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*Transmission by Email: [president@cwa-aec.gc.ca](mailto:president@cwa-aec.gc.ca)*

***Re: Response to Survey: National Water Security Strategy: Strengthening Water Security in Canada, Together***

Canadian Environmental Law Association (CELA) is a legal aid clinic dedicated to environmental equity, justice, and health. Founded in 1970, CELA is one of the oldest advocates for environmental protection in the country. With funding from Legal Aid Ontario, CELA provides free legal services relating to environmental justice in Ontario, including representing low-income and vulnerable or disadvantaged communities in litigation. CELA also works on environmental legal education and reform initiatives. For over five decades, CELA has provided its expertise analysis on the legislative and policy framework related to protection of drinking water sources, particularly in Ontario and on restoration and protection of freshwater ecosystems including the Great Lakes Basin Ecosystem.

CELA is submitting the following response to the questions posted to the [online survey: Public Engagement toward a National Water Security Strategy: Strengthening Water Security in Canada, Together](#) by Canada Water Agency. These comments are intended to complement comments submitted by twelve non-governmental organizations across the country.

**1. What water-related challenges and opportunities do you see or expect in your region, community, and/or sector?**

***Response:*** Access to safe and clean drinking water and the integrity to freshwater sources (surface water and groundwater) is threatened by actions on the land and water use from how we design and manage dams, irrigation needs, infrastructure development, waste and toxic substances discharged to the environment; climate change impacts, development and extraction proposals, and diversion proposals and water taking permits. However, there are opportunities to ensure land use planning; stewardship practices and nature-based solutions consider the impacts to our freshwater systems. The establishment of the National Water Security Strategy is an opportunity to address fragmented governance and decision-making processes related to land-use planning and water use across all jurisdictions in Canada and to strengthen unity and coordination. Efforts should adopt prevention measures including the application of the precautionary principle in these regulatory and non-regulatory measures that impact the integrity and well being of freshwater systems across this nation, with priority consideration to ensure equitable access to clean drinking water sources for all Canadian and for Indigenous communities that rely on the waters for cultural ceremonies, supporting important food sources and supporting their traditions.

**2. How well does the definition above reflect your understanding of water security?**

- Very well
- Somewhat well
- Neutral
- ***Somewhat poorly -- XXXXX***

- Very poorly
- Unsure

If the definition does not fully reflect your understanding of water security, please describe what water security means to you.

**Response:** *Watershed security* is our collective capacity to restore and protect the ecological integrity of healthy freshwater ecosystems (surface and ground water sources), including infrastructure, in a spirit of reciprocity and respect for water in order to support healthy and resilient communities, sustainable economies, healthy diverse ecosystems, and peaceful and equitable relations for present and future generations.

*We achieve watershed security through integrated watershed planning and co-management by investing in research, innovation, and action to ensure reliable access to adequate quantities of clean water for human wellbeing, resilient watersheds and ecosystems, and sustainable economies; as well as by adopting strategies that prioritizes prevention, avoidance, and remediation before offsetting and guided by the precautionary principle — to protect from cumulative water-related risks.*

**3. Do you know any initiatives or examples of efforts that are helping to improve water security in Canada?**

**Response:** *Uplifting rather than deregulating existing regulatory and shared agreements intended to restore and protect the freshwaters of the Great Lakes Basin Ecosystem such as the Great Lakes Water Quality Agreement, Great Lakes Charter, Canada-Ontario Agreement on the Great Lakes Ecosystem Basin is critical to support water security in the Lakes Region. This will involved commitments for shared governance that includes binational coordination of US and Canadian governments, as well as fed-provincial-municipal governments to ensure the protection of biological, chemical and physical integrity of the Great Lakes Waters. Furthermore, existing legislation such as the Ontario Clean Water Act and Source Protection Act should be fully implemented to ensure application of multi-barrier approach to protect drinking sources for millions of Ontario. In addition, the process should undertake an examination of permitting processes for industry and other users to account for water use and responsibility for toxic discharges to the water system, so they do not impact the quantity and quality of freshwater sources.*

**4. Is there anything we haven't covered that you feel is important to consider regarding water security in Canada?**

*Response: Adequate commitment for resources to ensure actions are taken to address threats to freshwater resources are an integral part of a national strategy. As well as setting clear timelines and full effective engagement of the public in the development and implementation of the strategy. Addressing how shared governance and outlining clear authority of each level of government is necessary in a national strategy to ensure the objectives of the National Strategy can be achieved.*

CELA welcomes the to the opportunity to engage in the development of a National Water Security Strategies. Thank you for considering our preliminary comments.

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