

Ian Rudland
Wetland Policy Project Team Co-Chair
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Monday, January 14, 2008

Dear Mr. Rudland,

Earlier this year, agricultural organizations across Alberta were invited to participate in the Alberta Water Council's "wetlands policy consultation" by submitting workbooks and attending public consultation sessions. The results of these consultations and subsequent policy implementation will no doubt have wide-reaching affects for the cropping sector in Alberta. Cropping sector representatives are therefore deeply concerned about several flaws in the wetlands policy consultation process.

We are pleased that Carrie Selin of the Intensive Livestock Working Group has been an active participant in the Wetland Policy Project Team on behalf of the agricultural industry. It was evident at the September 20th meeting in Edmonton however, that agriculture has not been fairly represented in the consultation process. Many of our producer-constituents were busy harvesting their crops during the consultation process and were therefore unable to attend the public workshops. Instead, organizational representatives attended on their behalf. While those representatives were able to voice their opinions at the sessions, it should be noted that those individuals were speaking on behalf of more than 17,000 Alberta farmers – not simply as single voices.

The consultation workbooks provided some valuable background into the Water for Life Strategy in Alberta. Nevertheless, many of the issues for debate were "motherhood statements" that proved difficult to argue against. In addition, when an organization filled out a consultation workbook, it was counted as one single opinion, rather than accounting for all of the collective concerns of the constituent members.

The cropping sector appreciates the importance of wetlands and their preservation in Alberta. While we recognize that any new wetlands policies will be aimed directly at industrial and urban developers, many farmers stand to be unnecessarily caught in the same nets. In particular, proposed restrictions on draining ephemeral wetlands may delay seeding in some fields. Ultimately, this can undermine valuable crop rotation and agronomic decisions with serious economic impacts.

Crop producers in Alberta are responsible for environmental stewardship decisions on the majority of Alberta's privately owned lands. Therefore, any public consultation/policy process with the potential to alter their business viability to the degree that the wetlands policy consultation does should fully reflect their opinions. As such, planning consultations during crop producers' busy seasons – seeding, and harvest – has not accurately represented the cropping sector's invaluable contributions to this process.

Thank you for considering this matter.



Doug Robertson
Chair
Alberta Barley Commission



Greg Porozni
Chair
Alberta Canola Producers Commission



Barry Grabo
President
Alberta Pulse Growers

Cc. Honourable Rob Renner
Minister of Environment