



ecojustice



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Dear Ontario MPPs,

As you know, the second reading debate of Bill 6, the proposed [Great Lakes Protection Act](#), continues this week in the Legislature. The Great Lakes Protection Act Alliance is supportive of the proposed legislation, and appreciates all parties' efforts to make it as effective as possible. There is wide-spread agreement, as evidenced in the second reading debates thus far, that Ontario needs to take more aggressive action to protect the Great Lakes' environmental, recreational, and industry-based value to Ontarians. After all, the Great Lakes and St. Lawrence River region supports 56 million jobs and a GDP of \$5.1 trillion. So, the question is not "if" but "how"?

Here, we share some high-level thoughts about the proposed legislation and examples of amendments we'd like to see.

Great Lakes Protection Act Alliance consists of six leading Environmental Non-Governmental Organizations that work on Great Lakes issues: Canadian Environmental Law Association, Ecojustice, Environmental Defence, Ducks Unlimited Canada, Great Lakes United, and the Sierra Club of Ontario, Great Lakes Section.

Our suggested improvements to the legislation fall into three categories:

1. Strengthen public and government participation in the Great Lakes Guardians' Council by ensuring a balanced representation from the public and strong involvement across government ministries;
2. Require targets to be set for each Great Lake, rather than making it optional;
3. Allowing for a simplified version of the Geographically Focused Initiatives and committing to funding and implementation.

Why do we want a Great Lakes Protection Act?

- To fill gaps in provincial law and policy affecting the Great Lakes;
- To permit the use of planning, regulatory, and other tools where needed in stressed parts of the Great Lakes—St. Lawrence River Basin;
- To commit, in legislation, to principles that guide integrated decision-making affecting the Great Lakes;
- To affirm a provincial commitment to improving the Great Lakes through the achievement of targets that align with other commitments (such as the Great Lakes Water Quality Agreement (2012), the Canada-Ontario Agreement Respecting the Great Lakes Basin Ecosystem (2007), and the Great Lakes—St. Lawrence River Basin Sustainable Water Resources Agreement (2005));
- To align the work of various Ministries that affect Great Lakes' health.

The implementation of the [Great Lakes Strategy](#), and new legislation that achieves the

above, would improve the Great Lakes' wetlands, beaches, shorelines, habitats and inhabitants, water quality and quantity, and would prioritize the development and use of new, clean technologies and techniques, through improved processes, cooperation, and commitments.

Examples of key improvements we want made to the Great Lakes Protection Act

Great Lakes Guardians' Council

- We support the current list of stakeholder groups to be included in the Council, but we want to ensure a transparent process for selecting members. We want to ensure that Council members represent a variety of views and will weather political changes. Members could be selected through a combination of election by their stakeholder group, by nomination, and by provincial appointment. The interested public could potentially weigh in on this through an *Environmental Bill of Rights* Registry posting.
- We suggest that the Great Lakes Guardians' Council include a core Council of Great Lakes Ministers and other stakeholder representatives, plus ad hoc committees. Efforts need to be made to ensure the Council can work effectively, are representative of challenges that vary across the Basin, and take advantage of existing structures rather than duplicating existing committees and functions.

Targets

- The proposed Act currently says that the Minister *may* set targets applying to particular stresses and locations. Given their importance, the Minister should be *required* to set targets for each lake in the Great Lakes St. Lawrence River Basin, and timelines for achieving the targets. For example, protecting all remaining wetlands in southwestern Ontario would go a long way towards addressing the particular stresses of western Lake Erie.

Geographically Focused Initiatives

- Although preparation and approval of Geographically Focused Initiatives is a structured process that provides opportunities for public input and transparency, we are concerned that it is complex. The province should also allow a simplified process for situations that meet pre-determined criteria – criteria that are developed in an inclusive and publicly accountable process.
- The province must commit to fund 3-5 Geographically Focused Initiative proposals each year for 5 years to ensure that public bodies are not financially strained for proposing an Initiative in their region or watershed.

We will continue to work with other ENGOs and community groups around the Great Lakes to encourage their involvement. Twenty-two groups signed onto the Alliance's [joint submissions](#) in the last round of public consultations on the proposed Great Lakes Protection Act and draft Great Lakes Strategy.

We appreciate your interest in this issue which will undoubtedly affect the quality of life for future generations of people, wildlife, and the entire region.

Yours sincerely,
The Great Lakes Protection Act Alliance

Please contact Claire Malcolmson for more information or to arrange a meeting.
cmalcolmson@environmentaldefence.ca
416-323-9521 x 257