



June 30, 2025

Honourable Rebecca Schulz
Minister of Environment and Protected Areas
General Submission Emailed to: EPA.Water@gov.ab.ca

Re: Team Alberta Crops Submission Phase II Engagement on Proposed Amendments to the Water Act to Improve Water Availability

Dear Honourable Minister Schulz,

Team Alberta Crops appreciates the opportunity to participate in the Phase II consultation on proposed amendments to the *Water Act* and policy to improve water availability. We commend the Government of Alberta for engaging stakeholders in this important dialogue and for recognizing the need to modernize water management to meet the province's growing environmental, economic, and community needs.

Team Alberta Crops is a working collaboration between seven of Alberta's agricultural producer groups that work together to advance grass-roots policy and advocate on behalf of Alberta's crop and beekeeping sectors. The partnership represents farmers and stewards of over 20 million cultivated crop acres through its members: Alberta Beekeepers Commission; Alberta Canola; Alberta Grains; Alberta Pulse Growers; Alberta-British Columbia Seed Growers; Alberta Sugar Beet Growers; and the Potato Growers of Alberta. This coalition is committed to supporting sustainable water use, as well as contributing to a resilient and efficient water management system.

We support, in principle, the proposed amendments to the *Water Act* and would like to highlight our alignment with the submission made by the Alberta Irrigation Districts Association (AIDA). In addition to the AIDA recommendations, we respectfully submit the following recommendations to improve the *Water Act* and policy, and support the broader goals of water availability, conservation, and productivity:

1. Revise Wetland Classifications on Agricultural Lands

Eliminate the temporary and seasonal classifications of wetlands on agricultural lands to facilitate ephemeral drainage without approvals. This change would enable farmers to responsibly manage runoff and enhance water storage on the landscape, building resilience to climate variability. *This recommendation aligns with the Ministry of Environment and Protected Areas' mandate to review Alberta's water management strategy to increase the availability of water for agricultural producers, while maintaining high standards of conservation and environmental stewardship. By revising wetland classifications on agricultural lands, the Ministry can support responsible land and water use.*

2. Streamline Dugout Construction Approvals

Permit the construction of dugouts in temporary or seasonal wetlands without requiring a license to fill. This would reduce regulatory burden and enable timely water storage for agricultural use. *This recommendation aligns with the Ministry of Red Tape Reduction's mandate to eliminate unnecessary regulatory barriers.*



3. Simplify Tile Drainage and other Applications

Develop standardized templates for tile drainage and other applications and consider cost-sharing mechanisms for third-party environmental assessments. This would reduce administrative complexity and support responsible water management practices. *This recommendation aligns with the mandate to promote high conservation standards by: ensuring that water management practices are environmentally sustainable; fulfilling the mandate to eliminate unnecessary regulatory barriers; fulfilling the Ministry of Justice's mandate to regularly engage stakeholders, which includes agriculture; identifying practical solutions to issues affecting them, including reducing unnecessary red tape and removing barriers that hinder their ability to grow the sector.*

As the *Water Act* and policy currently stands, even minor actions (such as draining a small, temporary pothole that would naturally disappear within weeks of snowmelt) can unintentionally criminalize farmers and ranchers. The *Water Act* and policy should minimize the exposure risk to farmers for legal liability for routine land management practices. The water policy as it currently stands creates regulatory uncertainty and undermines the confidence in the fairness and proportionality of environmental enforcement.

We urge Alberta Environment and Protected Areas to recognize the stewardship role that agricultural producers play in managing private lands. Allowing the consolidation of seasonal wetlands into semi-permanent or permanent wetlands would enhance both agricultural productivity, long-term water storage and reduce fertilizer emissions and other pollutants for ecological benefit.

We believe that agriculture can and should be a proactive partner in achieving the objectives of this consultation by improving access to water, optimizing its use, and supporting conservation. We look forward to continued collaboration as the Government of Alberta advances policy and legislative changes to ensure a sustainable water future for all Albertans.

As representatives of Alberta's agriculture sector, we look forward to continuing our partnership with you to improve the *Water Act* and related policies in a way that supports both environmental stewardship and the long-term viability of agricultural producers. Should you have any questions or concerns please do not hesitate to contact us.

Sincerely,
(Original signed by)

Curtis Miedema, President
Alberta Beekeepers Commission

Andre Harpe, Chair
Alberta Canola



**Scott Jespersen, Acting Chair
Alberta Grains**

**Shane Strydhorst, Chair
Alberta Pulse Growers**

**Sarah Weigum, President
Alberta-British Columbia Seed Growers**

**Gary Tokariuk, Chair
Alberta Sugar Beet Growers**

**Alison Davie, Chair
Potato Growers of Alberta**

cc: Minister Rebecca Schulz, Minister of Environment and Protected Areas epa.minister@gov.ab.ca; Mr. Christopher Thresher, Chief of Staff to Minister Schulz christopher.thresher@gov.ab.ca; Minister RJ Sigurdson, Minister of Agriculture and Irrigation AGRIC.Minister@gov.ab.ca; Mr. Josh Bilyk, Chief of Staff to Minister Sigurdson josh.bilyk@gov.ab.ca; Minister Devin Dreeshen, Minister of Transportation and Economic Corridors, transportation.minister@gov.ab.ca; Mr. Jerry Bilyk, Chief of Staff to Minister Dreeshen, jerry.bellikka@gov.ab.ca; Minister Rajan Sawhney, Minister of Indigenous Relations, ir.ministeroffice@gov.ab.ca; Mr. Riley Braun, Chief of Staff to Minister Sawhney; Minister Dale Nally, Minister of Service Alberta and Red Tape Reduction, ministersa@gov.ab.ca; Mr. David Jackson, Chief of Staff to Minister Nally, david.jackson@gov.ab.ca; Minister Mickey Amery, Minister of Justice, ministryofjustice@gov.ab.ca; Mr. Keith Pridgen, Chief of Staff to Minister Amery, keith.pridgen@gov.ab.ca

