

January 14, 2022

VIA email

Hon. David Piccini
Minister of the Environment, Conservation and Parks

Re: Review of Ontario's Great Lakes Strategy

Dear Minister Piccini,

Canadian Environmental Law Association (CELA) looks forward to actively engaging with the Ministry of the Environment, Conservation and Parks on the review of Ontario's Great Lakes Strategy (Strategy). As active participants in the consultations that lead to the establishment of the Strategy in 2016, we make the following initial recommendations regarding the review:

A. The Review Process

- i. ensure the Great Lakes Progress Report is released in advance of public consultations on the Strategy review so the public's input can be meaningful and informed;
- ii. ensure that at least 90 days are given for public review and comment once the updated Great Lakes Strategy is posted to the Environmental Registry of Ontario, particularly in light of the disproportionate burden on some communities in the ongoing pandemic; and
- iii. ensure that engagement with First Nation and Métis communities is conducted in a manner consistent with truth and reconciliation.

B. The Contents of the Strategy

- iv. maintain the existing principles that guide efforts to achieve Ontario's Great Lakes Goals: (1) ecosystem approach, (2) precautionary approach, (3) accountability, (4) adaptive management, (5) collaboration and engagement, and (6) recognition of First Nations and Métis communities;
- v. continue to track progress and measure results, ensuring that the chosen performance measures are ambitious, quantifiable, and based on activities over which the Ministry has control; and

- vi. continue to make safe drinking water for all a priority by committing to:
 - a. finalizing amendments to the technical rules for source protection plans under the *Clean Water Act*;
 - b. supporting culturally appropriate implementation strategies for drinking water source protection within First Nations communities; and
 - c. amending the *Safe Drinking Water Act* and associated regulations & policies to eliminate lead in drinking water.

We would welcome the opportunity to discuss the above recommendations. We look forward to your response.

Sincerely,
CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Theresa McClenaghan
Executive Director and Counsel



Jacqueline Wilson
Counsel



Krystal-Anne Roussel
Water Policy Coordinator
Healthy Great Lakes