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Dear Ms. Scott

RE: Blackbird Creek Drainage Project designation under CEAA 2012

The National Farmers Union (NFU) supports the designation under subsection 14(2) of the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) of the Smith Creek Regional Watershed Association Board's proposed Blackbird Creek Drainage Project located approximately 50 kilometres east of Yorkton, Saskatchewan and approximately 6 km from the Saskatchewan-Manitoba border. Designation under CEAA 2012 would cause the project to undergo a federal environmental assessment.

The NFU is a voluntary direct-membership, non-partisan national farm organization made up of thousands of farm families from across Canada – including Saskatchewan and Manitoba – who produce a wide variety of commodities, including grains, livestock, fruits and vegetables. As a general farm organization, our membership reflects the diversity of production systems, farm sizes and farmer demographics across the country. We promote food sovereignty, which is a holistic approach that puts people, food and nature in the centre of the policy picture, and that makes democratic control of the food system its priority.

The NFU embraces the precautionary principle, which calls for timely action to prevent harm even if all evidence is not yet available. NFU members believe that Manitoba and Saskatchewan should optimize water retention to mitigate downstream flooding. It is also the NFU's policy that a minimum of 20% of the land each landowner owns should be maintained as wetlands, grasslands or forest.

The Blackbird Creek project is located in Saskatchewan in the Upper Assiniboine River watershed and would drain 2756 acres of wetlands -- 66% of existing wetlands -- in an area of 21,456 acres. At completion, the project would comprise 623 kilometers of drainage works. The

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outlet of the drainage would be on Blackbird Creek, which feeds the Assiniboine River. Its waters continue into Lake of the Prairies and eventually Lake Winnipeg.

The project would be located in Saskatchewan but would have direct effects in Manitoba. The drainage of Blackbird Creek area wetlands would increase the total water volume flowing into Manitoba, increasing the risk of overflowing the Shellmouth Dam and the flooding of farmland downstream. In the past decade such flooding has already occurred frequently, causing hardship and loss of productive land to Manitoba farmers.

Drainage of the land would increase the amount of cultivated land in the project area, incorporating wetlands into fields. Wetlands are an important carbon sink. Maintaining wetlands is an important way to address the climate emergency. By removing wetlands, the Blackbird Creek project would exacerbate global heating, harming farmers across Canada and globally by contributing to greater climate instability. Thus, the project is contrary to the 2016 *PanCanadian Framework on Clean Growth and Climate Change*, which includes a commitment for Federal, provincial, and territorial governments to “work together to protect and enhance carbon sinks, including in forests, wetlands, and agricultural lands (e.g. through land-use and conservation measures).”¹

The landscape in the Blackbird Creek area is known as “prairie pothole” topography – which was created by material dropped by the melting glaciers. It is characterized by many small ponds, sloughs, and marshes. These water bodies and their margins are important wildlife habitat and are the nesting areas and stopping places for an abundance of migratory birds.

The potholes are not connected to each other by streams, but are filled most years by snowmelt and rainfall. In dry years they may not fill at all. Many dry up over the summer from a combination of evaporation and soaking down to replenish the groundwater formations below. Their evaporation contributes to summer rains needed for growing crops and pasture. Groundwater feeds local farm wells and provides for local communities’ municipal water supplies. In wet years prairie potholes retain water on the landscape to prevent downstream flooding; in dry years they provide needed moisture locally. They are like a sponge that holds water in wet years and releases it in dry years, preventing extremes of flood and drought.

Because prairie pothole topography is not connected by streams, drainage for cultivation purposes would require significant earthworks and/or tile drainage. The area is already scarred from extensive illegal ditching due to Saskatchewan’s decades-long failure to adequately enforce its previous drainage regulations. The Blackbird Creek proposal would lead to even more aggressive drainage works. Rapid removal of surface water and tile drainage would decrease downstream water quality. Without filtering through vegetation, runoff water is likely to contain higher levels of nutrients from fertilizers and more pesticide and herbicide residues. Nutrient contamination will affect downstream water quality in Lake of the Prairies and Lake Winnipeg, which are already badly affected by algae blooms and eutrophication.

The widespread use of neonicotinoid seed treatment on canola seed, the most prevalent crop in the area, would increase the load of these chemicals in downstream surface waters after converting drained wetlands to cultivation. In 2018 the Pesticide Management Regulatory Agency (PMRA) recommended a ban on agricultural uses of neonicotinoids due to the harm they cause to aquatic ecosystems and birds. Even if the PRMA recommendation is implemented by 2020 there would be a five-year phase out period where neonicotinoid-contaminated runoff water would damage ecosystems. Allowing an increase in the negative impacts of neonics on bird life may well be in contravention of the international *Migratory Bird Convention*.

The CEEA assessment should also investigate the cumulative effects of the Blackbird Creek project in conjunction with other projects in the Smith Creek watershed, as well as more broadly across Saskatchewan. Each individual drainage network may seem insignificant on its own, but when joined up with all the others occurring and being planned, their combined impact will be substantial, whether in drought conditions or years with unusually high precipitation.

In Canada's 2018 report to the UN Ramsar Convention it is noted that one of the biggest difficulties in meeting our commitments to this international agreement is development pressures on natural habitats in Southern Canada causing wetland loss, fragmentation, and degradation.ⁱⁱ The Blackbird Creek project would appear to be a backward step. A federal environmental assessment would be an important measure to highlight the need to ensure drainage for agricultural purposes does not cause more harm than good.

Respectfully submitted by
The National Farmers Union

ⁱ *Pan-Canadian Framework on Clean Growth and Climate Change*, 2016

<https://www.canada.ca/en/services/environment/weather/climatechange/pan-canadian-framework/climate-change-plan.html>

ⁱⁱ *Ramsar National Report to COP13*, Stewardship and Regional Operations, Canadian Wildlife Service, Environment and Climate Change Canada, March 2018.

https://www.ramsar.org/sites/default/files/documents/importftp/COP13NR_Canada_e.pdf