

PPPI RECOMMENDATIONS ON PROPOSED CHANGES TO THE SASKATCHEWAN PASTURES PROGRAM

Presented to the Government of Saskatchewan, Stakeholder Consultation Meeting, April 27, 2017

First, we would like to point out that to date we have seen no analysis of the risks and benefits of closing the provincial pastures system. A system that has existed for more than 90 years deserves a rigorous, independent public policy review of its ecological, agro-economic, and socio-cultural value, and of the risks and costs of privatization of management or ownership of these parcels. PPPI sees that as the first step before contemplating any change to the provincial pastures system.

We believe there should be at minimum an 18-month pause to accomplish this kind of due diligence. There is no urgency and no reason to hurry in decommissioning a system that took decades to build.

Once that work is done, if a restructuring of the SPP is deemed to be in the public interest, it should occur only in a manner consistent with the following foundational principles:

- a. No sale of Crown pasturelands.
- b. No subdividing of SPP pastures for individual/exclusive use.
- c. No breaking of native grasslands or long-established tame grass.
- d. Public access should be preserved but controlled to limit risks for habitat, livestock, and people.

In addition to those four primary points we also believe that

- a. Leases should be affordable and equitable, and use rights should be allocated fairly.
- b. Public pastures should model multifunctional management, seeking balance and complementarities between agro-economic, ecological, and socio-cultural goals.
- c. Management of public pastures should equal or exceed standards currently mandated by the province.
- d. Public pastures should model co-management involving producers, public servants, and other interested parties.
- e. Management for SPP (and former PFRA) pasturelands should include regional coordination and collaboration to assure ecological sustainability and to facilitate sharing of expertise and services.

While PPPI does not speak for First Nations or Metis communities or any other cultural groups, we would like to echo their concerns in reminding you of the centrality of land relations in community development, protecting historic and archaeological heritage, and honouring First Nations and Métis rights to access Crown lands for customary use of traditional lands as recognized by Canadian courts and in the provisions of the United Nations Declaration of the Rights of Indigenous Peoples.

In general, we believe that the precautionary principle should be applied. Once damaged or dismantled, prairie ecosystems and community pastures are not easily resurrected. The first responsibility of those proposing significant changes is to ensure these are not harmful or inequitable.

Significant risks for the Province if the pastures are sold or managed in ways that erode the public values of agricultural diversity, biodiversity protection, carbon sequestration and Species At Risk habitat:

- a. Saskatchewan's Representative Areas Network and contribution to Protected Areas Targets in the Prairie Ecozone would lose a significant percentage of protected land.

- b. Producers and the province would be exposed to more SAR issues—protection orders, imposed regulations on critical wildlife habitat, legal challenges.
- c. Invasive species out of control.
- d. Severely reduced capacity to use natural lands in the south to store carbon and manage for climate change resiliency.
- e. But there are some social and community-building benefits of a community pasture system that may be hard to measure and point to directly but they are nonetheless significant and equally at risk: a community pasture creates social infrastructure through which range and livestock management knowledge and skills are shared, and through which community itself is reproduced. The pastures are an important part of the lives and livelihoods of many individuals and communities, and a nexus for collaboration and exchange (among rural residents and between rural and urban people).

PPPI is concerned that the Province may implement a solution without doing any analysis of the risks and benefits of various options and has strongly urged the Saskatchewan government to do this analysis before taking further steps on dismantling the Saskatchewan Pastures Program.