



CREC

Campbell River Environmental Committee

CREC , PO Box 20092 STN. A, Campbell River, B.C.,V9W 7Z5

Water Sustainability Act,
Ministry of Environment, Water Protection and Sustainability Branch,
PO Box 9362 Stn Prov Gov, Victoria BC, V8W 9M2.

November 14, 2013

Re: CREC comments to BC Water Sustainability Act

Dear Minister,

Please accept this submission from the Campbell River Environmental Committee (CREC), a legally registered society, whose actions and activities have been guided for over 30 years by its mandate to ensure a healthy environment using principals of sustainability for the benefit of present and future generations.

1. Flow:

The flow of water through lakes, wetlands and streams is fundamental for their respective function and health. The new act must ensure that environmental flows are maintained in water allocation decisions and in existing water licences.

Legal ecosystem flow standards, rather than guidelines, should be the highest priority when issuing water licences.

A withdrawal and restructuring of existing licences is needed to ensure ecosystem flows are protected. Where stream health is compromised, licences must be reduced or amended to ensure adequate flows.

2. Groundwater:

Aquifer use should not be over allocated or compromised. The priority structure should be conservation first and then domestic use.

Large groundwater use must be discouraged or disallowed to safeguard sufficient water for domestic and agricultural use.

Aquifer and wetland mapping must increase to cover more areas of BC. The travel of contaminants via groundwater and aquifers must be considered when issuing water licences.

3. Protection:

The protection of groundwater, stream health and aquatic environments should be the overarching principal of the new Water Sustainability Act.

The protection of wetlands is especially needed. The important functions of wetlands are fast becoming compromised due to development and industry use.

Groundwater and aquifers must be protected from contaminants at all costs.

The precautionary principle should be used as a key tool to protect ecosystems and stream health.

Amendments to the Environmental Management Act and provisions in the Water Sustainability Act to not use the natural environment to dilute effluent are needed. Flows for stream health should not be used to dilute effluent as this action contaminates the very water needed for a healthy ecosystem. Prior to release of contaminants into the natural environment by industry, industry should have the legal obligation to treat effluent to a level that does not require dilution by natural streams or wetlands. The dumping of potentially harmful substances into streams, wetlands and aquifers must be prohibited.

4. Regulation:

The public ownership of water must be recognized and there must be a responsibility of users to manage water for public benefit.

Regional participation by a regional advisory group for local water management comprising local government, local NGO's and the public is needed to ensure appropriate water management and a healthy ecosystem.

There is a need for clear rules around water allocation in land use planning including zoning and land use decisions.

Compliance and enforcement rules must be clearly delineated in the Water Sustainability Act.

Yours truly,

Campbell River Environmental Committee

per

Leona Adams

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President

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