

November 16, 2016

BY E-mail: ConservingWetlands@ontario.ca

Terese McIntosh
Biodiversity and Wetlands Program and Policy Advisor
Ministry of Natural Resources and Forestry
Policy Division
Natural Resources Conservation Policy Branch
Natural Heritage Section
300 Water Street
Peterborough, ON
K9J 8M5

Re: A Wetland Conservation Strategy for Ontario 2016-2030 (EBR Registry Number: 012-7675)

Dear Ms McIntosh,

The Great Lakes Protection Act Alliance (“Alliance”) works to help achieve the purposes of the *Great Lakes Protection Act, 2015* (“Act”), which are:

- (a) to protect and restore the ecological health of the Great Lakes-St. Lawrence River Basin; and
- (b) to create opportunities for individuals and communities to become involved in the protection and restoration of the ecological health of the Great Lakes-St. Lawrence River Basin. (s1(1), [Great Lakes Protection Act, 2015](#))

To achieve this goal, the Alliance will:

- Act as a catalyst in implementing the Act;
- Encourage utilization, by governments, individuals, communities, and public bodies, of the tools enabled in the Act; and
- Monitor and encourage government progress toward achieving the purposes of the Act.

The undersigned members of the Alliance are writing today regarding the proposal for A Wetland Conservation Strategy for Ontario 2016-2030 (“Wetlands Conservation Strategy”, EBR Registry Number: 012-7675). In addition to any other comments that our organizations may have separately submitted and/or endorsed, we are particularly interested in the proposed Wetlands Conservation Strategy. We view the development of a comprehensive strategy to protect and restore wetlands as an important step toward fulfilling one of the detailed purposes of the Act, namely “To protect and restore

watersheds, wetlands, beaches, shorelines and coastal areas of the Great Lakes-St. Lawrence River Basin.” (s1(2)2)

The proposed Wetlands Conservation Strategy lists the ability, enabled in the Act, to set a wetland target or targets and develop an associated action plan. (Note that there’s a typo in the name of the Act in the proposed Wetlands Conservation Strategy, which should read “*Great Lakes Protection Act, 2015*”. In the table on p11 “2014” is used.) Nowhere in the proposed Wetlands Conservation Strategy does the Ministry commit to exercising this discretion. We strongly urge the Ministry to embrace the tools available under the Act and commit to setting time bound, measurable targets with aspirational milestones for wetlands in the Great Lakes-St Lawrence River Basin. As an example, the Ministry of the Environment and Climate Change has proposed timebound, measurable targets to address Lake Erie algae issues under the Act (discussed further below).

Recommendation 1: Commit to setting time bound, measurable targets with aspirational milestones for wetlands in the Great Lakes-St Lawrence River Basin, as enabled by the *Great Lakes Protection Act, 2015* (s9).

In addition to being important in its own regard, protecting and restoring wetlands in the Great Lakes-St Lawrence River Basin is an important action that can “assist in the reduction of algae blooms”, which is a mandatory target setting exercise to be conducted before Nov 3, 2017, by the Ministry of the Environment and Climate Change (s9(2) of the Act). In fact, there is currently an open public consultation under the Environmental Registry for a proposal entitled “Reducing Phosphorus to Minimize Algal Blooms in Lake Erie” (EBR Registry Number 012-8760, comments to be received by Nov 20, 2016). We strongly urge the two Ministries to work together to ensure that these two complementary proposals further the protection and restoration of the ecological health of the Great Lakes-St Lawrence River Basin.

Recommendation 2: We strongly encourage the Ministry of the Environment and Climate Change and the Ministry of Natural Resources and Forestry to work together on targets and related action plans that are interrelated, particularly the proposed Wetlands Conservation Strategy and the proposal for Reducing Phosphorus to Minimize Algal Blooms in Lake Erie.

If desired, we are willing to meet to discuss our submission with you at your convenience.

Sincerely,

Dr. Gail Krantzberg, Professor
Engineering and Public Policy Program
Boothe School of Engineering Practice and
Technology
McMaster University



Linda Heron, Chair
Ontario Rivers Alliance



Tim Gray, Executive Director
Environmental Defence



Jill Ryan, Executive Director
Freshwater Future Canada



Dr. Anne Bell, Director of Conservation
and Education
Ontario Nature



Lino Grima, Advisor
Sierra Club Ontario



Mark Mattson, President
Lake Ontario Waterkeeper



Andrew McCammon, Executive Director
Ontario Headwaters Institute



Alice Casselman, Founding President
Association for Canadian Educational
Resources (ACER)



Theresa McClenaghan, Executive Director
Canadian Environmental Law Association



Ducks Unlimited Canada
Conserving Canada's Wetlands
Kevin Rich, Head of Industry and
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Cc: Dr Dianne Saxe, Environmental Commissioner of Ontario