

February 24, 2021

The Honourable Jonathan Wilkinson, Minister of Environment and Climate Change
The Honourable Marie-Claude Bibeau, Minister of Agriculture and Agri-Food
Fontaine Building 12th floor
200 Sacré-Coeur Blvd
Gatineau QC K1A 0H3

Dear Ministers,

Via Email

RE: PUBLIC CONSULTATIONS TO HELP ESTABLISH THE NEW CANADA WATER AGENCY ('CWA')

We commend the government for this important initiative and have actively followed the consultations around the Discussion Paper, *Towards the Creation of a Canada Water Agency*.

CWWA-ACEPU representatives have participated in each of the regional forums and the national freshwater policy forum. We report the scope and vigor of these discussions is encouraging.

As the national voice for the municipal water and wastewater utility sector, CWWA-ACEPU is pleased to provide support to the CWA Forum Collective Response.

Today's letter is to help bring those broad consultations into sharper focus – based on CWWA-ACEPU's perspective.

CWWA-ACEPU requests representation as the 'Voice of the Water Utility' as next steps, policies, terms of reference and Advisory Committees for the CWA are being established.

What follows is a strategic outlook for the **CWA** as seen through the eyes of the CWWA-ACEPU:

A. URGENCY

Observations on key issues from the Discussion Paper and Forum involvement

B. REMEDY

How to reach agreement on which problems need solving first

C. SUPPORT

Rationale for close involvement of CWWA-ACEPU with the creation of the **CWA**

A. URGENCY

Observations on key issues from the Discussion Paper and Forum involvement

1. **The Discussion Paper understates the urgency of the moment.** A water crisis is looming, and timely response is essential. Prevention costs less than remediation...and caution from around the world advises *don't wait for the next emergency*. Aging infrastructure, potable water risk, resilience to extreme weather, water waste in food production, food waste and supply chain integrity, water security, adoption of SMART tools and alternate water treatment methodologies are all trending in the *wrong direction* for our nation, despite Canada being purported as the world's leader in freshwater. Eroding public confidence in tap water has created an unregulated secondary market for bottled water which generates negative externalities at a significant societal cost and imminent threat to the environment. Given the state of these stresses, our nation is fundamentally unprepared for a future of healthy water;
2. **The status quo in water management is *not* working.** The Discussion Paper spotlights this point relative to the health of freshwater resources. More so however, the economic model for water, the regulatory standards and compliance rules are more than 25-years out of date and are *disenablers* for the changes necessary to address the challenges ahead;
3. **This has serious implications for bridging the vast water infrastructure funding gap that currently exists.** Safe water in the future can only be assured by meeting the requirements of the future, not those of 25-years ago. A mechanism to accelerate new regulatory *outcomes*, diagnostic approaches vs. prescriptive approaches, alternative capital structures, procurement methods, public accountability and development and implementation of new technologies needs to be in place to create scalable added-value in new prototypes for future water management;
4. **The state-of-our-water does *not* signal a powerful, behaviour-altering alarm to Canadians.** This is an unfortunate impediment to progress. The World Economic Forum for consecutive *years* has placed water security at the top of its list of global risk factors. Meanwhile, in Canada, where water is integral to our national persona, why are others more concerned than we are ourselves? A public awareness and education campaign is essential. Again, with complex interdependencies at work, an ongoing, targeted and coordinated public communication, information, motivation effort needs to bring about meaningful change in consumer attitudes and behaviour. This needs coordinated data integrity, accessibility and analysis.

B. REMEDY

How to reach agreement on which problems need solving first

The CWA can bring leadership to developing a national strategy, acting as the central, go-to point of coordination among the layers of stakeholders (federal, First Nations, provincial, municipal, consumers) and as facilitator of cooperation across the 20+ federal departments and agencies that work on water issues, sharing data and implementing policy. The administration of the Canada Drinking Water Guidelines is an excellent example of how federal leadership can work to create standards that are adapted and adopted by provinces and territories and carried out by municipalities. This example can be expanded under broad terms-of-reference for the **CWA**.

The Paper speaks to developing a national strategy for realigning water governance and oversight. Coordinating such a strategy with updated federal water policies, including a more holistic view of water management, ought to fall to the **CWA** in a cross-functional leadership role, not unlike the Canadian Council of Ministers of Environment, Health and Food, or Health Canada's Drinking Water Committee.

We agree with the Five Foundational Pillars for the **CWA**, but from our perspective, and with consideration for the forgoing pressure points, we would suggest a reassignment of priorities as follows:

1. Deep, integrated legislative and policy reform – focused on outcomes;
2. 'Cooperative Federalism' to strengthen transboundary water management – including rules governing water security and international borders, commercial standards and dispute resolution;
3. Knowledge creation and mobilization to fill information gaps and improve data quality/consistency across the country and among consumers;
4. Watershed approach to create regional boundaries vs. a traditional jurisdiction approach;
5. Reconciliation in active partnership with Indigenous peoples.

We at CWWA-ACEPU recognize Canada's First Nations as part of Cooperative Federalism, and fully support reconciliation. While the work of the **CWA** can/will support those efforts, reconciliation should not preclude concurrent progress on the first four Pillars. Primary responsibility and coordination of reconciliation efforts must remain with the Minister of Crown-Indigenous Relations. Meanwhile, all five Pillars ought to be addressed in an integrative manner. However, the first four Pillars are what the **CWA** will be most-optimally positioned to address, which is why they are placed higher on the list.

C. SUPPORT

Rationale for close involvement of CWWA-ACEPU with the creation of the **CWA**

- CWWA-ACEPU is the national voice of Canada's water and wastewater sector, representing the municipal water and wastewater utilities;
- There are few national bodies with such broad visibility on water as CWWA-ACEPU, with as informed a national and holistic view of water in all its forms and uses;
- CWWA-ACEPU has traditionally focussed on the entire utility cycle – from intake pipe through treatment, delivery, collection, treatment and discharge – and the entire urban hydrologic cycle. We are very concerned with, and affected by, the quantity, quality and amount of treatment required;
- CWWA-ACEPU is deeply involved in sustainable watershed management to ensure a safe and secure supply of drinking water, sustainable management of water resources and flood protection;
- Representing the municipal level of governments, we have the most direct connection with individual Canadians, providing drinking water and community health and safety – which forms an excellent platform to communicate with Canadians in the places where they live;
- Likewise, CWWA-ACEPU is uniquely positioned to observe, comment, and facilitate discussion of environmental matters since so much of the responsibility for environmental infrastructure exists at the municipal level, and so many decisions made by our government and community partners affect municipal operations and budgets;
- Our experience with multi-party agreements makes CWWA-ACEPU an appropriate resource for **CWA** to facilitate cooperation among multiple agencies and stakeholders that work on water issues, sharing data and developing legislative and policy reform;
- CWWA-ACEPU is in an excellent position to support **CWA** in initiating and leveraging data sharing and collaboration among different sectors with common agenda – namely water utilities, electric and gas utilities, municipal owners, conservation authorities and water users to promote data-based decision-making in asset management, climate change and infrastructure renewal.

We stand ready to work with you in advancing this important initiative.

Sincerely,



Robert Haller

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February 24, 2021

Executive Director

cc. Mr. Terry Duguid, Parliamentary Secretary to the Minister of Environment and Climate Change (CWA)
Hon. Patty Hajdu, Minister of Health
Hon. Carolyn Bennett, Minister of Crown-Indigenous Relations
Hon. Marc Miller, Minister of Indigenous Services
Hon. Catherine McKenna, Minister of Infrastructure and Communities
Hon. Seamus O'Regan, Minister of Natural Resources
Hon. Bill Blair, Minister of Public Safety and Emergency Preparedness
Hon. Bernadette Jordan, Minister of Fisheries, Oceans and the Canadian Coast Guard
Hon. Joyce Murray, Minister of Digital Government
Federation of Canadian Municipalities
CWWA-ACEPU Members and Board of Directors