

Ontario Headwaters Institute

October 4, 2009

Ann Marie Weselan
Manager (Acting)
Ministry of the Environment
Integrated Environmental Policy Division
Land and Water Policy Branch
Water Policy
Floor 6 - 135 St. Clair Avenue West
Toronto, Ontario, M4V 1P5

RE: EBR Registry Number: 010-6350
Stewardship – Leadership – Accountability
Managing Ontario’s Water Resources for Future Generations

The Ontario Headwaters Institute (OHI) applauds the Government of Ontario for its continuing efforts to safeguard Ontario’s water resources for future generations.

Initiatives that we believe constitute milestones in support of this goal include recent changes to the Provincial Policy Statement on planning and the Conservation Authorities Act, the province’s intention to inventory and protect our boreal region, and many aspects encompassed in the Clean Water Act, including efforts focused on source water protection, groundwater mapping, and the development of water budgets.

The current initiative, *Stewardship – Leadership – Accountability: Managing Ontario’s Water Resources for Future Generations*, adds to this framework.

We offer the following comments:

1. Guiding Principles

We support the guiding principles and the need to create a culture of conservation. We find, unfortunately, that they are not positioned as strongly throughout the document as is warranted. Given the emerging pressures on water due to Ontario’s increasing population and the challenges posed by a changing climate, the document articulates valid and practical concerns on the availability of water for the human use of water and on the need for water conservation and efficiency.

We believe, however, that the main focus of this initiative should be an ecosystem approach to water and watershed management, including the protection of our headwaters, within which human demand and responsibilities should be articulated and managed.

**Preserving Ontario’s headwaters through education and action
www.ohwi.ca ♦ Andrew@ohwi.ca ♦ 416 857 9484
4 Wisteria Road, Toronto, Ontario, M1R 4X8**

2. Proposed Mission Statement

We support the concept of a mission statement but note that mission statements are usually provided for a specific organization or initiative. In this case, we are unsure of the purpose of the proposed mission statement.

We also note, as expressed above, that the proposed mission statement relates almost exclusively to the human use of water, and that it appears to place human health and the economy before the environment.

We suggest, instead, that the province acknowledge the environment as the foundation of our quality of life.

An alternate mission statement, for a purpose that needs better clarification, might be:

Water sustains life. We need to respect the integrity of the hydrological cycle, protect the purity of water, preserve it for ecosystem needs, and use it in a manner that safeguards public health within a sustainable economy.

3. Proposed Objectives

We support the objectives but note the need to strengthen them throughout the document, along the lines expressed above and as highlighted in italics in Strategic Objective 1, *“including taking ecosystem needs into account”*.

In its consideration of adaptive management programs and reviews of existing programs and planning efforts in other jurisdictions, we urge the Province to look into Integrated Watershed Management as a possible framework to guide the setting of objectives within a full ecosystem approach.

4. Targets

The OHI supports the development of targets based in part on public consultation and with reporting readily available to the public in a timely manner.

5. Possible Actions

We support the development of possible actions, developed and delivered in part through public consultation and engagement. In particular, we support:

- a. Item 1B: “Work toward long-term water availability planning”; and,
- b. Items 5A – D: All aspects of this objective should be presented in an ecosystem approach, perhaps framed in a system of Integrated Watershed Management.

6. Additional Comments

While the OHI is encouraged by the development of this initiative, its focus on the human consumption of downstream supplies does not address the protection of upstream flows, which of course provide the source of much of Ontario's water.

The OHI believes that designated drinking water supplies cannot be separated from their upstream sources.

Key upstream issues not mentioned in this document but which directly influence water availability and water quality for all Ontarians include:

- Large-scale forestry operations lacking adequate consideration of hydrologic impacts, especially in a changing climate;
- Logging on stands under 100 acres located on private lands;
- Groundwater and water table impacts from quarries, mines, and major infrastructure projects such as highways, water pipes, and dumpsites;
- Potential adverse effects from agricultural drainage tiles;
- Aquifer pumping above natural recharge rates; and,
- Continued permitting of settlement areas that allows small streams to be placed underground, often within a municipal sewer system.

In conclusion, the OHI applauds the Province on the development of this document as an important additional initiative to protect the environment and our water resources for future generations.

In our belief that designated drinking water supplies cannot be separated from their upstream sources, we ask the Province to:

- Adopt an ecosystem approach to water and watershed management, including the protection of our headwaters;
- Acknowledge the environment as the foundation of our quality of life; and,
- Consider Integrated Watershed Management as a potentially beneficial tool to improve the long-term protection of our precious water resources.

Sincerely,

Andrew McCammon
Executive Director