

Comments on the Water Sustainability Act

1. Beneficial Use/Metering and Reporting

- We support the notion of using water efficiently but feel a requirement for metering at the customer or individual level is necessary to accomplish this. It appears metering will only be required on the source withdrawals for “larger” customers.
- Metering and implementing higher efficiency standards for the agriculture sector will ensure sufficient water resources for the future. Competition will not be a concern when the resource is threatened. Investing now will allow long-term sustainability and will reduce costs.
- Water Pricing - Make full-cost accounting mandatory for all local governments

2. Range of Governance Approaches

More clarification is necessary regarding the alternative approaches and how funding is to be provided. The fear on our part is that governance could be downloaded to local governments with no funding to address additional staff or studies required for proper governance. This is particularly applicable to groundwater extraction in our area. The aquifer crosses an international boundary and contributes to the flow of a surface watercourse containing species and habitat that are classified as endangered.

3. Regulate and Protect Groundwater Use.

- We strongly support regulation of groundwater use but feel the act needs to go further in identifying the processes needed for determining the sustainable withdrawal from the aquifer and assigning authority to issue authorization. Performing the studies and development of groundwater models is complex and costly. Governance and financial responsibility must be considered and should not just be downloaded to local governments that likely do not have the resources available.
- The recommendation that new users applying to extract and use groundwater be required to assess the impact of their proposed extraction and use on known existing users should be reconsidered. In most cases the user will not have the resources to perform such an analysis. There are incomplete records of existing users and determining the impact of proposed flows from a new application can be very complex. In our case the aquifer cross the Canada/US border so there is an international component to consider. It is recommended that, at least in cases where there is a large heavily utilized aquifer, that the Ministry develops a model and determines the impacts of proposed withdrawals.
- Why make exemptions for domestic use purposes – this does not promote efficiency or honesty

- Self- identification will be challenging

4. Water Sustainability Plans.

The concept of water sustainability plans is commendable. However it is recommended that a comprehensive list of watersheds and aquifers requiring sustainability plans be developed. In addition, studies should be undertaken at a Provincial level that would determine sustainable withdrawals from these water sources.

5. Protect Stream Health and Aquatic Environments

Linking the Fish Protection Act and Water Sustainability Act will help enforce regulations

6. Consider Water in Land Use Decisions

Watershed management should be mandatory

7. Improve Security, Water Use Efficiency and Conservation

- Mandatory water conservation audits is an excellent idea
- How does the province plan to meet the Living Water Smart objectives that the province will become 33% more efficient and 50% of growth will be met through conservation by 2020 without making metering mandatory?