



Jan. 10, 2020

2019-P-159

Sherry Forsyth
Vice-Chair
Saskatchewan Alliance for Water Sustainability
(saskaws@gmail.com)

Dear Sherry Forsyth:

Thank you for your Dec. 11, 2019 email outlining the Saskatchewan Alliance for Water Sustainability's (SAWS) proposed directives on agricultural water management and wetland mitigation.

The Water Security Agency (WSA) appreciates the perspective of SAWS regarding agricultural water management. In general, WSA is still consulting with a range of stakeholders on its approach to the implementation of the Agricultural Water Management Strategy, as well as formulation and finalization of its draft wetland impact mitigation policy.

The suggestions you provided will be considered along with those of many other stakeholders who have provided input to WSA.

Thank you once again for your input.

Sincerely,

A handwritten signature in blue ink, appearing to read "Susan E. Ross", with a large, stylized flourish above the name.

Susan E. Ross
President and CEO
Water Security Agency

Nine Directives Proposed by SAWS

December 10, 2019

1. **That** WSA take up our recommendation to provide informational pamphlets that describe landowner's responsibilities and requirements when draining water off agricultural land. These handouts would be made available to crown corporations, (Sask Power, Sask Energy and Sask Tel), both on-line and hard copy, so that service technicians can hand out this information at the time line locates are requested.

Your suggestion will be considered as WSA further advances implementation of its Agricultural Water Management Strategy. WSA has previously posted information online regarding the Agricultural Water Management Strategy and the requirements/processes associated with obtaining approval for drainage, both existing and new.

2. **That** WSA's policy should apply to all wetlands. No wetlands should be excluded from requiring mitigation, regardless of size.

WSA is currently conducting further consultation on its wetland impact mitigation policy and will consider your suggestion regarding no wetland exclusion from determination of mitigation levels. One mitigation option being evaluated considers all wetlands with no exclusions.

3. **That** WSA Mitigation Policy should not allow for the use of uplands as a way to mitigate for wetland loss. By including land that is in grass or trees distorts the end result. Uplands do not mitigate for nutrients and flooding; they provide different habitat.

WSA is currently conducting further consultation on its wetland impact mitigation policy and will consider your suggestion regarding upland offsets.

4. **That** agriculture be held to the same standards as other industries, (e.g. water treatments, potash mines etc.) when adding to lakes and rivers. The % of wetlands to be retained should be the amount required to adequately mitigate for water quality, flooding and habitat.

What % is required to ensure nutrients are not sent downstream?

At this point, our evaluation of available literature suggests that 50 per cent wetland retention based on pre-development will provide satisfactory retention of nutrients. WSA is conducting further consultation on its wetland impact mitigation policy and will consider your suggestion regarding the percentage of wetlands to be retained.

5. **That** WSA include climate change/carbon sequestration in their Mitigation Policy. We now know that wetlands are tremendous carbon sinks storing tonnes of carbon, but become tremendous carbon sources when they are drained and cultivated. Draining just a few acres of wetlands releases as much carbon as what is stored in thousands of acres of zero till, canceling out any climate change gains this positive farming practice achieves. Restoring wetlands can also sequester significant amounts of carbon from the atmosphere. Wetlands, in addition to reducing GHG emissions, also have a cooling/humidifying effect on local climate and need to be part of the agricultural landscape.

WSA is currently conducting further consultation on its wetland impact mitigation policy, and will consider your suggestion regarding inclusion to references regarding the benefits of wetland retention/restoration on carbon sequestration and climate change resilience.

6. **That** WSA adopt Canada's signed commitment under the 17 UN Sustainable Development Goals, especially those related to wetlands, Goal 6.6, by 2020, "to protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes"; and other environmental goals, #6 "Clean Water and Sanitation", #13 "Climate Action", #14 "Life Below Water", #15 "Life on Land".

What incentives do agricultural producers have to adopt new sustainable practice where laws regarding wetlands are inadequate and/or not enforced, along with perverse incentives to adopt unsustainable practices and technologies in such circumstances, (e.g. tile drainage technologies with little legislative oversight, regulation and monitoring)?

WSA is currently conducting further consultation on implementation of its agricultural water management strategy and wetland impact mitigation policy and will consider your suggestions.

6. **That** WSA begin the process of moving from conflict to collaboration by ensuring any risk to water quality from a drainage approval will be assessed and measured.

WSA is of the view that its current network-based approach to agricultural water management moves from conflict resolution to collaboration, although changing the culture of drainage in Saskatchewan will take time. The regulations, the Agricultural Water Management Strategy and future wetland impact mitigation policy are intended to balance agricultural productivity/growth while ensuring protection related to flooding, water quality and habitat.

7. **That** water quality testing will be done by a third party and paid for by the developer. The data will be stored in a public bank ensuring transparency, accessibility and trust for Saskatchewan citizens.

WSA conducts research related to water quality and collaborates with other researchers to understand the efficacy of best management practices on water quality. Some surface water quality information is already available on www.SaskH2O.ca. Beyond that, your suggestion will be considered as WSA moves forward with consultation on implementation of its Agricultural Water Management Strategy.

8. **That** WSA ensure:

- a. Elected board members of watershed associations declare conflicts of interests in matters where they personally financially benefit in making specific decisions or by not enforcing conservation measures;

WSA agrees with your suggestions. Standard good business practice suggests that the need to declare conflicts of interest be addressed by rules governing the operation of boards and associations.

- b. WSA's impartial enforcement of licencing requirements as a regulator is not influenced by other economic or political objectives of the WSA or the province;

WSA implements regulations in an objective and impartial manner.

- c. The economic or other objectives of the Ministry of Highways and Infrastructure (in which the WSA is now located) do not impede WSA's duties as a regulator.

WSA and the Ministry of Highways and Infrastructure (MHI) are independent and separate entities. WSA is not located within the Ministry of Highways and Infrastructure.

There are many instances where a Minister is assigned responsibility for multiple ministries, agencies and/or crown corporations. Objectives of MHI do not impede WSA's duties.

9. **That WSA suspend all drainage approvals until the Mitigation Policy is finalized, or the proponent commits to undertaking a complete Environmental Assessment as part of their approval process.**

WSA believes it is best to proceed to manage agricultural water drainage projects through implementation of its Agricultural Water Management Strategy at this time, but will consider your suggestion as consultation on implementation the strategy and finalization of the wetland impact mitigation policy continues.