



International Joint Commission  
Canadian Section  
234 Laurier Avenue West, 22nd Floor  
Ottawa ON K1P 6K6  
Canada

March 25, 2020

Dear Commissioners:

On behalf of the South Basin Mayors and Reeves, please accept this submission regarding the International Red River Board's (IRRB) proposed phosphorus and nitrogen concentrations for the Red River and total loads for Lake Winnipeg.

In 2009, leaders from nine communities along the shores of Lake Winnipeg formed the South Basin Mayors and Reeves (SBMR) as a response to the deteriorating water quality they were witnessing. Leaders recognized first hand the significant environmental, social and economic threat to local communities, the Province of Manitoba and elsewhere across the globe.

The SBMR recognize that efforts to deal with the problem must be coordinated and activated across governments, business and industry, environmental interests and the public. They also recognize that if we are to tackle this issue before it is too late, action must be meaningful and immediate.

In 2009 the SBMR developed the Lake Friendly Initiative to align the various stewardship activities taking place across the watershed and provide a clear, concise message related to necessary actions to protect our freshwater resources, and in particular, Lake Winnipeg.

One of the areas of focus for the Lake Friendly Initiative was to develop resources to promote stewardship activities within the jurisdiction of local governments. The Lake Friendly Marking System for Local Government was developed and this provides clear direction for local Governments to:

- ✓ Protect water from nutrients, contaminants and other threats
- ✓ Conserve and value water
- ✓ Reduce GHG - move to renewable energy
- ✓ Build resiliency into our natural and built environments

What the SBMR have come to realize through their sustained efforts over the past 11 years, is that it is not a lack of information that has caused a lack of action, but that the lack of action is due to competing messaging, missing targets, unclear measurables and often financially unachievable technological solutions. This situation has been facilitated by governments, business, industry, environmental interests, the science community and NGO's alike and has allowed policies and processes to remain status quo, which is getting us nowhere.

In principle, the SBMR supports the IRRB's proposed phosphorus and nitrogen concentrations and loads. We know there must be a common understanding and clear targets with understood measurables. It is our understanding that many of the other submissions have focused on the high costs associated with both phosphorous and nitrogen removal, and suggesting that attention should only be focused on phosphorus at this time.

Although we believe it is important to tackle both phosphorous and nitrogen levels, we believe the current efforts to do this have been focused solely around expensive technological interventions supported by various levels of government. If we are to see the necessary action we must also explore other options and gauge the effectiveness of such.

Allowing for a variety of effective interventions and for new and innovative tools, along with setting limits and clear targets, can be a much more affordable way for nutrients to be reduced than high-cost grey infrastructure.

We are aware of examples from other jurisdictions, for example in the United States where Ohio is a leader in water quality trading that creates a market-based mechanism for nutrient reduction. Once concentration and load limits are in place, a market-based mechanism can provide the means for interested purchasers and interested sellers to buy and sell phosphorus and nitrogen credits. However, without limits in place for these nutrients, there is much less incentive driving the creation of a market.

Adopting the proposed phosphorus and nitrogen concentrations and loads as proposed by the IRRB is a necessary step in addressing this urgent problem, but we are also appealing to the commission to undertake a more thorough evaluation of the options and to review other material related to potential solutions. We believe that there are innovative mechanisms to address nutrient management that should be evaluated if we are to see the implementation of achievable targets, we also believe the International Joint Commission is well poised to do this.

Sincerely,



Rick Gamble  
Chair, Lake Friendly

cc: Pierre Beland, Jane Corwin, Henry Lickers,  
Merrell-Ann Phare, Robert Sission, Lance Yohe