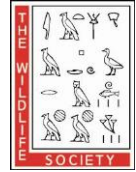




The Wildlife Society  
Manitoba Chapter



**The Wildlife Society, Manitoba Chapter**  
**Written submission to the Standing Committee on Legislative Affairs on**  
**Bill 7 - *The Sustainable Watersheds Act***  
**May 7, 2018**

On behalf of the membership of The Wildlife Society, Manitoba Chapter (TWSMB), Manitoba's oldest science-based wildlife management organization comprised of professional biologists, ecologists and natural resource professionals throughout the province of Manitoba, we wanted to provide comments to the Standing Committee on Legislative Affairs with respect to Bill 7 – The Sustainable Watershed Act.

In Manitoba, some of the most important and threatened wildlife habitat is located in landscapes dominated by agricultural use. As a result, it is important for natural resource managers to work with agricultural producers to develop and promote management practices that maintain habitats important to wildlife and biodiversity while still producing agricultural commodities. As the latest science has confirmed, and as outlined in our organizations position statement (attached), while wetland ecosystems are critically important to biodiversity across Manitoba, they are also critically important to healthy and sustainable watersheds, human health, communities and the economy.

The government deserves credit for introducing this important legislation to protect wetlands which is long overdue. The TWSMB has been engaged on this topic with the Minister of Sustainable Development prior to introduction of Bill 7 and it was one of our key recommendations to the Minister when we met with her last year. As a result, we are pleased how quickly this important policy has been developed and the corresponding legislation introduced. Bill 7 and Bill 16, the Climate and Green Plan Implementation Act, are key legislative components that provide important benefits for all Manitobans.

While supportive of Bill 7 overall, TWSMB's comments focus primarily on Part 4 - the Water Rights Act. The Bill has several clauses that are important to wetland conservation and protection and that TWSMB supports including:

- Sec 4.1(1) - The authority to create regulations to facilitate projects with small impacts to be in a registration process instead of full license process. We feel that a critical part of this clause is that Class III – V wetlands would be protected by a *no-net loss* clause for all potentially eligible projects.
- Sec 4.1(2) - The creation of “prescribed classes of wetland” that are afforded protection and subject to mitigation requirements in the event of loss or alteration. TWSMB is pleased to see the prescribed classes of wetlands that will receive strengthened protection will include Class III (Seasonal) as well as Classes IV and V wetlands using the Steward and Kantrud classification system. This is a scientifically based and well supported classification system for wetlands.
- Sec 5.1(2) - Wetland restoration for any loss of a prescribed class of wetland that includes either payment of an in-lieu fee or actual restoration in a location approved by the Minister. Either option precedes the issuance of a license that would allow a wetland impact.

- Sec. 5.1(1) - “No net loss of wetland benefits”. This is a fundamental concept to recognize and the application of it will curtail the on-going loss of wetlands across Manitoba. The inclusion of this clause is important and shows leadership in ensuring valuable ecological services and benefits from wetlands will continue into the future.
- Sec 5.2(2) - Reporting on funds received for wetland mitigation and acres of wetland restoration completed is an important component to demonstrate to all Manitobans that *no-net loss* of wetlands is being achieved. Details on the number, acres, location and class of wetlands permitted for drainage and the number, acres, location and class of wetlands restored to meet mitigation requirements will ensure transparency and accountability.
- Sec 23(1.2) - Enforcement and penalties are key components of any regulation to ensure functional protection of the intended resources; wetlands in this case. Careful consideration should be given to minimum fines to ensure there is a strong incentive to adhere to the regulations.

We are encouraged to see a greater recognition of the importance of seasonal wetlands (Class III). Research has shown that these wetlands represent biodiversity hotspots and deliver a significant number of ecological services like nutrient removal, carbon storage and holding excess water during flooding events.

It is important to note that Bill 7 is an important complementary piece to achieving reduction in greenhouse gases outlined in the Climate Change and Green Plan. Without strengthened protection of wetlands, large amounts of carbon stored in the hydric soils of wetlands will be released and will negate other reduction measures.

In closing, TWSMB commends the government for showing leadership with this important legislation. Wetlands are key biodiversity hotspots to a wide diversity of plant, insects, amphibians, birds and mammals across Manitoba and provide a host of environmental services to all Manitobans. We believe Bill 7 and its associated regulations are an important step to a more sustainable and prosperous future for Manitoba.

Sincerely,

*Michel Leclaire*

Michel Leclaire  
President, The Wildlife Society, Manitoba Chapter

Attach: TWS Final Position Statement - Alterations to Stream, Riparian, and Wetland Habitats in the US