



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

Hon. Rebecca Schulz
Minister of Environment and Protected Areas
Government of Alberta
By email: epa.minister@gov.ab.ca

Alberta Wilderness Association (AWA) is writing to oppose Environment and Protected Area's recent decision to end holdbacks on water licence transfers, and request the decision be reversed. As one of the few conservation tools available in the *Water Act* to address overallocated watersheds, eliminating holdbacks risks further degrading Alberta's rivers, many of which are already intensely used and overdrawn.

Founded in 1965, AWA is the oldest nonprofit in the province dedicated to conserving and protecting Alberta's ecosystems. With the support of over 7000 members across the province, AWA works to promote good stewardship of Alberta's wildlife, wilderness, and waters to ensure future generations enjoy the abundant benefits they provide.

Holdbacks have been authorized since 1996, their use re-emphasized in the *Approved Water Management Plan for the South Saskatchewan River Basin* in 2006 following the recognition that the Bow, Oldman, and South Saskatchewan Rivers had been overallocated¹. The Alberta government had licensed out more water for use than what was sustainable for the river's health and closed the basins from new licenses to reduce further impacts. The stated purpose of holdbacks since has been to "help increase the flows of highly-allocated rivers by a small amount, or at least help offset increases in water use by the new licence holder."¹

Removing large volumes of water that would otherwise be in the watersheds has serious impacts on both aquatic and terrestrial ecosystems. If rivers' natural flows are diverted it can reduce the overall volume of the river which can affect its ability to dilute or accommodate inputs like nutrients, sediment, and other potential pollutants. This in turn affects water chemistry, and can mean changes in temperature, pH, turbidity, and dissolved oxygen.

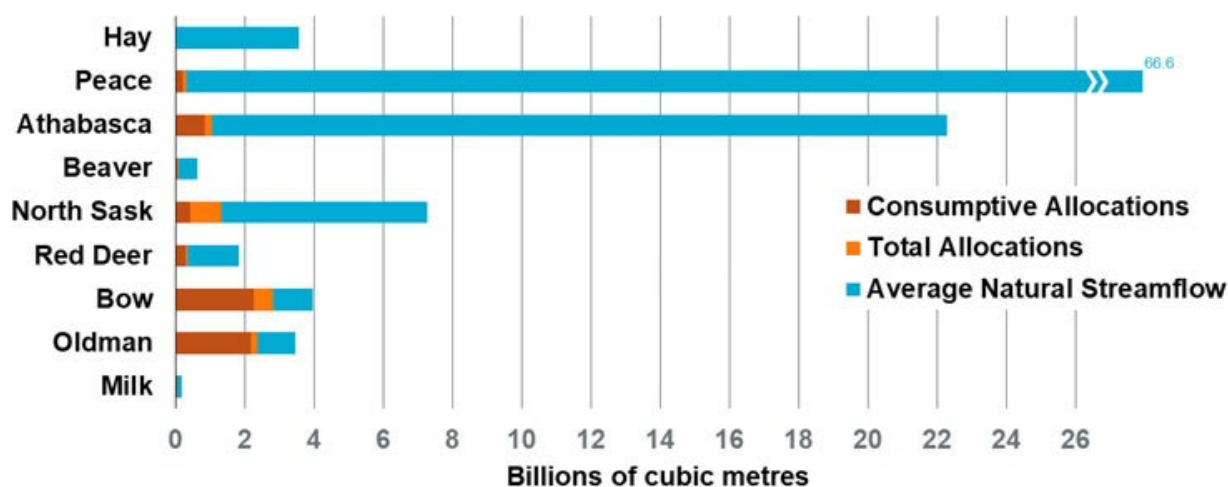
Diverting a river's natural flow can also decrease the river's depth, which can expose riverbanks to erosion, increase evaporation, and make the habitat unsuitable for the needs (movement, breeding, reproduction) of fish and other aquatic animals. This disrupts the overall ecosystem function. It may also result in changes to channel characteristics (shape, speed, width), which can alter the hydrology of a region and result in shifts and losses of associated ecosystems, like riparian habitat.

¹ Alberta Environment. 2006. [Approved Water Management Plan for the South Saskatchewan River Basin \(Alberta\)](#).

If unaddressed, the long-term impacts of diverting and using too much water from rivers can cause them to degrade and even dry up, as they no longer have the flows necessary to sustain their ecosystems, structure, and function. This threatens all livelihoods within the watersheds.²

The Alberta government recognizes (but doesn't require) that rivers should retain at least 85 per cent of their natural flow at any given time to remain healthy³. However, in recent dry years, water users within overallocated basins like the Oldman and Bow consumed more than half the natural flow, demonstrating the urgent need to reduce allocations and overall use in these watersheds.

2023 Surface Water Allocations by River Basin Compared to Average Natural Streamflow Volumes



Graph © Alberta Environment and Protected Areas. Accessed April 7, 2025 from [Drought – Water allocation and apportionment | Alberta.ca](#).

Where licensed volumes exceed 15 per cent of the natural flow, Water Conservation Objectives (WCOs) can be established through a public planning process. WCOs reflect the minimum flows required in the rivers to avoid an unacceptable decline in aquatic ecosystems, species, and water quality. The Auditor General's 2024 report on surface water management found that the government lacks water conservation objectives in most basins, is unaware if existing water conservation objectives work, and generally "lacks effective processes to manage surface water allocation and use."⁴ In the basins with WCOs, Alberta regularly fails to meet them⁵.

In the latest available report on the status of surface water quality in the South Saskatchewan Region, 93 per cent of "primary indicators exceeded the median and/or peak trigger" and there were "2 water

² Ko, J., & Donahue, W.F. 2012. [Maintaining Healthy Aquatic Ecosystems: Operational and Policy Recommendations for Instream Flow Needs](#). Water Matters

³ Locke, A., & Paul, A. 2011. [A Desk-top Method for Establishing Environmental Flows in Alberta Rivers and Streams](#). Government of Alberta.

⁴ Auditor General of Alberta. 2024. [Surface Water Management: Environment and Protected Areas](#).

⁵ AMEC. 2009. [South Saskatchewan River Basin in Alberta: Water Supply Study](#).

quality limit exceedances for the primary indicators at the Milk River Hwy 880 station”⁶, reflecting a reduction in water quality from past years.

Considering the current state of Alberta’s rivers and watershed management, it’s alarming that the government now considers holdbacks “unnecessary,” as there is nothing to suggest the situation has improved enough to warrant their elimination. The province needs methods to retain more water within rivers to prevent further ecosystem degradation and loss, as well as a looming water crisis⁷.

Holdbacks represent one of the few tools that can restore balance without negatively impacting current users. Water users’ licensed allocations and priority remain the same, and it is only when or if they choose to transfer their licence that 10 per cent of the volume can be held back for the environment.

At a time when climate change is increasing water insecurity, we need to protect our rivers. If we want these rivers to reliably provide fresh, clean water for the next generations, we need to recognize their ecological limits and live within them. We all rely on rivers; their health is our health.

Removing holdbacks is a step in the wrong direction for Alberta’s watersheds. Alberta Wilderness Association implores the provincial government maintain holdbacks and establish other mechanisms to address Alberta’s overallocated river basins.

Sincerely,
Alberta Wilderness Association



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⁶ Laceby, P.J., Taube, N., Cincio, P. 2025. [2022 Status of Surface Water Quality, Status of Surface Water Quality](#), South Saskatchewan Region – Update, Alberta. Government of Alberta, Environment and Protected Areas. ISBN 978-1-4601-6156-2.

⁷ Schindler, D.W., & Donahue, W.F. 2006. [An impending water crisis in Canada's western prairie provinces](#). PNAS. 103 (19) 7210-7216