

Presentation to the City of Merritt

August 9, 2019

Mayor, Councillors and staff of the City of Merritt

Request to change the zoning bylaws of the City of Merritt to prohibit the bottling of groundwater for commercial sale or bulk export

My name is Bruce Gibbons, and I live in Merville in the Comox Valley. I am submitting this request to address council about the issue of protecting groundwater all over British Columbia. In November of 2017, the Provincial Government approved a groundwater extraction licence for a resident of Merville, in the Comox Valley, to extract up to 10,000 liters of water per day from the Comox Valley aquifer, and bottle and sell that water. That was the moment we realized our groundwater was under threat from a new source. Under the 2016 Water Sustainability Act the provincial government has targeted our groundwater for extraction and commercial sale or bulk export. The provincial government continues to approve water extraction licences for groundwater in many areas of BC. Bottling of groundwater is extremely profitable for the licence holder, whether it is bottled on-site or trucked to a suitable bottling site. That is why we are campaigning to ask British Columbia communities to revise their bylaws to prevent water licence holders from bottling their water and asking those communities to also support the Strathcona Regional District resolution that was passed unanimously at the Association of Vancouver Island and Coastal Communities (AVICC) convention in April, and will be presented at the UBCM convention in September. The effects of climate change and the increasing demands of population growth are putting increasing demands on existing water sources for cities and groundwater will likely become more critical. Many communities/cities are becoming more conscious of treating groundwater as a critical natural asset.

I am the founder of a group called Merville Water Guardians. I formed the group in March 2018 to oppose the water licence in Merville, oppose the rezoning application and to achieve reforms to the Water Sustainability Act to protect the groundwater aquifers of BC. In March of this year we presented a petition with approximately 1,200 signatures in the BC Legislature, asking the BC Government to stop approving licences to bottle and sell water from all aquifers in BC. We have also posted that petition online in support of the paper petition, and it has approximately 1,400 signatures to date. Water is becoming a critical issue all over the world, and British Columbia is no exception. We just experienced a severe winter drought in many areas of BC, with water levels recorded at record lows. In the past few years we have seen prolonged summer drought, with serious repercussions to our rivers, streams and lakes and to the fish and fish habitat in those waterways. Rain events are less frequent during those drought periods, but are also more severe and extreme, causing serious run-off, flooding and erosion and not the typical behaviour associated with aquifer recharge. Our supporters and followers in the Comox Valley tell us that water, and the protection of our water was a big issue in the recent local elections and will be a huge issue in the next provincial election.

Approximately 22% of British Columbians, over a million people, rely on aquifers, or groundwater, for their only source of water for their personal needs and for producing food. If that water supply is depleted, then those millions of residents and farmers will not be able to look after their personal needs for drinking water, sanitation, growing their backyard gardens or growing their crops and raising their livestock. That would put our food security at risk. Without water, farmers cannot produce our food, the local food that so many people want and rely on. That applies to aquifers all over Vancouver Island and mainland British Columbia. Without water, there is no life. Population growth is putting more demand on the aquifers and we are already seeing the negative effects of climate change impact the quality and quantity of water in the summer drought period. We experienced level 4 drought all over Vancouver Island and in many other areas of BC this past summer. We have seen record dry months and record heat and every indication is that these changes are here to stay and will likely only get worse. Many areas of BC have had record low months of rainfall and have record low levels of water in their drinking water systems for this time of year. A Level 3 drought has been declared in some areas. This is causing grave concern over water supply in the coming summer drought period. Residents and farmers are being told to seriously conserve water. Yet we have provincial water licence holders for commercial profit who continue the extraction of water from the aquifers we all rely on despite the level 4 drought, and despite government precedence procedures. Climate change is causing glaciers to recede and shrink. Snow-packs in the mountains are diminishing. Those two factors alone are causing surface water volumes to shrink, and since those two sources are also part of the recharge system for groundwater, the normal recharge of groundwater is in question.

The Ministry of Environment and Climate Change Strategy just recently released a Climate Risk Assessment. The key findings of the assessment were:

- The greatest risks to B.C. are severe wildfire season, **seasonal water shortage**, heat wave, ocean acidification, **glacier loss, and long-term water shortage**.
- Other risks that have the potential to result in significant consequences include severe river flooding and severe coastal storm surge, although these events are less likely to occur.
- Nearly all risk event scenarios (except moderate flooding and extreme precipitation and landslide) would have major province-wide consequences in at least one category.

At some point, communities will need to rely on our aquifers for community water supplies when surface water systems become depleted or tainted. There is not enough information known about our aquifers to risk bottling and selling any of the water. The FLNRORD Ministry licence approval in Merville relied on old data, and technical calculations but did not consider climate change that is producing extended periods of serious drought, putting rivers, streams, fish habitat and fish stocks at risk. It did not consider serious impacts from receding glaciers and diminishing snowpack. The Ministry of Environment is espousing the risks of climate change while the FLNRORD Ministry is ignoring those risks and approving licences for the bottling of groundwater. It is clear from worldwide data that groundwater is being dangerously depleted by over-pumping, mismanagement and corporate greed. In countries like India, Morocco, Peru and even closer to home in California there are water crisis situations caused by mismanaging water resources. It is critical for us to take serious steps to start the process for managing and protecting our groundwater.

In the meantime, there is an existing, real threat to the groundwater of British Columbia since the provincial government continues to approve extraction licences for bottling and commercial sale or bulk export. We have campaigned with two specific goals.

1. Lobby the provincial government to stop approving licences for the extraction, bottling and sale or bulk export of groundwater.
 - a. The provincial government controls the approval of extraction licences; therefore, it is the provincial government who can stop the approval. We fully realize the Merville licence volume was not significant, but we are concerned about the precedent such a licence sets and concerned about future increases of the licence volume and/or the sale of the property, with the licence, to a large corporation where the possibility exists of the volume increasing from 10,000 liters to millions of liters. We are also aware that water bottling is not the worst offender when it comes to groundwater depletion. Both industrial use and farm use are significant, and we also need to take a hard look at improving the efficiency of both industrial and farm use of groundwater. Prohibition of the bottling and commercial sale of groundwater is a relatively quick and easy first step.
2. Lobby local governments to take local action to control activities that are within their purview. Local governments can control the type of business that is conducted in their jurisdiction by creating bylaws that permit or prohibit specific uses, including the prohibition of the bottling of groundwater in all zones. We have lobbied all the communities of the Association of Vancouver Island and Coastal Communities (AVICC) to change their bylaws to prohibit the bottling of groundwater in their zoning bylaws. We are pleased to see that numerous communities of the AVICC already prohibit the bottling of groundwater, several communities have already acted on our request to change their bylaws and numerous other communities are in the process of changing their bylaws or are considering the change. We are now in the process of contacting all member communities of the UBCM, asking for consideration of our request to change their bylaws to prohibit the bottling of groundwater. This step is critical, since there are no guarantees that the provincial government will act on a resolution raised by the UBCM.

We have been working with the Strathcona Regional District (SRD), since Sept 2018. We worked with SRD Directors to help draft a resolution and that resolution was presented to the Association of Vancouver Island and Coastal Communities (AVICC) convention in April, asking the provincial government to cease approval of licences for bottling of groundwater for commercial sale or bulk export. The AVICC delegates voted unanimously to pass the resolution. We are pleased to note the resolution has been accepted for the agenda of the UBCM convention in September and we are encouraging all UBCM member communities to support and vote in favor of adopting the resolution to be presented to the provincial government.

I have 2 requests for the City of Merritt.

- 1) that you consider taking the necessary steps to implement a bylaw that expressly prohibits bottling of groundwater in any of your zoning, to help in the fight to protect our groundwater/aquifers for the use of our residents and farmers today and for our children and grandchildren and great grandchildren in the future.
- 2) I also ask that the City support the Strathcona Regional District/AVICC resolution at the September UBCM convention, to ask the Provincial Government to cease the approval of licences for commercial extraction of groundwater resources for bottling and commercial sale or bulk water export.

Strathcona Regional District Water Protection Resolution

WHEREAS water is an essential resource upon which all life, including all ecosystems and all local communities depend,

AND WHEREAS water is a public heritage and a public trust for present and future generations and access to water must not be compromised by commercial operations relating to commercial water bottling or commercial bulk water exports,

THEREFORE BE IT RESOLVED that the Premier of British Columbia and the Minister of Forests, Lands, Natural Resource Operations and Rural Development be requested to immediately cease the licensing and extraction of groundwater for commercial water bottling and/or bulk water exports from aquifers.

We cannot allow water bottling from our aquifers based on theory and calculations. The consequences of being wrong could be catastrophic. We will continue to do our part to lobby and work with the Provincial Government, who have jurisdiction over groundwater licencing, and to support the Strathcona resolution to cease the approval of licences for groundwater extraction for bottling or bulk sales. We would sincerely appreciate the support of the City of Merritt in protecting the above ground uses of our groundwater by preventing anyone from bottling and selling water from any aquifer in BC. I implore you to talk to and work with the Strathcona Regional District to protect the aquifers of British Columbia. Water is our most precious resource. Water is life. We must do everything we can to protect and conserve it. Thank you for your time and your consideration.

Bruce Gibbons

Merville Water Guardians

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