



Manitoba Association of Cottage Owners

Submission to the International Joint Commission on Lake Winnipeg Water Quality from the Red River.

28 February 2020

The Manitoba Association of Cottage Owners is responding to your request for public comment on proposed recommendations for nutrient loading recommendations on the Red River. The Red River flows into Lake Winnipeg and Lake Winnipeg is the 10th largest freshwater lake in the world. This lake defines Manitoba's geography, shapes our cultures, supports our biodiversity and drives our economy.

As the President of the Manitoba Association of Cottage Owners (MACO). MACO serves as an umbrella organization for local Cottage Owner Associations in Manitoba. There are 44 member associations with over 2600 paid members in the local associations. Many of these Associations are located in the RM of Alexander and Lac du Bonnet.

Many of these cottage owners have their cottages along east and west shores of Lake Winnipeg. They have seen firsthand the unsightly and potentially toxic algae blooms that plague its waters every summer.

The connection between phosphorus and algae growth has been demonstrated by over five decades of research in freshwater lakes at the acclaimed International Institute for Sustainable Development – Experimental Lakes Area.

In the IJC's own report: "Phosphorus Loading to Lake Erie" in February, 2014 it was noted that Phosphorus was the key nutrient limiting the amount of phytoplankton and attached algae in Lake Erie. Nitrogen reduction was only a secondary concern. The primary sources of phosphorus loadings to Lake Erie in the decades leading up to the 1972 Agreement were municipal sewage plants. Today, however, external phosphorus loads occur largely as runoff from diffuse land uses such as fertilized farm fields, lawns and impervious surfaces including streets and parking lots.

In this case the major municipal sewage plant in question was from the City of Detroit sewage plant. In addition agricultural operations were identified as a major source of phosphorus loadings into Lake Erie. These loadings result primarily from fertilizer application and manure.

We have a similar situation in Manitoba but over the past 15 to 20 years the situation has improved because of regulation to limit run-off. This has been the result of improved and targeted soil testing programs to apply only the amount of phosphorus as fertilizer and improved manure application procedures as required for the crop to produce an acceptably good yield.

Nutrient & Soil Management for one Manitoba Company; HyLife Foods

This company is a fully integrated swine production company from production to processing and has a specific objective to provide partnering landowners with a high-quality manure nutrient product applied in a consistent, safe and sustainable manner. To aid this process, the company conducts detailed soil analyses and employs certified agrologists. Their Environmental Management Team develops and implements detailed nutrient management plans for each individual company site and is involved in all on-farm manure application activities to ensure application rates meet crop requirements.

The company track all nutrients applied on all land receiving manure from their facilities, which are monitored by Global Positioning System equipment. This ensures compliance of all field setback requirements and avoids any potential application concerns. Great care is taken to ensure this natural resource is utilized to its fullest extent.

To achieve those goals, they follow a 4R concept that incorporates the:

- Right fertilizer source at the
- Right rate, at the
- Right time and in the
- Right place

These practices are consistent with recommendations made in 2014 for Lake Erie. [See Report](#). A failure to act now will only delay action, the time for action is now.

We expect the governments of Canada and the United States to work together in a constructive way on evidence-based actions that will lead to meaningful improvements to this exceptional natural resource.

This is deeply concerning to MACO and all of those that are affected. Winnipeg's under-treated sewage is the single largest point source of phosphorus to Lake Winnipeg. Yes, there are other sources of phosphorus in Lake Winnipeg but the North End Water Pollution Control Center (NEWPCC) is largest single source of phosphorus on the Red River.

Science has revealed, through research and peer review, a consensus that phosphorous overload is the major cause of Lake Winnipeg's degrading health. Other contributors, including nitrogen were mentioned in the earlier generic information sessions. This led to such elaborate infrastructure solutions that government budgets and timetables pushed any hope of implementation off for decades.

The analysis of the Lake Winnipeg specific ecosystem has concluded that phosphorus overload is the #1 issue and is so far ahead of the 2nd issue that it renders it statistically irrelevant. This is critical to acknowledge, accept and endorse as it brings the infrastructure solution from a 25 + year implementation plan to a 5 year implementation plan for municipalities along the Red River waterway. In pragmatic terms, this is the difference between never and now.

MACO does not support the IJC's proposed nitrogen objectives, since reducing nitrogen loading will have little to no impact in reducing algae blooms in Lake Winnipeg. To

meaningfully address eutrophication and make effective use of limited resources, policy must be based on the best available science, and science tells us to focus on phosphorus.

The science has been well known and proposals have been made for about 15 years, but there does not seem to be the will to do something with many excuses being made. For the good of Manitoba and Lake Winnipeg, we must address the issues at Winnipeg's North End Water Pollution Control Centre. There are many visitors that come here for summer visits. If the algae blooms on Lake Winnipeg are the best we can show of Manitoba we have serious problems.

The Manitoba Association of Cottage Owners is deeply appreciative of the efforts of the IJC in gathering facts and listening to stakeholders' concerns relating to the Red River and ultimately the health of Lake Winnipeg. We look forward to distributing the final report and recommendations of the IJC to our membership.

The time for talking is over. The time for action is now and not later.

Sincerely,



Gus Wruck, President, Manitoba Association of Cottage Owners

Cc: Wayne Ewasko MLA for Lac du Bonnet

Alan Lagimodiere MLA for Selkirk