

June 11, 2021



Standing Committee on Environment and Sustainable Development  
Sixth Floor, 131 Queen Street  
House of Commons  
Ottawa ON K1A 0A6

Dear Members of the Committee,

**Re: ENVI Committee study on freshwater**

In relation to your study of freshwater, I am pleased to share with you the Green Budget Coalition's preliminary recommendation for Budget 2022 investments to address "Freshwater Management for the 21st Century," and a related recommendation to address "Coordinated Data Collection to Support Regulatory Evaluation of Pesticides." These recommendations highlight the need to ensure adequate resources are provided to manage and steward Canada's freshwater environment.

The Green Budget Coalition (GBC), founded in 1999, brings together twenty-three leading Canadian environmental and conservation organizations. Each year, the Coalition prepares a consolidated set of recommendations to the federal government regarding strategic fiscal and budgetary opportunities.

We are currently inviting feedback on our preliminary recommendations for Budget 2022. I expect to be able to share with you our final recommendations report in the early fall.

Should you have any questions about the attached recommendation, please contact the lead authors listed at the bottom.

Sincerely,

A handwritten signature in dark ink, appearing to read "Andrew Van Iterson". The signature is fluid and cursive.

Andrew Van Iterson  
Manager, Green Budget Coalition

## Green Budget Coalition Recommendations for Budget 2022 (Excerpts)

### Freshwater Management for the 21<sup>st</sup> Century

The management and stewardship of Canada's freshwater environments is one of the great challenges of our time. Pressures on freshwater environments are mounting and compounding due to growing populations, increasing demand for food and energy, expanded natural resource extraction, growing urban areas, and the changes in precipitation and temperature resulting from climate change. Effective stewardship and management of freshwater environments is critical to the health of fish and wildlife, the economy, and the people of Canada. Lake Whitefish and Sockeye Salmon, for example, are critical to Indigenous food security, culture and spirituality. Freshwater recreational and commercial fisheries generate over \$8 billion annually in economic activity and support rural communities.<sup>12</sup>

It is estimated that by mid-century most of the freshwater ecosystems in the world will be in significant trouble. In Canada, 56% of freshwater fish species or unique populations are at risk.<sup>3</sup> Unpredictability has become the new normal, particularly in water management. Extreme weather events — such as floods in Toronto and Calgary, and droughts in British Columbia — are becoming more common. The normal water cycles that wildlife and people expect or rely on are becoming disrupted. Climate change is altering the abundance, growth, and recruitment of several North American inland fish species due to changes in water temperature and flow, with particularly severe impacts on coldwater and migratory species. Habitat loss and alteration due to land conversion and resource extraction, such as agriculture, urbanization, and forestry, is having extensive impacts on freshwater ecosystems.

Effective stewardship and management of fresh water to sustain biodiversity and people into the future must address three interconnected dimensions – aquatic habitat, water quantity, and water quality. Pacific Salmon recovery, for example, will require action on all three fronts to restore the instream habitat that these species rely on and the watershed processes that sustain this habitat. Similarly, maintaining and expanding the recreational use of the Great Lakes coastal and offshore areas requires restoration of coastal habitat, management of water levels under a changing climate, and actions in the watershed to address water quality issues.

Due to shared jurisdiction and multiple overlapping interests, the management of freshwater environments requires a shared responsibility approach between all levels of government that sets out a holistic management framework. The federal government is well positioned to take a leadership role in building a pan-Canadian approach to freshwater that shares responsibility with the provinces, territories and Indigenous peoples and integrates across federal programs for fish habitat, aquatic species at risk, water pollution, and transboundary waters. The ongoing work to modernize the fish habitat protection program, update the *Canada Water Act*, and establish a Canada Water Agency is a unique opportunity to bring Canada's management of freshwater environments into the 21<sup>st</sup> century.

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<sup>1</sup> Fisheries and Oceans Canada, "Survey of Recreational Fishing in Canada 2015." <https://www.dfo-mpo.gc.ca/stats/rec/can/2015/index-eng.html#1-2>

<sup>2</sup> Fisheries and Oceans Canada, "Commercial Landings and Production by fishing activity, Canada, 2012-2016." <https://www.dfo-mpo.gc.ca/stats/cfs-spc/tab/xls/cfstab1-e.xls?>

<sup>3</sup> Steven J. Cooke, Nicolas W. R. Lapointe & John P. Smol, "Canada is failing its freshwater fish populations." <https://www.theglobeandmail.com/canada/article-canada-is-failing-its-freshwater-fish-populations/>

The Green Budget Coalition recommends investing in a Pan-Canadian Approach to Fresh Water with shared responsibility between federal departments and other levels of government, similar to Canada's Nature Legacy. The Pan-Canadian Approach should include the following investments:

- 1) Funding for ECCC and DFO to develop a **Pan-Canadian Approach to Fresh Water** to establish principles, goals, and targets for aquatic habitat, water quality and water quantity that are policy based and measurable.

**Recommended Investment: \$20 million over three years** [ECCC, DFO]

- 2) Ongoing funding to establish, enhance, and integrate a **monitoring and reporting system for the status of fish habitat and the state of freshwater**, building on the experience of the Freshwater Quality Monitoring and Surveillance program (FWQMS) and leveraging community-based monitoring programs. The purpose of this program would be to inform regulatory decision making, guide restoration and stewardship programs, and report on targets. This should include re-establishing and expanding the National Pesticides Monitoring and Surveillance Network.

**Recommended Investment: \$22 million annually on-going** [DFO, ECCC in collaboration with PMRA]

- \$5 million pesticides monitoring
- \$7 million fish habitat status and assessment
- \$10 million in addition to existing FWQMS allocation

*See also Coordinated Data Collection to Support Regulatory Evaluation of Pesticides, later in this document.*

- 3) Funding for DFO to work with the provinces, territories, Indigenous peoples, and stakeholders such as resource industries and fishing organizations to establish, as part of the Pan-Canadian Approach, a **Fish Habitat Strategy** that sets out the regional goals and management frameworks required to prioritize regulatory and non-regulatory actions to protect fish habitat and address cumulative effects on a regional basis in freshwater and estuarine environments.

**Recommended Investment: \$20 million over two years and \$2 million per year on-going** to continue to work with the provinces, territories, and Indigenous peoples to build and maintain the strategy to inform regulatory decisions and habitat restoration. [DFO]

- 4) Permanent funding for the **Canada Water Agency** to carry out its stated objective of ensuring federal policies and programs promote effective management and protection of freshwater resources and ecosystems in Canada for 21st century challenges and beyond—including adapting to climate change.

**Recommended Investment: \$70 million in new funding annually, ongoing** [ECCC in collaboration with DFO]

- 5) **Fresh Water Legacy Fund** to improve water quality and restore fish habitat through watershed and in water actions, including invasive species control. The Fund would be guided by existing priorities and additional priorities and targets set through the Pan-Canadian Approach to

Freshwater Management and the Fish Habitat Strategy. It could be structured similar to the Nature Legacy Fund with programs for priority places, priority species, and priority threats. Components of the funding program should be administered and promoted by arm's length organizations similar to Wildlife Habitat Canada's role in the Nature Legacy Fund, the Pacific Salmon Foundation, the Atlantic Salmon Conservation Foundation, or the National Fish Habitat Partnership in the United States. The Fund would include renewed funding for the Freshwater Action Plan to improve water quality and restore habitat in the Great Lakes-St. Lawrence and Lake Winnipeg. It would also support actions in other priority places and for priority species to advance watershed restoration and the improvement of fish habitat in streams, rivers, lakes, and estuaries to help meet responsibilities under the *Fisheries Act* to restore fish populations and address cumulative effects to fish habitat.

**Recommended Investment: \$250 million over five years** with the following components:

- I. **\$100 million over five years** in renewed and expanded funding for the Freshwater Action Plan to address key biodiversity and ecosystem concerns for the Great Lakes, St. Lawrence, and Lake Winnipeg:
    - **\$30 million** in new investments in fish habitat restoration in the Great Lakes and St. Lawrence River to benefit commercial and recreational species and species at risk [DFO];
    - **\$30 million** in new investments to reduce nutrient loading from the Red River and South Saskatchewan River Basins to Lake Winnipeg [ECCC]; and,
    - **\$40 million** in new investments to strengthen aquatic invasive species control through control structure creation or renewal, expanded eradication programs, and research into prevention and control methods. This includes meeting Canada's treaty obligation to fund the Great Lakes Fishery Commission by increasing funding from \$9.5 to \$19.4 million. [DFO, GAC]
  - II. **\$150 million over five years** to implement watershed and fish habitat restoration projects for priority watersheds and priority species. [DFO in collaboration with ECCC]
- 6) Funding for provincial, territorial, and Indigenous led **community-based monitoring** (CBM) to contribute data to the integrated monitoring and reporting system for the status of fish habitat and the state of freshwater described above. The program should support integration of CBM non-government groups into government monitoring programs and priorities, building on experience from past federal programs such as the Atlantic Coastal Action Program.

**Recommended Investment: \$25 million over five years** [ECCC, DFO]

- 7) Capacity for Indigenous peoples to engage in watershed planning, integrated planning for fish habitat, and water governance.

## Contacts

David Browne - [davidb@cwf-fcf.org](mailto:davidb@cwf-fcf.org)

Elizabeth Hendriks - [ehendriks@wwfcanada.org](mailto:ehendriks@wwfcanada.org)

Anastasia Lintner - [anastasia@cela.ca](mailto:anastasia@cela.ca)

Lisa Gue - [lgue@davidsuzuki.org](mailto:lgue@davidsuzuki.org)

## Coordinated Data Collection to Support Regulatory Evaluation of Pesticides

Canada needs a comprehensive, national water-monitoring program for pesticides that delivers robust data, for both environmental and human exposure assessment, in support of regulatory decisions. The federal pesticide regulator, the Pest Management Regulatory Agency (PMRA), frequently lacks data on environmental concentrations of the pesticides it is responsible for evaluating and regulating, and this is an unacceptable gap. The PMRA has designed a pilot program that is ready to go and should be funded. Eventually this work could be incorporated in the mandate of the Canada Water Agency.

The PMRA also lacks reliable data on pesticide use. Modern agricultural practices have created fundamental changes in pesticide use patterns that need to be reflected in pesticide exposure assessments. Systematic collection of pesticide use data would allow the PMRA to perform trend analysis, effectively evaluate exposure assessments submitted by pesticide registrants, and better plan and target compliance and enforcement activities.

The PMRA has proposed a new Integrated Approach to pesticide evaluation. The recommended federal investments in a national water monitoring program for pesticides and collection of pesticide use data, to be delivered in collaboration with ECCC and AAFC, are essential components of this new approach; it would be undermined without them.

### Recommended Investment:

**\$5 million in 2022** to deliver a water monitoring pilot [PMRA, in collaboration with ECCC]. The Green Budget Coalition is also recommending investments to re-establish and expand the National Pesticides Monitoring and Surveillance Network to carry on this work on an ongoing basis (\$5 million/year) - see *Freshwater Management for the 21st Century*, earlier in this document.

**\$5 million over five years** for pilot of pesticide use and annual data collection. [AAFC]

### Contacts

Lisa Gue – [lgue@davidsuzuki.org](mailto:lgue@davidsuzuki.org)

Kathleen Cooper – [kcooper@ccla.ca](mailto:kcooper@ccla.ca)