

October 26, 2023

The Honourable Tracy Schmidt, MLA
Minister of Environment and Climate Change
Room 344 Legislative Building
450 Broadway
Winnipeg, MB R3C 0V8
minecc@manitoba.ca

Dear Minister,

Congratulations on your election as Member of the Legislative Assembly of Manitoba representing Rossmere, and on your appointment as Minister of Environment and Climate Change. The Lake Winnipeg Foundation (LWF) is pleased to see the protection of Lake Winnipeg highlighted as a priority in your mandate letter from the premier. We look forward to working collaboratively with you and your cabinet colleagues.

This summer and fall, the algal blooms on Lake Winnipeg were impossible to ignore. Five decades of peer-reviewed research at IISD-Experimental Lakes Area (ELA) has unequivocally demonstrated that [excess phosphorus is the cause of these algal blooms](#). The effectiveness of phosphorus control in preventing algal blooms is widely accepted in science, policy, and management communities; has proven to work across Canada and in many other jurisdictions; and is directly pertinent to the management of Lake Winnipeg algal blooms.

[Yet in Manitoba, we lag desperately behind in addressing phosphorus pollution and its impacts on our fresh water](#). ELA research has been conspicuously ignored by Manitoba's Environmental Approvals Branch and the Water Science and Watershed Management Branch. Instead, provincial regulators have coupled phosphorus control with expensive and unnecessary nitrogen requirements, escalating costs and leading directly to delays and inaction.

Now, with leadership and clear guidance from your government, there is an opportunity to ensure that provincial policy and management of algal blooms are [focused on phosphorus – an approach that is both evidence-based and economically feasible](#). Immediately, the Manitoba government can accelerate phosphorus compliance at Winnipeg's North End Water Pollution Control Centre (NEWPCC), the single largest point source of phosphorus to Lake Winnipeg.

In 2005, the Manitoba government set the conditions of NEWPCC's operating licence, requiring that total phosphorus concentration in wastewater effluent not exceed 1.0 mg/L. This

requirement is fully in line with municipal wastewater regulations across North America, and can be met using well-established, effective technology. Yet, today, NEWPCC remains non-compliant with this provincial phosphorus limit.

Under your leadership, Manitoba Environment and Climate Change can expedite protections for Lake Winnipeg by explicitly acknowledging the 1.0 mg/L phosphorus limit as the primary requirement of NEWPCC upgrades, as articulated in Section 4.2(2) of [Manitoba's Water Protection Act](#). Specific numerical limits for phosphorus are listed in this provincial legislation, while other NEWPCC licence conditions are discretionary and must only be "met to the director's satisfaction."

Discretionary conditions include stipulations on nitrogen removal, the relative use of biological and chemical technologies, and the recovery and reuse of biosolids. These discretionary conditions must not be misrepresented as barriers to achieving the primary requirement of phosphorus compliance for the protection of Lake Winnipeg. Nothing in the Water Protection Act prevents the full and complete achievement of phosphorus compliance as soon as possible through the current construction of biosolids facilities.

LWF recommends that you and your department require the City of Winnipeg to meet and sustain NEWPCC phosphorus compliance through the imminent construction of the plant's new biosolids facilities, using a chemical method of phosphorus reduction. To provide clarity for project proponents and provincial regulators alike, LWF requests that you amend the NEWPCC Environment Act Licence 2684 RRR to include the requirement for sustained compliance with the 1.0 mg/L provincial phosphorus limit upon completion of the new biosolids facilities. This is a more cost-effective and timely solution than waiting for additional nutrient removal facilities that may take decades and billions of dollars to complete.

On behalf of our members, I am excited to work with you and your colleagues to bring Lake Winnipeg back to health and protect it for future generations. I look forward to meeting with you to discuss the recommendations above, and will follow up with your office accordingly in the coming days.

Sincerely,



Dr. Alexis Kanu
Executive Director