AEL ADVOCACY
Animal Environmental Legal Advocacy

October 23, 2026

DELIVERED VIA EMAIL TO water-eau@cwa-aec.gc.ca

To Whom it May Concern,

RE: Comments on the Public Engagement Toward A National Water Security Strategy

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Please accept the following submission on behalf of Animal Environmental Legal Advocacy ("AEL Advocacy") in response to the public engagement toward a National Water Security Strategy (the "Engagement Document").[1]

A. About AEL Advocacy

AEL Advocacy is an intersectional animal and environmental law charity dedicated to advancing justice for animals, people, and the planet.[2] Our lawyers understand the important interconnection between human, animal, and environmental well-being, and we leverage our legal and political expertise to support individuals, communities, and organizations working to protect animals and the environments where they live.

B. Our Comments

The following submission responds to the four questions posed in the Government of Canada's public engagement on the National Water Security Strategy (the "Engagement Document").[3] Our comments focus on the interconnectedness of human, animal, and environmental health through a One Health approach; the impacts of human activities on freshwater security; and the importance of maintaining strong environmental protections to prevent water pollution and ecosystem degradation. We encourage the Canada Water Agency to develop a comprehensive, preventive, and equitable Strategy that recognizes nonhuman animals as beneficiaries of water security in their own right and protects the health and integrity of freshwater ecosystems alongside the needs of human communities.

[1] https://perma.cc/TV9Y-WKB2
[2] https://www.aeladvocacy.ca/

1. What water-related challenges and opportunities do you see or expect in your region, community, and/or sector?

A key challenge is that water security is often framed primarily in terms of human consumption, economic development, and the needs of industries that depend on reliable water supplies. This framing overlooks the need to protect freshwater ecosystems and ensure that nonhuman animals have access to the water and habitats necessary for their survival and well-being. It also fails to adequately recognize nonhuman animals as beneficiaries of water security in their own right or fully account for the interconnectedness of human, animal, and environmental health.

AEL Advocacy recommends that the National Water Security Strategy adopt a **One Health approach**, recognizing that the health of humans, nonhuman animals, and ecosystems is interdependent. Freshwater pollution, habitat degradation, and changes in water availability can affect aquatic and terrestrial animals, undermine biodiversity, compromise drinking water quality, and threaten human health. Water security therefore requires not only ensuring reliable supplies for human use and economic activity, but also protecting the ecological integrity of freshwater systems and the animals that depend on them.

Intensive animal agriculture illustrates why this broader approach is necessary. Although the Engagement Document identifies animal agriculture as an industry that depends on reliable freshwater supplies, it does not adequately address how agricultural practices can also undermine water security. Runoff containing excess nutrients and pathogens from manure and agricultural land can contribute to harmful algal blooms, degrade aquatic habitats, and contaminate drinking water sources. These impacts can harm aquatic animals, disrupt ecosystems, and expose humans and wildlife to health risks. Recognizing these impacts alongside the industry's dependence on freshwater would help ensure that water security planning accounts for both the demands placed on freshwater resources and the consequences of activities that degrade them.

The Strategy should apply One Health principles across freshwater policy and planning by identifying opportunities to prevent pollution at its source, improve agricultural practices, and better monitor the effects of human activities on aquatic animals and ecosystems. In the context of animal agriculture, this should include promoting improved manure management through knowledge-sharing, technical assistance, and support for practices that reduce nutrient and pathogen runoff. The Strategy should also identify opportunities for dedicated funding and federal policy measures that support a transition towards more sustainable, plant-based food systems, which would reduce agricultural pressures on freshwater resources. More broadly, adopting a One Health approach would help ensure that decisions about

water use, pollution prevention, and freshwater ecosystem management account for the needs of humans, nonhuman animals, and the environment, both now and for future generations.

2. How well does the proposed definition of water security reflect your understanding of water security?

The proposed definition recognizes several essential elements of water security, including healthy freshwater ecosystems, access to safe and clean water, and the management of water-related risks over time. However, it does not adequately account for the interdependence of human, animal, and environmental health or recognize nonhuman animals as beneficiaries of water security in their own right.

We propose the following revised definition, which builds on the Canada Water Agency's proposed wording:

> *Our collective capacity to safeguard and sustain freshwater ecosystems; support reliable access to an adequate supply of safe, clean water to protect the health and well-being of humans and nonhuman animals, while supporting economic security; maintain the ecological processes, water quality, and habitats necessary to sustain freshwater-dependent species and biodiversity; and prevent and manage water-related risks, pollution, and other threats to freshwater systems, today and for future generations.*

This definition retains the original emphasis on freshwater ecosystems, reliable water supplies, economic security, and intergenerational responsibility while explicitly recognizing nonhuman animals as beneficiaries of water security. It also emphasizes that water security requires more than ensuring adequate supplies for human consumption and economic activity. It requires protecting the ecological integrity of freshwater systems and addressing the human activities that threaten water quality, animal populations, and biodiversity. This broader framing would support a more comprehensive approach to freshwater governance grounded in the interconnected health of humans, nonhuman animals, and the environment.

3. Do you know of any initiatives or examples of efforts that are helping to improve water security in Canada?

AEL Advocacy recommends that the National Water Security Strategy adopt a One Health approach, recognizing that the health of humans, nonhuman animals, plants, and ecosystems is interconnected. This approach is already reflected in federal policy. For example, *Canada's 2030 Nature Strategy*[3] identifies One Health as an integrated

[3] https://www.canada.ca/en/environment-climate-change/services/biodiversity/canada-2030-nature-strategy.html

approach to biodiversity conservation, while Environment and Climate Change Canada's *Science Strategy 2024–2029*[4] calls for cross-sectoral and interdisciplinary collaboration to address threats to biodiversity. The federal government's *National Freshwater Science Agenda*[5] further identifies One Health as relevant to freshwater risk assessment, including the management of invasive species, protection and restoration of aquatic habitats, and mitigation of waterborne pathogens.

The National Water Security Strategy should build on these existing commitments by making the integration of human, nonhuman animal, and ecosystem health a cross-cutting priority. It should identify practical opportunities to incorporate One Health principles into federal freshwater policies and programs, pollution prevention initiatives, watershed management, and climate adaptation planning.

These policy commitments provide a foundation for a more coordinated approach to freshwater protection. The Strategy should outline practical ways to apply One Health principles, including by promoting collaboration between wildlife health, environmental protection, and public health authorities; supporting research into the effects of freshwater pollution on aquatic and terrestrial animals; and encouraging watershed management approaches that account for ecosystem resilience and animal health alongside human needs.

To operationalize this approach, the Strategy should establish priorities for collaboration among federal, provincial, territorial, and Indigenous governments and communities, as well as public health authorities, wildlife and environmental agencies, and freshwater researchers. It should identify opportunities to support integrated monitoring and data sharing across human, nonhuman animal, and ecosystem health; promote the consideration of cumulative and watershed-scale effects in relevant decision-making processes; and establish measurable indicators to evaluate outcomes for water quality, aquatic biodiversity, wildlife health, and human well-being. These measures would help ensure that water security policies address not only the availability of clean water for human use, but also the ecological integrity of freshwater systems and the health of the nonhuman animals and communities that depend on them.

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4 https://www.canada.ca/en/environment-climate-change/services/science-technology/science-strategy/2024-2029.html

5 https://www.canada.ca/en/environment-climate-change/services/water-overview/protecting-freshwater/national-freshwater-science-agenda/report.html

4. Is there anything we haven't covered that you feel is important to consider regarding water security in Canada?

An important consideration is the need to ensure that Canada's broader environmental laws and policies support, rather than undermine, the objectives of the National Water Security Strategy.

Recent federal legislative developments, including the enactment of Bill C-5 in 2025, the introduction of Bill C-39 in 2026, and the designation of the Pacific Link Pipeline as a Project of National Interest, raise concerns about the implications of accelerated project approvals and changes to environmental assessment and regulatory frameworks for freshwater protection.[6] Where these changes reduce environmental scrutiny or weaken existing safeguards, projects with significant impacts on freshwater systems may proceed without adequate consideration of their direct and cumulative effects on nonhuman animals, biodiversity, public health, and affected communities. The Strategy should recognize these risks and establish freshwater protection as a priority in federal infrastructure and economic development planning, emphasizing the importance of maintaining robust environmental safeguards and protecting the long-term health of freshwater ecosystems and the nonhuman animals and communities that depend on them.

We recommend that the Strategy identify rigorous, transparent, science-based environmental assessment, meaningful public participation, and effective environmental safeguards as key elements of freshwater protection. It should promote the consideration of cumulative and long-term effects on watersheds, nonhuman animal habitats, species at risk, and downstream communities in relevant project planning and assessment processes. The Strategy should also identify opportunities to strengthen the implementation and enforcement of existing environmental protections, support adequate and sustained funding for freshwater monitoring and remediation, and promote transparent accountability for activities that contribute to freshwater degradation.

An intersectional approach is equally important. Water insecurity can disproportionately affect Indigenous Peoples, rural and remote communities, low-income households, and communities located near intensive agricultural or extractive operations. The Strategy should recognize Indigenous rights and governance, support Indigenous-led freshwater stewardship through sustained funding and capacity-building, and identify ways to ensure that affected

[6] See AEL Advocacy's submissions and advocacy materials addressing these initiatives: https://www.aeladvocacy.ca/_files/ugd/c883e8_6d70b61c2db240f4829b5c9a554861fa.pdf; https://www.aeladvocacy.ca/_files/ugd/c883e8_4a136d7fff4044718bc9f861dab30de9.pdf; https://www.aeladvocacy.ca/stop-federal-economic-zones-form-letter; https://www.aeladvocacy.ca/tell-the-federal-government-to-withdraw-bill-c-5

communities have meaningful opportunities to participate in water-related planning and decision-making.

Finally, the Strategy should establish clear, measurable objectives and indicators to assess progress in protecting freshwater quality and quantity for nonhuman animals, restoring and maintaining aquatic and riparian habitats, preserving ecological flows, and protecting aquatic species and biodiversity. These objectives should explicitly recognize the needs of aquatic animals, including their reliance on adequate water quality, quantity, connectivity, and habitat conditions to survive, reproduce, and thrive. The Strategy should identify responsible federal departments and agencies, establish timelines for reporting on progress, and support implementation through sustained funding, transparent public reporting, and coordination across jurisdictions. Indicators should measure outcomes for aquatic animals and the ecosystems on which they depend, rather than relying solely on measures of water availability or quality for human use.

C. Conclusion

AEL Advocacy recommends that Canada embed One Health principles in the National Water Security Strategy through preventive, science-based, and enforceable measures. This includes addressing pollution at its source, maintaining rigorous environmental assessment and regulatory safeguards, and ensuring that water security decisions account for the cumulative effects of industrial activities on human health, animal welfare, and freshwater ecosystems. These commitments should be supported by equitable governance, meaningful public participation, and sustained funding for implementation and enforcement.

AEL Advocacy appreciates the opportunity to contribute to the development of the National Water Security Strategy and would be pleased to provide further information or participate in future consultations concerning freshwater protection and the interconnected health of animals, people, and the environment.

Sincerely,

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