



BRITISH COLUMBIA CATTLEMEN'S ASSOCIATION

Representing the Beef Cattle Industry of British Columbia

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Water Strategies & Conservation
Ministry of Environment
PO BOX 9362, STN PROV GOVT
VICTORIA BC, V8W 9M2

Our File: 2013 – 080

SENT BY EMAIL to Ted White
HAND DELIVERED to Minister Polak

RE: Addendum to Comments on Water Sustainability Act (Submitted November 15th)

The BC Cattlemen's Association submitted our original comments on the Water Sustainability Act to your office on November 15th via email and mail. We ask that you please accept these additional comments as an addendum to our original submission on the Water Sustainability Act.

FITFIR:

- This is a well established and successful model for water licensing.
- Water resources are protected through proper management by licensed users who are diligent about ensuring their use of this resource is beneficial and not wasteful.

STOCK WATER:

- Livestock watering on private land (unrecorded use) needs to be grandfathered in; particularly in fully recorded watersheds.
- Remove the barriers that prevent people from installing off stream waterers (e.g. reopening of irrigation licenses and loss of FITFIR dates). Water licence holders are very reluctant to modify the licence and reallocate a portion of irrigation licences to stock watering because of the loss of the FITFIR date.
- Provide an opportunity for ranchers to shift away from unrecorded use by offering a period of time where this use would be grandfathered and stock watering licences could be applied for.

SCARCITY:

- Livestock watering on range must be seen as an essential use during scarcity.
- Agricultural users must be given equal priority as domestic household use during times of scarcity.
- Licensed users must be able to continue to provide water for both livestock and the crops that are necessary to over winter the animals.
- Water stored for agricultural uses should not be released to maintain essential flow needs or critical environmental flows.

GROUNDWATER:

- If a person isn't using their FITFIR licence on the stream because they now are sourcing their irrigation water from a groundwater source, these people should have the ability to apply the FITFIR date to groundwater licences.

- At one time the industry was encouraged by the Province to remove in stream works and instead drill wells to support irrigation.

STORAGE:

- It is important to retain all existing water storage infrastructure.
- The requirements for storage licences and dam inspections are costly for licence holders and some are considering decommissioning.
- Decommissioning existing works does not meet the water needs of the agricultural industry and would be detrimental to communities and the environment supported by this infrastructure.
- Funding assistance is required to retain and expand the provincial water storage capacity.

UNALLOCATED VOLUMES:

- Any unallocated water volumes that are available in the province should be reserved for agricultural use as a food security measure.

RESOURCES:

- The proposed *Water Sustainability Act* establishes a set of significant expectations for water users to follow. It will be important for the Province to ensure that adequate resources are available to implement and enforce the Act.
- Costs of implementing and enforcing the new Act cannot be supported by licence holders alone.

FEES:

- As price takers in the marketplace ranchers do not have the ability to adjust to fee increases and therefore would have to absorb any added costs. Ranchers' profit margins do not allow for any fee increases as part of a provincial cost recovery strategy.
- Fees from consumptive and non-consumptive uses should be directed toward management of the water resource on a provincial level. All fees should be reinvested into program delivery and building storage capacity rather than entering general revenue.

We thank you in advance for accepting our additional feedback on the *Water Sustainability Act* and would welcome the opportunity to be involved in the continued development of the Act and corresponding regulations.

Regards,



Kevin Boon,
BCCA General Manager