



November 15, 2013

The Honourable Mary Polak
Minister of Environment,
Parliament Buildings,
Victoria, B.C.
Email: ENV.minister@gov.bc.ca

Dear Ms Polak,

BC Nature applauds the intent and focus of the proposed Water Sustainability Act.

In particular, we commend the attention to the ecosystem approach, particularly with regard to:

- Protection of stream health and aquatic environments, including environmental flow needs and expansion of prohibitions on debris dumping.
- Considering water in land use decisions to maintain aquatic ecosystem health, watershed level planning, and checking for gaps in existing regulations. We support the drafting of Water Objectives to address water quality, water quantity and aquatic ecosystem health, and mechanisms to maintain them through indicators and area and site-specific management targets. We welcome the possibility of contributing to Water Sustainability Plans.
- Regulation and protection of groundwater, with application to current industry practices.
- Regulation during scarcity.
- Improving security, water use efficiency and conservation.
- Regulations for industries to measure and report to allow determination of sustainable use levels.
- Enabling a range of governance approaches, especially allowing for advisory groups around specific issues and specific areas.
- Better mechanisms for enforcement of regulations, and higher water prices.
- Recognition of current studies regarding climate change and its potential effects on waters all over BC, and suggestion of flexibility built into legislation for timely and appropriate responses to changing conditions.
- New tools to respond to urban development and resource development.
- A specific purpose for water use related to oil and gas activities.

We do, however, have a number of concerns and questions, including:

1. The potential for industry and resource extraction needs and their lobbies to override water quality and quantity concerns, and to give short term economic goals precedence over long term societal and environmental health. How does government plan to address this?
2. How will environmental flow rates be determined and protected?

3. How does government determine what constitutes a proper balance between economic priorities and ecological protection?
4. How will the government determine a level of enforcement stringent enough to ensure that ecosystem integrity is protected?
5. We are concerned about the potential for saline water source wells and deep saline groundwater to connect with shallower groundwater, especially hydraulic fracturing associated with oil and gas extraction.
6. How will water use for power be managed to track aquatic health requirements?
7. Might local control of watersheds create regulations that compromise a broader good?

We look forward to hearing from you how you propose to deal with the above concerns.

Regards,



John Neville, President
BC Nature (Federation of BC Naturalists)