



The Ontario Headwaters Institute

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RE: A renewed Canada-Ontario Agreement Respecting the Great Lakes Basin Ecosystem

The Ontario Headwaters Institute -- a registered charity working to protect Ontario's headwaters, natural heritage, watersheds, and receiving waters such as the Great Lakes -- expresses our appreciation to both federal and provincial staff for the efforts you've provided to engage people in the renewal of this important agreement, and we offer the following two comments.

1. Metrics

We urge the governments to be more thorough in developing and reporting metrics to report on progress.

It is true that the Parties to the Great Lakes Water Quality Agreement released their report card on the Lakes on Friday, but we have had no time as of yet to thoroughly assess the report. We understand that various issues, such as the shutdown of the US government, delayed the report, but allow us to suggest that having that report in hand throughout the review of COA might have been informative.

More to the point, COA appears to offer little transparency for any performance metrics of its own. Please bear with this explanation: it is patently obvious that there are reams of data around COA, and the half-day consultation we attended on May 20 included a lot of that, with citations about expenditures, remediation efforts, and science data.

One agency staff member stated, however, that COA had had 269 goals, of which most had been accomplished and the rest "significantly addressed". Yet when the OHI requested a spread sheet, or a list, none was made available. We therefore have no way of knowing if the goals were ecological, financial, or administrative; nor who was tracking what, how it was tracked, and how progress was assessed.

As a result, we have no way of knowing what the 269 goals were, nor if there should be others. For example, as you know, the OHI has a significant interest in watershed management. Logical questions for us that would lend themselves to meaningful metrics for COA and the Lakes are:

- The number of Canadian watersheds that flow to the Great Lakes;
- The number of those watersheds that have a watershed management plan; and,
- The number of Canadian watersheds that flow to the Great Lakes that do not meet key thresholds, such as 30% natural heritage or two or more of Ontario's Water Quality Monitoring Objectives.

Recommendation 1: That Canada and Ontario commit in the new COA to developing and sharing with the public a clear articulation of metrics to be used in assessing progress toward COA goals.

2. The need for a New Annex on Priority Watersheds and Watershed Management

We understand the historic distinctions between federal and provincial responsibilities for natural resources and water.

We suggest, however, that this distinction has been superseded in the Great Lakes Basin by past years of collaboration on the ecosystem approach, by the adoption of numerous goals that tie conditions in the Lakes to activities in the Basin, and by the use of the term “priority watersheds”.

Indeed, a statement released by MECP Minister Rod Phillips just yesterday underscored the reality of this framework for collaboration:

Over the past several days, I had the privilege to meet with leaders from neighbouring Great Lakes states and other jurisdictions to discuss how we can work with each other and our respective federal partners to protect and restore the Great Lakes while also growing the region's economy....

The Great Lakes, along with our inland waterways, are the life support system for our province and our people. They are the foundation of Ontario's prosperity and wellbeing - supplying water to our communities, supporting Ontario's economy, and providing healthy ecosystems that support recreation and tourism as well as biodiversity and fisheries....

Given these past and on-going partnerships, as well as the probable need for more as society faces looming threats such as climate change and Asian Carp, the OHI sees renewing COA as an opportunity to build on the existing basis of federal-provincial collaboration to address a key weakness of delivering on both the Great Lakes Water Quality Agreement and COA: the need for increased effort to treat the Canadian areas of the Basin as an ecological whole.

In fact, we think this might be the singularly most important aspect of this renewal: having the agreement better reflect key words in its title -- “Respecting the Great Lakes Basin Ecosystem.”

Recommendation 2: That Canada and Ontario develop a new annex on Priority Watersheds and Watershed Management to:

- a) Identify existing or emerging negative conditions, such as low natural habitat, high levels of pollutants, aggressive invasive species, or changing stream temperature, that could be used to designate a watercourse as a priority watershed;**
- b) Develop a system to receive and process nominations and to develop and fund plans to remediate priority watersheds in the Great Lakes Basin; and,**
- c) Use the development of a fulsome system of establishing and implementing plans to address priority watersheds as a basis for further efforts to collaborate on watershed management across Canadian portions of the Basin.**

We hope you find these comments helpful in developing a renewed agreement, and we would be available at your convenience to discuss our suggestions in more detail if desired.

Sincerely,

Andrew McCammon

Executive Director