September 12, 2018

Standing Senate Committee on Fisheries and Oceans
The Senate of Canada
Ottawa, Ontario
Canada, K1A 0A4

Dear Senator Manning:

The Western Canadian Municipal Associations (WCMA) convened its annual meeting to discuss municipal issues of shared concern. The WCMA consists of the Alberta Urban Municipalities Association (AUMA), the Rural Municipalities Alberta (RMA), the Saskatchewan Association of Rural Municipalities (SARM), the Saskatchewan Urban Municipalities Association (SUMA), and the Association of Manitoba Municipalities (AMM). We wish to provide an update on our shared perspectives regarding the proposed amendments to The Fisheries Act.

As you may be aware, the WCMA supports the House of Common’s Standing Committee on Fisheries and Oceans recommendations to provide sufficient protection provisions that act as safeguards for municipalities, to expedite permitting to allow for works that involve the restoration of damaged infrastructure and emergency works to protect people and communities, and for the creation of an advisory committee that includes municipalities so that ongoing recommendations can be delivered. We welcome the provision in the proposed amendments that would enable the establishment of advisory panels. We would appreciate any additional details you can provide on how this will function including timelines.

We urge the federal government to take into consideration municipalities’ needs and to ensure that additional administrative burdens are not created and that project delays are prevented. We also encourage the federal government to consider providing funding to municipalities and landowners for the costs they accumulate while taking measures to maintain publicly beneficial fish and fish habitat for environmental stewardship. We also believe that it is crucial to avoid duplication with provincial environmental regulations that already protect fish and fish habitat; working closely with provincial governments will help to eliminate and reduce red tape. Focus should also remain on Canada’s commercial, recreational and Aboriginal fisheries.

The WCMA is also concerned about the expansion of the definition of “fish habitat” to include any waters frequented by fish. This broad definition of “fish habitats” will cause challenges to project proponents, as the term “frequented” is subjective and could be
broadly interpreted. To ensure regulatory clarity, more specific criteria for identification of fish habitats is needed.

The WCMA looks forward to continued engagement on The Fisheries Act to ensure that municipalities needs are taken into consideration. Balancing the needs of the environment and municipalities may be achieved through strong collaboration and communications with stakeholders such as the WCMA and the Federation of Canadian Municipalities.

Thank you for considering our comments on The Fisheries Act.

Sincerely,

[Signature]

Al Kemmere
President, RMA

[Signature]

Barry Morishita
President, AUMA

[Signature]

Ray Orb
President, SARM

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Gordon Barnhart
President, SUMA

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Chris Goertzen
President, AMM
cc: Federation of Canadian Municipalities