

October 16, 2025

Ministry of Water, Land, and Resource Stewardship
Government of British Columbia
PO BOX 9012 STN PROV GOVT
Victoria, BC V8W 9L6

Sent via email: PermittingSolutions@gov.bc.ca

Subject: BCAC Response to Construction Dewatering Authorization Changes

To Whom It May Concern,

On behalf of farmers and ranchers in British Columbia, thank you for your Ministry's efforts to improve permitting requirements under the *Water Sustainability Regulation* and other relevant provisions. Water is the cornerstone of agricultural production, and a policy environment that both protects valuable groundwater resources and facilitates necessary work on the land is essential to the viability of our sector.

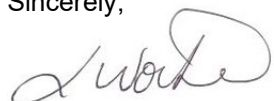
BC Agriculture Council (BCAC) is the unified voice of B.C.'s agriculture industry, representing over 20,000 farm families and 96% of farmgate sales in the province through our 29 member associations. We work to advance policies that support a strong and competitive agriculture sector across B.C. BCAC also appreciates the opportunity to participate in the Premier's Task Force on Agriculture and Food Economy, and we are pleased to see the Ministry of Water, Land, and Resource Stewardship is taking steps to deliver on the Task Force's recommendation this year to improve permitting requirements in several important areas.

BCAC supports the proposed changes to authorization requirements for construction dewatering, including the three-tiered approach envisioned by the Ministry. Farmers already face considerably lengthy timelines when pursuing the construction of new structures essential to farm operations. These timelines in part reflect permitting requirements from local governments, the Agricultural Land Commission, and other relevant authorities. Exempting some projects from the requirement to apply for construction dewatering authorizations would help ease some of this administrative burden and somewhat reduce construction timelines.

Further, the new approach proposed by the Province could allow for the dedication of additional staff capacity in the Ministry to addressing other challenges. In particular, BCAC remains concerned by the considerable delays in the processing of groundwater licensing applications from farmers and ranchers throughout B.C. It is our hope that the adoption of the new approach to construction dewatering authorizations will allow for the dedication of additional resources needed to clear the backlog of existing use groundwater applications. Addressing this backlog will also serve to increase producer confidence in the groundwater licensing process.

In case of any need for additional information or details from this response to the Ministry's consultation, please do not hesitate to contact Danielle Synotte, BCAC's Executive Director, via email at dsynotte@bcac.ca or via telephone at 604-854-4454. We look forward to responding to the other consultations on natural resource permitting improvements in due course.

Sincerely,



Jennifer Woike, President
BC Agriculture Council