

December 12, 2025

Ministry of Water, Land, and Resource Stewardship
Government of British Columbia
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Victoria, BC V8W 9L6

Sent via email: PermittingSolutions@gov.bc.ca

Subject: BCAC Response Regarding a Low Volume Water Use Streamlined Authorization Process

To Whom It May Concern,

On behalf of British Columbia's farmers and ranchers, BC Agriculture Council (BCAC) welcomes 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 integral to agriculture. Without reliable access to water, the availability of agricultural products essential to human well-being would be affected and so it is vital that our sector is actively engaged in developing 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 farmgate 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. prioritize implementing 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."

The Ministry's envisioned development of a new streamlined review process for low volume water license applications would deliver part of this Premier's Task Force recommendation. It would also provide greater certainty for farmers and ranchers who have been reluctant to invest in improvements to their farm operations when faced with significant delays in the processing of existing use groundwater applications. A streamlined review process would help address the backlog and thereby ensure agricultural producers have the confidence needed to invest and to support the food security of British Columbian communities. As such, we support the Ministry's initiative in developing this process.

In the context of this proposal, we believe that applications seeking authorization to use volumes of 100,000 cubic metres per day (100,000 m³/day) or less should be subject to a streamlined review process. Such a volume would allow for the irrigation of a farm property approximately 10 hectares in size producing forage crops in a dry region of B.C., albeit one with streams or aquifers with sufficient supply. Setting eligibility for the streamlined review process at a volume much lower than 100,000 m³/day would mean most agricultural producers in B.C. would not benefit from the new review process and would signal that ensuring the availability of water for agricultural production is not a priority.

It is also important to note that the Government of B.C. has already invested considerable resources into the development and implementation of the Agriculture Water Demand Model (AWDM). This model calculates water use on a property-by-property basis, drawing upon data from a variety of sources,

including the Agricultural Land Use Inventories maintained by the B.C. Ministry of Agriculture and Food as well as climate and soil reporting. Summing each property obtains a total forecast of agricultural water demand for an entire basin or sub-basin, with a view to allowing the Government of B.C. to deliver on its commitment to establish agricultural water reserves – a commitment that has been underscored by the Premier's Task Force recommendation to “identify opportunities to proactively set aside water for potential agricultural water infrastructure projects through agricultural water reserves and Water Sustainability Plans...”

Multiple Premier's Task Force recommendations could be met by applying the AWDM to groundwater license applications from agricultural water users. Currently, such users must provide detailed information to support the verification of the crops grown on the property for which a license is sought. Reviewing this information contributes to the length of time needed for Ministry of Water, Land, and Resource Stewardship staff to review the application. This aspect of the review could be eliminated and the processing time reduced if the AWDM were to be applied to applications from all agricultural water users, regardless of the volume sought for authorization.

In case of any need for additional information or details regarding our submission in response to this 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.

Thank you once again for this opportunity to contribute the perspective of B.C. farmers and ranchers! We look forward to responding to other Ministry consultations regarding permitting improvements in the coming days.

Sincerely,



Jennifer Woike, President
BC Agriculture Council