



Nutrient Management Regulations Review

The Manitoba Eco-Network water Caucus would like to thank you for the opportunity to provide comments on the Nutrient Management Regulations Review.

Do you think the regulation is helping to reduce nutrients in Manitoba waterways?

Considering what is at stake, the Manitoba Eco-Network water Caucus believes the current regulations do not go far enough. Saving Lake Winnipeg is going to involve real costs, and sacrifices. As citizens we need to accept this and move on. The very things we need to do to save Lake Winnipeg will also help to make our water supply safer and more secure in general. Regulations and legislation are necessary since volunteer and individual efforts haven't been enough to stem the tide of nutrients entering our communal water supplies.

What are the strengths and limitations of the regulations?

The current regulations do not effectively-forced ban on phosphorus in all cleaning products sold in Manitoba as well as cosmetic use of phosphorus-laden fertilizers. A mandatory ban will be much more effective than a voluntary ban which would be unlikely to achieve more than a 50% update, regardless of publicity. While the challenges of industrial agriculture and municipal sewage treatment are more onerous, we view action on cosmetic fertilizers and dishwasher soaps to be "low hanging fruit" that can be plucked immediately.

What are other possible approaches, mechanisms and strategies that should be developed to ensure a more effective Regulation?

The Province of Manitoba can do much with regards to prevention. Every year the province opens up an additional 1000 cottage lots by or close to the water. Homeowners and cottagers should be required, through leases (for example) to eliminate the use of household products that contain phosphorus, to retain buffers on their shorelines, and the prohibition of cosmetic pesticides. Urban sewage treatment must require nutrient removal. Storm water controls are essential. Storm water treatment and erosion control can and must be budgeted for and practiced everywhere. Minneapolis offers very good examples of for erosion control and storm water control through property tax reductions, incentives, regulations and fines. Additionally, the province needs to encourage the City of Winnipeg to move faster on wastewater treatment and septic treatment as they are one of the biggest contributors to Lake Winnipeg's eutrophication.

A further significant prevention mechanism is the protection of wetlands. The Manitoba Eco-Network Water Caucus recommends that wetland protection both on the Prairies and in the Boreal is required to make progress towards improving the health of Lake Winnipeg. We recommend that a new revised wetland policy that provides stronger protection for more prairie pothole wetlands is necessary. Such a commitment will result in significant contributions to the reduction of nutrients into Lake Winnipeg.

What would you recommend be added, removed or amended in the regulation?

The Manitoba Eco-Network Water Caucus supports instituting an immediate and effectively-enforced ban on the cosmetic use of phosphorus-laden fertilizers and cleaning supplies such as dishwasher detergents. We recommend real restrictions on the use of fertilizers near watersheds as well as real restrictions on the pasturing of livestock along waterways. Additionally the provincial government needs to impose realistic guidelines for fertilizer use and stiff penalties for the excess use of fertilizers in all aspects of agriculture and offer significantly more support for environmental friendly alternative agriculture – aimed at producer and consumers. Furthermore the Province of Manitoba needs to implement and enforce restrictions on phosphates from municipal and residential lakeside residence.

Which of the following recommendations do you strongly agree with? Please choose one

- Keep regulation as is
- **Revise regulation significantly**
- Repeal regulation and start again
- Repeal regulation and stop the management of nutrient application
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We, in Manitoba, are on the end of the receiving line in our watershed and the compounds everybody else's nutrients. It is therefore good to know that other jurisdictions are beginning to act, particularly down south. But we need to show, like them, a very positive example by acting with strong and measurable regulations and policies.

Sincerely,

Manitoba Eco-Network Water Caucus
3-303 Portage Avenue
Winnipeg, MB R3B 2B4
ph. 204 943-0318