

22 May 2019

The Honourable Rochelle Squires
Minister of Sustainable Development
Room 344 Legislative Building
450 Broadway
Winnipeg, Manitoba R3C 0V8

Dear Minister,

Follow-up to Water Rights Regulation consultation

The Lake Winnipeg Foundation (LWF) acknowledges the Water Rights Act was amended in 2018 based on the following three principles:

- Increased efficiency through a streamlined registration process for low-impact drainage and water-retention projects;
- Ensuring no net loss of wetland benefits through compensation mechanisms for projects greater in scope;
- Enhanced enforcement and increased fines.

LWF has participated in a number of public consultations on the proposed regulation under the Water Rights Act, most recently in January, 2019. We understand over 250 submissions were received from organizations and private citizens. Public input, supported by robust departmental analysis, must inform meaningful revisions to the proposed regulation. There is still much work to be done.

LWF requests that the draft Water Rights Regulation not be passed until further stakeholder discussion has taken place.

Further, we recommend three actions be taken to build consensus, improve transparency and ensure meaningful integration of public input and departmental analysis into the proposed regulation.

1. Publish all submissions received through public consultation conducted by your department from November, 2018 to January, 2019.
2. Publish the departmental analysis of the public input received, including a description of how this analysis will inform changes to the proposed regulation, in line with the guiding principles established by the Water Rights Act.

3. Define clear objectives and a constructive process to guide future stakeholder discussions.

As supporters of Manitoba's Sustainable Watersheds Act, we are encouraged by your commitment to gather further input on the proposed Water Rights Regulation. We look forward to engaging constructively with your department to improve this very significant regulation.

Sincerely yours,



Alexis Kanu
Executive Director

Cc: Ralph Eichler, Minister of Agriculture
Bruce Gray, Deputy Minister of Sustainable Development