



Canadian Federation of University Women
ONTARIO COUNCIL



Comments on:

Healthy Great Lakes, Strong Ontario
EBR Number 010-6105

to the

Great Lakes Office
Ontario Ministry of the Environment

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By the

Canadian Federation of University Women
Ontario Council

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This fax contains 15 pages including this cover

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HEALTHY GREAT LAKES, STRONG ONTARIO

The Canadian Federation of University Women (CFUW) Ontario Council welcomes the opportunity to respond to the discussion paper Healthy Great Lakes, Strong Ontario.

We commend the Government of Ontario for their continuing commitment to meaningful consultation and for the strong network they have built throughout the province in the past few years, a coalition between stakeholders from all sectors and provincial staff. The Annex Advisory Panel and the Great Lakes Cities Initiative are just two examples of this exciting new spirit of cooperation. CFUW Ontario Council has been pleased to be a part of this ongoing consultative process since 2004, and to participate in the excellent consultation on May 6, 2009 in Toronto.

CFUW has, over many years, developed a body of policy which impact on Water, addressing such issues as the Export of Bulk Water, Prohibition of Inter-basin Diversions, the Status of Water under NAFTA, Drinking Water Standards, Marine Development, Water Pollution, Preservation of Wetlands, Acid Rain, Resource Depletion and Safe Waste Disposal. (Some pertinent CFUW policies on water appended, Appendix A)

The 6,000 members of CFUW Ontario Council in 57 communities in all the regions of Ontario (list appended) have made Water and all policies surrounding this life-sustaining resource a priority.

In 2001, CFUW established a policy that:

- declared that water, being a non-renewable natural resource of paramount importance, belongs to the...public and its use must be regulated in the public interest;
- requested that government adopt and implement a sustainable and prudent water management policy to respond to long-term regional needs with due regard to the ecosystem and hydro-geological reality; and
- requested that government promote conservation and more efficient use of surface water and groundwater

Response to the Discussion Paper:

Sections 1 and 2 Goals:

The Goals you have set are all important. But they seem to deal mainly with the Great Lakes' effect on those around them - the people, the ecosystem, the communities and economies (recreation, fisheries, power generation). Concern for the health of the waters themselves is missing. It may be an implicit goal in all these areas - but it needs to be made explicit. CFUW Ontario Council suggests that the first goal should be framed in language similar to that used in the preamble to the Safeguarding and Sustaining Ontario Waters Act (SSOWA) that stated that: "The Waters of the Great Lakes Basin are a shared public treasure and the States and Provinces as stewards have a shared duty to protect and manage these renewable but finite Waters" and that "protecting, conserving, restoring and improving these Waters is the foundation of Water Resource Management in the Great Lakes Basin."

CFUW Ontario Council recommends that Goal #1 be added:

"Protecting, Conserving, Restoring and Improving the Waters of the Great Lakes"

The recognition of the finite nature of the water resources within the Great Lakes Basin is another huge issue. There has been much talk of dispelling the "myth of abundance". Conservation has been an important watchword over the years. And yet, Ontarians continue to consume water, per capita, at a rate of 260 litres per day. Ontario uses 495 trillion litres of water annually - a volume equal to that of Lake Erie. To date relatively little concrete action has been taken to ensure that we reduce our unsustainable consumption of water.

Conservation must now become a priority for provincial action, and be targeted as one of the Goals.

CFUW Ontario Council recommends an additional Goal:

"Conservation of Water Use"

Section 3 - Strategies:

An Additional Strategy should be added to mirror the Goal of Conservation

CFUW Ontario Council recommends an additional Strategy:

"Promote and Implement Conservation Initiatives"

This would include such initiatives as changes to the building code, and adding water efficiency targets to appliances; use of grey water, metering urban homes, block billing for water bills to reflect consumption, upgrading infrastructure to eliminate leaks and inefficient pumps, and a whole host of Best Practice used in other jurisdictions. It should also be a factor in setting the baseline for water withdrawals for municipalities and industries at a lower level - one that presumes conservation measures are or will be in place.

Although there has been much discussion around intra-basin diversions, this topic is missing from the current list of strategies. This is an important issue with a huge potential impact on the health and water levels of the Great Lakes, especially as pressure mounts from Municipalities who need alternate water sources and turn to the Great Lakes as a new source of supply. If there are exceptions granted, will there be a requirement for twinned pipes to ensure Return Flow to the Lake of origin? This is particularly critical to the water levels of Lake Huron, which are already under stress, with the potential removal of water from the Lake Huron Watershed through the York Pipeline to Lake Ontario and also through the Grand Bend Pipeline to London and Lake Erie.

CFUW Ontario Council would like to comment on the current nine Strategies:

Strategy One:

One of the issues that continues to hold back the removal of toxic sediment is the fact that there are no current technologies or processes that allow the sediment to be removed safely. There is the constant danger of spreading toxins from the contaminated sediment to the surrounding water and soil. Covering contaminants with concrete, as is proposed in Hamilton Harbour is an inadequate second-best solution.

Part of this strategy should include programs for the **development of new technologies** which will serve us into the future to clean and mitigate the effects of toxins dumped into our lakebeds.

Strategy Two:

This is an important area - but the "activities" suggested are more like Goals than Actions.

Potential activities could include:

- ensure stricter monitoring and enforcement of anti-pollution/anti-dumping laws
- establish targets and schedules for upgrading municipal infrastructure
- extend Source Protection work to include private wells and septic systems
- subsidize programs to provide easily accessible hazardous waste collection (a "black box" for community recycle collection!?)
- work with the federal government to identify funding priorities for needed research
- encourage research into new processes to remove chemicals and pharmaceuticals from waste water during sewage treatment
- encourage research into new processes to remove nitrates and phosphates from waste water during sewage treatment
- establish a protocol for storage and clean-up of snow contaminated by road salt and investigate and promote less toxic alternatives for use on highways.

Strategy Three:

It is important when looking at this strategy that Precedence for the Health of the Lake be established for situations where the needs/wants of municipalities, industry or developers collide with the needs of the ecosystem. As noted above, the demand for additional water sources will only increase.

This strategy could also include:

- identify areas within legislation pertaining to mining, forestry and agriculture that need to be amended and aligned with the Healthy Great Lakes vision.
- stricter regulations for planners/developers/homeowners on issues involving encroachment on shoreline habitat
- encourage the Federal government to align their regulations for ballast water with the American guidelines, and to better monitor and enforce violations under the Fisheries Act and the Shipping Act.

Strategy Four:

We commend the Government of Ontario for the work done already and that still planned to combat the reality of Climate Change. Our only suggestion would be to add the words "**and Mitigate the Effects of**" to the Strategy title to read "**Adapt to and Mitigate the Effects of Climate Change**"

Strategy Five:

Many of the suggestions we made for Strategy Three would apply here as well. There should perhaps be an emphasis here again on mitigation. It is important, for instance that we develop and share expertise to deal with Quagga mussels and Zebra mussels not just accept and adapt to the havoc they are creating.

Strategy Six:

With both the Canada Ontario Agreement (COA) and the Great Lakes Water Quality Agreement (GLWQA) up for renegotiation and renewal, this is the ideal time for Ontario to use its expertise and the momentum it has gained, and work with the Federal government to secure a reinvigorated action plan to deal with many new and longstanding issues in the Great Lakes.

Strategy Seven:

This is a **critical strategy** to the long term health of the Great Lakes. But in order to be successful, there are **several other activities to add**:

- define the watersheds for each Great Lake with the **upstream** connecting channel only. This is a crucial step in controlling potential water loss through intra-basin diversions as discussed above.
- learn and understand much more about the interaction and interdependence between ground and surface water in a watershed, especially as they affect the near shore waters
- learn and understand much more about the near shore waters and the ecosystems they create
- search for Best Practice in mapping aquifers within the watershed
- expand monitoring programs and the collection of data
- collect data on a single easily accessed platform

Strategies Eight and Nine:

Education of our young people through enhanced curriculum resources in the schools is certainly a way to increase appreciation of the Great Lakes in the long-term. And in the short term, programs to support volunteer efforts to protect and restore the lakes - especially the wetland and coastal areas are excellent.

But CFUW Ontario Council is concerned that Strategies Eight and Nine have the potential to put more stress and loading on the Lakes by bringing more visitors/commercial activities to their shores. It would call for very careful and cautious implementation.

Perhaps Strategy Nine should read "**Redevelop**" rather than "**Develop**" - changing harmful industry and its pollutants for greener?

Section 4: Role of Government

CFUW Ontario Council **commends** the way **the Ontario Government** has expanded the role of government in Ontario. Over the past several years you have enacted a number of new legislations and regulations which will serve to safeguard our water supply. Importantly, **these laws were formulated after an unprecedented consultation process with stakeholders from every sector working with government.**

CFUW Ontario Council expects that this collaboration will continue and will result in much more grass roots support for the success of the Healthy Great Lakes Strong Ontario vision. There will be opportunities for individual citizens to get involved in restoration projects, for businesses to become industry leaders celebrated for sharing their innovative Best Practice with colleagues, for agriculture to be supported in making changes to help the environment, for NGOs to work with communities, sharing their expertise with renewed enthusiasm in projects supported by provincial programs. It's called participatory democracy - and it's welcome and all too rare in government style.

Section 5: Delivery of Strategies

The province can best act in several ways.

- The first is in its important role of legislator. It will be up to government, in consultation with the relevant sectors, to set targets, change building codes, enforce violations, regulate Best Practice, implement the Conservation initiatives, set up a series of incentives - and disincentives! This will demonstrate the government's intent to have the vision succeed.

- It will be important to tell Ontario about its vision, to celebrate the Great Lakes and the successes that are happening through the various initiatives.
- It will be important to engage the Federal government for some of the funding - especially for Areas of Concern (AOC) remediation.
- It will also be vital to act as facilitator - to set up programs and funding sources - so that - at a watershed and a local level people can work to help with some of the remediation work. Perhaps these projects could be delivered through the local Source Protection network and the Conservation Authority or through existing RAP's.

Section 6: Priorities

One of the most important strategies is that of **Conservation** and the implementation of the Conservation Initiatives. This would include everything from Infrastructure updates to building code changes to block billing on water bills. It would include too the setting of the baseline for water taking for municipalities and industry at a lower level which assumes conservation measures are/will be in place. The amount of water we consume is unsustainable and must be addressed.

Another important strategy is **addressing the near shore issues** - problems of phosphorous loading, algal blooms, toxic sediment, low lake levels, wetlands, and coastal erosion and degradation through development.

A third priority would be **cleaning up industrial pollutants** and their legacy in toxic hot spots. But it is also important to take steps to prevent further pollutants from contaminating the waters - through industry dumping/leaking, or municipal sewage overflows, or effluent from primary treatment plants.

Section 7: Timing re: Economy

CFUW Ontario Council would suggest that during this time when Stimulus Funds are being made available by the federal government and provincially, projects be targeted which meet the criteria for capital funding (sewage treatment plant upgrades, infrastructure upgrades).

Summer students looking for work would be great rebuilders of wetlands or coastlines. As mentioned above, now is the perfect time to influence the Bi-National Agenda. And there are many Strategies that are important but not dependant on major funding - designing programs for restoring parts of the Lakes, making the legislative and regulatory changes needed to go forward, designing an education program, researching Best Practice, setting up delivery networks and creating and prioritizing action plans.

Section 8: Top Strategy

CFUW Ontario Council would suggest that to move forward with **enhanced lake-based and watershed-based planning and action** would be the most effective strategy to bring all the other issues into play and deal with them as they occur at the local level. Each Lake is unique with its own needs and its own specific priorities for action. By focusing on enhanced planning and action at the lake and watershed level, those individual needs could be addressed first, and communities of each Lake could see improvements being made.

Section 9: Strategy that Worsens

The one area that would seem to be counterproductive at the moment would be Strategy 9 in **bringing more population and industry to the shores of the Lakes**. It would seem prudent to get to a point where the demands on the Lakes were sustainable before we encourage more demands.

Section 10: Outside Provincial Control

There are several areas that might appear to be outside provincial control - Climate Change, the Bi-National Agenda and invasive species for instance. But that doesn't mean that the province would want to walk away without trying to mitigate their effects or influence their outcome. Each of the threats poses its own unique problem, and each will take determination and political will to tackle it successfully.

Section 11: First Focus of Action

The first focus of action would probably be **different for each of the Lakes & Watersheds**.

The need for **Conservation initiatives** will apply throughout the whole basin.

But apart from that, for some lakes or watersheds the greatest need might be delisting AOC's and pollution abatement - for others it might be shoreline and wetland restoration - still others might need to focus first on near shore phosphorous loadings and algal blooms or on infrastructure upgrades to control stormwater/wastewater overflow.

Whatever project is chosen for each area, it should have a definite timeline and its successful completion should be celebrated to create and maintain momentum for some of the larger tasks.

Section 12: Who Should Be Involved

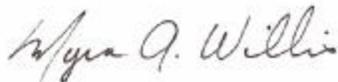
Everyone should be involved.

The Province will take the lead and will need to involve the Federal government and the American government in areas where jurisdictions and interests overlap. There are many bi-national committees and organizations who will assist, including the IJC. Sector-specific representatives will continue to share their expertise with government through consultations. The academic and scientific community will be involved in monitoring, data collection and research. Source Protection Committees will have a role to play. All stakeholders will be affected in some way or another - whether it is through the conservation initiatives, or whether it is in a change of rules for how they do business - or how they use the land - or whether it is in volunteering on one of the Lakes in a restoration project, on a RAP or LaMP.

Once again, members of CFUW Ontario Council would like to thank the government of Ontario for your ongoing stewardship and active care of the water resources of our Great Lakes. We look forward to the successful launch of your vision for Healthy Great Lakes, Stronger Ontario.

Ontario Council of the Canadian Federation of University Women is composed of 57 clubs comprised of graduates living in urban and rural areas across Ontario. We are non-partisan, non-sectarian and we are totally member funded. Our members are active in public affairs, advocating on public education, justice, health and environmental issues as well as the status of women and human rights. Ontario Council is part of the Canadian Federation of University Women and has links to the International Federation of University Women.

Respectfully submitted,



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APPENDIX A

Canadian Federation of University Women ONTARIO COUNCIL

Policy relating to the Water and the Great Lakes

Note: CFUW Ontario Council policy integrates policy passed by CFUW Ontario Council as well as that of CFUW and IFUW

1967 Water Pollution

RESOLVED, That the Canadian Federation of University Women request the Government of Canada to give effective leadership in the following ways, as laid down in the guidelines of the Conference of Resource Ministers:

1. To establish a national abatement code as soon as possible.
2. To direct and co ordinate development of standards, supply of information, and active research related to water pollution, and
3. To continue to provide financial incentives, in order to accelerate the application of pollution control measures.

1988 Drinking Water Quality

RESOLVED, That the Canadian Federation of University Women urge the Government of Canada, to enact legislation which would establish substantive and procedural laws in order to:

1. set rigorous quality standards for ground and surface drinking water which would be updated frequently to reflect current research and increased technology; and develop strict standardized inspection, testing and enforcement procedures to uphold these standards;
2. fund research into the identification and removal of substances in the drinking water which may be harmful to human health and distribute the results of such research to the provincial and territorial authorities responsible for administering water quality legislation;
3. provide user protection by:

- a) requiring immediate public notification of instances of water contamination and ensuring an adequate supply of safe water either by decontamination or the provision of alternate sources; and
- b) requiring the inclusion of safe water provisions in Emergency Planning Canada and promoting emergency planning schemes at other government levels.

2006 Enforcement of the Fisheries Act

RESOLVED, That the Canadian Federation of University Women urge the Government of Canada and the Ministry of Fisheries and Oceans to enforce the Fisheries Act to eliminate the pollution of fish and their habitat in Canada's coastal and inland waters.

2004 Alien Invasive Species

RESOLVED, That the Canadian Federation of University Women urge the Government of Canada:

1. to establish and fully implement measures, policies and funding as recommended by the Canadian Biodiversity Convention Office in their Canadian Biodiversity Strategy to fulfill Canada's commitment to the United Nations Convention of Biological Diversity (1992) with respect to Alien Invasive Species; and
2. to coordinate the related efforts of departments of the federal, provincial, territorial and municipal governments to prevent, control and/or eradicate these species.

RESOLVED, That the Canadian Federation of University Women urge the federal, provincial territorial and municipal governments to expand and promote broader educational programs that would alert the public to the wide variety of dangers posed by alien invasive species and would inform the public of measures that can be taken by individuals to prevent, control and/or eradicate these species.

2001 Canadian Water

RESOLVED, That the Canadian Federation of University Women (CFUW) urge the federal, provincial and territorial governments of Canada to protect our water resources and specifically to declare that water, being a non-renewable natural resource of paramount importance, belongs to the Canadian public and its use must be regulated in the long-term public interest;

RESOLVED, That CFUW urge the federal, provincial and territorial governments to adopt and implement a sustainable and prudent water management policy to respond to long-term regional needs with due regard to the ecosystem and hydrogeological reality; and

RESOLVED, That CFUW urge the federal, provincial and territorial governments to promote conservation and more efficient use of surface water and groundwater at individual, local, provincial, territorial, national and international levels.

2000 Canadian Water

RESOLVED, That the Canadian Federation of University Women urge the Government of Canada and the provincial and territorial governments to take all measures necessary to ensure that large-scale freshwater commercial exports carried out by any means do not take place.

1993 Canadian Water

RESOLVED, That the Canadian Federation of University Women (CFUW) urge the Government of Canada to pass and enforce a Canada Water Preservation Act which will prohibit further diversion of water between drainage basins and which will ensure Canada sovereignty over its domestic water resources; and

RESOLVED, That CFUW urge the Government of Canada to resolve immediately the uncertainty surrounding the water-trade issue through the execution of a separate and binding joint diplomatic agreement, ratified by both the US Congress and the Canadian Parliament, which ensures that nothing in the Canada-US Free Trade Agreement shall apply to Canada's water resource in other than bottled form.

1995 Sustainability

RESOLVED, That national federations and associations (of the International Federation of University Women) should:

1. urge their respective legislative bodies to incorporate the protection of the environment as an overall goal into their basic laws;
2. help raise a general awareness of the necessity of protecting the environment, in particular by expounding the consequences of resource depletion, the degradation of natural systems, the dangers of pollution and the destruction of fragile ecosystems;
3. promote the education of girls and boys of all ages in science, technology and disciplines relating to the natural environment; and
4. encourage governments to promote the development of sustainable and ecologically sound consumption and production patterns including ecologically

safe waste disposal, the re-use and recycling of resources, the reduction of air pollutants, the careful management of energy sources and the use of environmentally sound technologies.

1990 **Preservation of Wetlands**

RESOLVED, That the Canadian Federation of University Women (CFUW) urge the Government of Canada to:

1. establish a standard system of evaluation of wetlands, in co-operation with the provincial and territorial governments in order to identify wetlands which it is agreed are worthy of preservation and statutory protection. (specially significant);
2. increase its support of research on wetlands;
3. increase its efforts to make the Canadian public aware of the vital importance of wetlands; and

RESOLVED, That CFUW urge their provincial and territorial governments to:

1. a) establish a system of evaluation for wetlands consistent with the national system, and to pass legislation to protect and monitor those wetlands which have been identified as specially significant;
b) increase their support of research on wetlands;
c) increase their efforts to make the public aware of the vital importance of wetlands; and to
2. a) be alert to any proposed development in areas where there are wetlands which might be degraded or lost; and
b) urge the relevant planning boards, municipal councils and like authorities at the local level to have evaluations done in order to preserve significant wetlands.

Appendix B

Canadian Federation of University Women ONTARIO COUNCIL

Club Locations

| | | |
|-----------------------|------------------------|--------------------|
| Ajax – Pickering | Kingston | Oshawa & District |
| Aurora - Newmarket | Kitchener - Waterloo | Ottawa |
| Barrie & District | Leaside - East York | Owen Sound & Area |
| Belleville & District | London | Perth |
| Brampton | Markham- Unionville | Peterborough |
| Brantford | Milton & District | Renfrew & District |
| Burlington | Mississauga | Sarnia Lambton |
| Cambridge | Muskoka | Saugeen |
| Chatham -Kent | Nepean | Scarborough |
| Cornwall & District | Niagara Falls | Southport |
| Etobicoke | Norfolk | St. Catharines |
| Georgetown | North Bay | St. Thomas |
| Georgian Triangle | North Toronto | Stratford |
| Grimsby | North York | Sudbury |
| Guelph | Northumberland | Thunder Bay |
| Haliburton Highlands | Oakville | Toronto |
| Hamilton | Orangeville & District | Vaughan |
| Kanata | Orillia | Welland & District |
| Kincardine | Orleans | Windsor |