



August 2, 2012

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Dear Mr. Dextrase:

Re: Conservation Ontario's Comments on "Biodiversity: It's in Our Nature, Ontario Government Plan to Conserve Biodiversity" (EBR# 011-6450)

Thank you for the opportunity for Conservation Ontario (CO) to provide comments on the draft "Biodiversity: It's in Our Nature, Ontario Government Plan to Conserve Biodiversity". Conservation Authorities (CAs) strongly supported the development of the Ontario Biodiversity Strategy 2011 (OBS) and are pleased to have the opportunity to provide feedback on this ambitious implementation plan. These comments are provided with the intention to encourage the government to establish priorities; identify and clarify the roles of key partners and initiatives that can be leveraged for successful implementation; and to encourage the development of new relationships with the provincial health sector.

The proposed integrated approach across ministries in order to assist with implementation of the OBS targets is commendable. It is critical to raise the awareness of policy-makers within related sectors to align their operations with OBS priorities in order to contribute to successful achievement of the OBS targets.

In addition to creating new synergies within government, Conservation Ontario strongly believes the Province has a responsibility to create a similar shared commitment with and across Ontario's conservation sector in order to leverage local expertise, resources and current programs. Many organizations were encouraged to provide input to the development of a common vision and mandate for the OBS in order to make it a more holistic and attainable document. Similarly, the Province should use their plan as an opportunity to engage a broad range of stakeholders in order to identify how these stakeholders can now participate in the implementation of the government's plan.

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Recommendations for Enhancements to the Ontario Government Plan to Conserve Biodiversity

1) Link actions to outcomes and timelines; Set Priorities

- The wide variety of actions suggested in this document will contribute significantly to achieving the overall OBS targets. Physically aligning these actions with the targets, and including timelines and progress report schedules would make it easier to assess and prioritize the numerous actions. Input from all stakeholders should be sought for establishing priorities.

2) Specifically reference or outline ways to leverage local resources, initiatives and partnerships

- Given the current fiscal realities, success in achieving this ambitious implementation plan will rely on the Province's ability to leverage local resources, particularly around stewardship program delivery, landowner and resident relationships, education and awareness building, monitoring, and development of economic instruments.

The Province (in collaboration with stakeholders) should identify specific resources, initiatives and partnerships that would be assets in moving the implementation of this plan forward and what the organizations' roles could entail. For example, through various partnership initiatives today, Conservation Authorities contribute *significantly* to the protection and enhancement of Ontario's biodiversity. Clarification around the future role of Conservation Authorities and other partners within this plan would be helpful in moving forward with these partnerships.

Conservation Authorities and their numerous partners can help achieve objectives

Ontario's 36 Conservation Authorities have significant experience and success in working with a wide variety of other local and provincial partners (private, public, and landowners), to target and deliver effective strategies and programs that enhance and protect Ontario's biodiversity. CAs are committed to continuing their work in this area. As per their mandate, Conservation Authorities ensure the conservation, restoration and responsible management of Ontario's water, land and natural habitats through programs that balance human, environmental and economic needs. Specifically, they:

- plan and deliver programs and initiatives that protect, manage and restore ecological features and functions;
- offer technical expertise in watershed management, watershed stewardship, source water protection planning and natural heritage planning;
- support biodiversity monitoring by collecting local data, conducting analysis, and reporting results;
- plan and implement watershed stewardship programs and projects with landowners;
- deliver outdoor education programs aligned with Ontario's curriculum to 475,000 students annually;
- regularly host a wide variety of local environmental special events such as water festivals;
- own and protect approximately 144,000 hectares and offer 2,000 km of trails;
- facilitate numerous local planning and delivery partnerships among landowners, governments and other agencies;
- develop and implement green infrastructure and low impact development programs and initiatives; and
- Engage in the emerging Green Economy to deliver better returns on natural, human and economic capital investments, using fewer resource inputs.

- 3) Ensure coordinated actions by various watershed stakeholders (including agencies, landowners and others) takes place through an integrated watershed management process**
- An integrated watershed management approach considers how **our activities** impact the natural functions and processes of Ontario’s biodiversity. This is done on a watershed basis, taking into account social, economic and environmental issues; as well as community interests, in order to minimize negative environmental impacts and ensure healthier and more resilient biodiversity and communities. This approach enables us to address multiple issues and stressors across sectors, leveraging existing local watershed initiatives, programs, and partnerships.

This implementation framework could provide guidance to link to watershed plans or strategies where they exist in order to ensure smarter targeting and objective setting.

- 4) Link to and build upon existing legislation and policy directions**
- The Province should specifically reference how they can build upon and enhance current biodiversity initiatives such as the Great Lakes Protection Act and Strategy, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan, Greenbelt, as well as the current and developing Great Lakes Biodiversity Conservation Strategies.

The province should commit to strengthening the level of biodiversity protection through the current review of the Provincial Policy Statement (PPS).

- 5) Advance the human health – biodiversity connection by building relationships and awareness within the provincial health sector**
- Given the target that by 2015, 50 per cent of Ontarians understand biodiversity and its role in maintaining their health and well being, the Ministry of Health should be included as one of the key ministries to help promote and advocate for environmental improvements in order to benefit the health of society. Issues such as climate change, water and air quality, and drought/heat are examples of environmental conditions which directly impact the physical and mental health of Ontarians and similarly, biodiversity within Ontario. The Ministry of Health is an important ally in promoting messaging linking human health to biodiversity issues.

Specific Comments on the Ontario Government Plan to Conserve Biodiversity

#1 Communicate the Relevance of Biodiversity to Society

As per the comments above, Conservation Ontario recommends the use of an integrated watershed management approach to reinforce that individual decisions have an effect on biodiversity in Ontario and abroad.

Conservation Ontario is supportive of a Children’s Outdoor Bill of Rights.

#2 Integrate biodiversity education into all levels and types of curriculum, as appropriate.

Ontario’s 36 CAs play a key role in environmental education and support the government’s intention to integrate biodiversity education into all levels and types of curriculum. CAs are an important partner in the delivery of this action.

#5 Continue to integrate biodiversity into Ontario’s policy and legislative framework.

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Further to the comments above, CO supports the Province's efforts to build upon existing legislation and policy direction to integrate biodiversity. This should include a review of how existing policy and legislation effects biodiversity and the Provincial Policy Statement should be strengthened to incorporate biodiversity concerns.

A review of the Pesticide Act may also be appropriate, to see how and if it should be amended to improve control of invasive plants.

#6 Investigate economic tools that encourage biodiversity conservation.

Conservation Authorities have undertaken a number of studies to attempt to place a value on ecosystem services. It is recommended that the Province look for opportunities to build upon the work that has already been completed and look for partnership opportunities, where appropriate.

Conservation Ontario's Green Economy Project may also provide a good opportunity for the government to collaborate and to promote 'green industries' which support biodiversity conservation.

#7 Support and enhance participation in biodiversity conservation.

It is recommended that a specific reference be made to Conservation Authorities in this section, given their expertise in stewardship activities which support biodiversity conservation.

#9 Take steps to reduce urban sprawl.

Habitat loss is the largest global threat to biodiversity. Urban sprawl is a major driver of habitat loss, but it is not the only component. Infrastructure development, resource extraction, habitat conversion, etc also contribute to the loss of natural areas across the province, and as such, should be included in this action to cover all aspects of habitat loss.

#11 Promote water conservation.

This action should be expanded to include a more serious ecological examination of water conservation tactics that will improve/maintain biodiversity. The creation of water budgets/balances at various scales should be identified as a tool to assess water allocation (e.g. permits to take water), conserve biodiversity (particularly wetlands), and model (and prepare for) climate change impacts.

It is recommended that wherever possible existing, local agencies (such as CAs) should be used as partners for delivering this action.

#12 Reduce the threat posed to biodiversity by invasive species.

It is recommended that this action should also promote partnership with the Ontario Invasive Plant Council.

#14 Expand the system of protected areas and conservation lands.

This action provides a high level overview, but does not contain a commitment to expand the system of protected areas and conservation lands. Publically owned natural spaces not only provide long term protection of significant features and functions, but also provide opportunities for the public to enjoy and learn about the importance of biodiversity, and for researchers to undertake long-term monitoring programs. Continued investment through fee simple ownership of properties (particularly in southern Ontario) is necessary to ensure significant natural heritage areas are protected and maintained.

It is recommended that wherever possible, the government should partner with CAs, municipalities, registered charitable conservation organizations, etc to expand the system of protected areas.

#15 Further integrate biodiversity into land use and resource management planning.

Integration of biodiversity into land use planning will support development and protection of connected natural heritage systems. This can be furthered, in part, by strengthening the recognition and protection of natural heritage systems in the PPS. It is important that the government continue to support the connection of natural heritage systems, particularly at the boundaries of the policy areas (i.e. Greenbelt versus 'Whitebelt').

#16 Promote landscape-level conservation planning.

Many Conservation Authorities and their municipal partners have undertaken detailed Natural Heritage System Reviews. Tools to assist the work of these agencies with landscape-level conservation planning, and endorsement of existing Natural Heritage System Reviews would be a valuable provincial contribution. In addition, the development of Ecoregion scale Natural Heritage Systems would assist with maintaining connectivity across the province, and ensure that areas of regional significance are protected.

#17 Promote and support the development of urban biodiversity and green infrastructure strategies.

As outlined above, CAs have been actively engaged in the development and implementation of green infrastructure and low impact development programs and initiatives. Continued government support of and partnership in the development of these technologies should be encouraged within this plan. As previously mentioned, the government should aim to retain and enhance connectivity amongst natural heritage systems and should not rely on green infrastructure in isolation to retain those connections.

#18 Promote consideration of genetic diversity in policy development and decision-making and #20 Protect species diversity.

The success of conserving genetic diversity (Action #18) and species diversity (Action #20) will be largely dependent on successful landscape level conservation planning (Action #16). Landscape level conservation planning that captures the full range of representative ecosystems across Ontario will ensure that species and genetic diversity is protected. In order to scope the use of limited government resources, it is recommended that activities for protecting genetic and species diversity in Ontario be limited to those which would not be covered under a landscape level approach. In particular, a Genetic Resource Management Strategy may not be necessary to ensure genetic biodiversity is protected in the province. It is recommended that this strategy be scoped to cover only activities that would not be covered through Action #16 (e.g. seed banking, protecting Species at Risk, and rare species from genetic bottlenecks). Scoping activities will ensure that limited resources are directed efficiently in biodiversity protection initiatives.

#21 Develop and implement tools to maintain and enhance ecosystem services.

Additional restoration and rehabilitation activities will be necessary to ensure that biodiversity is protected in Ontario. Restoration of key ecosystems further assists with building resilience in the face of climate change, above and beyond activities addressed in Action #19, as well as "Climate Ready: Ontario's Adaptation Strategy and Action Plan". For example, wetland and stream restoration can help mitigate the impacts of drought and water shortages, as well as the impacts of large storms. As such, this activity would serve to meet multiple provincial goals.

#22 Support science, research and information management to inform biodiversity conservation.

As iterated above, Conservation Ontario supports the setting of priorities for protection and restoration of biodiversity at both the provincial and local scales. This will help the province to further target their actions.

This action could make a specific link to the Natural Heritage Information Centre and support for the promotion of the Ecological Land Classification System as a consistent provincial standard.

#23 Establish a long-term biodiversity monitoring system.

CO recognizes the importance of establishing a long-term biodiversity monitoring system, with a focus on building on existing programs and established protocols. Additional indicators above and beyond existing provincial monitoring programs (e.g. tree health data collected through the Ontario Forest Biomonitoring Network) may be necessary to sufficiently address the state of Ontario's biodiversity. Many CAs undertake long-term ecological monitoring programs which utilize standardized protocols developed by the province as well as other organizations (e.g. Environment Canada's Environmental Monitoring and Assessment Network [EMAN]). The data being collected through these programs could be used to assess the state of Ontario's biodiversity.

An important gap in evaluating ecological trends across the province is the ability to amass and organize existing data which is collected by various organizations. A repository of quality-controlled data would enable province-wide analysis of current monitoring science and would encourage collaboration amongst various stakeholders.

Once again, thank you for the opportunity to provide comment on the province's "Biodiversity: It's in Our Nature, Ontario Government Plan to Conserve Biodiversity". Conservation Ontario applauds the province for recognizing that biodiversity is not a single-Ministry issue and recognizes the positive inter-ministerial cooperation that occurred in the preparation of this response. In order to ameliorate this plan, it is recommended that the government set priorities which link actions to outcomes and timelines; include mechanisms to leverage local resources, initiatives and partnerships; seek to coordinate actions by stakeholders; build upon existing legislation and policy directions; and advance the human health-biodiversity connection.

As described, Conservation Authorities are fulfilling an essential role in monitoring, restoring, managing and educating the public about Ontario's biodiversity. We look forward to continuing to support the province's work in biodiversity conservation.

Should you have any questions about this letter, please contact me at extension 228.

Sincerely,



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