



ASSOCIATION OF MANITOBA MUNICIPALITIES

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January 22, 2007

Dwight Williamson
Director, Water Science and Management Branch
Manitoba Water Stewardship
200 Saulteaux Crescent
Winnipeg MB R3J 3W3

Dear Mr. Williamson:

Public consultations are a vital mechanism for ensuring that people have an opportunity to voice support and concerns in relation to a plan. The department of Water Stewardship has held a number of public forums where Manitobans expressed their views on the proposed regulation. The AMM participated in this process and is pleased to see the final draft regulation brought forward. The AMM Board has reviewed the regulation and supports the general concept of the proposed Nutrient Management Regulation, however there are issues that need to be addressed for it to be viable for municipalities in Manitoba.

Currently a definition has been developed to define Zone 5, the urban zone, without a real indication of what it will be. As proposed, Zone 5 has only one stipulation attached to it in relation to nutrient application in buffer zones. Any future regulations that will be developed in relation to this zone will utilize the same definition, which could be restrictive given that future parameters have not been set.

The AMM understands that municipalities need to be responsible for nutrient management in their communities. Presumably future regulations for Zone 5 will restrict cosmetic fertilizer application. Regulations that exist for other zones provide opportunities to vary the regulations with suitable nutrient management plans, therefore within Zone 5 there should also be opportunities to vary the regulations with suitable nutrient management plans.

Decisions that will have impacts on municipalities require extensive discussion. Future regulations with an impact on Zone 5 will require input from municipalities. The AMM should be involved in any decisions involving municipalities. The AMM can provide Water Stewardship with an advance understanding of how municipalities will likely respond to new regulations in order to assist in streamlining this process and indicate what is feasible when it comes to implementing the requirements.

*Representing
Manitoba's
Municipalities*

The development of future regulations may increase the responsibility of municipalities in the management of nutrients. Municipal budgets are already over-extended and municipal governments are not in the position to take on additional costs and responsibilities. Considerable capacity may be required to make proposed regulations a reality. Technical support should be available to assist in any technological upgrades and financial assistance would be important to ensure that capacity is available to make any necessary changes.

The proposed Nutrient Management Regulation fails to specify the available resources that will need to be available to municipalities to implement these regulations. Current infrastructure programs are already over-extended and should not be relied upon to cover the costs of implementing new provincial regulations. New opportunities for municipalities to access resources will be required.

The process of evaluating the Nutrient Management Regulation is currently unclear. A cost-benefit analysis should be undertaken to assure landowners that the regulations would balance the positive impact on water quality within the province along with economic opportunities. The cost of administering the proposed regulation and a science-based evaluation of impacts will need to be taken into account to ensure that any future regulations to deal with nutrient management will be the best use of finances. This program needs to be sustainable to be successful.

The AMM believes it is critical that all Manitobans be made aware of the overall, long-term provincial water protection plan. Seeing the plan only in small pieces makes it more difficult to understand either the benefits or the hazards of these regulations. The AMM Board would like to ensure that Water Stewardship continues to be attentive to the need for meaningful consultation with the AMM in order to assist in making regulations for water viable. If you have any additional questions or concerns, please do not hesitate to contact our office.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Bell". The signature is fluid and cursive, with the first name "Ron" and the last name "Bell" clearly distinguishable.

Ron Bell
President