversight, not regionally managed

About BC Salmon Farmers and Water Use

Access to a good freshwater supply provided the basis for the establishment of the salmon aquaculture industry within British Columbia. Freshwater aquaculture facilities are located within close proximity to the marine environment, and rely on surface water and groundwater sources of freshwater to raise fish at the early stages of their development. It is of vital importance to the industry that clean and ample supplies of water are accessible as the rearing of juvenile salmonids and brood stock holding facilities requires the protection of stream health and the aquatic environments to produce a high quality farm stock.

Our facilities are non-consumptive, in that we return the freshwater (either groundwater or surface water) to the marine environment or back to source. The industry is diligent in managing use of the water sources to maximize freshwater production.

Our sector has made major investments to optimize production through technology and infrastructure and to use our water resources responsibly. We have been in the forefront of developing and implementing re-circulating aquaculture system technology (RAS). The industry may augment water supplies through oxygenation systems, heat transfer and sterilization systems. Our farmers have a track record of striving for improvements, both biologically and financially to produce the highest quality smolts with diligent use of their freshwater source.

Water use efficiency is an on-going process within our sector. We have made significant capital cost commitments to streamline all costs to remain competitive in the farmed salmon marketplace and optimize rearing conditions and production. The salmon farm industry operates under best management practices and adheres to international standards to demonstrate this commitment.

Comments & Concerns

Water Pricing

While we understand that there may be increases in fees, we are concerned that significant increases in costs could affect our farm companies' competitiveness in the market and threaten long-term viability.

Ensuring secure access to healthy water (good quality and adequate quantity) is a priority for the continuing development of salmon aquaculture in British Columbia. Future development of B.C. aquaculture must be able to use this competitive advantage to compete in the global economy of seafood production.

2.3.1 General Water Use Purposes

Our farmers require access to freshwater at the current levels to sustain production and in some areas will require increases in the future to grow our sector. We recommend a specific purpose for water use related to aquaculture be developed rather than maintaining its inclusion within the broader industrial purpose. This would better inform the definition of a reasonable amount of water to be allocated to raise fish. We recommend that this water purpose be under the agriculture classification but specifically named as aquaculture and recognized as a non-consumptive user.

Ensuring secure access to healthy water (good quality and adequate quantity) is a priority for the continuing development of salmon aquaculture in British Columbia.

Regulation of Surface Water: First in Time, First in Right System of Rights Allocation

Water rights in B.C. may be exercised under a system of priorities according to their respective priority dates

Industry would support the First- In-Time, First-In-Right and a Priority of Use approach to managing water – including groundwater. As a food production sector, industry must be weighted as a key priority. Aquaculture facilities, like waterpower projects, are non- consumptive and utilize water resources differently than consumptive users.

2.3.2 Protect Stream Health and Aquatic Environments - Environmental Flow Needs

Our farmer's freshwater facilities require access to freshwater at the current levels to sustain production and in some areas will require increases in the future to grow our sector.

Considering that the health and welfare of our fish is dependant upon current levels of use, restrictions in use would severely affect industry production plans and continuing investment into British Columbia.

For salmon farmer licensees, who utilize water to maintain the health and welfare of their product – periodic reduction or suspension of water would have huge economic and fish health and welfare ramifications. Hatchery water use is determined by the biological load within the system. Any reduction or suspension could increase physiologic stress to the point of mortality regardless of the timing of the potential suspension at any point during the production cycle.

2.3.1 Consider Water in Land Use Decisions

The establishment of Provincial Water Objectives (PWOs) is recognized as a means to address land use and water allocation. As the PWOs are developed, the salmon farming sector requires direct consultation to determine the status of fish culture within these objectives.

2.3.4 Regulate and Protect Groundwater Use

As discussed previously, water pricing concerns our farmers because of the potential impacts on industry viability and competitiveness in the marketplace. The enabling of economic instruments needs to recognize our sector's commitment to continually improve water use efficiency in terms of food production, most specifically the advances in the re-use of water and water optimization for production.

Transitioning existing groundwater users

The transitioning of existing groundwater users must have very explicit timelines and be communicated to historical users to achieve timely transition under the WSA. If fees are to be imposed they would have to be uniformly administered; as the time for transition is based on priority dating.

2.3.5 Regulate During Scarcity

The needs of our farmers operating freshwater production facilities must be considered as agricultural users. Any periodic reduction or suspension of water would have huge economic and fish health and welfare ramifications

2.3.6 Improve Security, Water Use Efficiency and Conservation Beneficial Use

The criteria for water use efficiency requirements and the criteria and form of a water conservation audit must be understood within the context of the use for all freshwater aquaculture in the Province – including federal, provincial, public and private aquaculture. As BC's largest agricultural export, freshwater use for salmon production must be considered as use in agriculture however our facilities are non-consumptive. Any increased costs to monitoring and efficiency will increase costs for our farmers and will affect BC's ability to compete globally in aquaculture.

Agricultural Water Reserves

Farmed salmon is recognized as British Columbia's largest agricultural product but operates outside the Agricultural Land Reserves. Our freshwater operations should be considered within the agriculture sector and have secured water access under this designation.

Review of Licence Terms and Conditions Proposal

As detailed previously, the salmon farming sector in BC has made many technological advances in water use. Our sector will continue to refine, develop and adopt technological advancement to maintain water use efficiencies. The length of the 30 year review allows for the farmer to implement such changes within a secure business environment.

2.3.7 Measure and Report Proposal

Given the proposed changes the hatchery and brood stock holding facilities would become regulated as users of large groundwater withdrawals if determination is to be the range >250 cubic metres per day. All proposals will add increased costs of production and will impact the competitive ability of our farmers.

The establishment of these proposals should be addressed with the following considerations:

- Global competitiveness, freshwater as a competitive advantage
- Beneficial and efficient use
- Salmon farming included as an important agricultural sector, regionally and globally
- The economic and social benefits to rural and coastal communities
- The non-consumptive use of freshwater by our farm sector

- Business certainty needs for our farmers
- Technological advances.

2.3.8 Enable a Range of Governance Approaches

We believe there should be strong provincial oversight and a clear and consistent regulatory framework for agriculture, which includes aquaculture freshwater facilities.