



The British Columbia Ground Water Association  
1334 Riverside Road, Abbotsford  
British Columbia, V2S 8J2, Canada

Date: August 31, 2021

To: Honourable Katrine Conroy  
Minister of FLNRORD  
PO BOX 9049, STN PROV GOVT  
Victoria, BC V8W9E2

Cc: Honourable George Heyman, Minister of Environment and CCS  
Honourable Lana Popham, Minister of Agriculture, Food and Fisheries

Subject: Looming crisis concerning groundwater licensing and the Water Sustainability Act

Dear Minister,

This letter is to raise our concerns to government regarding the lack of compliance with groundwater licensing under the Water Sustainability Act in BC, and the looming crisis facing government with the March 1, 2022, deadline for existing non-domestic groundwater users to comply. As it stands, after the deadline approximately 80% of the expected users (some 15,000 +) will be non-compliant and their businesses and water rights at risk. Moreover, failures to implement groundwater licensing effectively now threaten water management in BC as a whole. The BC Government needs to display leadership and have a plan in place before the deadline to prevent these potentially disastrous consequences.

The British Columbia Ground Water Association (BCGWA) is dedicated to the protection, promotion, and responsible development of groundwater resources in BC. As such we support groundwater licensing for British Columbia and the legislation that brought it into force in 2016. In November 2018 we wrote to the then Ministers of FLNRORD and ENV expressing our concern regarding the previous deadline (March 1, 2019) for existing groundwater users to apply for a licence. At that time only 10% to 15% of the expected existing users had done so. We strongly recommended that the government extend the deadline, but also warned that an increase in resources needed to be applied to the program if it was to succeed.

We were pleased to see the deadline extended to March 1, 2022; however, it is our understanding that as of July 2021, still only 4,125 out of an expected 20,000 existing water users have applied. Unless there is a remarkable increase in the number of applications in the next six months, approximately 80% of the existing water users in BC will be non-compliant at the deadline. These are predominantly small businesses, the backbone of the BC economy, and the likelihood of losing access to water has the potential to destroy their livelihoods.

It is not just water users who are at risk. The BCGWA is made up of businesses that work in the groundwater industry, including water well drillers, pump installers and professionals. Last month we

carried out a survey of our members and almost 50% of respondents are concerned with what will happen to their businesses after the deadline.

BCGWA members work with groundwater users on a daily basis, and as such have first-hand knowledge of public opinion regarding groundwater licensing. We surveyed our members asking for the reasons why non-domestic groundwater users have been so reluctant to apply for a license. The main contributing factors as identified by our members are:

- 1) insufficient communications from government,
- 2) a complicated and sometimes expensive application process,
- 3) unacceptably long waits for applications to be processed (frequently 3 years or more), and
- 4) a lack of compliance enforcement.

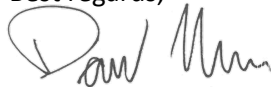
These factors have eroded the public's confidence in groundwater licensing, and need to be addressed on a significant level for it to achieve public buy-in. It is our opinion that the necessary resources have not been devoted to the groundwater licensing effort and as a result it is at risk of failure due to non-compliance.

Water management is essential to the future of British Columbia, particularly as we witness the ravages of Climate Change. Groundwater licensing is an integral part of managing our precious water resources. With the deadline for existing water users to comply fast approaching, the government now faces a looming crisis. As it stands the government is already struggling to implement groundwater licensing given current resources, but after March 1 over 80% of existing groundwater users in the province will have lost their historical water rights and will be using water illegally. The government must have a plan in place to address this deadline and to ensure the success of groundwater licensing moving forward.

We believe that the best option available to government to ensure the success of groundwater licensing in BC is to extend the deadline by 1-2 years (years deprived by fighting wildfires and addressing COVID) and apply a significant increase in the amount of leadership and resources dedicated to the program. Leadership from the highest level is required to define success and allocate resources accordingly. Sufficient resources will be necessary to rapidly bring on existing users through a streamlined application and review process, and substantial compliance enforcement will be required. Failure to appropriately address this issue will leave the government dealing with the outfall, including severely impacted businesses, a further erosion of confidence that BC can manage our groundwater resources and overall will likely set back water management in BC by decades.

Thank you for your consideration of this matter. The BC Groundwater Association is a strong supporter of the Water Sustainability Act and groundwater licensing. We request a meeting with the Honorable Katrine Conroy, who is accountable for the WSA, to further discuss these significant challenges facing FLNRORD and potential courses of action. We look forward to continued collaboration with MFLNRORD and MOE to protect our ground water resources.

Best regards,



Dave Mercer, PGeo

General Manager

British Columbia Ground Water Association

