

July 15, 2022

Environment and Climate Change Canada
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To Whom it May Concern

Via Email

RE: PUBLIC CONSULTATIONS ON THE NATIONAL ADAPTATION STRATEGY (NAS)

There are few national bodies with such broad visibility on water as the CWWA-ACEPU, which has informed a national and holistic view of water in its many forms and uses. As the **national voice** for the municipal water and wastewater utility sector, the CWWA-ACEPU is pleased to provide support to the NAS Development. Representing the municipal level of governments, which provide drinking water and community health and safety – the CWWA-ACEPU has a connection with individual Canadians, in the places where they live.

CWWA-ACEPU is uniquely positioned to observe, comment, and facilitate discussion of water-adaptation matters since much of the responsibility for environmental infrastructure is managed at the municipal level. Decisions made by CWWA-ACEPU's government and community partners directly affect municipal operations and budgets.

To start, we commend the Government of Canada for this important initiative. We appreciate the opportunity for CWWA-ACEPU representatives to have been part of the consultations that led to the Discussion Paper, *Preparing for Climate Change – Canada's National Adaptation Strategy*. CWWA-ACEPU committee chairs have been actively participating in the Resilient Infrastructure Advisory Table and our technical committee members have individually participated on other tables as well. We note that the scope and vigor of these discussions is encouraging.

The CWWA-ACEPU is pleased to provide the following recommendations related to the Discussion Paper and we request continued representation as **the 'Voice of the Water Sector'** as the next steps of the Strategy are developed.

CWWA-ACEPU Helps Connect the Government of Canada to Municipalities and their Water Utilities

Creating a NAS is ambitious and necessary. Connecting national goals, objectives, and strategies to on-the-ground adaptation actions across various jurisdictions will not be easy.

- **The CWWA-ACEPU can continue to help** federal departments and agencies understand the conditions, constraints, and opportunities at the municipal level such as:
 - How will proposed programs affect municipalities and utilities?
 - Where is help needed the most and where are the gaps?

Municipalities Need National (Centralized) Data Monitoring and Collection

National, centralized open data collection will help municipalities contribute to and access critical data. Data often does not respect political boundaries. Centralized data can often be leveraged many times for multiple purposes and by various levels of government and stakeholders.

- **The CWWA-ACEPU recommends** the development of a framework for a national data repository for climate and adaptation-related environmental data.

Municipalities Need Equitable Funding Models

Canadian municipalities are incredibly diverse and need funding models that serve all types and will not inadvertently favour only those with the means to apply and deliver large-scale projects.

- **The CWWA-ACEPU recommends** that the Government of Canada continue to leverage the success of the Federation of Canadian Municipalities' (FCM) Municipal Asset Management Program (MAMP) and similar programs. The FCM administration funding model has been very successful in efficiently distributing funding and align with local needs.
 - The recently closed MAMP program enabled municipalities of all sizes and capacity to build their asset management framework, data, and knowledge.

Thank you for taking the time to consider our comments and recommendations. We stand ready to work with you to continue to advance this important initiative.

Sincerely truly,

Robert Haller

Robert Haller
Executive Director

cc. CWWA-ACEPU Members and Board of Directors