

Water Sustainability Act, Ministry of Environment

Our Views:

Due to the limited time allotted for public response, we must limit our views to generalities rather than detail. Had we a few more weeks or months we could expand on these points and should you wish, we would be pleased to draw up a formal detailed proposal related to these general points.

Concerns that we feel should be addressed in the new legislation:

- Environmental Flows must be protected and entrenched in an Act that supersedes all other Acts in BC as it is essential to maintaining healthy watersheds. There is no need to have some 14 acts regulate water.
- Local Governance bodies have the authority to decline licence requests if environmental flows would be affected in any negative way and have resources to ensure their directives are followed.
- Private entitlements should not impair nor interfere with the free movement of this public resource.
- Water is a Common and the government is a steward of that Public Trust – to wit:
 - *The property in and the right to the use and flow of all the water at any time in a stream or in groundwater 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 any other Acts or former Act are subject to be managed in the interest of present and future generations.*
- Water licences should be reviewed every 10 years unless climate changes are substantial in which case reviews can be shortened to 5 year intervals.
- Public participation should be enshrined so that people in the local governance area have representation on water boards and that all proceedings/licencing be conducted via public forums.
- Water fees should be raised to reflect actual administrative costs.
- Exemptions to Oil, gas, forestry, or mining only give those industries subsidies. That is unacceptable and should be removed from this legislation. All usage must be reflected in revenue generated and be subject to audit.

- Groundwater, stream water, lake water, river water is ALL water. It is all inter-related and what happens to one segment is reflected in the other. It is essential to life on this planet and as such it should ALL be protected for the living things on this same blue ball.
- This new legislation has to be very clear that water is NOT a commodity to be bought, sold, or traded. Nor should anything related to that water be considered a commodity.
- A **Water Stewardship Council** with far reaching regulatory powers should be enconced in this legislation to ensure adherence both in action and in spirit to the ideals stated in the opening of the legislation. All other acts by the Province should be of lesser precedence than this Act.

Respectfully submitted by:

The Parksville Residents Association
233 Crabapple Crescent
Parksville, British Columbia V9P 1H9

PH: (250) 248-9611

Anne Fairclough, Secretary