

March 15, 2016

By email Katarina_Carthew@gov.nt.ca

Katarina Carthew,
Department of Environment and Natural Resources,
Government of the NWT.

Dear Ms. Carthew:

Draft NWT Water Stewardship Strategy Action Plan 2016-2020

Thank you for the opportunity to comment on the above noted document. The NWT Chapter of the Council of Canadians offers the following comments within the context of well-documented threats to the human right to water and the health of our aquatic ecosystem:

- Only three NWT fresh water lakes and rivers protected under federal legislation and lack of protection for most fish habitat since the passage of Omnibus Budget Bill C-45.
- Lack of oversight of toxic wastewater storage and federal legislative loopholes that allow rivers and lakes to be used as toxic dump sites.
- Industrial activities that seem to have unfettered use of valuable freshwater resources.
- Climate change.
- Tentative if any, commitment to, investment in, or independent oversight with respect to Mackenzie River Basin management even though the Basin is the lynchpin of continental hydrology.
- Uncertain if any, capacity to enforce bi-lateral transboundary water agreements.

We are pleased to see that the 2016-20 Action Plan engages a wide variety of water partners; takes collaborative and ecosystem approaches; honours Indigenous rights and title; and relies on both traditional and scientific knowledge. However, we are disappointed that the Action Plan is ambiguous on the matter of territorial legislation relevant to water management (3.2) and seems to make no commitment to strengthen the *NWT Waters Act*, even though a review and amendment of the Act are part of the mandate of the 18th Legislative Assembly. Changes to the Act must be linked to the *NWT Water Stewardship Strategy* and result in a robust legal framework that addresses the above mentioned threats to our water, and gives meaning to the wide ranging monitoring and research commitments in the Action Plan. We also hope that there is a solid investment in the upcoming GNWT budget to both this legislative work and water quality and quantity commitments under the Action Plan.

Finally, on the matter of transboundary agreements, we would like to see a more concerted effort to educate and engage the general public in working with little understood agreements than what is suggested in section 1.5.

Regards,



Lois Little,
Co-Chair,
NWT Chapter Council of Canadians.