

# Formal Submission to British Columbia's Water Act Modernization

Prepared for:

## **Water Act Modernization Submission**

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## **The BC Cattlemen's Association Formal Submission to British Columbia's Water Act Modernization**

This document outlines the BC ranching industry's need for water and the importance of this resource to the sustainability of the province's beef industry and thus the province's food security. The BC Cattlemen's Association urges the Province to recognize these factors when modernizing the *Water Act*.

BC beef producers have provided comment based on the *Water Act Modernization Discussion Paper* released in February 2010 and we have summarized those comments as they pertain to the paper's proposed principles, goals, objectives and possible solutions (pages listed refer to that document unless otherwise noted). Additional recommendations and suggestions deemed necessary by the ranching industry are also proposed, taking into consideration the perspectives of a broad group of stakeholders in the province's ranching community.

The *Water Act Modernization Discussion Paper* lists very general principles, goals and objectives for modernizing the *Water Act*. Our concern with these simple concepts is that they are too vague and can be interpreted with various meanings and consequences. When such general concepts are introduced, the focus changes to how and who will be interpreting them and implementing proposed solutions. Our formal submission details how we would like to see the goals and objectives modified to clarify details and ensure water users are respected and their needs considered in the modernization of the *Water Act*.

The Ranching Task Force (comprised of both government personnel and ranch industry representatives) completed a regulatory review in June 2009. The priorities that were identified in the review process included "Secure access to water" and recommended the following changes to legislation, regulations and policy:

- Through *Water Act* modernization, secure access to water that will meet the needs of livestock on range and private land.
- Develop regulations under the *Water Act* that facilitate off-stream livestock watering and help secure stream health (where applicable).
- Develop a process to be followed when dealing with conflict between fish and agricultural uses during periods of drought.

The BC Cattlemen's Association asks that that Province recognize these recommendations that were identified by the Ministry of Environment and endorsed by the Ranching Task Force. (See pg 9 of the British Columbia Ranching Task Force Report to Government).

Of utmost importance to the BC Cattlemen's Association, our members and the agriculture industry as a whole is maintaining the First-in-time first-in-right (FITFIR) water allocation system. This method is the only viable option presented in the Discussion Paper that ensures water that is presently allocated for agriculture use remain in agriculture. Secure access to water for agriculture lands is essential for the ranching industry. Continuation of the FITFIR model along with government's protection of water for food production on all ranchlands including land within and outside the ALR, will validate the Province's commitment to food security.

The BC Cattlemen's Association is open to discussing our recommendations further. We appreciate the opportunity to provide input and we look forward to working with the Province to develop a modernized *Water Act* that will meet the needs of water users.

The BC Cattlemen's Association is a non-profit association with voluntary membership (approximately 1350 cattle producers) that has been representing ranchers since 1929. The BC Cattlemen's Association is comprised of 52 local associations, which combine to form 17 regional associations. It is from within these regional groups that directors to the BC Cattlemen's Association are elected. Today there are 28 directors from across the province representing ranchers' interests.

## **Proposed Principles (p.5)**

It is important that these principles accurately represent the wishes and needs of BC's water users. The broad scope of these principles presents challenges for us in fully supporting them and we would suggest the following changes or clarifications.

#2. Modernization of the water act should not segregate or accommodate specific cultural groups. Water is a public trust and the modernized *Water Act* should respect that.

#3. Utilizing science to affect decision making is acceptable if the science is reliable, unbiased and relevant. Unfortunately unreliable science is too often used when it is convenient or when a particular study supports a group or government's agenda. If science is used for decision making the Province must make sure it is dependable and impartial.

#5. & #7. The terms "investment climate" and water "investors" creates confusion about how BC's water resource is being handled. Treating BC's water like a commodity rather than a limited resource is not a healthy approach to managing the Province's water, i.e. selling water to the highest bidder does not ensure sustainability of the Province's water. This type of "commodity" approach would guarantee that agriculture would not have necessary access to water because agriculture producers are unable to afford high water prices that may be driven by non-agriculture water users.

An additional principle should be added addressing BC's food security dependency upon access to a consistent supply of water for food production.

## **Goal One: Protect stream health and aquatic environments**

The BC Cattlemen's Association supports the general concept of the goal but the objectives need more clarification and parameters included.

The first objective (p. 8), "Environmental flow needs are considered in all water allocation decisions to protect stream health", needs to include certain parameters to define exactly

what the environmental flow needs are in specific areas and streams and what is encompassed in "stream health" that will affect water users.

It is important that ranchers should not have to augment or maintain an unnatural flow in a stream when normally that stream does not flow during certain times or contribute to fish habitat. Additionally, we feel the ranching industry should be acknowledged for the existing reservoirs and dams that were created by ranchers for agricultural use. This infrastructure provided by the ranching industry allows the public to enjoy enhanced and additional green spaces and recreational opportunities. Some of BC's streams would not be flowing year round without them and there would be no fish habitat.

BC Cattlemen are more supportive of Option A (p.9). Environmental Flow Guidelines when considering how environmental flow decisions are to be made because it allows for flexibility and will prevent situations where a rancher is responsible for augmenting unnatural stream flow.

Objective Two (p.10) states that watershed-based water allocation plans include environmental flows and water available for consumptive use, which we agree with in principle. It is essential that water for agriculture, including ranching be a priority and that ranching be considered a valuable function of water utilization. Furthermore, ranchers should receive full compensation for the value of the production loss associated with water rights (licenses) that are taken away (for fish, etc.) and also for developing and building infrastructure that contributes to improved/increased fish habitat, ecological flow, etc.

We support the optional development of water allocation plans (on a watershed basis) and we feel that consideration of the watershed allocation plan is more favorable than requiring a plan and strict enforcement (Option A and C p. 11). We also feel it is important that priority water users, i.e. ranchers be involved in the decision making process and that all water users are aware of the protocol that is in place. Water allocation plans should be developed for when there are water shortages, conflict among users, drought and large unlicensed use is occurring. Having a plan in place for situations like this ensures all users are aware and understand what measures will be taken if or when these circumstances arise.

The third objective (p.22), "Habitat and riparian area protection provisions are enhanced" needs to have more information and details provided. Ranchers work hard to protect streams and aquatic environments. Examples of work done by the ranching industry that should be recognized include:

- BCCA manages and delivers the Farmland-Riparian Interface Stewardship Program (FRISP) for its members, which assists ranchers to protect and enhance water quality, riparian vegetation and fish habitat.
- Ranchers have also undertaken the following measures to ensure water efficiency:
  - irrigation efficiencies such as appropriate nozzle size, automatic shut off, low flow irrigation systems
  - improved maintenance on existing irrigation systems such as eliminating leaks and installing floats on livestock waterers
  - off-stream watering and limited stream access for livestock watering
  - livestock watering structures such as troughs and dugouts
- The Environmental Farm Plan is another example of proactive measures undertaken by BC ranchers.
  - Up to March 2008, 420 farms had completed EFPs and 532 Best Management Practices (BMP) applications had been submitted.
  - 65.5% of the total number of projects were for projects effecting riparian areas.
  - The following BMP's effecting riparian areas were completed:
    - Riparian Area Management (142), Erosion Control (52), Wintering Site Management (44), Corral Relocation (33), Enhancing Wildlife Habitat (26), Farmyard Runoff Control (22)

It is critical for the Province to continue to fund programs for agriculture that assist producers to fence off water ways, install watering systems, build reservoirs, etc. Funding of these programs needs to be topped up to maintain a minimum level of 50%, for example the Environmental Farm Plan is currently at 25%-50% which makes it unaffordable for ranchers given the current economic climate in the ranching industry. Additionally these programs need to have a common sense approach, utilizing efficient

and cost effective practices to ensure the expense of these projects is manageable. An example of this is the Farmland Riparian Interface Stewardship Program (FRISP) administered by the BC Cattlemen's Association. This program utilizes the skills, knowledge and experience of individuals capable of evaluating the situation, providing the technical advice and prescriptions for a solution and recommending an affordable option and source for completing the work involved in the project. Programs like FRISP and EFP contribute to infrastructure development and are examples of how the ranching community is already contributing to the Province's suggestion of "smart spending on smart infrastructure" as referenced on pg 63 of the Province's Living Water Smart booklet.

When drafting a modernized *Water Act*, the Province must realize that riparian areas are part of the cattle range and wildlife habitat and should be used with proper management since off-stream watering of livestock is not always possible nor is it always ecologically sound. And although ranchers work hard to protect riparian areas, it is not practical or feasible to fence off entire streams from cattle access (like is referenced on pg. 29 of the Living Water Smart – British Columbia's Water Plan booklet). At this time ranchers are guided by the MoFR Forest and Range Practices Act (FRPA), which maintains a high level of protection for forest values including watersheds and wildlife habitat. The FRPA and their rancher Range Use Plans are used by ranchers in determining range utilization including guidelines for disturbances along riparian areas, streams, lakes and waterways. Crown land presents further challenges to off-stream watering of livestock or watering livestock at a designated area of the stream. Public access to the Crown land causes interference, damage or theft of livestock watering systems and extensive stream-banks make it simply unfeasible to fence off entire streams.

Ranchers have a desire to protect riparian areas and continue to be good stewards of the land, and with access to funding they can remain on the leading edge of water conservation.

## **Goal Two: Improve water governance arrangements**

The BC Cattlemen's Association is supportive of the goal and objectives listed in general as long as the Province does not pass along the entire responsibility in regards to water

licensing and governance. Government involvement with local input would be an ideal format. The Province should retain the responsibility of monitoring and measuring snow packs, water levels and flow rates and not pass this responsibility onto others. We feel it is important to work together with other water users to achieve a common goal while retaining the water that is necessary for agriculture. Allocation of water volumes to agriculture is imperative and specifically for ranchers for livestock watering and forage production.

Food security is dependent upon equal protection for land and water. This needs to be recognized by the Province with more secure access to water for agriculture lands, as is referenced in the Province's Living Water Smart booklet, pg. 55, "Government will secure access to water for agricultural lands." The ALR was created to protect agriculture lands for food production, but food security has been neglected by government's failure to protect water for agriculture. All ranchlands, including land within and outside the ALR and Crown lands should have access to a safe, secure and adequate water supply necessary for livestock production and food security.

For long-term food security, the livestock industry's requirement for animal drinking water and irrigation water must be recognized and protected in legislation. Livestock drinking water and irrigation water need to be given priority when drafting watershed based water allocation plans. Therefore we feel it is important to have representation from users (particularly high priority users, i.e. agriculture) if using a Shared approach (Option B p. 17) or Delegated approach (Option C p. 18). This also allows local or regional issues to be addressed by people that understand the specific problem and can offer reasonable and appropriate solutions.

The modernization of the *Water Act* is an opportunity for the Province to work with local and regional watershed groups to set priorities and guidelines, inform water users of these and stick to them. Water users need to know what to expect from water governance arrangements. Ranchers are concerned about the water and water conservation and they are constantly looking at ways to be more water efficient in their use, be it for livestock watering or forage production. Any regional watershed group/advisory board assembled to assist with or establish water governance should include agriculture water users.

### **Goal Three: Introduce more flexibility and efficiency in the water allocation system**

The BC Cattlemen's Association has some concerns about the goal and objectives. It is imperative that the ranching industry maintains our access to water – that is the physical access for cattle to water at lakes, streams, etc. as well as the volume of water that the cattle are using. The volume of water being used by cattle may not currently be accounted for, therefore it is important to recognize that it is a necessity and if regulated the Province must allow the necessary livestock drinking water volume to be transferred from in-stream usage to off-stream watering facilities.

Ranchers are concerned about the water they rely on for their livelihood and to provide the Province with food security. The ranching community continues to look at ways to be more efficient in our water use for both livestock watering and forage production, which addresses Objective One (p.22). For example, agriculture has focused on improving irrigation effectiveness through higher efficiency irrigation systems, improved water management, and scheduling irrigation to meet crop water demands. The shift to efficient irrigation systems does not necessarily translate into water savings unless these systems are managed correctly. Advances in irrigation scheduling technology (using soil moisture or climate/weather data), allow ranchers to schedule water applications on a daily basis, thereby improving efficiency. In BC irrigation scheduling with fully automated systems controlled by units that monitor evaporated demand has been shown to reduce water use by 20 to 30%. These measures address the Province's comments on pg. 29 of the Living Water Smart booklet specifying that, "farmers invest in efficient farming practices" and they demonstrate the ways that the agriculture sector is already meeting or exceeding the Province's expectations in this regard. It is important that any positive effect on water utilization (i.e. less water used) within a watershed that is a result of water efficiency measures taken by agriculture water users be recognized as such, and that volume of water continue to stay allocated to agriculture water uses.

The examples listed above demonstrate practices that are already employed in the agriculture industry which supports the objectives listed in 7.1 (p.21) and illustrate how using an allocation system (Objective One p.22) combining Option B (Code for efficient

infrastructure and practices in different sectors are developed in partnership with the sector) and C (The use of incentives and economic instruments) would work. Under the first objective we also support Option F (p. 24, Permitted uses would be defined and allowed under the Act in accordance with regulations. Regulations might apply differently throughout the province based on risk or, if considered acceptable, defined and applied through a water allocation plan).

If the Province is considering transferring of water rights from one user to another (Objective One, Option D p.22), the BC Cattlemen's Association stresses the importance that water allocated for agriculture use not be transferred out of agriculture (i.e. transfers from agriculture water users need to go to other agriculture water users). The BC Cattlemen's Association would support the creation of an agriculture water reserve in watershed allocation systems that would recognize the importance and value of water to agriculture production and discourage the transfer of water licenses to other purposes and would ensure a basic level of food security for the province into the future.

Adjusting allocation plans dependent upon environmental, economic and social conditions (Objective Two p.25) is far too vague to warrant support. Preplanning for events such as drought are absolutely necessary and prevent the need to change allocation plans at times when water is needed most. Planning on an individual watershed basis will enable each area to look at potential causes for future water shortages and plan accordingly so that all water users are aware of what contingency plans are in place and what measures will be taken should a specific situation arise.

In regards to Objective Three (p.26): "The water allocation system integrates the management of groundwater and surface water resources where required in problem areas," we strongly support Option A (First-in-time first-in-right- FITFIR). The BC Cattlemen's Association feels this is a critical point to identify agriculture as a priority water user, and ensure water that is presently allocated for agriculture use remain in agriculture under a modernized *Water Act*. This is the only option that will insure water is not turned into a commodity and sold off to the highest bidder. We cannot stress enough the absolute importance of keeping FITFIR in place for the sustainability of the ranching industry and agriculture as a whole. This component of the existing *Water Act*

works well and should be included in a modernized version along with a description of the details for all water users of how the system works.

Objective Four (p.27) addresses drought and water users' obligation to conserve water during times of drought or when stream health is threatened. Drought plans need to be in place and shared with water users so that all priority levels of water users understand the measures that will be taken should the situation arise and can then plan for it accordingly. Full transparency is crucial for all water users to understand and respect preplanned measures. Preferably the Province and regional watershed groups will have drought mitigation plans and infrastructure development in place long before any conservation plans need to be implemented. This will minimize drought effects on water users and allow for the planning and building of infrastructure and water storage systems to prevent severe water use limitations during times of drought. Drought management plans should be developed with a watershed approach to infrastructure development and action plans that can be implemented within the watershed to minimize potential impacts of drought.

Water storage is a strategic and critical component to water management and water allocation systems that is not adequately addressed in the *Discussion Paper*. As discussed under our recommendations for Goal One, agriculture has contributed to water storage infrastructure (over 2,000 storage facilities licensed for agriculture) and would like to see the Province now provide the resources and funds to further expand and build new water storage systems. For example, catching and storing excess water during spring runoff (that is currently wasted) would conserve water for use later in the season when demand increases. Land owners and water users are aware of the issues in their specific areas and can provide the Province and watershed advisory boards with potential solutions and suggestions for water storage, thereby greatly decreasing or eliminating the cost of further analysis.

#### **Goal Four: Regulate groundwater extraction and use**

The BCCA encourages efficient use of ground water and we feel strongly that the key to managing ground water comes from having the information to make rational decisions. That is why government must ensure that a regional or watershed approach is taken in

ground water extraction assessment to gather the right information so that cost effective management strategies can be implemented. In addition to a watershed approach to ground water management the FITFIR allocation system should be applied. Many agriculture producers have devoted a great deal of time and expense to developing sustainable and proper wells, relying on ground water from aquifers to meet their water needs.

The BC Cattlemen's Association is supportive of a process that would identify priority (critical) areas and look at monitoring ground water extraction from large users. We do not feel we have enough information on volume to support either of the options listed for determining the thresholds for a large groundwater user (p.31). We would prefer to see volumes listed in gal/min. We would support a threshold that identifies most farms as falling below that figure for ground water extraction (i.e. ranches would not be considered "large users").

It is important that if the Province regulates ground water that existing agriculture wells are "grand fathered" into the system, and that new wells will be able to do the job that they are drilled for. The BC Cattlemen's Association does not support the licensing of all wells and we suggest that agriculture wells be exempt or "grand fathered" in if legislation goes that way. Current ground water users should have some protection from new wells being drilled that have an impact on existing wells flow rates and/or water quality. Ranchers require access to clean water, particularly for livestock watering, and we encourage and support practices that keep ground water safe and free from contamination.

An area not covered in the *Discussion Paper* is the practice by the oil and gas industry of deep injection of fresh water into wells for oil and gas extraction. Understanding that fresh water is a resource needed by everyone that is sometimes scarce and in high demand, oil and gas companies should be limited to using fresh water for deep injection only when it is not in short supply, i.e. needed by other users for food production, domestic consumption, etc. and it must come from sources where the water is replenished annually from runoff of snow and precipitation. Additionally, individuals should not be permitted to establish wells within an aquifer and then sell the water to oil and gas companies. The provincial government should not have, nor should they

continue to delegate authority over water to the Oil and Gas Commission, but restore that authority to the Ministry of Environment.

### **Conclusion**

In summary the BC Cattlemen's Association is supportive of modernizing the *Water Act* with minor, simple adjustments to recognize current issues and more effectively address present day challenges. Our main concern is that a modernized *Water Act* recognizes the importance of water for agriculture and guarantees water security for ranchers for livestock production. We need the Province to recognize that all ranchlands, including lands within and outside the ALR, should have access to a safe, secure and adequate water supply necessary for livestock production and food security. Keeping the First-in-time first-in-right allocation system is unquestionably essential to our members and it must be included in a modernized *Water Act*. Our water position statement (see Appendix A) outlines our specific concerns and requirements from the province in regards to water for the ranching industry.

## **Appendix A**

### **BC Cattlemen's Association Water Position Statement**

Adopted by the Board: Feb 4, 2010  
Publicly released: Feb 11, 2010

#### **POSITION STATEMENT:**

### **Water and the Beef Cattle Industry in British Columbia**

Water is critical for a healthy and sustainable cattle industry to meet the Province's food security needs, now and in the future. The BC Cattlemen's Association demands that the Province recognize the vital role water plays in the viability of the cattle industry. Modernization of the *Water Act* must provide water security<sup>1</sup> for both livestock drinking water and irrigation purposes.

The Province imposed the Agricultural Land Reserve (ALR) to protect agricultural lands for food production but neglected to protect food security by ensuring agriculture has water security. The BC Cattlemen's Association recommends the Province implement measures that ensure all ranchlands, but not exclusively ALR lands, have necessary water security.

The cattle industry remains committed to good stewardship and conservation in managing our valuable water resources. The BC Cattlemen's Association insists the Province offer programs and incentives to all agricultural water users that encourage water conservation and assist with water storage.

The Association outlines several recommended actions by the Province to increase water access and security for the ranching industry.

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<sup>1</sup> The BC Cattlemen's Association defines water security as affordable, long-term access and use of water resources with adequate supply.

# Recommendations on Water Security & Access for the Ranching Industry

ISSUE	RECOMMENDED ACTIONS
<p><b>WATER ACCESS</b></p> <p>Food security is dependent upon equal protection for land and water. For long-term food security, the province must recognize the livestock industry's requirement for animal drinking water and irrigation water and these supplies must be protected in legislation.</p>	<ol style="list-style-type: none"> <li>1. The Province must acknowledge the livestock industry's present access and future need for in-stream livestock drinking water by issuing water licences with volume allocations.</li> </ol>
<p><b>WATER LICENCING</b></p> <p>The BC Cattlemen's Association believes the Province must secure access to water for agricultural lands to meet the Province's food security needs. The association demands the Province recognize the important role water plays in the viability of the cattle industry by taking immediate steps to provide the cattle industry with water security for both livestock drinking water and irrigation purposes.</p>	<ol style="list-style-type: none"> <li>2. The province must provide agricultural lands with secure access to water.</li> <li>3. The province must continue to recognize the <i>First In Time</i> model for water licencing and allocation.</li> <li>4. The province must allow the necessary livestock drinking water volume to be transferred from in-stream usage to off-stream watering facilities.</li> <li>5. In order ensure a sustainable agriculture industry that meets the Province's food security needs, water resources are required to be reserved for agriculture.</li> </ol>
<p><b>WATER CONSERVATION</b></p> <p>Ranchers have invested in and adopted water-efficient practices such as low flow irrigation nozzles. The cattle industry remains committed to conservation in managing this valuable resource and the BC Cattlemen's Association believes the Province should offer water conservation incentives for agricultural landowners.</p>	<ol style="list-style-type: none"> <li>6. The Province should offer water conservation incentives and assistance programs for agricultural producers.</li> </ol>

<p><b>WATER STORAGE</b></p>	
<p>Many ranchers have developed water storage facilities to capture high water flows for use later in the season. A side benefit to these storage facilities is that they provide valuable fish habitat and create recreational fishing opportunities.</p>	<p>7. The Province should work with cattle producers to offer water storage solutions, incentives and assistance that contribute to enhanced fish habitat and provide ecological value while also increasing water flow during critical periods.</p>
<p><b>WATER STEWARDSHIP</b></p>	
<p>The BC Cattlemen's Association and its members are committed to water stewardship. The Association works to encourage best management practices for environmental stewardship by promoting programs such as the Environmental Farm Plan program.</p> <p>Additionally, the Association delivers a Farmland Riparian Interface Stewardship Program (FRISP). This program is designed to help ranchers protect and enhance water quality and riparian vegetation while preventing (or mitigating) impacts on streams and lakes.</p> <p>For seventeen years, the Association has annually recognized BC ranchers with <i>The Environmental Stewardship Award (TESA)</i> for their outstanding stewardship achievements. In 2002 and in 2009, British Columbia ranchers were awarded the National TESA for their exceptional stewardship efforts, standing out among their peers across Canada. These are achievements that all British Columbians can be proud of.</p>	<p>8. The Province must continue to provide financial support for environmental stewardship programs that assist agricultural producers with meeting objectives laid out in the British Columbia Water Plan for Agriculture.</p> <p>9. The Province should explore the feasibility of waste water as a source of irrigation water and provide financial support for these emerging technologies.</p>

<p><b>DROUGHT MANAGEMENT</b></p> <p>The cattle industry aims to look at possible models and applications of a Drought Management Strategy in BC. Ensuring water security and protecting agricultural access is a high priority for the BC Cattlemen's Association in the future.</p>	<p>10. The province should develop a drought management strategy in conjunction with the ranching industry.</p> <p>11. The province should facilitate a process to prevent and/or resolve land-use conflicts that arise during periods of drought.</p>
<p><b>LAND WITHIN THE AGRICULTURAL LAND RESERVE</b></p> <p>The creation of the Agricultural Land Reserve (ALR) by the province has protected agriculture lands but neglected to protect agriculture's access to water. The Association believes that the province therefore has a responsibility to ensure that lands within the Agriculture Land Reserve have secure access to water.</p>	<p>12. All levels of government and the Agricultural Land Commission must consider the present and future water needs for agriculture and ensure these needs are given priority over:</p> <ul style="list-style-type: none"> <li>○ Subdivisions or community expansion,</li> <li>○ Oil &amp; Gas development, and</li> <li>○ Other industrial uses.</li> </ul> <p>13. A moratorium should be implemented on the practice by the Oil &amp; Gas Industry of deep injection of water that is suitable for agricultural purposes.</p>
<p><b>LAND <u>NOT</u> WITHIN THE AGRICULTURAL LAND RESERVE</b></p> <p>Much of the land that is used for cattle production is not included within the Agricultural Land Reserve. These non-ALR lands are critical to the overall ranching operation and require water security.</p>	<p>14. The province must provide water security for lands not included in the Agricultural Land Reserve (ALR).</p> <p>15. Lands not within the ALR must be recognized and considered in the British Columbia Water Plan for Agriculture.</p>

## Definitions:

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The BC Cattlemen's Association defines these keywords and phrases that were including in our Position Statement and Recommendation on Water.

Water security	Affordable, long-term access and use of water resources with adequate supply.
Livestock access	The right for livestock to physically access a water source along with the recognition of the volume of water consumed.
Ranchlands	All lands that are essential to the ranching operation including: private deeded lands, leased lands, and Crown lands, regardless of whether they are within the boundaries of the Agricultural Land Reserve.
Water footprint	An indicator of the total volume of freshwater that is used to produce the goods and services consumed or produced.

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