

November 22, 2013

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

Re: Legislative Proposal for BC Water Sustainability Act (WSA):

In response to Government's request for input, Tolko Industries Ltd. (Tolko) is pleased to provide input to the proposed changes and modernization of the Water Act.

Tolko is a leading manufacturer and marketer of a broad range of forest products to customers around the world. Founded in 1956, Tolko has grown from a small sawmill in Lavington, British Columbia, to become a company diversified by geography and product. Tolko manufactures lumber, unbleached kraft papers, panel products, co-products, biomass power, and a growing number of specialty wood products in its operations across Western Canada.

Tolko is supportive of Government's approach to modernize the Water Act but have a number of comments regarding the proposed legislation and ways to improve it. These include:

- Any new piece of legislation needs to ensure a balance of social, environmental, and economic objectives and a process to evaluate this balance.
- Water objectives need to be clearly articulated and need to be consistent with the Forest and Range Practices Act (FRPA). Specifically, the definition of "stream" needs to be consistent with FRPA.
- A Provincial wide strategy to guide water management. This one set of rules to guide all users will provide a consistent approach across the Province that can guide regional priorities and support regional programs.
- The Water Sustainability Act (WSA) should not reduce timber supply from the timber harvesting land base or increase costs to forest operators due to increased regulation.
- Potential duplication and overlap of both Provincial and Federal legislation. The WSA must clearly define and provide direction when these pieces of legislation overlap.
- Tolko ideally would like to see one comprehensive statute covering all aspects of water management applied consistently to all users and Industries.

- Water licence allocations should be based upon an over-arching plan for an area backed by a science based approach. Existing tenure holders rights should be protected and enhanced.
- The “essential household use” exemption should also include people using water in industrial settings such as logging camps.
- Tolko recommends an appropriate amount of time be given to stakeholders to formally respond to final options and recommendations for a modernized WSA.

Tolko appreciates the opportunity to provide comment on the WSA Legislative Proposal and looks forward to further dialogue in the future.

Sincerely,



Grant Glessing, RPF
Stewardship & Tenures – BC/Manitoba