

March 1, 2021

Sent via email: ec.water-eau.ec@canada.ca

Dear Sir/Madam,

Re: Toward the Creation of a Canada Water Agency

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates the opportunity to provide our comments on the discussion paper "Toward the Creation of a Canada Water Agency." This discussion paper acknowledges that management of freshwater is a shared responsibility, provides a commitment to work with other levels of government and identifies the need for collaboration. With this recognition comes a responsibility to also provide resources. It is in the best interests of all parties that the administrative costs of a new Canadian Water Agency (CWA) be minimized, with a focus on delivering funding towards initiatives aimed at maintaining or improving water quality. This could include funding for implementation of beneficial management practices and towards freshwater research and demonstration projects.

Agriculture and Freshwater:

A proposed objective within this discussion paper for the development of Canada Water Agency is "Canada is leader in sustainable agricultural water management", and "work with the provinces and territories, the agricultural sector and other partners to enhance development of innovative water efficient technologies and decision-support tools and to accelerate adoption of practices and technologies that will increase resilience and sustainability." These are noble statements, however details of how this will actually be achieved are critical. It is important to note the significant diversity in the agricultural sector among jurisdictions and agricultural commodities produced regarding water management requirements and agricultural practices. As a result, the technology and infrastructure needs can be very diverse. Achieving these objectives will require financial investments by government to assist with development and adoption of new technology or infrastructure, which can be extremely costly.

Ontario agriculture is cognizant of international water issues due to our proximity to and reliance on the Great Lakes. This discussion paper outlines how the CWA could assist in ensuring that “Collaborative arrangements are in place and support effective management of domestic and Canada-U.S. transboundary fresh waters.” Such agreements already exist through the International Joint Commission with the U.S., and the Canada-Ontario Great Lakes Agreement is in place to address jurisdictional issues. However, these agreements often do not provide sufficient long-term resources for ensuring the international commitments can be met. These commitments often rely on long-term or even permanent changes by landowners, including farmers. However, if any cost-share or funding assistance is currently provided, it is for short-term initiatives. If the CWA is going to be involved with both domestic and international agreements and commitments, then there must also be a requirement to ensure adequate support, both technically and financially, are in place to ensure that the commitments can be implemented and sustained for the long term.

Data:

One significant freshwater data gap has been identified by the agricultural community. The Pest Management Regulatory Agency (PMRA) under Health Canada is responsible for pesticide regulation in Canada. In the absence of reliable water data from Canada, PMRA substitutes data from the United States or other jurisdictions during a pesticide risk assessment. This includes pesticide levels found in surface and groundwater. This is an inappropriate source of data as Canadian use patterns and agricultural practices differ from international data being used. It is believed that Canadian farmers have lost access to important pesticides as a result of this inappropriate data. Ensuring that PMRA has access to robust Canadian data, some of which already exists in some form across the Province’s, would be useful.

There are also concerns and questions that must be fully addressed in any data-related discussions. Questions around who collects the data and who pays? If these data sets are relying on information from individual landowners or business, then the individuals must be fully informed of the uses of their data and that sharing their personal data require a very clear opt-in agreement. What disclaimers are put around the data to ensure unsupported inferences and interpretations do not become new ‘facts’ that are ultimately used for regulatory purposes? There must also be strong security protocols around data that prioritizes safety over access. Some open data (and related mapping) can cause potential security threats to both our water systems and our food safety and security. These concerns were highlighted by the World Health Organization. “Unfortunately, the agricultural and food industries are vulnerable to disruption, and the capabilities that terrorists would need for such an attack are not considerable.”¹ The World Health Organization confirms this vulnerability, stating “Agricultural production areas can be vulnerable to deliberate contamination...Irrigation water can be easily contaminated with chemical and biological agents”. The risk to fruits and vegetables is enhanced given that these products are often consumed directly, without processing and therefore more susceptible to contamination being undetected².

The discussion paper identifies that “more than 20 federal departments and agencies have freshwater responsibilities.” A similarly large number of officials have freshwater responsibilities

¹ Peter Chalk. Agroterrorism: What Is the Threat and What Can Be Done About It? Rand Corporation. 2004.

² World Health Organization. Public health response to biological and chemical weapons: WHO guidance, 2nd edition. Geneva. 2004.

in Ontario alone, including multiple Provincial ministries, municipal governments (both single and two-tier systems), Conservation Authorities and Indigenous. In developing a Clean Water Agency, the federal government must be sure to connect and build consensus with all the relevant players and ensure that meeting the needs of some parties does not come at a cost to others. The agency must also endeavour to minimize administrative costs, to ensure maximum resources are directed towards initiatives that will ultimately maintain or improve our shared freshwater resources.

Sincerely,

A handwritten signature in black ink, reading "Peggy Brekveld". The signature is written in a cursive, flowing style. To the right of the signature is a vertical line.

Peggy Brekveld
President

cc: OFA Board of Directors