



**Presentation to the PEI Environmental Advisory Council
A Water Act for Prince Edward Island**

**PEI Food Security Network
November 17, 2015
Wellington, PEI**

On behalf of the PEI Food Security Network, we are pleased to have this opportunity to share with the Environmental Advisory Council our perspectives and recommendations as we work together to develop a Water Act that will preserve and protect our water for future generations. We know that is important for our organization to participate in this process of public consultation and for you to hear our voice. We also recognize that with this kind of public dialogue comes a significant responsibility for the Environmental Advisory Council, and we are respectful of that. Undoubtedly, the legislation resulting from this process will have an enduring impact on our Island community, and will define the legacy of both the Advisory Council and our current provincial government.

The PEI Food Security Network (FSN) is an action and education organization committed to changing community attitudes and public policy to promote: environmentally appropriate practices for the production and distribution of food; the availability of affordable, healthy food; livable income for producers; the right to food; and PEI self-reliance in food.

We adhere to the principles that:

- the production, processing, distribution and consumption of food are all components of a food system that is influenced by social, economic, cultural and environmental factors, and further, that
- any degradation of the environment is a major constituent of the real cost of food. An ecologically responsible system of food production, processing and distribution is a necessary part of food security.

We are also committed to the idea that community attitudes and public policy are major influences on food security and must be focal points for action. This is why we come before you today, to share our thoughts about the forthcoming Water Act within the context of Food Sovereignty, which is defined as:

the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and the right to define and control our own food and agriculture systems, including markets, production modes, food cultures, and environments.

So you may be thinking what does Food Sovereignty have to do with a Water Act? That's fair – we've asked ourselves the same question. We have all become so accustomed to the role and place of water in our lives and livelihoods that we may have forgotten the broader perspective. And yet, water and food sovereignty are inextricably linked.

Secure, adequate supplies of clean water are essential for human nutrition, for food production and processing. In turn, secure supplies of clean water depend on healthy ecosystems and conservation of land, forests, waters and wetlands. These interdependencies – preservation of water, food sovereignty and environmental health – call for a coordinated approach to the development of legislation and policies related to land, water and food.

Without secure and adequate supplies of safe, clean water, we cannot have food. It really is just that simple. It really is just that important.

Prince Edward Islanders need and deserve a Water Act that incorporates:

1. Community
2. Environmental Responsibility and Sustainable Food Production
3. A Local Food System that Values All Participants
4. Building & Sharing Knowledge and Skills

These are also values that define food sovereignty, which is why we've chosen them as a way of organizing this presentation.

1. Community

Water is not a commodity or a resource, to be controlled, owned or exploited. Water is a common good and its protection is a shared responsibility. Just as all people have the right to adequate food, so do they have the right to water in sufficient quantity and quality to meet their basic needs. The Water Act must be very clear in its purpose to protect water for the people, as a common good.

Policies and regulations associated with the Act must be designed to support the idea of water as a public trust and of government as the trustee. Incorporating this principle into the Water Act would ensure that aquatic environments are preserved, and that water quality and quantity are protected for future generations of Islanders. Treating water as a public trust would put water for the environment and water for the people at the centre of decision-making.

Food sovereignty places importance on food as an embodiment of culture, traditional wisdom, and celebration. This is inspired by Indigenous insights – that define food as sacred and part of a web of relationships with the natural world that sustains culture and community. In fact, the same may be said of water. The Council has heard Eliza Knockwood of Abegweit First Nation speak and sing of the way in which water connects us all. It is important that as the Water Act is developed, the perspectives of the Mi'kmaq people living on this island are taken into account. This can only happen through direct consultation and dialogue.

2. Environmental Responsibility and Sustainable Food Production

Food Sovereignty promotes agro-ecological methods for food production and rejects methods which harm ecosystems, are energy intensive or which depend on monoculture and industrialized practices. The aim is a more resilient food system, better able to withstand major disruptions, for example extreme weather events and other effects of climate change.

The Food Security Network agrees with other groups who have presented to the Environmental Advisory Council, that the goal of the Water Act should be healthy and sustainable aquatic ecosystems in this province.

Furthermore, the interconnectedness of Island streams, rivers and estuaries with the Gulf of St Lawrence should be acknowledged. The Act should extend to PEI's portion of the Gulf including the Northumberland Strait. Our fishers and shellfishers suffer the consequences of destructive practices on land. For example, when heavy rains are predicted, the shellfishery is shut down as a precautionary measure, to avoid contamination by whatever might run off farmed fields during the heavy rainfall. Sadly, there is much evidence demonstrating the need for this kind of precautionary action. Fish kills caused by run-off of agricultural chemicals into our waterways are a far too common occurrence. Anoxia caused by excessive nitrates – entering our surface and groundwater mostly from agriculture – occur on a regular basis in estuaries across the province with potentially devastating effects on the shellfishery.

Many of the impacts of agriculture on water quality can be traced back to the industrial model for food production that has been adopted and promoted by PEI since the Comprehensive Development Plan introduced in 1969. The effects on the environment of a system of monoculture so dependent on chemical inputs are profound.

While the scope of the Environmental Advisory Council's work is limited to the development of a Water Act, the importance of moving towards a new model for agriculture cannot be overstated. Water policy and food policy are closely linked and under ideal circumstances would support one another. A food policy that is built on a local food system and small, mixed farms with an emphasis on organic production methods would result in much better protection of water than the system that predominates in PEI today.

The White Paper issued by the Department of Communities, Land and the Environment at the outset of this process makes the point that some existing legislation will have to be brought into line with the Water Act. This is an excellent opportunity to amend policy and regulations to increase buffer zones, protect sensitive areas and strengthen the Crop Rotation Act. There should also be a plan and resources allocated to comprehensive monitoring and enforcement of those regulations.

Healthy soils are essential in the production of healthy food. The Food and Agriculture Organization designated 2015 as an International Year of Soils, because:

Soil is a non-renewable resource; its preservation is essential for food security and our sustainable future, and it stores water, which improves resilience to floods and droughts.

So, when soil is depleted or degraded, there are serious consequences not only for agriculture, but also for rest of the environment. Soil that is low in organic content has compromised capacity to hold water, and is more susceptible to erosion. Soils higher in organic content are better able to withstand dry periods.

Most of PEI's agricultural soils currently have organic matter contents of 2-3%; only about 20% of potato fields have organic matter levels above 3%, the level commonly thought needed for good soil quality. (Department of Agriculture and Fisheries website) It has been shown that by increasing organic content in soil by 1%, the water-holding capacity increases almost 4%. Such an increase could represent the equivalent of 16,500 gallons of water over one acre which would decrease susceptibility to periods of drought.

By setting goals and taking actions to improve soil health, we could reduce the need for irrigation and better protect PEI's streams, rivers and estuaries. Given the impact on water of poor soil management practices, we would hope for policies within the Act that would address soil health. Some specific areas that could be addressed would be limiting fall ploughing and ensuring that crop rotation regulations include no exemptions and promote a diversity of crops aimed at improving soil health. In addition, all landowners could be provided encouragement to maintain and enhance hedgerows, and tree cover, especially in riparian areas. These measures would help to keep our valuable soil healthy, and on the land, where it is needed.

3. A Local Food System that Values All Participants

Given the importance – the absolute necessity – of food in our lives, we cannot afford to undervalue the contributions of food providers. The people who grow, harvest and process food have the right to a decent income.

We produce enormous volumes of food in this province yet, ironically, experience one of the highest rates of household food insecurity in the country. It is becoming apparent that we have a systemic problem with how we produce, process and distribute food. Part of the problem is the exploitation of participants throughout the system – from producers and labourers to eaters – many of whom are the most vulnerable in our society and our community.

In Prince Edward Island, farm income in some sectors has risen in recent years, yet high costs of production mean that for many farmers who are working as hard as ever, margins are still small. Farm debt, on the other hand, is almost unimaginably high. It could be said that farmers are subsidizing a system that simultaneously undervalues their efforts and perpetuates the fallacy of “cheap food”.

The Food Security Network believes that the costs associated with measures such as taking agricultural land out of production to protect water must not be borne solely by farmers. The principle of water as a common good dictates that we share the responsibility for its protection. This may involve enhancing programs of Ecological Goods and Services/ALUS, and making them as accessible and predictable as possible. Farmers must be compensated fairly for taking land out of production in the interest of the common good.

Food sovereignty favours local food systems, bridging the gap between producers and consumers of food, and reducing dependency on remote and unaccountable corporations. Access to locally produced food means that consumers' hard-earned income stays in the community, benefitting the local economy instead of contributing to corporate profits.

A made-in-PEI food policy supportive of a local food system has the potential to increase income for food producers. A recent workshop held by the food security network highlighted the possibilities for and benefits of institutional procurement of locally sourced food. If hospitals, nursing homes, schools and post-secondary institutions were all mandated to buy local food, people in those institutions would be healthier, food producers would be better off, and the environmental costs associated with importing food would be reduced.

For too long the actual costs of our food system have been underestimated. We do not typically account for the damage caused to our land, soil and water of industrial agriculture, and we do not consider the environmental costs associated with transporting food around the globe. While the environmental impacts of our current system are quite evident (fish kills, anoxia, siltation), the loss of land, soil and water quality, loss of habitat and the financial costs associated with remediation and mitigation are rarely accounted for. Transportation of food over long distances produces more greenhouse gas emissions, and requires more energy for refrigeration and storage. These too are costs that should be accounted for.

One of the most defining principles of food sovereignty is that the right to use and manage land, water and seeds belongs in the hands of the people who produce food. Large corporations already hold more than their share of power and control in the food system. The request to remove the moratorium on high capacity wells has come from one main party – a corporation that already has a lot of control in PEI. The request should be evaluated using the lens of food sovereignty and local control – who really benefits if the moratorium is lifted? Who gains control?

Several reports, including the 2008 Report of the Commission on Nitrates in Groundwater, have made the recommendation that PEI move to governance on a watershed basis. It's an idea that makes a lot of sense. People who live in a given watershed are connected, and have a collective stake in maintaining the health of that watershed. Governance on a watershed basis would allow for planning that respects ecological integrity and continuity. It could increase the participation of communities and people in making decisions about important issues, including water.

It is important that the PEI government critically examines and voices its concern about the most recent trade agreements that have been negotiated by the federal government – TPP and CETA. The Investor State Dispute Mechanisms contained in these agreements would impair the PEI government's ability to develop policies that are good for Islanders and the environment. Due to the same types of provisions in NAFTA, foreign corporations have already sued Canada when they perceived their ability to make profits was negatively affected by policies such as Quebec's moratorium on fracking. It is highly likely that this type of suit will become more common under future agreements.

4. Building & Sharing Knowledge and Skills

Inherent in the idea of food sovereignty is the importance of passing on skills and local knowledge from one generation to another, and respect for traditional knowledge.

The Council has heard from other groups – The Coalition for Protection of PEI Water and the National Farmers Union – about the concept of Intergenerational Equity. This must be an underlying principle of the Water Act. If it is clearly stated, in its purpose, then all the provisions, policies and regulations that follow will need to be developed with and measured against the impact on future generations.

We need a system of food production that adapts to available water supplies – extracting only what is proven to be sustainable. This means we need to have complete, up-to-date information about how much water is being used in comparison to how much is being recharged.

Community-based watershed groups have accumulated volumes of information and knowledge – this must be taken into account and valued. These groups can be an effective way to bring food producers – farmers, fishers – together in local communities and to engage them in planning and actions to maintain the health of our aquatic ecosystems. Their knowledge is essential to effective planning, but in order to do their work, they need better, secure, predictable (i.e. multi-year, core) funding.

Recommendations

The PEI Food Security Network asks that the Environmental Advisory Council include in its report on the Water Act Consultations the following recommendations:

1. Given the inextricable link between the health of aquatic ecosystems, watersheds and food production, that Prince Edward Island develop a Food Policy based on the principles of food sovereignty with particular focus on a sustainable, local food system.
2. That the moratorium on high capacity wells remain in place, based on the precautionary principle, and that existing wells be monitored and their impacts on the environment be assessed on an ongoing basis.
3. That the important role of healthy soils in the management of water be recognized, that the problem of soil erosion, depletion and degradation be addressed in the Water Act and that measures be taken to increase organic content and protect soils from further degradation.
4. Knowledge and information is essential to guide the development of regulations and policy, and in the development of strategies for water conservation. We are asking that the Act lay out clearly processes for determining how much water is used not just in agriculture and food processing but by all “water users”.

5. Based on the principle of water as a common good and shared responsibility, that strategies be developed to ensure that food producers are financially supported to make changes or take land out of production when it is determined to be necessary to protect water.
6. Given the serious risks associated with fracking and its potential to degrade the water that is necessary for growing food and for livestock production, join with the other Maritime provinces to institute a ban on fracking.

In conclusion:

Although they fall outside of the scope of the Water Act, food policy based on the principles of food sovereignty, local food systems and institutional procurement, free trade agreements and the predominance of industrial agriculture all contribute to the political, social, economic, cultural and environmental context within which the Act will be developed. The Environmental Advisory Council has the privilege to hear from Island organizations and individuals about their visions and ideas for protecting and improving water in its quality and quantity. Some of the presentations will, like ours, stray into overlapping areas of policy and legislation. We encourage the Council to take this opportunity to highlight the connections and promote the idea of “matched up” policies and legislation affecting water and food sovereignty, with the ultimate goal being healthy ecosystems on which we all depend, and which we have the responsibility to protect.

Appendix: Membership of the PEI Food Security Network

The FSN is comprised of individual members as well as many organizations, including:

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| Cooper Institute | National Farmers Union District 1, Region 1 |
| Environmental Coalition of PEI | Women's Network PEI |
| Food Exchange PEI | PEI Advisory Council on the Status of Women |
| Medical Society of PEI | PEI Association for Newcomers to Canada |
| PEI Healthy Eating Alliance | PEI Council of People with Disabilities |
| PEI People First | |

The FSN in turn is a member of the PEI Coalition for the Protection of PEI Water, the Prince Edward Island Farm Centre, Food Secure Canada and the network of Island organizations opposed to CETA.

Our website is <http://www.peifoodsecurity.wordpress.com>
 And we can be found on Facebook <https://www.facebook.com/peifsn>