

AGRI WASTE CONTROL REGS REVIEW: Our comment.... Sept 2015

While there are multiple sources of waste contamination our submission focuses on an area that receives little attention as per the following:

Submission to Agricultural Waste Control Regulation Review by: Al Grant for Boundary Environmental Alliance Org. www.boundaryalliance.org September 14 2015.

This writer approaches this process with great skepticism informed by 40 years of farming and 30 years as an active environmentalist (particularly in stream protection) in the Fraser Valley and here in the Boundary area for the last 20 years. Having been a participant in numerous exercises promoted by Government to address myriad environmental concerns, one constant has been Government reluctance to do what is necessary to protect the environment.

Twenty five years ago I wrote a report for the Langley Township Council's Environment Committee on Water Quality and Preservation of Natural Resources. That report led to an Environmentally Sensitive Areas Study by UBC. Both reports documented farm and other waste problems affecting streams and large aquifers in the Fraser Valley. There was nothing new in this information as the various sources of degradation had been known for years. Despite numerous government and producer initiatives over the years these same problems still persist and nitrate and other potentially harmful toxins have increasingly created dead streams and ever increasingly tainted aquifers.

This AWCR process has been going on for years, frightened it appears, to move with any deliberate speed due to perceived agriculture industry resistance and has indicated that any (presumably weak) changes will be implemented over some extended timeline.

This writer farmed as a (fairly large) hobby farmer for 40 years and in doing so had an inside perspective on industry concerns and industry contributions to environmental problems. For those who perhaps regard "hobby farming" as not real farming, I would point to the B C Cattle industry which is the target of our upcoming criticisms, and point out that the recent government Ranching Task Force pointed out that most ranches in BC have outside work to support their hobby.

Since 2006 Boundary Alliance has documented damage and pollution created by ranching operators in the Boundary area. The primary focus has been on damage to public lands, so called range land made available to ranching operators at an absurd rental. Other examples of damage on private land exist and links are provided below.

Earlier input into the AWCR process indicates a substantial number of contributors want to preserve the status quo and resist "owning" their contribution to the problem or even acknowledging the problem. One response seemed to encapsulate this mindset by saying "*the samples of the Coldstream & Osoyoos Aquifer (given in an AWCR update/review) are not representative of watercourses and aquifers throughout BC and are therefore not sufficient to demonstrate that broad based regulatory changes are*

required”.

While the AWCR could have supplied a multitude of other documented problems, it was not the purpose of that report to provide that long list. The problems of Coldstream and Osoyoos aquifer are indeed representative of BC aquifers and streams and in fact there are far more problems than government has so far seen fit to acknowledge.

The latest AWCR update/review referred to Best Management Practices on Crown Land in Community Watersheds. In our linked reports we note in detail that MFLNRO has promoted the notion that some higher level of care, (guidelines only and unenforceable) applies to Community Watersheds. The Forest Practices Board and the organization representing logging on private land have both stated that there is no justification or worthwhile rationale for distinguishing between officially designated “Community Watersheds” and the many undesignated watersheds on which many are dependent. The Ministry of Environment needs to require all watersheds get protection and not follow the artificial distinction that Ministry of Forests... has promoted.

The notion that Best Management Practices will effectively address any range use problems is only possible if one ignores all earlier criticisms of range practices by Forest Practices Board, FREP and other observers who have noted that Range Branch and rancher oversight is insufficient to protect public resources. There are compelling reasons, including economics and attitudes that that will remain so.

The AWCR update/review of July 2015, footnoted (8) on Section 10, page 9 that “*Management Plans for grazing leases do not consider water quality and that dispersed grazing for low intensity well distributed livestock on grazing leases generally poses a low environmental risk to water quality*”.

Our articles and links that follow show this claim to be utterly unjustified.

The following reports document damage and pollution, primarily by range cows, and demonstrate that the levels of contamination are directly related to the presence or absence of range cows. The reports also show that the level of contribution of wildlife to E.coli contamination of streams is not significant, contrary to claims by Range Branch and ranchers.

Links for our reports:

The Problem with Range Cattle, a report sent to Ministry of Forests..., Ministry of Agriculture, Min of Environment April 2010. Ministry of Environment never replied to this report. Min of Forests indicated they were working on changes. We have never seen them. The issue of contaminated water begins on page 10 of that report, however the whole report refers to contributory factors.

www.boundaryalliance.org/rangecattle_problem.org

Ecoli Counts in Streams, a 2009 report on several representative streams in the Boundary.

www.boundaryalliance.org/ecolireport2009.pdf

Pathogens and Protection, report which covered cattle range use in our sensitive dryland area and the consequences to water quality, riparian zones.

www.boundaryalliance.org/pathogens_and_protection.pdf

Patterns of E.coli Contamination in Public Land Streams related to the presence of Range Cattle. 2013

This study is ongoing. Results for 2014 and 2015 have not yet been published but so far confirm the earlier results.

www.boundaryalliance.org/e.coli_report2013.pdf

Eholt Creek: A Damaged Stream.

An example of private land damaged including video from 2014

www.boundaryalliance.org/eholtcreek.pdf

A number of other complaints relating to cattle damage can be found at our blog:

www.dryrotjournal.blogspot.ca

with expanded versions on our website: www.boundaryalliance.org

AI Grant for Boundary Alliance Org

Tags: Agricultural Waste Control Regulation Review, Best Management Practices, Range Cow damage, Stream damage by cows, E.Coli contamination of streams