



Government
of
Saskatchewan

Minister of Environment
Legislative Building
Regina, Canada S4S 0B3

JUL 2 1 2021

2021-193

Chad MacPherson
Saskatchewan Stock Growers Association
(ssga@sasktel.net)

Dear Chad MacPherson:

Thank you for the opportunity to comment on the Saskatchewan Stock Growers Association's (SSGA's) resolutions from the 108th AGM held in June 2021. Below are the responses to resolutions that fall within the mandate of the Ministry of Environment.

Resolution #3: BE IT RESOLVED that SSGA lobby the Federal and Provincial governments to provide tax incentives for term conservation easements.

The Ministry of Environment supports the use of term conservation easements as a conservation tool that can promote landowner stewardship efforts across the province. For term or perpetual conservation easements to qualify for the province's Protected and Conserved Areas Network (PCAN), they must meet provincial and national standards for Protected Areas or Other Effective Area-based Conservation Measures. Saskatchewan supports SSGA in requesting the federal government consider recognizing term conservation easements as being eligible for the federal Ecological Gifts Program.

Resolution #4: BE IT RESOLVED that SSGA lobby the Government of Canada to have the COSEWIC assessment and recovery planning processes updated to reflect the status of the species entire population and that recovery actions in Canada consider the overall status of the species population.

While the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) assessment process is driven by the federal government, it is actually a federal-provincial-territorial committee that makes recommendations to the Ministers responsible. As such, the province does have the ability to influence decisions at the national table. The current COSEWIC process assesses species status throughout their Canadian range and may evaluate threats to the species while outside the country (migratory species). COSEWIC may break a species down into Designatable Units (DUs) and assign different ranks to DUs (e.g. sturgeon in Ontario vs sturgeon on the prairies) where the status of the DUs differ.

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However, recovery planning often does not extend across the entire range or DU. For example, critical habitat for Sprague's Pipit is restricted to the South of Divide rather than the full range in Saskatchewan. Furthermore, recovery plans often do not clearly state the share of the population and distribution objectives they cover (i.e. how much habitat/how many Sprague's Pipits are expected in the South of Divide). The Government of Saskatchewan provides reviews of every recovery plan or management strategy relevant to Saskatchewan. This issue is well known to the province and reviewed in each document. The federal government is doing a better job at communicating on this matter, but it is an ongoing discussion.

Resolution #5: BE IT RESOLVED that SSGA lobby for a more streamlined and clear process for individuals to apply for a permit to control BTPDs.

The ministry continues to collaborate with Agriculture, Parks Canada and producers to find a solution that considers both the wellbeing of the community and the protection of this federally-listed species inside existing colonies. The proposal at this point includes both non-lethal and lethal control. The species is listed under the federal *Species at Risk Act* and therefore non-lethal methods are considered when there is no risk to rangeland health and can be implemented in a timely and effective manner.

For lethal control, the ministry would have to issue permits under *The Wildlife Act*. A working group has been established to develop a straightforward and efficient permitting process for lethal control in problem areas.

Resolution #13: BE IT RESOLVED that SSGA lobby the Federal and Provincial governments to provide funding as part of the next Canadian Agricultural Partnership (CAP) for the development of agricultural carbon protocols.

The province, led by the Ministry of Environment, is developing the Saskatchewan Greenhouse Gas Offset Program to be implemented in 2022. At the start of the program, the ministry intends to have two agriculture sector protocols in place, one for farming and one for ranching. Going forward, additional protocol development will be market-driven, enabling prospective project developers to propose and develop additional protocols for inclusion in the program. The ministry acknowledges that the costs of developing protocols may be considerable. The Government of Canada recently announced Agricultural Climate Solutions (ACS), a program that may alleviate some of these costs. ACS is a 10-year, \$185-million fund to support farmers to co-develop, test and implement farming practices to address climate change.

With respect to funding future agricultural protocols from the next Canadian Agricultural Partnership (CAP 2), the Ministry of Agriculture is in the early stages of discussing priorities for CAP 2. In the near future, Agriculture will also engage stakeholders on their priorities for CAP 2.

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Resolution #14: BE IT RESOLVED that SSGA lobby the province of Saskatchewan to allocate 7% of all crown land sales revenue into a conservation endowment trust to fund conservation activities on private lands.

Saskatchewan is committed to protecting 12 per cent of our unique terrestrial and aquatic ecosystems through the Protected and Conserved Areas Network (PCAN), formerly referred to as the Representative Areas Network. Conservation on private and leased lands with native vegetation is seen as an important way to meet our target in southern Saskatchewan. It would be helpful to know additional details of the proposal and other suggestions you might have, including options for potential tax incentives or other economic instruments. Please contact Brant Kirychuk, Executive Director, at 306-787-2309 to arrange a time to meet with ministry officials.

Approximately 1.3 million acres of critical habitat are on agricultural Crown land and additional measures have been put in place for protection; approximately 400,000 of these acres are further protected under The Wildlife Habitat Protection Act (WHPA). The Ministry of Agriculture is working on a made-in-Saskatchewan, multi-species approach to critical habitat on agricultural Crown land. This important work is planned to start later this year. Additionally, the Southern Conservation Land Management Strategy requires seven per cent of the proceeds from any sale of WHPA lands to be provided to the Fish and Wildlife Development Fund, to support conservation and habitat protection projects.

Resolution #16: BE IT RESOLVED that SSGA lobby the Federal and Provincial governments to invest in research to investigate the development of environmentally friendly agricultural plastic alternatives.

In January 2020, Saskatchewan released a Solid Waste Management Strategy for Saskatchewan, which strives for a practical, sustainable and integrated solid waste management system. It will serve as a roadmap for waste reduction and management, and outlines goals and commitments to raise public awareness, encourage regional collaboration, modernize rules and regulations, enhance waste diversion, foster innovation and demonstrate government leadership. As part of the strategy, Saskatchewan has set a goal to reduce the amount of waste generated per person by 30 per cent by 2030 and 50 per cent by 2040.

While there are many benefits to plastics, the use and management of plastics is creating challenges in Saskatchewan and around the world. Saskatchewan supports the Canadian Council of Ministers of the Environment (CCME) Strategy on Zero Plastic Waste and is actively working with other jurisdictions on initiatives related to single-use and disposable plastics, and harmonizing extended producer responsibility programs. The strategy is expected to drive innovation and create opportunities to improve how plastic waste is managed. Saskatchewan's grain bag program has been successful in diverting 6,200 tonnes of grain bags (approximately 9,000 grain bags) since the start of the program in 2018.

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Saskatchewan recognizes the importance of research on development of environmentally friendly agricultural plastic alternatives, especially those that are biodegradable, cost effective and durable wrapping material that can withstand Saskatchewan weather conditions. Through the Agriculture Development Fund (ADF), the Ministry of Agriculture has funded several research projects related to this area and shares ADF research proposals with industry partner groups, including SSGA, to seek co-funding for ADF projects. SSGA can use this as a platform for co-funding similar research with the Ministry of Agriculture. Recent funding includes: discoveries in extrusion pulping agricultural crop residue into compostable products (University of Regina), and development of agricultural-based carbon black master batch for plastic processing via rotational/injection molding (Saskatchewan Polytechnic).

Resolution #17: BE IT RESOLVED that SSGA lobby the Government of Canada to extend the license for strychnine until a viable alternative is available.

The Government of Saskatchewan is aware that currently-registered alternatives to strychnine for control of ground squirrel populations are less effective, more labour-intensive and expensive than strychnine. In February 2021, the Government of Saskatchewan requested an extension from the Pest Management Regulatory Agency (PMRA) on the proposed sale and use of strychnine in Canada. The ministries of Environment and Agriculture have requested a delay of implementation of manufacture and sales deadlines by one year and permitted use by one year and six months, until September 2024.

Furthermore, the Government of Saskatchewan submitted a Notice of Objection to the final decision by PMRA regarding strychnine for ground squirrel control, in April 2020. PMRA has indicated that a secondary review of the decision, with personnel not associated with the original decision, is still ongoing. However, PMRA will not suspend the re-evaluation registration decision while the Notice of Objection review proceeds. The current status remains: cancellation of manufacture, March 2021; sale until March 2022; and final use of the product, March 2023.

A widely-applicable replacement for strychnine is currently under investigation. Registered and as-yet-unregistered products will be evaluated as part of a research project led by the Ministry of Agriculture, in collaboration with the Ministry of Environment and Alberta Agriculture and Forestry in spring 2022. This work was originally scheduled for 2021 but was delayed due to COVID travel restrictions.

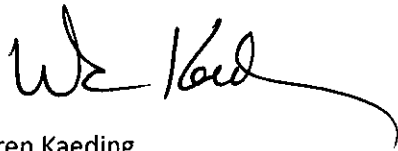
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Thank you for writing, and for developing resolutions that work toward positive stewardship of Saskatchewan's environment. I look forward to continuing to work together on these important initiatives.

Sincerely,

A handwritten signature in black ink, appearing to read "Warren Kaeding". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Warren Kaeding
Minister of Environment

cc: Honourable Donna Harpauer, Minister of Finance
Honourable David Marit, Minister of Agriculture
Honourable Don Morgan Q.C, Minister of Labour Relations and Workplace Safety
Honourable Bronwyn Eyre, Minister of Energy and Resources
Honourable Jeremy Harrison, Minister Responsible for Saskatchewan Research Council