

**COMMENTS ON THE FEDERAL SUSTAINABLE DEVELOPMENT STRATEGY
FOR CANADA 2016 – 2019**

**Canadian Water and Wastewater Association
National Committee on Climate Change**

June 21, 2016

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Introduction

The government of Canada has reviewed and updated its Federal Sustainable Development Strategy (FSDS) for Canada for 2016 - 2019 and submitted it recently to the general public for comments until June 24, 2016. The Canadian Water and Wastewater Association (CWWA), as the national voice for the municipal water and wastewater sector, has reviewed the FSDS. Through its National Committee on Climate Change, the CWWA provides the following general comments, comments on Goal 1: Taking Action on Climate Change, and Goal 2: Clean Technology Jobs and Innovation.

General Comments

- 1. CWWA recommends that the FSDS include a clear statement that municipalities are partners** (as opposed to stakeholders) of the federal government in its strategies towards a sustainable future. Municipalities have a definite link with water management and climate change adaptation and are often closest to the action level. CWWA recommends that the page under the title: Recognizing the contribution of our partners, should be modified to insert (1) the word “municipal” everywhere in that text, when and after the word “provincial” is written and (2) the word “municipalities” everywhere in that text, when and after the word “provinces” is written. CWWA and partner organizations such as the Federation of Canadian Municipalities (FCM) support Canadian municipalities in achieving their local sustainability goals and in contributing in essential ways to the national sustainability goals. CWWA members include municipal water and wastewater managers and a range of other technical professionals and experts in water and sustainability.
- 2. CWWA recommends that the FSDS include minimal quantitative data about the progress of the strategies for each target.** This approach would facilitate the consultation of the FSDS document about its goals and targets without having to consult the progress report for the previous period in order to find qualitative and quantitative information about the individual strategies and their achievements so far.
- 3. CWWA advocates that federal messaging** (including messaging in the FSDS) on Climate Change Adaptation **features and explains the following strong linkages:**
 - Climate, Water Infrastructure, and Emergency Management
 - Climate, Water Infrastructure, and Comprehensive Asset Management
 - Climate, Water Infrastructure, and Long Term Resilience Planning
- 4. Nationwide there is a need to identify and evaluate current infrastructure deficiencies** resulting from age, climate change and other risks, and current/future regulatory requirements. This is a

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continuous improvement process that is underlain by the principles of comprehensive asset and resource management at the municipal and higher levels. **The FSDS should identify this need and opportunity as a goal in any specific target it may pertain to.**

1.1 National Leadership on Climate Change

5. **CWWA encourages the federal government to create a national open database of Life Cycle Inventories in municipal services, such as water and wastewater services.**

The federal government can a) recommend, b) include as infrastructure funding or Gas Tax eligibility, or c) mandate, that municipalities complete life cycle inventory (LCIs) of their municipal water and wastewater services to determine the embodied atmospheric emissions, aquatic emissions and resource consumption in the treatment + distribution, or collection + treatment, of a cubic meter of water or wastewater. This value is dependent on a number of factors including the specific municipal water and wastewater infrastructure in place and the utilities that support it. It therefore can vary greatly between municipalities.

Municipal water and wastewater treatment systems alone account for about 3 percent of total energy consumption and approximately 35 percent of the energy consumed by municipalities therefore they typically embody significant emissions and resource consumption.

Industries relying on these municipal services in turn need data to make informed statements and decisions about their own products and services considering the full cradle-to-grave lifecycle. These measurements also help governments to develop regulation regarding resource use and environmental emissions. The creation of a national database can therefore **enable decision making and proper accounting of the progress towards the federal government's sustainability goals.**

1.2 Resilience to Climate Change

6. **CWWA encourages the federal government to frame the process that all municipalities can follow** to manage Climate, Water, Engineering Assets, Emergencies, and Long Term Resilience. The federal government can a) recommend, b) include as infrastructure funding or Gas Tax eligibility, or c) mandate that municipalities complete infrastructure vulnerability assessments and resiliency planning.

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The framing of the following processes can be accomplished with the creation of guideline documents and/or protocols for municipalities. CWWA is available to provide input / assist in this endeavour.

- Local Climate Change Hydrologic Study to develop comprehensive scientific understanding of the range of stresses induced by climate change
- Local risk analyses on municipal assets (including critical infrastructure) viewing Climate Change as one more risk layer to consider in the range of risks addressed in Comprehensive Asset Management
- Systems planning / modelling to identify the linkages between economy, society, environment, emergency management, human and physical resources at the municipal scale to enable systems planning approach and to improve resilience and security.

7. **CWWA encourages the federal government to financially support municipal training** for Climate Change and sustainability.

Municipalities are frequently limited today in their ability to participate in, contribute to, and attend valuable training sessions and conferences at which they can learn from each other's successes and failures. Furthermore, training budgets are often the first budgets cut when cash flow is tight as this may be seen by some as a low priority expense. Training and conferences, however, are a critical tool for long term knowledge management and transfer.

Targeted federal support in this area will ensure a **long term, sustainable system of knowledge management** and succession planning in key technical areas.

2.1 Clean Technology and Green Infrastructure

8. **CWWA encourages the federal government to develop national heatmaps of environmental degradation sensitivities**

Aquatic Toxicity and Eutrophication Potential are critical metrics in evaluating the sustainability of a green infrastructure project for water or wastewater. The impacts are waterbody specific and are not readily available to a practitioner evaluating Green infrastructure funding. CWWA recommends heatmaps of sensitivity to the most significant environmental degradation metrics be developed to provide a consistent basis for evaluation of green infrastructure projects and funding for those projects.

Conclusion

As the national voice for the municipal water and wastewater sector, CWWA will continue to support the federal government's sustainability initiatives and can be a link between federal departments and municipal and technical experts from a wide range of professions from across the country. These

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municipal and technical experts will help to operationalize the federal government's sustainable development goals.

CWWA is in the position to engage federal departments in conversation, provide input, and support its goals on a broad range of water and wastewater related issues.