

25 August 2008

Mr. Gordon Edwards
Executive Director
Alberta Water Council
#1400, 9915 – 108 Street, N.W.
Petroleum Plaza, South Tower
Edmonton, AB T5K 2G8

Dear Gord:

The members of the Non-Government Organization (NGO) caucus of the Alberta Water Council (AWC) appreciate the opportunity to provide our perspectives on the recommended Wetland Policy and Implementation Plan.

We recognize and respect the trust that the Government of Alberta (GOA) placed on the AWC when it gave us the responsibility to provide our recommendations on this important environmental policy. The Wetland Policy is one of the original initiatives taken on by the AWC and is unique because it will contribute to achieving all three primary goals of the Water for Life Strategy.

Wetlands play a critical role in maintaining water quality, water supply, and healthy aquatic ecosystems throughout Alberta. Wetlands also contribute significantly to other environmental goals, such as reduction of greenhouse gases through carbon sequestration. It is important to recognize that Alberta has already lost more than 64% of the original wetland area in the Settled Area and impacts to wetlands in the Non-settled Area have increased dramatically in recent decades with little understanding of how this loss and degradation will ultimately affect our rivers and other components of the boreal landscape. Given the pace and nature of economic development in our province, it was logical and imperative that a comprehensive Wetland Policy was included as a short-term deliverable in the Water for Life Strategy.

Over the past three years, members from all caucuses on the AWC have invested considerable time and understanding in the development of a recommended provincial Wetland Policy and implementation plan. To achieve consensus at the project team table, all stakeholders made numerous compromises in their respective positions to reach agreement on the policy and implementation plan that were presented to the AWC in June.

It should also be recognized that the Wetland Policy and its implementation plan were built on input from two major rounds of consultation involving participation of more than 1000 stakeholders. The summarized input from these consultations demonstrates that Albertans support even stronger approaches to wetland protection and conservation than those brought forward in the policy and implementation plan. This provides strong evidence that our caucus members made many compromises to achieve final consensus on the policy recommendations. Furthermore, successful incorporation of diverse perspectives in the Wetland Policy and implementation plan is strongly supported by the fact that 23 of the 25 stakeholder groups represented on the AWC support adoption and implementation of this policy.

We are disappointed by the positions and revised approaches being advanced in the non-consensus letters from the Alberta Chamber of Resources (ACR) and the Canadian Association of Petroleum Producers (CAPP), which would essentially reduce the policy to discretionary guidelines. Three of the four issues brought forward (i.e., issues 2, 3 &4) were dealt with extensively by the Wetland Policy Project Team (WPPT) and were taken into consideration along with the other interests represented at that table. There is no doubt that these positions had a profound effect on both the principles and specific wording recommended in the policy and implementation plan. For example, to help address sector-specific concerns associated with the scale of compensation that could be required for oilsands mining, considerable flexibility was built into the options for compensation, which was not mentioned in the non-consensus letters. Their fourth position, actually issue 1 in both letters, arose very late in the discussions at the project team table. The WPPT deemed that these fundamental revisions would erode certainty, equity and efficacy of the Wetland Policy that the vast majority of stakeholders had requested. Application of the wetland mitigation framework to all development proponents is a basic principle of fairness and efficacy in the policy. Furthermore, and perhaps most importantly, these revisions would undermine the ability of the policy to achieve its own goal and significantly reduce the ability of the Wetland Policy to achieve the goals of the Water for Life Strategy. It also seems reasonable at this point that most stakeholders would at least support maintaining the current wetland area and its associated benefits given that the GOA clearly stated in March that this would be the minimum acceptable approach for this policy.

The policy and implementation plan presented by the WPPT in June were agreed upon as the “best possible products” that could be produced given the variety of stakeholder interests. This consensus decision was supported by the members from ACR and CAPP and therefore we believe that any further negotiations would undermine the consensus process and more importantly impact carefully crafted decisions made in a multi-stakeholder forum. This approach would erode stakeholder confidence in participation of groups such as the AWC and Clean Air Strategic Alliance, both of which have provided immense value to our province.

Finally, rapid adoption and implementation of the recommended Wetland Policy will provide clear indication that this government is very committed to the Water for Life Strategy, the AWC, and responsible environmental management. Furthermore, rather than hinder economic development, the Wetland Policy will help protect our economy and position Alberta as a leader in responsible environmental management. In particular, we believe that oilsands development must be managed by effective environmental policies or we risk that concerns associated with this industrial activity will continue to grow. The Wetland Policy can help reduce negative perceptions associated with oilsands mining and other large scale industrial activities by ensuring that impacts to wetlands are appropriately compensated for by development proponents. Finally, the oilsands economic impact scenario prepared by the WPPT suggested that wetland compensation would not be too onerous nor curtail investment in this component of our economy.

The positions advanced by ACR and CAPP put us in a difficult position. We made numerous compromises on fundamental issues important to our caucus. We trust that the GOA, as the steward of the final policy, is aware that all parties have made compromises and that it would be inappropriate to re-open these issues. Keeping with the intent of the consensus

approach, we stand by our original recommendation in June that the Wetland Policy and implementation plan presented to the AWC should be advanced to the GOA for adoption and implementation.

Best regards,

Robert Cameron,
Environmental Organization Sector, South Peace Environmental Association

Carolyn Campbell
Environmental Sector, Alberta Wilderness Association

Cheryl Bradley
Environmental Sector, Southern Alberta Group for the Environment

Danielle Cobbaert
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Dave Kay
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Jason Unger
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Jay White
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