

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 Low Volume Water Use Exemptions

To Whom It May Concern,

On behalf of British Columbia's farmers and ranchers, BC Agriculture Council (BCAC) appreciates the efforts by the Ministry of Water, Land, and Resource Stewardship to improve permitting under the *Water Sustainability Act* as well as under other relevant legislation and regulations. Water is the cornerstone of agriculture. Without reliable access to water, access to agricultural products essential to human well-being could be affected, and so it is vital that our sector is involved in developing changes to policies that govern water use in B.C.

BCAC is the unified voice of our province's agriculture industry, representing over 20,000 farm families and 96% of farm gate sales in B.C. through our 29 member associations. We work to advance policies that support a strong and competitive agriculture sector across B.C. We have also appreciated the opportunity to participate in the Premier's Task Force on Agriculture and Food Economy and believe it is important that the Government of B.C. implement the Task Force's recommendation to "...streamline applications for new groundwater use, with low volume users automatically issued authorizations at a threshold at or higher than domestic users."

BCAC supports implementing the exemptions the Ministry has proposed in this consultation regarding low volume water users. By exempting non-domestic groundwater use under 2 cubic metres per day (2m³/day) from the licensing requirement, the Province would be delivering on one of the most important recommendations from the Premier's Task Force and would potentially afford opportunities to redirect administrative capacity within the Ministry to address the backlog of existing use applications as well as shortening processing times for new high volume applications.

BCAC also appreciates that this exemption would not extend to watersheds experiencing scarcity issues. While farmers and ranchers have been frustrated by delays in groundwater licensing applications, our sector does not wish to see the over-subscription of watersheds and declines in water availability for existing users. As such, BCAC would still support the maintenance by the Ministry of a registration system for low volume wells, even if not formal licensing for this particular water use. This would ensure transparency and accountability regarding groundwater use, as well as the long-term sustainability of B.C.'s water resources.

Further, it may be necessary to stipulate in any amendments to the *Water Sustainability Act* or *Water Sustainability Regulation* that the exemption would only apply to one low flow well per property or aquifer to prevent cumulative overuse. In particular, we are concerned that a user could subdivide a property and

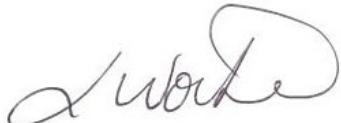
establish a well on each parcel, resulting in a cumulative that exceeds 2m³/day even if each well may qualify as low volume water use.

While we are supportive of the Ministry's proposal, it is also nonetheless important to emphasize the need for policy solutions that will address the challenges faced by agricultural water users who will not benefit from this exemption, such as those farmers in water scarce regions or whose use exceeds 2m³/day. BCAC continues to seek the adoption of Agricultural Water Reserves (AWRs), which are possible under Section 39 of the Act. Much of the work necessary to establish AWRs across B.C. has already been completed through the Government of B.C.'s development of the Agricultural Water Demand Model. We believe this investment of public resources should be leveraged for the benefit of all British Columbians and with a view to ensuring the future sustainability of agricultural production in B.C.

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 would be particularly happy to discuss opportunities to implement AWRs in B.C. as part of this effort to improve natural resource permitting.

Thank you once again for this opportunity to contribute the perspective of B.C. farmers and ranchers! BCAC looks forward to responding to the consultations regarding other aspects of this topic, such as ways to streamline the application review and decision process, in due course.

Sincerely,



Jennifer Woike, President
BC Agriculture Council