



November 14, 2013

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

RE: Legislative Proposal for the Water Sustainability Act

Dear Water Sustainability Act Team:

Thank you for providing an overview on the legislative proposal for the Water Sustainability Act to our members on November 6, 2013. We appreciated the opportunity to learn more about the Proposal and to ask questions in an attempt to gain a better understanding of the details of the proposed Act.

The Mining Association of British Columbia (MABC), established in 1901, represents companies involved in the exploration and development, mining and smelting of minerals, metals, coal and industrial minerals in British Columbia. It is regarded as the pre-eminent voice of mining in the province. The comments provided below reflect the combined views of members of MABC. Individual member companies may provide more detailed comments in the technical areas relevant to them.

As you can probably understand the proposed Water Sustainability Act is very important to the members of MABC. MABC agrees that British Columbia's supply of clean, fresh water is a tremendous resource that will provide benefits to society for years to come and should be protected and maintained for the benefit of current and future generations. We also believe that reliable access to water is a benefit to all British Columbians that we can use to help build a strong British Columbia economy.

MABC acknowledges that there is an inherent level of uncertainty when it comes to drafting legislation and it is for this reason that MABC will reserve the majority of its comments until after the proposed Water Sustainability Act is drafted. MABC does, however, have the following specific comments:

- Decisions relating to the proposed Water Sustainability Act, including any subsequent regulations and policies, should be science-based, centrally-led and focussed on resolving problems,
- Science and data requirements should not be downloaded to specific industries such as the mining sector, but instead should be the responsibility of all stakeholders,

- The proposed Act and subsequent regulations, policies and processes should be fair (the Act should not favour the future water use of one industry, such as agriculture, over those of another industry as suggested in the proposal), efficient, effective and transparent in order to preserve British Columbia's competitive advantage.
- MABC recognizes the need to regulate the extraction and use of groundwater, but warns that a blanket approach may be overly cautious, placing significant strain on regulatory resources and significant costs to current and future license holders and project proponents (eg. exploration and geotechnical dewatering wells).

MABC remains keenly interested in participating in the development of subsequent regulations and policy stemming from the proposed Water Sustainability Act.

Regards,



David Ewing, Vice President – Environment & Technical Affairs

BC's Voice of Mining since 1901

900 – 808 West Hastings St., Vancouver, BC V6C 2X4
Tel: (604) 681-4321 / Fax: (604) 681-5305 / Web: www.mining.bc.ca