



# PEI Soil & Crop Improvement Association

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P.O. Box 21012

Charlottetown, PE

C1A 9H6

Tel/fax: (902) 887-2535

[office@peiscia.ca](mailto:office@peiscia.ca)

[www.peiscia.ca](http://www.peiscia.ca)

January 10<sup>th</sup>, 2016

Water Act Consultations  
c/o Environmental Advisory Council  
Dept of Community, Land and Environment  
PO Box 2000  
C1A 7N8

Dear Sir/Madam:

Our organization has been unable to prepare a submission to your consultation process until now, and we apologize for that.

First we were pleased to see a tremendous response with many viewpoints, either by public presentation or written submission. Our BOD did review a small sampling of these submissions, including PEI Potato Board, Cavendish Farms, PEI Federation of Agriculture, Pesticide Free PEI, and Kensington North Watersheds Association. Many great points and ideas have been brought forward in this process.

We believe that the most important thing to remember is to allow sufficient time to get the legislation right so it is meaningful, sensible, deliverable, practicable, clear and enforceable. Our province has seen too many times in the past, legislation that simply doesn't work. This process was spurred on by the high capacity well issue, but of course the water act involves much more than that.

The decisions associated with the water act must be science and research based as opposed to anecdotal or emotional. Individuals or groups in agriculture as well as members of the public

should be consulted as the legislation is being developed to ensure that the final product is one that can work for everyone who is affected by the legislation. Legislation without agriculture consultation has been an issue in past years.

The agriculture sector will need technical and financial support through the PEI Department of Agriculture and Forestry Sustainable Agriculture Section. The necessary human resources must be identified and put in place to support farmers in any sort of planning and implementation process as a result of legislation. This will most likely require additional sustainable agriculture professionals.

As farmers who have families living on this land, we as much as anyone, desire a healthy landscape. The evidence of this desire is shown in the amount of buffer zones, soil conservation, nutrient management and integrated pest management practices farmers are doing – contrary to public opinion. The difference in sustainable agriculture practices are as different as black and white in the past 25 to 30 years.

Although some members of the public may not be aware or do not see it, but PEI Agriculture is improving its sustainability record. There are still some challenges facing us, but we have come a long way.

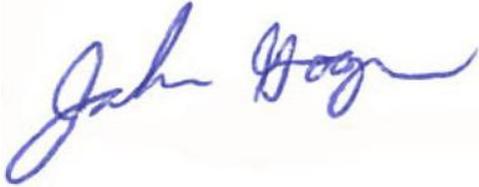
We do see a niche for supplemental irrigation, for those producers who wish to adopt this as a management tool. Soil health and organic matter remains high priorities to producers as the main tool to produce that marketable crop, but we do see the benefits associated with the occasional need of extra water. Farmers who voluntarily want to irrigate, on a watershed that is monitored and able to supply desired amounts of water, should be permitted to irrigate. Strategic use of ponds being filled at low impact times from higher capacity wells, streams, or spring freshet events, makes good sense and must be explored and supported.

The PEI Federation of Agriculture and others recommended a step or incremental high capacity well permitting process. Our Association believes this makes perfect sense, once the science is shown to be quite solid. We'd be agreeable in the permitting process to have consideration of sustainable agricultural management practices - but again agriculture needs to be at the table to help develop this strategy.

I think the submissions received will give many great ideas to move forward. PEISCIAC wishes to keep engaged in this process as the Province progresses. We and other agricultural organizations would wish to see the legislation in draft stages as it is developed and our Association will provide comments and ideas.

Thank you

Sincerely,

A handwritten signature in blue ink, appearing to read "John Hooper". The signature is fluid and cursive, with the first name "John" being larger and more prominent than the last name "Hooper".

John Hooper  
President PEISCIAC