



October 10, 2018

Standing Senate Committee on Transport and Communications
The Senate of Canada
Ottawa, Ontario
Canada, K1A 0A4

Dear Senator David Tkachuk:

The Western Canadian Municipal Associations (WCMA) convened its annual meeting to discuss municipal issues of shared concern. The WCMA consists of the Alberta Urban Municipalities Association (AUMA), the Rural Municipalities Alberta (RMA), the Saskatchewan Association of Rural Municipalities (SARM), the Saskatchewan Urban Municipalities Association (SUMA), and the Association of Manitoba Municipalities (AMM). We wish to provide an update on our shared perspectives regarding the proposed *Canadian Navigable Waters Act*.

The WCMA requests more information on the Indigenous traditional knowledge of the proposed legislation. We are also seeking clarification on how municipal concerns will be addressed by the proposed amendments. A teleconference was held between members of the WCMA and Transport Canada department officials on April 13, 2018. The information provided was not overly positive for municipalities. It appears that the new legislation will include a broadening out, beyond the scope of the legislation prior to 2012, and these changes will have significant administrative impacts on municipal infrastructure projects.

The duty to consult and notification requirements of project proponents will increase administrative costs for municipalities. There is also concern that more municipal infrastructure projects will likely fall under federal review; therefore, likely delaying projects and increasing costs.

The new category of projects that are in-between “minor” and “major works” is also an area of concern. Questions remain on what projects this will include, what the requirements will be and who determines this? Clarification would be appreciated and the WCMA would welcome the opportunity to provide input on this process.

Thank you for your consideration of our comments and we look forward to working together on these issues.

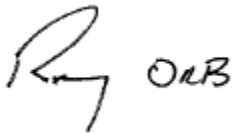
Sincerely,



Al Kemmere
President, RMA



Barry Morishita
President, AUMA



Ray Orb
President, SARM



Gordon Barnhart
President, SUMA



Chris Goertzen
President, AMM

cc: Federation of Canadian Municipalities