



The Ontario Headwaters Institute

Erinn Lee
Ministry of Environment, Conservation, and Parks
PDF via e-mail to waterpolicy@ontario.ca

August 2, 2020

RE: ERO 019 – 1680 Updating Ontario’s Water Quantity Management Framework

Dear Ms Lee,

In addition to having supported a submission led by Wellington Water Watchers and being a member of the Simcoe County Greenbelt Coalition, which also made a submission, the Ontario Headwaters Institute provides this note with a few additional comments.

Fundamentally, notwithstanding some welcome progress on priorities for water-takings, municipal willing hosts, and access to data, we are deeply disappointed in the deceptive title of this policy proposal and numerous voids in its content.

On the former, the purported intent signaled by the title is abandoned in the first half-page of the minister’s message, as the focus quickly becomes ground water.

On the latter, there is no comprehensive effort to address the existing water quantity management framework, and only vague references that the ministry might provide guidelines for future actions.

Missing from action is how climate change, increased settlement, expanded forestry actions unfettered by the environmental assessment process, and flooding may impact both surface and ground water, and which agencies might be involved in managing which aspects of those issues.

This is important as the province is tinkering with mandates with respect to conservation authorities, flooding, and development, and recently cancelled municipal permit responsibilities for aggregate extraction below the water-table.

The policy proposal also is mute on the province’s commitments for water conservation and the link between water quantity and water quality, where water quality indicators become worse when water quantity falls. This has direct implications on municipal water downstream from intense agriculture and on water quality downstream of municipal sewage treatment plants.

These are significant omissions, exasperated by the obligatory reference to the Province’s draft Made-in-Ontario Environment Plan, which further belittles the Government’s integrity.

In addition to these voids are a few significant allusions to work that needs to be done but appears to lack any mandate. We shall limit our comment to two sentences on page 1 of the BluMetric Summary:

1. “Improving existing tools and providing more guidance to water managers will help to manage water even better.” This is, of course, not necessarily so, as existing, draft, and future tools may lack clout requiring their consideration. On the first, numerous organizations have suggested for several years that Ontario’s Natural Heritage Reference Manual be made normative, to no effect. An example of the second is the February 2018 draft guidance on Watershed Planning in Ontario. We are not endorsing that draft as it stands, but it is an improvement on its 1993 predecessor. On the third, any future guidance could be to NOT do something, or there may be no funds to implement the guidance; and,
2. “Water quantity management could be improved if the Government developed a plan to help municipalities manage water across municipal boundaries.” We agree, but observe that the Government appears to be headed in the opposite direction, having recently withdrawn the historic mandate of watershed management from conservation authorities, while apparently having no interest in maintaining Source Protection Committees nor the Ontario Biodiversity Council.

In spite of using words such as comprehensive and sustainable, the proposed policy holds little water.

We urge the Government to cease the use of grandiose titles for narrow initiatives and to stop marketing the barest of progress as adequate in the face of climate change and the sixth mass extinction.

In the near future, the OHI will publish our summary of WaterScape III, with recommendations for resilient landscapes and healthy waters in south-central Ontario. We hope you might find it helpful.

Please feel free to contact the undersigned at your convenience for any needed clarification.

Sincerely,

Andrew McCammon

Executive Director