



March 29, 2019

Sustainable Development Office
200 Sacré-Coeur Boulevard 7th floor
Gatineau, QC K1A 0H3

Re: 2019 to 2022 Federal Sustainable Development Strategy

On behalf of the Saskatchewan Association of Rural Municipalities (SARM), I am writing regarding the draft 2019 to 2022 Federal Sustainable Development Strategy (FSDS). SARM represents all 296 rural municipal governments in Saskatchewan. Our association has a mandate in municipal and agricultural issues and takes direction from our members.

SARM has reviewed the draft FSDS and has feedback for several areas of the strategy. First, SARM supports the Government of Canada in achieving its climate change mitigation commitments, but we do not believe a carbon tax is the most effective policy strategy to achieve these goals. People living in rural and remote areas are expected to see the largest cost of living increase from the carbon tax because of the fuel required to travel long distances on a regular basis and for heating homes during Saskatchewan's long, cold winter months. In addition, agriculture producers will be forced to absorb the cost in their bottom line. While farmers are often pointed out as heavy greenhouse gas emitters, they are one of many sectors that has already improved their energy efficiency and reduced their carbon footprint.

The Saskatchewan Soil Conservation Association has been studying carbon sequestration in Saskatchewan since the 1990s and has found that 8.75 million new tonnes of CO₂ are being sequestered each year in Saskatchewan soil; this is the equivalent of 1.83 million cars being taken off the road. Saskatchewan farmers have also adopted zero-till, direct seeding practices on more than 23 million acres of farmland across the province. As the global population increases and developing countries experience economic growth, demand for food also increases. Canadian producers must remain competitive and viable to ensure that Canada remains a strong trading partner. It is important for Environment and Climate Change Canada (ECCC) to recognize that by its very nature, agriculture is a biological process. The agriculture sector requires special consideration in terms of support for further sustainable practices.

We appreciate efforts to support municipalities in mitigating and adapting to climate change, as well as preparing for natural disasters. SARM has been working to assist rural

municipalities in adopting better asset management practices. Because many communities lack resources, assistance for capacity building is required. We are also working with the Federation of Canadian Municipalities to incorporate a climate lens into asset management. We support ECCC in incorporating this goal in the FSDS.

The FSDS also calls for investment into more energy efficient oil and gas. We believe investments such as this will be more effective than introducing a carbon tax. Investing in technology, such as carbon capture and storage, is an opportunity for Canada to be a leader on climate change without hindering economic growth.

SARM is also concerned about the amendments to *The Fisheries Act* that are proposed under Bill C-68. The 2012 amendments to the Act effectively balanced the need for habitat protection with the need for municipal infrastructure development by focusing on federal oversight on the protection of Canada's commercial, recreation and Aboriginal fisheries. We believe these changes should not be reversed, but rather maintained or enhanced. Prior to 2012, the Act created significant administrative burden, increased construction costs and caused delays for many municipalities, as impact assessments and modified design and construction processes were often required for municipal bridges and culverts to accommodate fish habitats that, in many cases, did not exist. Any amendments to *The Fisheries Act* must take municipal needs into consideration to avoid bringing back the administrative burdens and project delays that existed before the 2012 changes.

The draft strategy includes efforts to reduce the spread of aquatic invasive species (AIS). For the last several years, SARM has asked the provincial and federal government to take steps to prevent the introduction and reduce the spread of AIS. While no invasive mussels were found in Saskatchewan's waterways in 2018, we are at risk as invasive mussels have been found in Ontario, Manitoba, Quebec, and 34 states, including nearby Minnesota, Montana and North Dakota. Once AIS are introduced to a waterbody, they are virtually impossible to eradicate and the costs to combat these species can cost tens of millions of dollars. Prevention is the best course of action. Saskatchewan recently amended regulations to make it mandatory for individuals transporting watercrafts through the province to remove the plug, stop at watercraft inspection stations and submit to inspection. SARM participates on the Saskatchewan AIS Task Force and works to promote the "Clean, Drain, Dry" message and encourages our members to monitor waterbodies with substrate samplers. We hope the FSDS will emphasize the need for the federal government to take proactive steps to prevent further spread of AIS.

We support the FSDS's call for the proper disposal of hazardous materials, such as paints and oils. In Saskatchewan, SARM is supportive of initiatives that divert materials from landfills and dispose of hazardous materials safely. SARM has called upon the Government of

Saskatchewan to introduce regulations to establish a household hazardous waste program; this is now under development. In a similar vein, SARM supports organics waste diversion, as organic waste makes up a significant portion of the waste stream in landfills and releases methane into the atmosphere. Diverting organic materials would not only significantly extend the life of landfills, saving municipalities and ratepayers money, but also help protect the environment. To help move organics waste diversion forward in Saskatchewan, SARM sits on an Organics Working Group led by the Saskatchewan Waste Reduction Council. Efforts under the FSDS to support such initiatives in provinces and territories should be encouraged.

The FSDS states that the Pan-Canadian Approach to Transforming Species at Risk Conservation in Canada shifts terrestrial species at risk conservation to a more multi-species and ecosystem-based approach. SARM has been long been an advocate of this change. Saskatchewan's Ministry of Environment takes a landscape-based approach, which accounts for all species that live and interact in an ecosystem, while the federal government has previously taken a single-species approach. This can create serious issues. For instance, SARM is aware of Swift Foxes being released into Greater Sage Grouse habitat. Without a multi-species approach, efforts to protect one species at risk can cause significant harm to another species at risk. SARM is a strong supporter of the adoption of a multi-species approach to species at risk.

SARM also urges ECCC to work with the farmers and ranchers who live among species at risk. These producers are on the boots on the ground and have lived experiences with species at risk. Producers make efforts to protect species at risk every day. They know the landscape best and have much to offer in terms of protecting species and habitat. The FSDS should recognize the knowledge of producers and ECCC should work with and provide support to producers to help them continue to protect species at risk.

The FSDS aims to complete the re-evaluation of remaining legacy pesticides by 2020. SARM has serious concerns with the Pest Management Regulatory Agency's (PMRA) re-evaluation program, special review process, and authorities of the PMRA under the *Pest Control Products Act*. We understand that as science advances and new information on potential human health and environmental risks associated with pesticides become available it may be necessary to re-evaluate current registrations. However, the current re-evaluation program or special review process does not ensure sufficient stakeholder engagement, nor do they facilitate the collection of a sound dataset for use in decision-making. In the past the PMRA has relied heavily on data provided by Environment Canada which was improperly generalized to all parts of Canada and/or based primarily on anecdotal information.

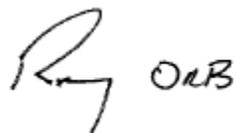
To resolve these issues, we recommend that the PMRA undertake its own research, or contract out independent research, on pesticides that are scheduled for re-evaluation

or flagged for special review. Prior to releasing a proposed decision, the PMRA should identify areas of risk and allow stakeholders enough time to address them and to generate related data to be considered in a future re-valuation or review process. If additional risks are identified once a re-evaluation or a special review has begun, there should also be an opportunity for dialogue with stakeholders to address these concerns before a decision is made. Dialogue and formal PMRA consultations on products used in agriculture production also need to take place during times of the year that enables participation from the agriculture sector. SARM would like to see the *Pest Control Products Act* amended to require the PMRA to find viable alternatives to proven pesticides as part of its deregistration process. Once it has been decided that a product registration will be revoked, the original product must remain accessible while any viable alternatives are piloted by an adequate sample of producers to further limit any disruptions in agriculture production that a deregistration may cause.

SARM strongly supports ECCC's goal that all Canadians have access to safe drinking water. By 2030, the federal government aspires to achieve universal and equitable access to safe and affordable drinking water for all. Many rural municipalities in Saskatchewan also struggle to provide safe drinking water to residents due to cost and geography. Water is also central to the expansion of economic development in Saskatchewan. Potable and non-potable water must be made easily available to residents, industry, and agricultural producers. SARM believes point-of-use and point-of-entry water treatment systems are an affordable, attainable solution to bring safe drinking water to all homes. These systems are less complex and inexpensive compared to conventional water treatment plants. In addition, in cases where the end-use of the water is for irrigation, livestock, or other non-potable uses, point-of-use and point-of-entry systems lessen the adverse ecological impact of water treatment. Though Ontario and British Columbia allow these water treatment systems, Saskatchewan does not. The FSDs should support the adoption of point-of-use and point-of-entry water treatment systems to ensure all Canadians have access to safe drinking water in their homes and businesses.

Thank you for the opportunity to review the draft Federal Sustainability and Development Strategy. We look forward to working with the Government of Canada to achieve these goals while ensuring rural Saskatchewan remains vibrant and prosperous.

Sincerely,

A handwritten signature in black ink that reads "Ray Orb". The signature is written in a cursive, slightly slanted style.

Ray Orb
President