



BRITISH COLUMBIA CATTLEMEN'S ASSOCIATION

Representing the Beef Cattle Industry of British Columbia

AGRI CENTRE - #4 - 10145 DALLAS DRIVE, KAMLOOPS, B.C. V2C 6T4 PHONE (250) 573-3611 FAX (250) 573-5155

April 17, 2023

Water Protection and Sustainability Branch
Ministry of Environment and Climate Change Strategy
PO Box 9362 STN PROV GOVT
Victoria, BC V8W 9M2
livingwatersmart@gov.bc.ca

BCCA File # 2023-018
SENT BY EMAIL

RE: Comments from the BC Cattlemen's Association on the Watershed Security Strategy Intentions Paper

The BC Cattlemen's Association (BCCA) is a non-profit association representing beef cattle ranchers in British Columbia. Ranchers own and manage a large land base including riparian areas, meadows, fields, pastures and Crown lands. As stewards of the land, we are invested in the management of uses within the watershed and about water quality and quantity. As food producers, we use water in a variety of ways primarily for irrigating forage crops and watering livestock.

We appreciate the opportunity to provide comments on the Watershed Security Strategy Intentions paper, which was released in March of this year (2023). We are grateful to the province and the BC-First Nations Water Table for their leadership and work in steering this process.

We know that healthy watersheds are essential to all living things. Whether for conserving salmon populations, supporting Indigenous values, ensuring food production and security, creating opportunities for carbon capture and storage, protecting wildlife and species at risk, providing opportunities for recreation or fostering a climate resilient landscape, we know that water abundance and quality across British Columbia is critical.

As an association that prides itself on the stewardship of our natural resources and as a group that relies on the availability of water for our business, we are pleased to see the BC taking a holistic, 'watershed' approach to water. What happens on the broader landscape has a significant impact on water.

Because water quality and supply are significantly affected by land use more broadly, we are encouraged to see reference in the *Intentions Paper* to the range of authorities that influence water outcomes. Sustainable water quality and supply rely on a landscape that allows water to penetrate the soil and recharge the water table; a most basic process informing ecosystem health and landscape productivity. This cycle is significantly impacted by landscape change such as some forest and mining practices and urban and rural development. Watershed security, attempted in earnest, requires that all the various planning and regulatory regimes be brought together and work in alignment in a 'whole-of-government' approach.

We were also particularly glad to see linkages made between water and watershed health in supporting numerous values that are critical to society, including agriculture and the provision of food security.

We offer the following specific comments and look forward to participating in subsequent discussion about this critical topic.

Comments on the intentions Paper:

1. We need to steward existing water infrastructure

As our climate changes, and increased demands are placed on our watersheds, having the ability to store or 'hold water' on the landscape is vital. We need both large aquatic bodies, like lakes and reservoirs, as well as many smaller water bodies, like wetlands and dugouts, across the landscape to ensure the provision of numerous ecological goods and services, including the ability to produce healthy foods locally in support of food security.

Water in BC in many ways is a 'seasonal good', linked to melting winter precipitation, which means that much of the availability of water throughout the year in BC depends on water storage. Water is stored during times of surplus flow (typically winter and spring) and is released in useful increments throughout the year to ensure consistent availability, supporting a host of values.

Approximately 80% of active dams in BC are agricultural dams, with approximately 75% of these agricultural dams being owned and operated by cattle ranchers. This means that a significant amount of the water that is stored on the landscape, and that provides a broad range of values to society, links directly with agriculture producers.

While stored water has never been more critical to society, unfortunately, for those tasked with the management of critical water storage infrastructure like dams, diversions and weirs, it has never been more costly and challenging. For those involved, the challenges can be so daunting that we risk losing critical water storage infrastructure because dam owners and licensees cannot bear the process uncertainty, costs, capacity requirements and liability required to manage them.

As part of the path forward, we need to look at ways to ensure that we are not only able to effectively manage and maintain our existing critical water infrastructure, but that we also create the conditions for *increased* water storage opportunities moving ahead.

The BCCA and our fellow water storage licensees, Ducks Unlimited Canada, have drafted a discussion paper that further details some of the issues and potential solutions associated with water storage in BC. We look forward to tabling this with government in the next month and hope that the contents are carefully considered as part of this engagement.

2. Water and Food Security, including water for livestock

Water is critical for agriculture and the BCCA was pleased to see reference to this vital connection in the *Intentions Paper*. Whether for growing crops or watering livestock, the BCCA membership – like other agriculture producers in BC - relies on water for their operations and in order to continue to be able to support food security. Ensuring that there is water dedicated for Agriculture in BC must be an essential, formal element of the strategy moving forward.

As part of the regulatory review associated with this strategy, the BCCA hopes that security for livestock watering on range is formally established and recognized through a suitable policy instrument. It is important to note that livestock water represents an extremely small amount of water use by volume and that this type of use has existed since the mid 1800's prior to any formal water recording. It can therefore be thought of as, functionally, part of our water 'baseline' - much like wildlife use.

Furthermore, the BCCA would like to see specific provisions put in place to ensure that water for livestock is considered a priority water use in the context of drought planning and in cases where drought measures are implemented; something essential to ensure the humane treatment and quality care of livestock.

3. Allocation of Water Resources

The BCCA appreciates that legislation in BC requires updates and amendments in order to align with the principles of the DRIPA, and that law and policy governing water is no exception.

For over a century, water has been allocated based on a licencing system that creates a temporal prioritization of right to use (FITFIR): a government-created allocation system to which our businesses have organized and adhered to.

Because water licences are appurtenant to private land, over time farm and ranch businesses have been bought (with land values that reflect associated rights) and agricultural businesses developed based on a degree of

certainty that rights to water are included. Furthermore, most producers have also invested heavily in the capital and maintenance costs associated with water infrastructure, like dams, diversions and weirs.

While the BCCA understands the needs to uphold and recognize Indigenous rights, *the rights of existing licences as well as recognition of the priority of water for agriculture must be upheld*. This recognition sends critical reassurance to the business community in BC, signaling that long term investments are secure and that we are serious about the importance of agriculture and food security in BC.

4. Water Reporting

The BCCA understands that there is a need to better understand our provincial water budget, and that this requires a better understanding of both supply and demand at any given time. Because of this, the BCCA is committed to doing our part to both employ water conservation technologies and to use best practices in water and watershed stewardship.

It is the case, however, that monitoring and reporting practices and technologies that are suitable in different circumstances, such as for municipal water use, are not practicable solutions for cattle producers in BC. Therefore, the BCCA supports the implementation of a measuring and reporting system that is aligned with broader objectives, but that is practical and suitable for producers: resilient against technological failures and not unnecessarily onerous and costly to small, family business. The Association has funded a water use reporting tool for agriculture that can be adopted by the province.

5. Broad engagement on water moving forward as part of new approach to Governance

The BCCA supports, in principle, the move to more localized governance of resources, including water, as proposed in the *Intentions Paper*. Afterall, with producers coming from regions across BC, the BCCA is intimately aware of the nuances and regional differences surrounding what is needed and what is possible for effective resource stewardship.

The BCCA understands and respects the moral and legal necessities surrounding G2G engagement. We are concerned, however, that opportunities for meaningful engagement with partners and stakeholders on the ground are becoming fewer and that, where they exist, the richness of process and opportunity for stakeholder influence is being eroded. This often leads to a feeling of alienation and mistrust, which corrodes the good faith with which our membership wishes to approach solutions focused discussions.

Not only does being excluded create risks to morale and incite tensions within communities, but amounts to a costly process failure: excluding parties who are licenced users of the landscape and who are willing to engage in thoughtful conversation and partnership creates very tangible inefficiencies and missed opportunities.

Moving forward, the BCCA is emphatic that there needs to be *meaningful* opportunities for non-Indigenous parties, like the BCCA, to engage in discussions of policy, planning, objective setting and management around all natural resources, including water.

Once again, thank you for the opportunity to provide comments and highlight some of the BCCA priorities moving forward. If there are any questions arising from this submission, please do not hesitate to contact us.

Sincerely,



Brian Thomas, BCCA President