

Montreal, 27 April 2021

Mr. Francis Scarpaleggia
Chair
Standing Committee on Environment and Sustainable Development
via email: ENVI@parl.gc.ca

SUBJECT: Study of Canada's freshwater—recommendations of a Quebec working group

Dear Mr. Scarpaleggia:

We are pleased to accept your committee's invitation to table our recommendations in the context of a study of Canada's freshwater. We believe, as you do, that water is a crucial resource for the economy and the quality of life of Canadians and that it requires governance suited to the 21st century.

GENERAL COMMENTS

A working group composed of representatives of various Quebec stakeholders has developed recommendations to inform your review of water governance. First, the group would like to acknowledge that the Canada Water Agency:

- Represents a historic opportunity to provide for genuine integrated management of our water resources; however, it is essential that this management cover not only **freshwater**, but also marine waters (cf. the approach taken by [Source-to-Sea](#) Sweden) and that the Agency's mandate extend to Canada's North
- Represents an opportunity to ensure that federal laws and policies are consistent with the United Nations Declaration on the Rights of Indigenous Peoples and to move forward with **reconciliation with Indigenous communities**
- Should be deployed with **due regard to federal and provincial jurisdiction** and in a true spirit of co-operation to ensure that actions and programs are consistent

As part of the consultation held by the Minister of the Environment and Climate Change when the Canada Water Agency was created, this same working group tabled joint proposals and recommendations for the Agency's future mandate. We thought that we would submit these same recommendations to the Standing Committee on the Environment for your study of Canada's freshwater.

DEVELOPMENT OF A CANADIAN WATER STRATEGY AND AN ACTION PLAN TO IMPLEMENT IT

A national water strategy would make it possible to define a vision shared by all the federal departments and agencies concerned and to guide, in a consistent way, how priority projects are progressing and how measures, plans and programs are aligned, while regularly tracking implementation. This strategy should recognize the major water issues facing Quebec:

1. Reduction of water pollution at source
2. Water infrastructure: wastewater treatment, asset maintenance, modernization



3. Agriculture: eutrophication, pesticides
4. Climate change
5. Commercial shipping and marine activities
6. Biodiversity: marine protected areas, fisheries, alien invasive species, etc.
7. Cross-border (interprovincial and international) management
8. Access to data

KNOWLEDGE MOBILIZATION AND SHARING

With the creation of the Agency comes an opportunity for knowledge sharing between federal, Indigenous, provincial and municipal governments and for involvement of the various spheres of society (academia, not-for-profit organizations, etc.). The working group proposes that the Agency devote part of its mandate to centralizing knowledge on a platform that is accessible, user-friendly, and focused on the end user.

The European framework directive can serve as a model for producing a comparable knowledge base for concerted action. The priorities are:

- To harmonize baseline data and standardize certain data collection and structuring protocols to make it easier to compare that data across provinces
- To support knowledge acquisition by promoting complementarity between monitoring networks (federal, provincial, academic, citizen science, etc.);
- To promote the sharing of data and information in an “open” access mode (Open Data).

SHOWCASING STAKEHOLDERS' ROLE AND CONTRIBUTIONS

The Agency, recognizing the remarkable contribution of civil society, should provide a signal boost for the actions and initiatives taken by regional and provincial organizations and stakeholders. In Quebec, a number of structures and organizations have a proven track record and play an important role in water protection. The working group would like to see a platform that would give access to tools, work methods and case studies that have worked thus far, with a view to inspiring other stakeholders to use them.

GOVERNANCE

The working group proposes governance based on proven multi-jurisdictional programs such as the [Great Lakes Restoration Initiative](#), the [Chesapeake Bay Program](#) and the [St. Lawrence Action Plan](#) and the one proposed by numerous experts from Ontario and Quebec in the [Action Plan to Protect the Great Lakes and St. Lawrence 2020-2030](#). What these programs have in common is participatory governance, i.e. the integration of the different spheres of civil society in governance. Again, [the European-framework directive](#) is a good example of co-operation that could inspire the Agency in its catalyst role.

Participatory governance must ensure the continued involvement of government departments, with particular emphasis on involving the water stakeholder community. This two-pronged approach makes it possible to take regional realities into consideration while ensuring that government approaches and programs are geared to practical needs.

Lastly, the group believes that an open and participatory approach would help break down the silos between federal departments and provinces to address cross-border issues and encourage better inter-provincial co-operation.

SPECIFIC ROLE AND FUNCTIONS OF THE AGENCY

1. Develop a Canadian water strategy and action plan to ensure that federal policies are consistent and in line with the relevant departments' strategic planning
2. Support the provinces and territories and Indigenous communities in implementing integrated water resources management across Canada
3. Reform the legislation and regulations to integrate new issues pertaining to water
4. Support the acquisition, inventory, collation and sharing of water-related knowledge and tools in Canada, including tools made available by governments, universities, research centres, not-for-profit organizations, Indigenous communities, etc.
5. Follow up on the progress of the projects and the achievement of their objectives
6. Continuously evaluate the measures in place and adapt the action plan accordingly
7. Oversee the implementation of the action plan, ensuring that it has adequate funding, and facilitate working agreements between the various organizations responsible
8. Periodically provide the federal government with recommendations for new issues to be added to the action plan
9. Map endangered aquatic sites (degraded ecosystems, sediment contamination, endangered or invasive species) and implement restoration programs as GLRI is doing in the United States
10. Be innovative, acting as a catalyst and coordinator to foster collaboration and harmonization across jurisdictions

We are eagerly looking forward to the results of your study. Be assured that we are ready to get involved in the implementation of the Canada Water Agency and take concrete action in Quebec.

Sincerely,



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APPENDIX - QUESTIONS AND ANSWERS

As a supplement to the letter outlining our recommendations, and for reference, we are also including some answers to questions posed by the House of Commons Standing Committee on Environment and Sustainable Development. Only the questions we have responded to are shown below, using the proposed classification.

A number of references in the lines below are given in the form of hyperlinks, which we encourage you to follow, as they supplement our answers and demonstrate more fully the expertise of the organizations belonging to the group.

1. Introductory information

a) Which issues related to protecting and managing freshwater does your organization work on?

Some members of our group have been closely involved with the Great Lakes St. Lawrence Collaborative and its [Action Plan to Protect the Great Lakes and St. Lawrence-Lawrence 2020-2030](#)) and the [Assainissement 2.0 working group. A number of recommendations for modernizing municipal water infrastructure](#) emerged from this work. Some members of the group are also involved in the awareness campaign [Pensez Bleu](#), part of Quebec's strategy for saving drinking water, [Stratégie québécoise d'économie d'eau potable](#), and in the [support for sustainable storm water management](#). As for protecting and managing freshwater, some of our organizations have been actively involved for more than two decades in the St. Lawrence Action Plan, especially the Working Group on the State of the St. Lawrence Monitoring, which provides a diagnosis of the state of the St. Lawrence River, including an important component on water quality.

The [Centre d'interprétation de l'eau](#) (C.I.EAU) promotes the protection and responsible use of water through its museum and all-ages activities. It is a shining example of public education on water-related issues. The C.I.EAU is also involved in the [Coalition for responsible and sustainable navigation](#) to raise awareness among boaters of the protection of aquatic life.

The [Regroupement des organismes de bassins versants du Québec](#) (ROBVQ) is a not-for-profit organization that the Quebec Department of the Environment and the Fight Against Climate Change (MELCC) recognizes as its primary contact for the implementation of integrated watershed-based management in Quebec. Its mission is to bring together Quebec's watershed organizations in order to promote water governance through integrated watershed-based management in the name of sustainable development.

[Réseau Environnement](#), the largest network of environmental experts in Quebec, acts as a catalyst for the green economy.

[Stratégies Saint-Laurent](#) (SSL) is an umbrella organization bringing together Quebec ZIP (zones d'intervention prioritaire – areas of prime concern) committees. Using innovative models, it promotes shoreline communities' participation in the protection, rehabilitation

and reclamation of the St. Lawrence. SSL has been recognized in the St. Lawrence Action Plan (SLAP) since 1993.

[The de Gaspé Beaubien Foundation](#) uses entrepreneurial drive to conduct philanthropic projects in the water sector. This approach is based on the fundamental principles of listening, sharing and working with the community to initiate sustainable action and change.

[Aqua Forum](#) is a not-for-profit organization driven by disrupting the status quo with innovative ideas in the water management sector. Its flagship program, AquaHacking, draws out innovative ideas and solutions by engaging young entrepreneurs with a can-do mindset and creates opportunities for co-operative development of technology solutions.

2. Interaction and collaboration with federal departments and agencies

a) Does your organization interact with federal departments and/or agencies on freshwater issues?

Yes. The members of this working group have different types of ties with many departments.

If so, on which issues and with which departments and/or agencies?

Discussions were held with [ECCC](#) and [Health Canada](#). These dealt, in particular, with the Chemicals Management Plan (CMP), the implementation of measures in accordance with the Stockholm Convention and the *Species at Risk Act*, and St. Lawrence ecosystems, with particular reference to endangered species such as belugas. Some of the partners in the working group are also concerned with the St. Lawrence Action Plan (SLAP).

We are also working with [Transport Canada](#) on issues related to the *Shipping Act*, especially in terms of the new approaches in the Oceans Protection Plan (OPP), such as proactive vessel management and management of the cumulative effects of marine shipping. Our organizations also participate in committees on dredging management and hydrocarbon risks. We also work with regional authorities under the responsibility of Transport Canada: the St. Lawrence port authorities and the pilotage authorities and corporations.

[Fisheries and Oceans Canada](#) is also a participant in several fish habitat conservation initiatives, but also through the OPP's Coastal Restoration Fund (CRF) in which a number of our members are involved. We also work with the [Canadian Coast Guard](#).

[Parks Canada](#) is also a natural partner for our organizations on issues related to biodiversity conservation, but also on water quality issues.

Lastly, our work occasionally involves [Agriculture Canada](#).

d) Do you foresee engaging with the new Canada Water Agency? If so, in what way? What are your organization's expectations with respect to the Agency?

Yes. More particularly in connection with:

- Implementation of the Great Lakes St. Lawrence Collaborative's Action Plan 2020-2030. Working with the Government of Quebec on endeavours arising from the [recommendations of Assainissement 2.0](#).
- The protection of the resource as indicated in Réseau Environnement's [recovery plan for a greener Quebec economy](#).
- Enhancement of concerted action resulting from the St. Lawrence Action Plan, particularly the area of prime concern program—2021–2026
- Recognition of natural assets (natural capital) and the value of natural infrastructure in the tax standards of various federal programs is important for both our economy and our environment. At a time when climate change requires a better understanding of all manner of impacts on land use planning, the value of natural assets can no longer be a marginal or satellite element in an economy that we are seeking to make ever more sustainable. Canada possesses extensive natural capital: it is time to measure its full extent and to integrate all the tools at our disposal to ensure that its value is maintained and even increased for future generations.
- Here is the conclusion arrived at by a webinar on water awareness held 13 October 2020 as part of the series of [webinars about the Canada Water Agency](#): Since funding and coordination are the watchwords for federal involvement in water awareness activities in Canada, a committee of marketing and water experts could be struck. It could make recommendations for funding and ensure coordination with provinces and regions to build on existing initiatives. Awareness must be raised at the national, regional and local levels. A new water agency should not replace existing awareness initiatives, but rather support them as part of an overall strategy. This Agency must succeed in bridging different provincial approaches, such as [Pensez Bleu](#), or local initiatives (e.g.: the initiatives of the watershed organizations in Quebec within the framework of the [Mois de l'eau](#)). Linking macro and micro approaches shines a brighter light on the issues being raised and fosters a greater affinity between individuals and the resources in their living space. The Canada Water Agency could provide access to communication tools to help redirect citizens to appropriate resources. It is vital that we all work together for future generations to protect Canada's freshwater.

3. Federal water legislation, policies and regulations

b) Can you identify any current gaps in federal water legislation, policies, regulations, and/or initiatives, or in general across jurisdictions? If so, please specify.

Yes. Here is a list of recommendations:

- The principle of precaution should be further integrated into CMP decisions. Studying one molecule at a time is not an effective approach. Instead, families of harmful compounds must be looked at to adequately protect the environment and human health and avoid regrettable substitution.
- More use should be made of ecofiscal measures. “Ecofiscal policies put a price on pollution. They offer real incentives for investment in innovative technologies so that we can continue benefiting economically from our natural wealth while also providing better protection to the environment. The revenue generated from ecofiscal policies can create further economic benefits; for example, by reducing income and payroll taxes or investing in new technologies or critical infrastructure.” ([Canada’s Ecofiscal Commission](#)).

c) Do you feel the federal government could play a more effective role in protecting watersheds in Canada? If so, which watersheds and how?

Yes. The Government of Canada should be involved or continue to be involved at the large watershed level. The Great Lakes-St. Lawrence watershed is the most important for our working group and co-operation with the United States is vital. This warrants effective involvement of the Government of Canada in addition to that of the Quebec and Ontario governments. The particular issue of excess nutrient runoff contributing to hypoxic zones in the St. Lawrence ecosystems requires collaboration between Canada and the United States, since nitrogen is not an issue in the Great Lakes, but is very much one downriver, in the St. Lawrence. Given that the St. Lawrence Great Lakes system is an international waterway, the Government of Canada must be proactive in minimizing the impact of marine transport on ecosystems and water quality.

d) Are there areas of freshwater policy, legislation and/or regulation where you feel the federal government should play a greater role?

With respect to the management of interprovincial transboundary waters, there appears to be a gap in existing legislation and policy. Provincial governments are implementing integrated resource management approaches (e.g., watershed organizations in Quebec and Conservation Authorities in Ontario), but these structures focus on provincial waters. The St. Lawrence Action Plan, through ZIP (area of prime concern) committees and regional round tables, also allows for action on integrated management of the water resources of the St. Lawrence, but these initiatives do not have a transboundary scope—they are limited to the St. Lawrence River corridor in Quebec. This results in poor integrated management on rivers that cross a border (e.g., the Saint John River between Quebec and New Brunswick) or form a border (e.g., the Ottawa River between Quebec and Ontario). Federal action in this area, while respecting and complementing provincial approaches, would be a plus. In this regard, the ROBQ held an [International Forum on Transboundary Waters Management](#) and is currently conducting a project for the MELCC on the integrated management of the Quebec portion of the Ottawa River.

Other detailed recommendations for possible adjustments to legislation and policies are included in [Assainissement 2.0](#).

- e) Are there areas of freshwater policy, legislation and/or regulation that you feel the federal government should vacate and leave to another level of government or to the private sector?

The regulations that apply to commercial shipping and marine activities are not really applicable to recreational boating on the some 500,000 lakes and 4,500 rivers in Quebec outside the maritime territory of the St. Lawrence River. The application of the regulations is complex and does not allow for the monitoring of recreational boating activities according to the carrying capacity and bathymetry of the smaller bodies of water. An adjustment to this framework and co-operation with provincial governments in its application should be considered for recreational boating outside the maritime territory of the St. Lawrence River. This holds for the whole of Quebec. The [Coalition for responsible and sustainable navigation](#), in which the ROBVQ participates, also has expertise in this area. This situation is also outlined in several water management plans of watershed organizations in Quebec.

4. Collection of information and data

- a) Do you believe that there is sufficient data collected and made available publicly about freshwater in Canada?

No. Here are just a few examples:

- There is insufficient data on important integrating parameters, such as the summation of persistent organohalogens in water, sediment and living organisms (quantification of total organic halogens). The same applies to endocrine disruptors (in vitro and in vivo tests).
- There is also a lack of comparable national level data on cultural and agri-environmental practices to prevent [phosphorus sources and eutrophication](#). This situation, among others, is documented by [Blue Accounting](#), in which the ROBVQ participated.
- There is an opportunity to leverage citizen science networks to increase the amount of data available and to develop mechanisms to have the validity of those networks' data verified by government authorities. Inspiration may be drawn from the [voluntary lake monitoring network in Quebec](#), as well as [the one on benthos](#), conducted by G3E. These two projects demonstrate the importance of supporting citizen involvement in order to increase the scope of knowledge acquired, particularly in regard to water. And since work of this kind requires both technical and financial support, a federal agency could become a major lever to take it even further. This is documented in particular by [a pan-Canadian coalition](#) of which the ROBVQ is a member.
- In recommendation 10 of the [Assainissement 2.0 working group](#), the importance of developing a best practice guide and a protocol for monitoring water quality data is emphasized. Similarly, consideration should also be given to a centralized portal to disseminate information to the general public. These types of projects require federal and provincial authorities to work together, in mutual respect of one another's jurisdictions.

- It is also essential to maintain and increase financial support for initiatives such as the St. Lawrence Global Observatory (SLGO), which provides a wealth of environmental data related to the St. Lawrence.
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5. International and business issues

a) Should Canada play a greater role internationally in helping find solutions, either through government and/or the private-sector involvement, to the challenge of global freshwater security?

Yes.

b) Do you feel Canadian private-sector companies, including financial institutions, can and should play a role internationally?

Yes.