

The Ontario Headwaters Institute

Preserving Ontario's headwaters, the foundation of our watersheds

July 31, 2012

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RE: Biodiversity: It's in Our Nature – EBR Registry No 11 – 6450

We write to extend our appreciation for Ontario's draft implementation plan, Biodiversity: It's in Our Nature.

The Ontario Headwaters Institute, a registered charity, works to preserve the province's headwaters through education and community engagement. Our focus includes both the implementation of enhanced watershed management in Ontario and specific policy, program, and stewardship initiatives to protect headwaters.

Headwaters and their catchment areas constitute the majority of any watershed; provide the bulk of flow to our watercourses; contribute the majority of nutrients, phosphorus, and organic material to our rivers; and provide an abundance of habitat types that harbour the greatest portion of Ontario's biodiversity. In several ways, therefore, headwaters provide the basis of much of the downstream ecosystems.

As a result, we consider biodiversity to be a high-order philosophical construct within which many ecological issues reside, from protecting nature, through conserving resources, to limiting all sources of pollution -- including greenhouse gases.

We therefore hope that Ontario will develop and deliver the broad educational goals of the implementation plan so that biodiversity will become a significant, unifying principal upon which pro-active social engagement in protecting the biosphere will be based, and we encourage the Government to refine, fund, implement, monitor, and report on the implementation of the plan.

We offer the comments and numbered recommendations that follow to assist Government actions and activities under the plan.

Action 3: Mainstream biodiversity within the OPS

Leadership on biodiversity from the Province is essential, and we suggest:

1. That all Ontario ministries be required to articulate how they will work to protect and/or mainstream biodiversity, and not just the 15 listed in the Plan; and,
2. That Ontario consider broadening the existing Statements of Environmental Values to a statement focused on protecting and mainstreaming biodiversity.

Actions 5, 9, and 15: Multiple References to the Provincial Policy Statement

PPS 2005, currently under review, has significant deficiencies regarding the protection of natural heritage and biodiversity. We urge MNR to become pro-active in this regard and work to improve the PPS as follows:

3. That the sections on Natural Heritage be amended and implemented in a manner that requires that biodiversity inventories and reporting be included in large-scale land use planning documents, such as official plans and their amendment, using the watershed as the ecologically meaningful scale for planning; and,
4. That the Ontario Natural Heritage Reference Manual be cited as a normative reference in the PPS, requiring all planning and permitting authorities to adhere to its policies and procedures before approving development plans.

Action 5 RE: Review Ontario's Wetland Conservation Policy

The issue of wetland preservation is paramount to maintaining Ontario's biodiversity, as wetlands provide breeding and nursery habitat for about 30% of Ontario's species. Against this imperative for wetlands, it is unacceptable that past permitting regimes have allowed the loss of 72% of wetlands south and east of the Canadian Shield, with losses exceeding 90% in some areas.

Ontario must move rapidly to:

5. Replace the Wetland Conservation Policy with a Wetland Protection Policy;
6. Designate all remaining wetlands and their ecological functions in EcoRegions 6E and 7E as significant, and thereby protected from development and site alteration;
7. Deem all remaining wetlands in EcoRegions 6E and 7E to be listed as significant in existing and emerging municipal official plans and amendments ; and
8. Generate a Climate Change Scenario for wetlands, currently absent from Climate Change Impacts On Natural Resources at http://www.mnr.gov.on.ca/en/Business/ClimateChange/2ColumnSubPage/STDPROD_090063.html.

Action 21: Develop and implement tools to maintain and enhance ecosystem services

9. We urge the inclusion of a description, list, and/or drawing of ecological services in the next draft of the implementation plan.

Actions 22, 23, 24, and Page 30: Implementation, Measuring Progress, and Reporting

The OHI is very concerned about general cutbacks to environmental science in Ontario, and to cutbacks to monitoring and reporting in particular. One issue we wish to flag as particularly irresponsible was the inability of the Province to deliver promised indicators on the PPS 2005 in time for the 2010 review, essentially depriving decision-makers and the public that insight into the effectiveness of the PPS.

As the importance of science and monitoring cannot be over-stated:

10. We urge MNR and all ministries to ensure robust budgets for accurate and timely monitoring and reporting, and to address better compatibility of databases so that monitoring may become both more efficient and cumulative.

Major MNR Item not in the Strategy

The OHI notes our deep concern on a matter under MNR's purview.

While improved headwater protection was implied in the new definition of a watercourse in the amended Conservation Authorities Act (2006), MNR has unfortunately not required all conservation authorities in the province to develop policies and procedures to protect headwaters in accordance with the new definition.

The OHI considers this contrary to both the letter of the law and the spirit of the biodiversity implementation plan. We strongly recommend:

11. **That MNR protect biodiversity through the implementation of the definition of a watercourse in the Conservation Authorities Act (2006).**

In conclusion, we applaud the development of the implementation framework, suggest the Government address the concerns cited above, and we look forward to more progress as the Government refines, funds, implements, monitors, and reports on the plan.

Sincerely,

Andrew McCammon

Andrew McCammon
Executive Director

cc – The OHI will be forwarding copies to selected recipients.