

**OHI Comments to the
International Joint Commission
March 31, 2026**

The Ontario Headwaters Institute is a registered charity that promotes watershed security: healthy and resilient watersheds that protect regional ecological integrity, social wellbeing, and economic vitality.

With respect to the Great Lakes Water Quality Agreement, we focus on Physical Integrity and regional watershed security.

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Comments on Annex 2 Lakewide Management

The Lakewide Management Annex would benefit from a greater emphasis on the eco-system approach, increased understanding of the impact of land-based activities on the lakes, and the potential of the municipal and watershed management organizations on the annex committee to both better protect the Physical Integrity of the lakes and the security of regional watershed health.

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Comments on Annex 2

Actions

- Expand current policy perspectives, such as those on agricultural practices, to further recognize that the Great Lakes watersheds and the lakes are one ecosystem in which land use planning decisions and land occupancy practices have direct and indirect impacts on the lakes.
- Explore with key agencies, such as municipal governments and watershed management agencies already involved in the Annex, how land use and watershed planning can be integrated at the municipal level to better protect both regional watershed security and the health of the lakes.

Science

- Create an evaluation framework of how, and to what extent, existing alterations to aquatic features and functions, such as in-stream barriers, riparian natural habitat, costal natural habitat, and dredging are impacting the physical integrity of the lakes and their aquatic life.
- Develop a priority list to avoid further negative impacts and, where possible, rehabilitate sites that are having the most negative impacts.

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Comments on Annex 7: Habitat and Species

The Habitat and Species Annex would benefit from a greater emphasis on the eco-system approach through increased recognition that contributing streams and their surrounding watersheds offer important habitat for aquatic and other species found in the lakes; that they contribute sediment, organic material, nutrients, and biota to the food chain in the lakes; and that changes in stream flow, temperature, and pollution levels can have negative impacts on both the nearshore and the broader lakes themselves.

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Comments on Annex 7

Actions

- Expand current policy perspectives, such as those on agricultural practices, to further recognize that the Great Lakes watersheds and the lakes are one ecosystem in which land use planning decisions and land occupancy practices have direct and indirect impacts on the lakes.

Science

- Create an evaluation framework of how, and to what extent, land conversion, especially the transition from natural heritage to impervious surfaces, is impacting both the quantity and quality of water flowing to the lakes as well as how the loss or fragmentation of natural heritage is impacting regional biodiversity.
- Develop a priority list to avoid further negative impacts and, where possible, rehabilitate sites that are having the most negative impacts.

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Thank you

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