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Re: Nashwaak Watershed Association comments on New Brunswick's draft Water Strategy

The Nashwaak Watershed Association (NWA) congratulates the Department of Environment and Local Government on its progress towards its commitment to deliver a Water Strategy for New Brunswick. Since 1994, the NWA has been actively working to protect and enhance the Nashwaak River and its tributaries. We were one of the first watershed organizations to participate in and complete the requirements for the Province's water classification program and have advocated on behalf of our members and supporters for the need for an overarching plan to manage our rivers, lakes and streams for future generations.

We are happy to see progress on this long-awaited Strategy and welcome the opportunity to make a submission that can lead to an improved Strategy.

In summary, this draft document lays down some great recommendations for protecting NB waters; however, those nuggets seem lost in an overall lack of enthusiasm and commitment and solid plan for priorities and timelines. Furthermore, the omission of the details of an enhanced water classification program from the Watershed Management Working Group is creating confusion to the wider public and should therefore be finalized and made a central tenet of the final Water Strategy.

Below we offer specific comments on each section of the draft Strategy that we hope to see incorporated into the next/final document.

Sincerely,

Stephanie Merrill
Vice-President
Nashwaak Watershed Association

Water Strategy Framework

The vision, while sound, could be energized with more positive and forward-thinking language rather than the status-quo. This is where we can dream big about the future of what we want for our waters and may wish to include terms like precious water, healthy, people and nature. The principles and goals are sound and include key areas such as priority on human and ecosystem health, science-based decision, conservation, and public reporting.

Water in New Brunswick Today

- **New Brunswick's Water Resources:** This section could really use some energy. This section is a good opportunity to set the tone for the importance of rivers, lakes, streams to NB people, tourism, agriculture, cultural identity, economy. It should emphasize pollution prevention, ecological restoration, and water quality enhancement over time. It should also make a strong case for these foci in the face of the realities and challenges of climate change impacts seen and projected. Setting this stage well signals the importance of NB waters to government and introduces the meat of the Strategy in a more powerful way. It currently reads thin.
- **A First Nations Perspective on Water:** Other groups and individuals are better poised to make recommendations on this section, however perhaps Indigenous is the more accepted language to use here. Respecting that conversations are still ongoing with Indigenous organizations and communities; this section could be more powerful by acknowledging that we live and are operating on unceded territory and that Indigenous rights and protocols must be a part of a meaningful water Strategy. This section should reinforce commitment to reconciliation and peace and friendship. This is an opportunity to assert our commitment to doing a better job and respecting better process.

Action Plan

The 26-point 'action plan' includes many great initiatives that could go a long way towards protecting NB waters. The concern that we have, however, is that many of these initiatives are items that the department has promised but not delivered, begun but not finished, or finished without implementation in the past. Water organizations who are repeatedly asked to participate in these stakeholder processes are becoming fatigued before they see results. The strategy document names a number of such initiatives that have become documents on the shelf, or not released. **It is our recommendation that the Water Strategy prioritizes the implementation of these efforts (long-term wetlands protection policy guidelines, coastal areas protection strategy, flood risk reduction strategy, biodiversity strategy, etc.) through regulatory modernization and become prioritized in the action plan.** These are low cost 'wins' that will be needed once the Water Strategy is finalized and we move into implementation.

The action plan should prioritize the action items so that something very strong and signal setting is at the top of the list. In our opinion, the first priority should be presenting an enhanced Water Classification program to fix the almost 15 years of inaction on the regulation. This action item is the crux of a strong and protective water strategy. We are well aware of the working group on watershed management and many of the details of an enhanced water classification system are being worked on and soon to be recommended to the Minister. Unfortunately, the release of this strategy without these details has the potential to confuse the public and media which could lead to the Strategy falling short on tangibly moving towards solving this situation – which is an expectation of many organizations and

the public. **It is our recommendation to finalize the recommendations of the watershed management working group and have those recommendations be a central tenet of the final Water Strategy document.**

The listed action items seem appropriate; however, **we recommend that there be a prioritization of the action items with an approximate timeline.** Otherwise, this list of actions has no indication of urgency or commitment.

While there is mention of public education campaign on water laws, there is a noticeable lack of mention of water regulation enforcement in the Water Strategy. Furthermore, the focus on public and omission of industrial or municipal users is concerning. **We believe that an overly permissive permitting system and lack of enforcement capacity are both key challenges to long term water health and recommend adding initiatives to address these in the Water Strategy.**

An action plan should set a clear pathway that can be reported on. We are very happy to see an emphasis on transparency and accountability through regular public reporting both on water related data and information and on progress and success of the Water Strategy. **We recommend that all water information, including permits, should be required to be posted publicly. Furthermore, a minimum of the first year's priorities with performance indicators should be set, so that they can be measured for the first annual report.**