



January 24, 2025

Honourable Rebecca Schulz
Minister of Environment and Protected Areas
Government of Alberta

Re: Water Availability Engagement

To whom it may concern,

On behalf of Alberta Beef Producers, I would like to thank you for the opportunity to provide feedback on Alberta's Water Availability consultation.

With over 18,000 beef farms and ranches across the province, Alberta's beef producers rely on water at multiple stages of production. Whether through irrigation for forage and crops, livestock water, rural residential use, or processing facilities, water is vital to both agriculture and our communities. The diverse water needs across Alberta reflect the varying landscapes and histories, particularly in the south where surface water has long been a critical resource.

Beyond water use, beef producers contribute to Alberta's water cycle by stewarding wetlands and grasslands, which act as natural water purifiers. These contributions highlight the critical role agriculture plays in both protecting and utilizing water resources.

However, the 2024 drought underscored the growing anxiety among producers regarding water security. With historic lows in water tables and continued drought into 2025, this concern has reached unprecedented levels. It is essential to increase water storage capacity and develop more efficient systems to ensure that agriculture and communities can thrive together.

First, we would like to commend the government for the following actions:

1. **Preserving First-in-Time, First-in-Right (FITFIR):** This principle protects water license holders' long-standing investments in their land and prevents devastating impacts to their operations.
2. **Avoiding Right-Sizing of Agricultural Water Licenses:** Producers require flexibility in water usage to meet the changing needs of crops and environmental conditions.
 - *Suggestion:* Allow agricultural producers to temporarily transfer unused allocations to other users on an annual basis.

To support Alberta's water management system and ensure water security, we urge consideration of the following:

1. **Prioritizing Water Security and Food Security:**

Water security is inherently tied to food security and the economic strength of Alberta. The beef industry contributes over \$6 billion farmgate receipts and heavily depends on reliable water access. Without consistent water availability, food production, supply chain sustainability, and consumer access are all at risk. For this reason, food security should be prioritized.

2. **Encouraging Water Efficiency:**

While many beef producers utilize off-site watering systems and wells to protect water quality, these systems can be prohibitively expensive. Current funding programs often target specific scenarios, leaving many producers unsupported.

- *Suggestion:* Expand the S-CAP funding program to cover a broader range of water efficiency upgrades.

3. **Streamlining Approval Processes:**

Approvals for upgrading water systems or adopting more efficient practices should be expedited, particularly for EPEA approvals. Improved approval timelines will enable quicker adoption of sustainable practices.

4. **Enabling On-Stream Storage:**

The development of dugouts and capture basins connected to water sources should be simplified to encourage the capture of high volumes of overland runoff, particularly during periods of excess water availability.

5. **Improving Groundwater Understanding:**

Alberta requires a province-wide strategy to assess groundwater availability and quality. With increased reliance on groundwater as surface water becomes constrained, producers face substantial financial risks from costly wells that fail to meet quality or quantity demands. Existing programs do not adequately address these expenses.

6. **Expanding Infrastructure:**

Alberta Beef Producers strongly supports increasing reservoir capacity and refurbishing aging reservoirs to ensure their full potential is realized. Expanded infrastructure will benefit both agriculture and municipal water users.

7. **Reconsidering the 10% Holdback:**

The 10% holdback disproportionately impacts individual license holders—



particularly in generational transfers. This burden is especially difficult for families navigating succession planning.

8. **Avoiding Mandatory Volumetric Pricing:**

Producers already face significant water-related costs, including well drilling, on-farm storage, and distribution infrastructure. Provincially mandated volumetric pricing would add an unsustainable financial burden.

9. **Exploring Water Reuse:**

Water reuse could present opportunities for agriculture, but its application for livestock requires extensive research to ensure animal health and maintain public confidence in agricultural products.

We thank you for the opportunity to participate in Alberta's Water Management System consultation. Alberta Beef Producers remains committed to sustainable water use and stewardship, and we hope this feedback is helpful in shaping policies that balance the needs of agriculture, communities, and the environment.

Sincerely,

Mark Lyseng
Government Relations and Policy, Lead