



# MEC's Input to the Province on the Proposed Water Sustainability Act

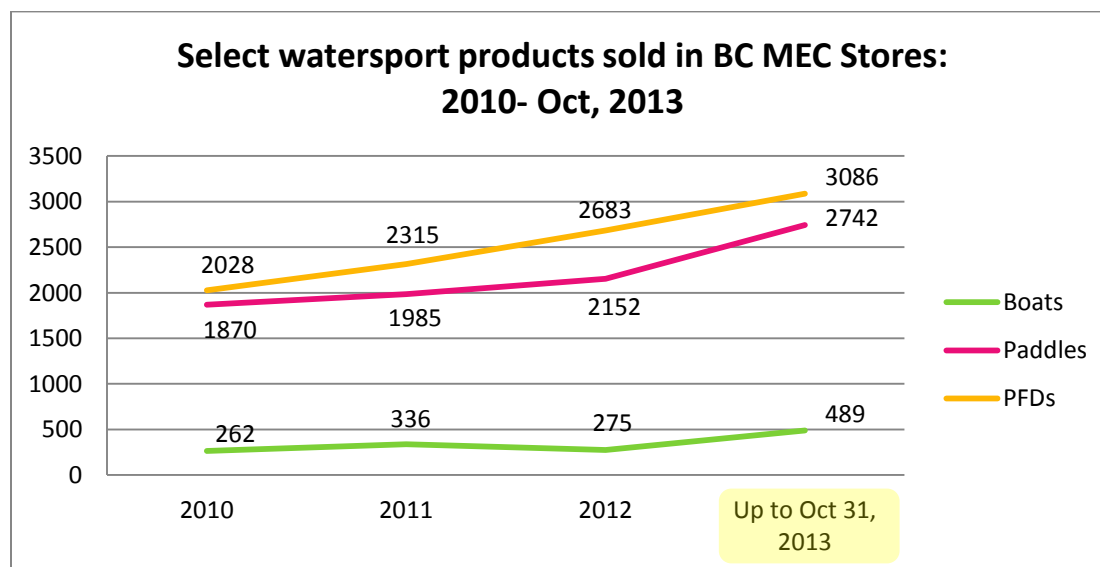
As a member-owned co-operative whose existence is tied to the integrity of the land – and water – on which British Columbians play and recreate – be it camping, canoeing and kayaking, climbing or hiking – Mountain Equipment Co-op (MEC) has a vital stake in water as a public resource. British Columbia's lakes, rivers, and wetlands are 'great natural pathways' that enable citizens to discover and explore the province's natural heritage. Citizens' direct experience on our water pathways also tends to instill a stewardship ethic toward them. However, without adequate protection, the economic, social and environmental benefits that flow from water resources are at risk. Fresh water that meets ecological needs and that flows in sufficient quantity is necessary for recreational interests to be preserved.

This is a great opportunity to create a strong *Water Sustainability Act* that creates certainty for our industry while protecting the fresh water we all rely upon.

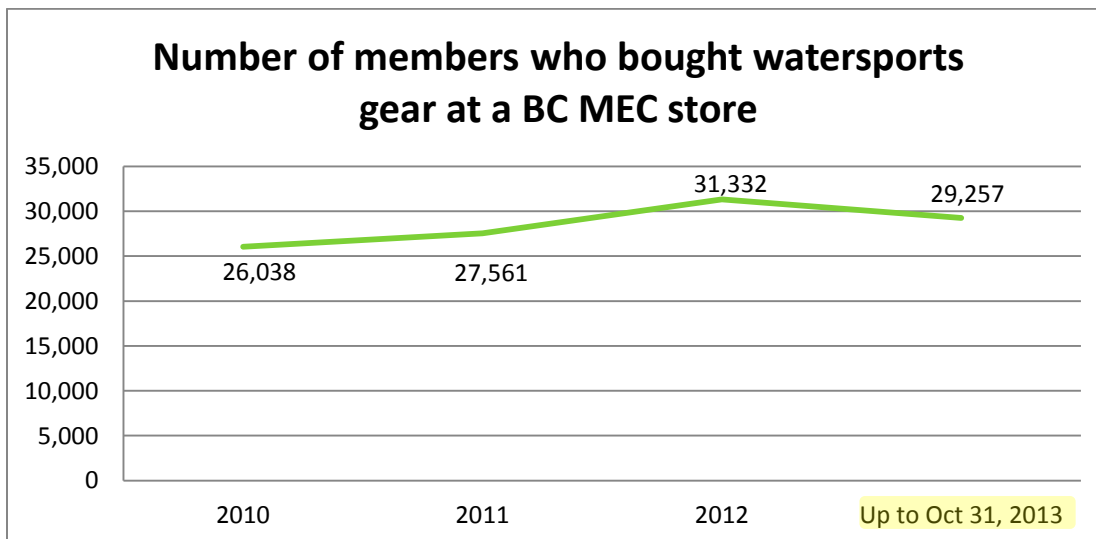
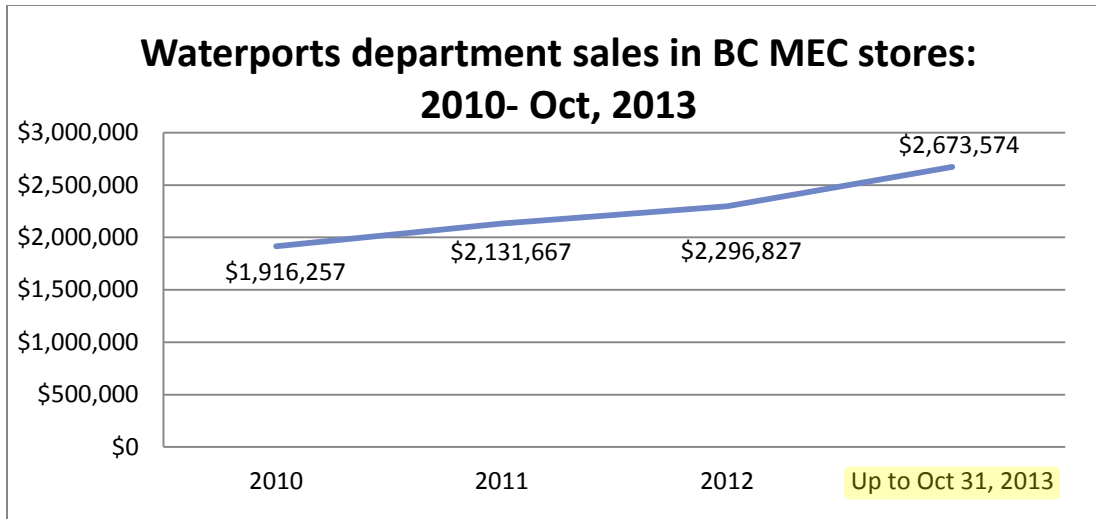
## MEC and Fresh Water in BC<sup>1</sup>

MEC has a large interest in fresh water issues in BC as the following figures attest to:

- Over 884,000 MEC members in BC (approximately 19% of BC population)
- Freshwater can be linked to almost any outdoor activity MEC members pursue. While directly relevant to watersports, rivers and lakes also provide great natural pathways and areas to recreate along. For any multi-day trip, clean freshwater sources are essential destinations.



<sup>1</sup> All figures for 2013 in this section were retrieved on October 31<sup>st</sup>, 2013. This leaves out a significant amount of products sold during November and December, the busy holiday season.



- The charts above speak to the significant, and growing, economic and member benefits water-based outdoor recreation provides.
- MEC sales represent an estimated 10% of the paddling product in Canada, focussing on the quality/performance end of the spectrum. This estimate does not consider a number of categories that are considerably larger such as fishing, boating, rafting, sailing, kite boarding and the tourism and recreation service industry such as lodges and outfitters.
- The amount of people that spend time on water and rely on it for recreation purposes is enormous.
- Grants in BC: MEC has made significant investments in the British Columbian water community. Between 2009 and 2012, we have given \$617,360 through 103 grants to water and watersports related projects. Measuring from 1987, those figures jump to \$1,864,532 through 201 grants.

## Specific feedback on the Legislative Proposal:

The health of the recreation industry is tied to the ecological integrity of the land and water where British Columbian's play and recreate. In addition, our industry requires certainty, and an ability to create long-term plans based on legislation versus discretionary decisions. As such, MEC, representing recreational interests and over 884,000 BC members, recommend the following:

1. Regarding our hope that the Water Sustainability Act will legislate in-stream and environmental flows and protect ecological needs:
  - Recreational interests require strong, legally enforceable Environmental Flow Needs (EFN) and Critical Environmental Flows (CEF) to ensure the health of ecosystems. The proposed WSA would be too reliant on the discretion of decision makers versus legally enforceable standards. We recommend EFNs, and CEFs be clearly defined and ecologically defensible, enacted as standards that are applicable to both new and existing licences.
2. Regarding our hope that the Water Sustainability Act will (1) uphold the public interest and environmental protection in water licencing and (2) ensure natural and social systems are resilient in the face of climate change and unexpected events:
  - Ensure the notion of the Public Trust is codified in legislation. We are in agreement with the Polis Project's [recommendations](#) in general, but especially on this point. We recommend that Public Trust language be included in the WSA which entrusts the government of British Columbia with the duty to preserve our collective fresh water resources and act in good faith in management decisions on an ongoing basis. Given the complexity of managing environmental resources, such as fresh water, ensuring a clause in the WSA which continually promotes sustainable water management is essential. An example of language that could be used is as follows: "The property in and the right to the use and flow of all the water at any time in British Columbia are for all purposes vested in the government in trust for the public, and any private rights established under licences or approvals under this or a former Act are subject to be managed in the interest of present and future generations."
3. Regarding our hope that the Water Sustainability Act will (1) mitigate against potentially harmful water impacts through proper planning, and (2) provide for public engagement, including with the outdoor recreation community:
  - The proposal with respect to water governance is on the right track. We highly encourage the WSA to explicitly enable watershed governance arrangements at the local level which would include recreational interests. These entities, to be successful however, need financing. As such, they should be given the ability to access taxable income or levy funds. A good example of this is seen in the Okanagan Basin Water Board.
4. Regarding our hope that the Water Sustainability Act will recover the full cost of administering the system and providing incentives to conserve
  - Groundwater is very badly underpriced at \$0.85 per 1000 cubic metres. As a public resource, the fees gained from industrial/commercial consumptive use of groundwater should at least cover costs to administer the system including basic administrative costs, monitoring, flow

assessment and enforcement. Indeed, the rents should even be sufficient enough to also be used to support other aspects of sustainable water management, for example, funding local water governance arrangements. We recommend a dramatically higher rental fee, and legislation which ensures those fees go specifically toward resourcing water management and governance versus general revenue for the province.