

Freshwater Aquaculture Association of BC
c/o 2930 Jameson Road
Nanaimo BC V9R 6W8
steve@freshbcsalmon.com

November 15, 2013

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

livingwatersmart@gov.bc.ca

I am writing on behalf of the Freshwater Aquaculture Association of BC. Several of our members have raised concerns regarding the possibility of the proposed new Freshwater Sustainability Act to have an adverse impact on our industry. Most of our members are family farms or hobby level aquaculturists and don't have the luxury of corporate financing so any additional costs are felt immediately and have an impact on family level expenditures. Water is the basis of our industry and the imposition of fees for its use by us will have a very negative effect.

Some concerns / questions / comments that have been raised are:

1. Producers are very concerned about changes in fees and the proposed increases in fees, especially given that proposed new fees will include ground water.
2. Given the nature of aquaculture operations, aquaculture is seeking recognition as agriculture-type activity. In this context they would like to balance water use fees (to be as low as possible given dependence on water) but recognition as a priority user.
3. Will "protection" be carried over to fish farms that depend on water to keep fish (aka livestock) alive during times of shortage?
4. Aquaculture would like recognition that use is non-consumptive and unique. In most instances effluent water is subject to a high degree of filtration before it's discharged.
5. There is a difference between aquaculture and facilities that use recirculating aquaculture systems (RAS) and public enhance facilities that use single pass, non-recycled water.
6. The aquaculture industry seeks recognition for efforts to develop RAS systems for efficient use of water (up to 99% recirculated).
7. They would like clarification regarding alignments with the Fish Protection Act and the Water Sustainability Act with respect to prohibited substances deposited to aquifers. For example, fish hatchery effluent contains "animal" (i.e. fish) wastes. What does this mean with respect to this section? What can they expect?

8. Exemptions for saline water. If a fish farm/hatchery uses a saline well for source water (which is the case in some instances) will they be exempt from fees as is currently being proposed for exempting saline water from deep wells used in the oil and gas industry?

We would ask that consideration of the very unique place of the freshwater aquaculture industry be taken into account in the drafting of this new legislation, and that policies be put in place that would support this very important emerging sector.

We would request a meeting with the Director of Water Protection and Sustainability at her earliest convenience to discuss the potential impacts of this legislation.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Steve Atkinson', with a long horizontal stroke extending to the right.

Steve Atkinson – Chair
Freshwater Aquaculture Association of BC