

From: Conservation Society [mailto:ccentre@cccconserv.org]
Sent: Tuesday, November 12, 2013 1:11 PM
To: Living Water Smart ENV:EX
Cc: ccentre@cccconserv.org
Subject: Feedback on Water Sustainability Act

Re: Water Sustainability Act feedback

The updating of the BC Water Act is long overdue and we congratulate the province for developing the Water Sustainability Act. It is a long awaited step in the right direction, however we do have some concerns and suggestions.

Our first suggestion is that you extend the comment period beyond November 15 to give the public more time for meaningful input.

British Columbia is indeed fortunate to have "more than 290 unique watersheds, including fish-bearing rivers and streams, spectacular lakes and exceptional wetlands" but given the pressures on these watersheds and the uncertainties of climate change, there is no guarantee our water supply is infinite.

We all agree that because water is essential to all life on earth, water sources must be protected, managed and shared in a way that ensures adequate supplies now and for future generations, not only for human use but for all wildlife, both freshwater and land-based species. That won't happen unless there are stringent regulations accompanied by provisions for oversight and accountability.

One of our concerns is that the Precautionary Principle, the key to sustainability, seems to be missing from the proposed Act. The possibility of any negative impacts on all aspects of water use must be taken into account, and that would include damming, development, industrial usage, polluting, and any other factors that could damage water sources or water quality.

The "fracking" process used by oil and gas companies in the production of liquid Natural Gas uses billions of litres of water and is an example of our concerns. Do we know the long term impacts of the process? Does the government keep a running inventory of how much water is being taken compared to the capacity of the water sources to renew themselves?

Industrial use of water must not take precedence over other users and the operations must be regulated and closely monitored to ensure they aren't creating problems for the future. Industries should pay as much or more per litre than domestic users and the fees should more than cover all administration cost incurred. All users should be responsible for mitigation of any damage. Should a project be terminated for cause, that action must be exempt from any lawsuit under free trade agreements.

The ecological benefits of watersheds, including riparian habitat, must be protected from abuse from both commercial and recreational users, and we

suggest both local groups and scientists set the standards for use. The development and implementation of technology for efficient use of water and water consumption reduction should be encouraged and adequate funding be made available for this work. Education is a key factor here. For the past eight years our organization has partnered with the City of Williams in delivering Water Wise education and three years with both the City and Cariboo Regional District with Waste Wise conservation programs in the schools and for the general public. Activities like this could be the model for other communities.

The Act should recognize that water is water, no matter the source, and legislation should be co-ordinated with the different land use ministries (Forestry, Mining, Energy, Agriculture, etc.) rather than having a confusing hodgepodge of rules.

Diana French, President
Cariboo Chilcotin Conservation Society

250.398.7929
sustain@ccconserv.org
www.ccconserv.org