

January 28, 2022

VIA Email

The Honourable Chrystia Freeland
Minister of Finance

Re: Continued Investment in the Great Lakes Program

Dear Minister Freeland:

The Great Lakes are one of the world's most important natural resources. With more than 20 percent of the world's surface freshwater, they provide drinking water for 1 in 4 Canadians, sustain approximately 4,000 species of plants and animals, and are the basis for billions of dollars in economic activity.

Despite the importance of this ecosystem, the water quality and health of the Great Lakes have been and continue to be significantly degraded by threats such as human activity, large-scale algae blooms, releases of harmful substances, invasive species, loss of biodiversity & habitat, and climate change.

To protect this critical region, Canadian Environmental Law Association (CELA) and Environmental Defence (ED) strongly encourage the Federal Government to prioritize continued investment in the Great Lakes Program beyond 2022.

The Great Lakes program – including the Great Lakes Nutrient Initiative (GLNI), the Great Lakes Action Plan (GLAP) and the Action Plan for Clean Water (Great Lakes Sediment Remediation Projects or GLSRP) – supports actions to address commitments stemming from the Canada–US Great Lakes Water Quality Agreement (GLWQA) and enables Environment and Climate Change Canada (ECCC) to work with the US, federal, provincial, state, and community partners to improve Great Lakes water quality. Key funding priorities for the program include:

- establishing binational lake ecosystem objectives;
- restoring Great Lakes Areas of Concern (AOCs);
- preventing toxic and nuisance algae;
- assessing and enhancing the resilience of Great Lakes coastal wetlands; and
- reducing releases of harmful chemicals.

The Great Lakes program is an effective program that is helping to improve water quality, protect shorelines, restore habitats, clean up toxic sediments, prevent invasive species, and more. Continued investment in the program is needed for this important work to be carried on. As

noted in the last evaluation of the program, “[c]urrent and emerging environmental concerns for the Great Lakes require ongoing attention from the Government of Canada”¹ and necessitate a federal presence because of their binational and extra-provincial nature.

The Great Lakes program is aligned with Federal Government and ECCC priorities, including the commitment in the Minister of Environment and Climate Change Mandate Letter to “implement a strengthened Freshwater Action Plan, including a historic investment to provide funding to protect and restore large lakes and river systems, starting with the Great Lakes-St. Lawrence River System [...]”.²

The program is also consistent with federal government roles and responsibilities, including continued involvement in meeting commitments in the Canada–US GLWQA.³ For example, the most recent assessment of the International Joint Commission on progress under the GLWQA identified an ongoing need for Parties to develop a binational approach to climate change adaptation in the Great Lakes as well as invest in a binational vulnerability assessment.⁴

Historically, Canadian investment levels have not been high enough to adequately provide enough resources towards addressing the many pressures the Great Lakes face and will increasingly face. Ontario, which borders four of the five Great Lakes, provides roughly \$14 million a year. Federally, the government has committed \$53 million directly into investments in the Great Lakes over the last six years. In 2017, the federal government publicly announced approximately \$45 million for the Great Lakes Protection Initiative (GLPI).⁵ In 2020 another \$5.1 million in funding for the GLPI was announced and in 2021 another \$3.1 million for the GLPI was announced.⁶

In comparison, we have seen in the United States the success of bipartisan legislation to invest in the Great Lakes through the Great Lakes Restoration Initiative (GLRI). From 2010-2021 \$3.8 billion dollars were committed and this breaks down to roughly \$345 million a year over that time period.⁷ In 2021, a renewed bipartisan commitment was reached to reauthorize the GLRI program for five years, through until fiscal year 2026, and the level of funding increased to \$375 million for 2022 and is set to increase by \$25 million annually until it reaches \$475 million in

¹ https://www.canada.ca/content/dam/eccc/documents/pdf/evaluation-great-lake-program/Evaluation_of_the_great_Lakes_program.pdf

² <https://pm.gc.ca/en/mandate-letters/2021/12/16/minister-environment-and-climate-change-mandate-letter>

³ https://www.canada.ca/content/dam/eccc/documents/pdf/evaluation-great-lake-program/Evaluation_of_the_great_Lakes_program.pdf

⁴ <https://ijc.org/en/2020-TAP-Report>

⁵ <https://www.watercanada.net/great-lakes-protection-initiative-receives-45m-from-federal-government/>

⁶ <https://www.canada.ca/en/environment-climate-change/news/2021/12/canada-invests-31-million-to-protect-the-great-lakes-and-launches-new-call-for-proposals.html>;

<https://www.canada.ca/en/environment-climate-change/news/2020/11/canada-invests-51-million-in-great-lakes-protection.html>

⁷ <https://www.glri.us/funding>

2026.⁸ Additionally, \$1 billion in funding was recently secured for the GLRI via the *Infrastructure Investment and Jobs Act* that was also the result of bipartisan infrastructure negotiations.⁹

To further demonstrate the need for increased investment, a 2021 survey of 241 cities, villages, and other jurisdictions along the Great Lakes and St. Lawrence River shows that coastal damage from climate change alone will cost at least \$1.94 billion over the next five years, with shoreline communities having already spent \$878 million over the past two years.¹⁰ Granted, there are population differences to take into account across both countries when thinking about investment levels per capita. However, it is clear that there is a need for stronger and ongoing Canadian federal support for the Great Lakes in the form of investment levels that better reflect the investment being made by the U.S.

The Federal Government has already pledged to invest \$1 billion in freshwater protection over ten years. There is a need for a significant portion of this funding to go towards the Great Lakes.

As discussions are had about where to allocate federal funding in 2022 and beyond, CELA and ED urge the Federal Government to recognize the continued need for investment in the Great Lakes program to meet federal government commitments and to improve the water quality and ecosystem health of the lakes.

Thank you for your consideration of this matter.

With regards,



Canadian Environmental Law Association
Per Theresa McClenaghan



Environmental Defence
Per Tim Gray

cc.: Right Hon. Justin P.J. Trudeau, Prime Minister of Canada
Hon. Steven Guilbeault, Minister of Environment and Climate Change
Hon. Mona Fortier, President of the Treasury Board
Janice Charette, Interim Clerk of the Privy Council and Secretary to the Cabinet

⁸ <https://www.greatlakesnow.org/2020/02/great-lakes-restoration-initiative-passes-house/>

⁹ <https://healthylakes.org/senate-passes-infrastructure-bill-with-1b-for-great-lakes-restoration/>

¹⁰ <https://glslicities.org/wp-content/uploads/2021/07/Damages-Survey-Final-7.8.21.pdf>