

Brent Taylor, Senior Policy Analyst  
Water Policy Environmental Policy Division  
Ministry of the Environment, Conservation, and Parks  
PDF via e-mail to [waterpolicy@ontario.ca](mailto:waterpolicy@ontario.ca)

February 4, 2021

**RE: ERO 019 – 2017 – Proposed Implementation of Updates to  
Ontario’s Water Quantity Management Framework**

Dear Mr Taylor,

The Ontario Headwaters Institute (OHI) is a charity working to protect the province’s headwaters, natural heritage, and watersheds.

Current priorities include advocating for provincial guidelines similar to those in How Much Habitat is Enough, the development of a sustainability lens for land use planning in Ontario, the Province’s transition to Integrated Watershed Management, and creating a series of headwater alliances to foster community visions on protecting upland headwater areas.

We have very little to say about the updated draft. As per our submission of August 2, 2020 on ERO 019-1680, we urge the Province to pursue a comprehensive effort to address the existing water management framework in Ontario in a comprehensive, integrated manner.

This narrow initiative is passable as a short-term effort at a time when the Government seeks to lift the water taking moratorium, but it marks precious little progress from the last draft, appears to have not benefited from volumes of valuable comments, and could not even muster the courtesy and acumen of providing a table of contents for the Draft Water Quality Management Implementation Guidance.

We must do better. So many organizations -- from academe, civil society, government agencies working to protect natural heritage and water, and from the business sector -- can help Ontario move from land use planning and water silos to an integrated framework for a sustainable future.

Not embracing such a framework, doing things piecemeal without public engagement and building consensus in a time of climate change, the sixth mass extinction, and polarization, is a recipe for environmental, social, and economic disaster.

Sincerely,

*Andrew McCammon*

Executive Director