



PEACE RIVER REGIONAL DISTRICT

Office of: the Chair

email to: ENV.Minister@gov.bc.ca

April 8, 2014

The Honourable Mary Polak
Minister of Environment
P.O. Box 9047, Stn Prov Gov't.,
Victoria, BC V8W 9E2

Dear Minister Polak:

Re: **Water Sustainability Act Pricing Comments**

On behalf of the Peace River Regional District, PRRD, please accept the following comments with respect to pricing model principles of the Water Sustainability Act.

Due to the time sensitivity of the comment period, the PRRD Board referred the comments to its Water Stewardship Committee to comment on behalf of the Board. Committee members provided comment which has been compiled for this submission.

While the majority of the principles were endorsed, the principles of ***Fairness and Equity*** and ***Food security and health*** was a top priority. It was felt that access to water is a fundamental right and that both access and pricing should be fair and equitable for the purposes that it would serve.

Equitable pricing should indeed reflect the type of right granted, intended use, location or scarcity. Further, the principle should clearly state that consumptive use of water should be priced much higher than water which will remain in, or return to the water cycle vs. water which will be removed from the water cycle. Similarly, water which is used and then returned to the water cycle in a polluted condition should be charged a higher fee than water which is used and returned without any detriment to its condition.

In addition, a very nominal fee, if any, should be charged for domestic water. Water is essential for all living things. No British Columbian (human or non-human) should ever be deprived of water because they cannot pay the designated price. Similarly, food is essential, and according to the recent report of the UN International Panel of Climate Change, the world is headed to a major food shortage. Water should be made available to citizens for their own food production at a very nominal fee, if any. Similarly, water should be made available at very low cost for small irrigation systems used for food production.

PLEASE REPLY TO:

- BOX 810, DAWSON CREEK, BC V1J 4H8 TELEPHONE: (250) 784-3200 OR (800) 670-7773 FAX: (250) 784-3201
EMAIL: prrd.dc@prrd.bc.ca
- 9505 – 100th Street, Fort St. John, BC V1J 4N4 Telephone: (250) 785-8084 Fax: (250) 785-1125
EMAIL: prrd.fsj@prrd.bc.ca

Municipalities, domestic users and small food producers should not be charged a fee in order to provide a return for the Crown for a public resource. The “public” owns the water; domestic users and municipalities are part of that “public” and a fee should not be charged for them to use their own resource. If a fee were imposed it is felt that Municipalities should be charged similar to rural domestic rates. Small commercial food producers should be charged a nominal fee. Large industrial “for profit” users should expect to pay a reasonable fee to the Crown.

In terms of **Cost recovery**, fees collected should be “targeted” for “water research, monitoring, planning, and facilitating community involvement, regulation and enforcement.” The fees should not go into general revenue.

Thank you for giving us the opportunity to provide comment on the proposed pricing model and principles. We look forward to your ministry’s role out of the Water Sustainability Act and its corresponding pricing model.

Yours truly,

A handwritten signature in cursive script that reads "Karen Goodings".

Karen Goodings
Chair

c.c. – Lynn Kriwoken, Water Protection & Sustainability Branch