

Conservation Council's Assessment of New Brunswick's 2024 Water Strategy Progress Report and Five-Year Review

Introduction/Context

The Conservation Council of New Brunswick (CCNB) has been serving as the voice of environmental issues on behalf of New Brunswickers for over 50 years. Our mission is to create awareness of environmental problems and advocate solutions through research, education and interventions in collaboration with others. As part of our mandate, we hold governments accountable for their commitments to address environmental issues such as pollution prevention, climate change and biodiversity loss.

In December 2017, the New Brunswick government released “[A Water Strategy for New Brunswick 2018 – 2028](#)” (Water Strategy). This document was developed with engagement from various government departments, non-governmental organizations, Indigenous communities and other stakeholders through a collaborative process as outlined in the government report “[Working Together to Build a Water Strategy for New Brunswick](#).” The purpose of this document was to “provide the foundation for improvements that will enable the Province to continue to manage water resources in a sustainable way now and into the future.” The government outlined 29 individual actions under five goals of the Water Strategy:

Goal 1: To better understand and share knowledge about water. **Goal 2:** To protect drinking water supplies. **Goal 3:** To preserve and enhance aquatic ecosystems and the water on which they depend. **Goal 4:** To work cooperatively on aspects of water protection and management. **Goal 5:** To report publicly on strategy implementation.

As part of Goal 5, the government committed to “issuing annual progress reports on the status of the action items listed in this water strategy” and “review(ing) the strategy within five years of its release to ensure its continued relevance and to identify potential new actions for consideration in the next version.”

The government published its first “annual” progress report in 2021. In January 2024, the government released “[A Water Strategy for New Brunswick Progress Report And Five-Year Review](#).” (2024 Progress Report and Review)

Below, we examine the 2024 Progress Report and Five-Year Review to highlight actions where the government has met its commitments outlined in the Water Strategy and actions where the government has failed to meet its obligations. First, we will examine the five-year review, commenting on the government's review process, handling of climate change impacts, lack of new

actions and unclear amended actions. Then, we will look at the progress report, evaluating completed, ongoing and future actions.

By examining the Progress Report and Five-Year Review, we hope the government will address our comments and recommendations either in the next progress report or by updating the five-year review. We also encourage the government to consider our comments when creating the next version of the Water Strategy or any other similar strategy related to environmental issues in New Brunswick.

Water Strategy Five-Year Review (Action 29)

Within the 2024 Progress Report and Review, the government indicated that an internal review of the Water Strategy was completed. The results of the review were: 1) affirmation that all of the actions outlined in the strategy were relevant and achievable and 2) that 12 actions needed to be clarified through rewording.

CCNB comments:

Five-year review process

- We congratulate the government for completing a review of the Water Strategy. However, we have many questions regarding the thoroughness of the review. For example, the government failed to mention the process used to review the Water Strategy. There is no indication of who was involved in the review, the timeline, or the rubric for evaluating the strategy. This lack of transparency makes it difficult for the reader to judge the accuracy of the government's five-year review.
- During the internal review, no consultation was done with stakeholders. This lack of consultation does not support the intent of the Water Strategy, particularly Actions 2, 24 and 25. Consulting with stakeholders would have resulted in a more robust review of the Water Strategy and elevated the confidence of stakeholders and the public in the review. Stakeholders could have provided recommendations for strengthening wording, improving current actions, and suggesting new actions to manage water resources sustainably in New Brunswick.
- This review was an opportunity for the government to include more Indigenous perspectives in the Water Strategy. However, the government failed to take advantage of this opportunity. Indigenous voices are entirely absent.
- Additionally, there is no mention of the results of the “[State Of The Water Quality In Lakes and Rivers](#)” report last completed in 2019 (see comments on Action 1 below) or the results of the “[Drinking Water Quality in My Community](#)” report completed in 2021 (see comments on Action 9). Both these reports highlighted water quality issues that the government should have mentioned as part of this review. Are the actions outlined in the Water Strategy addressing these water quality issues, or are additional actions needed?

Climate change

- The Water Strategy mentions actions being taken by the government in relation to climate change and water (e.g. [Transitioning to a Low-Carbon Economy - New Brunswick's Climate](#)

[Change Action Plan \(2016\)](#)), but the five-year review and progress report doesn't mention movement on any of these actions. Climate change has a significant impact on water resources in New Brunswick, but it is not clear who in the government is responsible for reporting and addressing these effects. How is the government responding to the impacts of climate change, such as increased forest fires, flooding, drought and heat, on water resources?

New actions

- According to Action 29, the review of the strategy was to include new actions for consideration in the next version of the Water Strategy. However, there are no new actions mentioned in the review. This suggests that the government has not identified any new actions that are needed to ensure water resources are managed sustainably.
- However, both the “State Of The Water Quality In Lakes and Rivers” report and the “Drinking Water Quality in My Community” report highlight water quality issues that may not be addressed by the current actions listed in the Water Strategy (e.g., impacts of agriculture, forestry, municipal developments pharmaceuticals and personal care products, nanoparticles and flame retardants on water quality). In addition, identifying, mitigating and adapting to the potential impacts of climate change (e.g., increased forest fires, flooding, drought and heat on water resources) should be included in the next version of the Water Strategy.

Amended actions

- As part of its internal review, the government amended 12 actions. Some actions were amended with clear wording clarification (e.g., Action 2 changed “Aboriginal” to “Indigenous”), but some amendments changed the scope of the action. It is not clear why the following amendments that change the scope and intent of the action were made:
 - Action 19 changed from preparing a water conservation plan for the province to **creating a drought index and public advisory reporting system**;
 - Action 20 changed from understanding and evaluating the causes of algae blooms and implementing an action plan to **providing public education and supporting research**;
 - Action 23 changed from developing a regulatory framework to designate coastal protected areas under the Clean Water Act to **exploring options for improved management of coastal areas**;
 - Action 28b changed from issuing **annual progress reports** on the status of water strategy action items to issuing **periodic progress reports**.

CCNB recommendations:

- The government should encourage stakeholders to review, ask questions and comment on the 2024 Progress Report and Review. The government should then update the 2024 Progress Report and Review based on feedback from stakeholders. Amendments to the Water Strategy should be clearly explained and justified.
- Future water strategies should outline the process for review and updating. The process should include robust engagement with stakeholders and a review of all applicable

resources (e.g., “State Of The Water Quality In Lakes and Rivers” and “Drinking Water Quality in My Community”).

- The review and progress reports should include actions related to climate change and water resources.
- The government must respect its commitment to engage with Indigenous communities and organizations when creating, reviewing and updating strategies such as the Water Strategy.

Progress Report

The government indicated that since the release of the Water Strategy, of the 35 actions (some of the 29 actions have been subdivided), 14 actions have been completed, five are ongoing, 12 actions have been started, and four have yet to be started.

CCNB’s comments:

Completed Actions

We acknowledge the government's work to complete Action 1, Action 5a, Action 5b, Action 7, Action 8, Action 9, Action 13a, Action 16a, Action 16b, Action 17, Action 21a, Action 21b, Action 22 and Action 29. However, we question whether the government successfully delivered on the intent of some of the actions. See below for details.

Action 1 – Issue an initial report on the current state of water quality in lakes and rivers in New Brunswick. Completed in 2019.

- This report was completed, but it clearly states in the report that it is “the first province-wide **annual** report on the state of New Brunswick’s surface water quality.” The wording in the report created the expectation that it would be updated yearly. However, this initial report appears to be the only completed one that is publicly available.
- It is not clear if/ how the information from the report was incorporated into the 2024 Progress Report and Review. If not to inform reviews and actions, what was the point of the report?
- The report mentions emerging concerns such as pharmaceuticals, personal care products, nanoparticles and flame retardants. These issues are not mentioned in the five-year review of the Water Strategy as potential new actions.
- It is not clear when the next report will be produced. Our climate is changing rapidly, and updated information is imperative for understanding the impact of this change and reducing risks to water supply for people and wildlife.

Action 9 - In collaboration with local governments, issue a report based on a comprehensive analysis of drinking water quality for all New Brunswick communities that have a public water supply system. “Drinking Water Quality in My Community” report completed in 2021.

- This report was [completed](#), but it states that “this report was developed as a **first step** to meet that commitment (action).” The report's wording suggests that there

are more steps that need to be taken, but it is unclear what those steps might be in relation to Action 9 and if they have been completed.

- The report indicated water quality issues of concern, e.g.,
 1. “raw water sources often had bacteria present before treatment was applied.”
 2. “common exceedances of the health-based guidelines were for turbidity and lead.”
 3. “less often, exceedances were found for arsenic, uranium, selenium, and fluoride.”
 4. “occasional exceedances of the health-based guidelines for some disinfection by-products in particular water systems.”
 5. “For those chemistry-based parameters with aesthetic guidelines, the most common exceedances were for manganese and iron, and less often copper, chloride, and sodium.”
- The report also indicated that the information collected (such as those listed above) could “help the government to prioritize which water systems may need additional support to ensure even more consistent, safe and reliable drinking water in the future.” It is not clear if/how the information from the report was incorporated into the 2024 Progress Report and Review.

Action 13a - Evaluate options for introducing regulatory requirements for the bottling and sale of potable water; to ensure that: public health is protected, these operations undergo inspections and monitoring, and potential effects on other water users are considered. Completed in 2022 - 2023.

- It should be noted that the provincial government did not take any specific activities to complete this action. Instead, it indicates that the federal government regulates bottled water under the Food and Drug Act.

Action 22b - Evaluate the pesticide permitting requirements for the agriculture industry under the Pesticides Control Act for non-domestic pesticides, and take appropriate action. Completed in 2022-2023.

It should be noted that the government had the opportunity to amend this action to include evaluating the pesticide/herbicide permitting requirements for the forest industry but did not do so within the 2024 Progress Report and Review.

- [CCNB strongly encourages the government to review the use of pesticides/herbicides](#) by the forest industry in New Brunswick and the potential impacts of the use on water quality. Glyphosate, the main active ingredient in most herbicides used in New Brunswick Crown forest operations, is a controversial chemical known to affect beneficial insects, bird populations and Freshwater ecosystems, thereby affecting other wildlife that is dependent on these food and shelter sources.

Action 29 - Review the strategy within five years of its release to ensure its continued relevance and to identify potential new actions for consideration in the next version. Completed in 2022 – 2023.

- As indicated in the Water Strategy Five-Year Review section above, we believe that the government did not present the findings of a robust review of the Water Strategy.
- In particular, the government appears to ignore the findings of its own reports (e.g., “State Of The Water Quality In Lakes and Rivers” report and the “Drinking Water Quality in My Community” report) that highlight water quality issues that may not be addressed by the current actions listed in the Water Strategy.

Ongoing Actions

We acknowledge the government's work on Action 2, Action 24, Action 25, Action 28a and Action 228b. However, the government does not provide specific milestones for meeting the deliverables and intent of these actions. Therefore, it is difficult for the reader to determine what, if any, progress the government intends to make on these actions in the next four years. See below for details.

Action 2 - Maintain an ongoing dialogue with First Nations in order to better understand and incorporate Indigenous perspective as it relates to water

- While we are pleased the government worked with some Indigenous communities to create educational signage and other materials regarding cyanobacteria, we are deeply disappointed that this is the only “dialogue” with First Nations communities reported by the province. This work, while important, is not really reflective of having a dialogue to better “understand and incorporate Indigenous perspectives.”
- As mentioned above, the five-year review of the Water Strategy was an opportunity for the government to include more Indigenous perspectives into the strategy and deliver on the intent of Action 2. However, the government failed to take advantage of this opportunity. Indigenous voices are entirely absent from the review.

Action 24 - Continue a collaborative dialogue between government and First Nations regarding permits, projects, initiatives, and other topics of mutual interest.

- In its report, the government says it has worked with the Department of Indigenous Affairs to support “First Nation communities and organizations as they undergo stewardship efforts such as water quality monitoring and make plans to adapt to climate change.” However, it doesn’t provide specific examples of the type of support it has provided. Therefore, it is difficult to determine if the province is meeting the intent of this action.

Action 25 - Work collaboratively with watershed groups, lake associations, First Nations, academia, and non-governmental organizations on data collection, education, stewardship and other water protection and management-related initiatives.

- The government reports to have “work(ed) collaboratively with several groups.” However, it doesn’t mention which groups it has or is collaborating with, or provide specific examples of the type of work that has/is being done. Therefore, it is difficult to determine if the government is meeting the intent of this action.
- The government says that “watershed groups, lake associations, universities and other partners is supported through the province’s Environmental Trust Fund (ETF).” Now that the ETF is no longer funded through the Beverage Containers Act, what is the government’s

plan for ensuring that these groups have adequate funding to continue their important work on behalf of the government and all New Brunswickers?

Action 28a - Identify key performance indicators for each action in this strategy as the actions are initiated.

- The government indicated that it “will continue to create project charters for each project once they are started.” However, **no key performance indicators (KPIs) are mentioned within the 2024 Progress Report and Review**. If the government has created KPIs for the actions listed in the Water Strategy, they should be included in the 2024 Progress Report and Review. If the government has not yet created KPIs, then it should be developing them in collaboration with stakeholders and reporting on them in future progress reports.

Action 28b - Issue periodic progress reports on the status of water strategy action items.

*Amended wording as a result of the five-year review.

- It should be noted that the government changed the wording of this action from issuing annual progress reports to issuing the reports periodically.
- It is clear that the government changed the wording of Action 28b because it has been unable to issue annual progress reports (one progress report was issued in December 2021, and also the second progress report in 2024).
- Given the wording change, it would be helpful if the government could provide an estimate as to when the next progress report is expected.

Started/Future Actions

Almost half of the 35 actions have been recently started (12) or have yet to be started (four). For most of these actions, the government did not indicate a plan for completion. There are no milestones or time frames mentioned. Given that this is now year six of a 10-year strategy, it would be beneficial for the government to outline steps to be taken to complete these remaining actions.

CCNB Recommendations

1. Follow through with commitments made in Action 28 to create KPIs for each action in collaboration with stakeholders and report on them in subsequent progress reports.
2. Provide milestones and timelines for completion of the KPIs for each action within subsequent progress reports.
3. Recommit to publishing progress reports annually that provide clear and specific information (e.g., KPIs) on the progress made to deliver on the intent of the actions.
4. Report on activities that reflect meaningful dialogue between the government and Indigenous communities and result in incorporating Indigenous perspectives in the management of water resources in New Brunswick.