



April 9, 2014

The Honourable Mary Polak  
Minister of Environment  
PO Box 9047, Stn Prov Govt  
Victoria BC V8W 9E2

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

Dear Minister;

**Re: Comments on the Water Sustainability Act and the “Pricing of B.C.’s Water”.**

This letter is to provide comment by the BC Greenhouse Growers’ Association (BCGGA) on the Water Sustainability Act (WSA) and the “Pricing of B.C.’s Water”.

The BCGGA represents greenhouse vegetable growers in British Columbia (BC). Our members grow 96% of BC’s greenhouse vegetables on 295 hectares, which represents about 0.01% of BC’s total farmland. The farm gate value of our produce is \$300 million and the estimated value of our sector to the BC economy is \$600 million. We employ more than 3,500 people. We offer the following comments on the WSA and the “Pricing of B.C.’s Water”.

**1) Change the definition of irrigation in the WSA to include greenhouse uses**

The mix of vegetables we grow includes beefsteak tomatoes, tomatoes-on-the-vine, sweet bell peppers, long English cucumbers, specialty cucumbers, specialty peppers, lettuce and eggplant. All crops must be irrigated because they are grown inside a greenhouse and so are not exposed to rainfall. However, as the WSA is currently written the definition of irrigation does not include water used to irrigate greenhouse crops. We find this puzzling when one considers that we produce 125 million kilograms of fresh, nutritious vegetables for BC consumers. This volume represents 32% of farm cash receipts for BC’s overall horticultural food production i.e. tree fruits, berries, grapes field vegetable and greenhouse vegetables. For this reason we propose that the WSA definition of “irrigation” be changed to “the use of water to nourish crops on cultivated lands, natural lands, greenhouses and nurseries”.

**2) Agriculture water pricing should be for licencing only**

Water pricing should only cover the actual costs of efficient management for monitoring and enforcement of WSA.

**3) Agriculture water pricing should not be used to drive efficiency**

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BC  
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Greenhouse vegetable growers are already leaders in efficient water use practices. One practice is to use drip irrigation systems that deliver a set amount of water to the crop roots only when the plant needs the water. Another practice is to re-use the irrigation water. This involves capturing water not used by the plant which has drained out of the growing media. The captured water is stored in large tanks and mixed with fresh water and reused.

Such practices cost money when growers purchase drip irrigation systems, water storage tanks, gutters for water collection as well as pasteurization systems to treat the recirculated water. Even though greenhouse vegetable growers are very efficient water users, we still require large volumes of water to grow our crops. We feel we should not be penalized for our conservation efforts with high water prices because we use large volumes of water.

#### 4) **Existing wells should be exempt from licensing costs**

Some greenhouse vegetable growers secure their water from wells. To access this water they paid the costs to drill the well and put the necessary infrastructure in place. Their business plans did not include having to also pay for the water. Therefore, we propose that existing wells should be exempt from licensing costs.

We thank you for this opportunity to comment on the WSA and the "Pricing of B.C.'s Water". We sincerely hope that the social benefits of having a BC-grown, safe, secure and nutritious food supply will be taken into consideration when setting water prices for agricultural producers including the greenhouse vegetable sector.

Regards

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BC Greenhouse Growers' Association

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