

March 31, 2023

RE: Manitoba Water Action Plan

Keystone Agricultural Producers (KAP) is Manitoba's general farm policy organization, providing a unified voice for farmers on issues that affect agriculture. KAP represents and promotes the interests of over 4,400 farmers and 18 commodity associations.

According to the 2021 census, agricultural producers owned approximately 12.46 million acres of improved land. As stewards of large portion of private land and well as agricultural crown land producers play a key role in water management and sustainability in Manitoba. KAP is pleased to provide comments to the Department of Environment and Climate on the development of the Action Plan that builds off of the recent provincial Water Management Strategy. The recommendations below are key areas KAP believes must be included in the upcoming Action Plan to address the needs of Manitoba producers.

1. RECOMMENDATION: Consider programs and initiatives that are economical, practical, adaptable and effective when applying them to the agriculture sector.

Producers are price takers and have a limited opportunities to demand higher prices for the commodities they produce. Consequently, decisions made on the farm are strongly influenced by economics. Implementing programs and initiatives that are economic and achieve practical outcomes increase the likelihood of adoption and success.

2. RECOMENDATION: Prioritize infrastructure project improvements to areas that are at the greatest risk of flooding.

There have been significant flooding events in the past few decades that have negatively impacted Manitoba farmers and the province as a whole. For example, the 2011 flood impacted 7.41 million farm acres and caused over \$1 billion in damages. Although the government has made significant progress in minimizing damages through flood control works, further work needs to be done on areas most susceptible to future flooding.

3. RECOMMENDATION: Develop and increase funding to programs specific to reducing excess nutrient loading to Manitoba's waterways.

Access to water sources for livestock and the application of nutrients to fields are key components of raising livestock and growing crops. There are government funded beneficial management practices that assist farmers in reducing nutrient runoff, however funding availability is limited, and the cost share proportion may disincentivize producer uptake. Controlled drainage, saturated buffers, drainage water recycling, 4R Nutrient Stewardship, cover crops, field buffers, conservation tillage and managing

livestock access to waterways are all effective measures that have been shown to reduce nutrient loading to waterways.

4. RECOMMENDATION: Collaborate across departments, provinces, territories and international boundaries when developing programs and policies to implement the water management strategy.

Manitoba is part of a very large drainage basin that receives water flows across its boundaries in all directions. The policies and programs that are developed in Manitoba cannot be created in isolation. Government must recognize the importance of implementing policies and programs that are congruent with other jurisdictions and departments.

5. RECOMMENDATION: Focus on water management projects to address changing climatic conditions and soil health concerns.

Climate change is expected to bring more precipitation to Manitoba during the winter months with less precipitation occurring during the summer months. Climate change models also show an increase likelihood of floods and droughts. The low spring runoff and the lack of moisture in 2021 had a devastating impact on Manitoba producers. Additional investments by government in water management projects generate positive returns for the producer and society in the form of improved water quality, increased drought resiliency, reduced irrigation needs and longer grazing periods.

6. RECOMMENDATION: Work with rural municipalities to encourage their participation in a watershed district.

There are 14 watershed districts in Manitoba, represented by the Manitoba Association of Watershed (MAW). There are numerous rural municipalities in the province that are not part of the Watershed District Program. This means producers cannot take part in watershed district-specific incentive programs aimed at reducing nutrient runoff, improving water quality, increasing climate resiliency, boosting water retention or enhancing biodiversity. Because of this, we believe all rural municipalities should be members of a watershed district, thus allowing all producers in Manitoba to take part in their programs. We recommend that the province provide enough funding to ensure that all rural municipalities have access to join the Watershed District Program, and that the province work with municipalities to retain existing and recruit new municipal partners.

7. RECOMENDATION: Expand and upgrade current irrigation infrastructure and capacity.

Producers growing potato, vegetable or fruit crops are heavily reliant on irrigation to meet the water needs of their plants. The size of irrigated acres in Manitoba is projected to increase in the coming years due to increased demand for high-value crops and changing climate conditions. Provinces such as Saskatchewan and Alberta are increasing investments into their irrigation systems and it is critical that Manitoba takes similar action.

8. RECOMENDATION: Invest in innovative technology.

To achieve many of the strategic objectives government must look towards innovative technologies as providing part of the solution. An increased focus will be placed on water use and efficiency while occurring under the context of a growing population and increased demand for food. Harnessing the

latest water innovative technology will result in better outcomes and increasing the probability of meeting strategic objectives.

9. RECOMMENDATION: Implement forward thinking financial tools that will fund and sustain the programs and initiatives laid out in the Action Plan.

Government must look at additional funding methods to meet their forty-seven strategic objectives. Grants issued to organizations and individuals are effective methods, however additional methods should be considered that include water bonds, water offsets, green bonds and social impact bonds.

10. RECOMMENDATION: Ensure current data is used for decision-making.

The approval or denial of water management projects on farmland is often guided by data-informed decision making. As technologies improve and water management practices evolve it is critical that government decision-making is reliant on recent and accurate data to inform these decisions.

Thank you for the opportunity to provide feedback on Manitoba's Water Action Plan. If you have any questions about this submission, please contact KAP Policy Manager, Neil Van Overloop, at neil.vanoverloop@kap.ca.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jill Verwey".

Jill Verwey
President, Keystone Agricultural Producers Inc.