

November 26, 2004

Bill Barlow, Chair
Lake Winnipeg Stewardship Board
P.O. Box 305
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Dear Mr. Barlow and the Lake Winnipeg Stewardship Board:

Thank-you for participating at the inaugural meeting of the Manitoba Eco-Network water caucus.

We would like to provide general comments based on your presentation of November 8, 2004 and the information contained within the Manitoba Conservation Public Registry.

Our first suggestion to the Lake Winnipeg Stewardship Board (LWSB) would be that it embraces a holistic approach in developing solutions to the nutrient problem of Lake Winnipeg. While your scope appears limited to nutrients, we wish to make you aware that potential remedies, in the form of changing laws, technologies and practices will have the ability to improve water quality beyond impacts associated with only nutrients. In this respect, importance must be placed on the identification and inclusion of other pollutants within the scope of your review, as any change or action contemplated must be measured against the potential for having applicability to other pollutants entering Lake Winnipeg. For instance, restorative practices such as erosion and sediment control will have direct tangible benefits for the water and be able to filter constituents other than nutrients.

We further suggest that the LWSB monitor and report back on other issues, which may impact the integrity of the Lake Winnipeg ecosystem. Examples that come to our mind include:

- hydro development and the regulation of Lake Winnipeg as a reservoir
- the reduced flows of the Saskatchewan River
- East Side of Lake Winnipeg planning process and potential impacts resultant from increased development
- climate change and related impacts to water quantity and quality
- North Dakota's Red River Valley Water Supply Assessment
- Non-nutrient contaminants relating to waste water and runoff, including pesticides, pharmaceuticals, endocrine disrupters, household and industrial cleaners and so on...

On a second matter, we suggest that your board seriously review the tasks at hand and ask whether you have the capacity (human and financial) to carry out the necessary duties and functions required of you and in a timely matter. Will resources be made available to conduct a proper public involvement program in the future? We understand that there may be differences of opinion between the federal government and provincial government on which nutrient to control, either phosphorus or nitrogen. So we ask, is the capacity available to resolve this issue? (As a suggestion, perhaps engaging an independent scientific third party may help resolve this issue)

Furthermore, we suggest that as a guiding recommendation to government, your board request that both the federal and provincial governments substantially increase investment for the protection of our water resources. These investments will be required for watershed planning, improving our baseline data, implementing the Lake Winnipeg remediation plan, and hiring staff for monitoring, enforcement, research, education and public outreach. On this matter, it would make sense for the LWSB to cost out the various options, which it intends to identify in its plan. We suggest that any incentive and/or instrument recommended, whether voluntary, regulatory or financial have a price tag attached to it. Consideration should also be given to ease of implementation and expected results. This economic exercise must incorporate the polluter pay principle.

Thirdly, we ask that your board take precaution in its deliberations, when making recommendations. Implementing improvements on one side of the equation may have severe impacts on the other side. For example, better treatment of wastewater will invariably create a higher degree of toxicity in the sludge for land application. In this instance we strongly recommend that a pollution prevention component be built into the overall remediation plan. Pollution prevention as defined by the Canadian Council of Ministers for the Environment is the use of processes, practices, materials, products or energy that avoid or minimize the creation of pollutants and wastes at source. On this point, practices such as transporting nutrients from nutrient rich areas of the province to nutrient deficient areas is energy intensive and does not address the production problem at source. In the longer run, at source solutions are far superior, environmentally and economically, to end-of-pipe solutions.

As a fourth general principle, we suggest that any assignment of responsibility for implementing change instill an ethic of cooperative independence. This is to ensure that checks and balances are built into the overall implementation of the plan and that parties who must change their actions are held accountable. Since governments have tended to shy away from command and control regulatory approaches and have chosen the path of voluntary compliance, special attention must be paid to who will be responsible for implementing a particular action and what disincentives (or incentives) will be rendered for non-compliance. The status quo of voluntary compliance schemes, combined with minimal governmental monitoring, enforcement and follow-up have led us to our current situation. A move away from voluntary compliance and to regulatory action will build public confidence and lead us to improved public interest and participation.

And lastly, upon review of the geographic scope and task at hand, it appears that the board may have to adjust its representation and/or jurisdiction to include a stronger federal perspective in order to move ahead.

We thank you for your time and we look forward to your first interim report.

Sincerely

Janine Gibson, Chair, Pansy Ground Water Committee/Co-Chair, Organic Food Council of Manitoba

Don Sullivan, Executive Director, Boreal Forest Network

Lindy Clubb, The International Erosion Control Association (Northern Plains Chapter)

Ted Ross/Bill Harrison, Roseisle Creek Watershed Association

Glen Koroluk, Coalition to Save the Assiniboine River

Glenda Whiteman, Concerned Residents of Winnipeg, Inc

Cathy Holtslander, Coordinator, Beyond Factory Farming Coalition

Tania Gottschalk, Sturgeon Creek Association/Friends of Omand's Creek

Anne Lindsey, Campaign for Pesticide Reduction, Winnipeg

Ron Thiessen, Campaign Director, Western Canada Wilderness Committee – Manitoba

Liz Dykman, President, Resource Conservation Manitoba

Ken Sigurdson, Region 5 Coordinator, National Farmers Union

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Water Caucus

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