



September 24, 2009

Ms. A. Weselan
Manager (Acting)
Ministry of the Environment
Integrated Environmental Policy Division
Land and Water Policy Branch
Water Policy
135 St. Clair Avenue West
Floor 6
Toronto Ontario
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RE: Proposal Paper: Stewardship - Leadership - Accountability: Safeguarding and Sustaining Ontario's Water Resources for Future Generations (EBR 010-6350)

Dear Ms. Weselan,

Thank you for the opportunity to comment on the Province's "Proposal Paper: Stewardship - Leadership - Accountability: Safeguarding and Sustaining Ontario's Water Resources for Future Generations." Conservation Ontario represents Ontario's 36 Conservation Authorities, created in 1946 by an Act of the Provincial Legislature. Conservation Authorities are mandated to ensure the conservation, restoration and responsible management of Ontario's water, land and natural habitats through programs that balance human, environmental and economic needs. One of the objectives of Conservation Authorities is to ensure that Ontario's rivers, lakes and streams are properly safeguarded, managed and restored. Conservation Authorities are known globally for their stewardship of our rivers, lakes and streams through the development and delivery of watershed-based programs that work with nature to protect, restore and effectively manage Ontario's water resources. In addition to serving the public and Ontario landowners, Conservation Authorities also provide advice and counsel to all levels of government on the responsible management of water.

The following comments are submitted for your consideration based upon a review of the paper by staff from Essex Region Conservation Authority, Grand River Conservation Authority, Toronto and Region Conservation Authority and Conservation Ontario. In the past, ecological requirements have been largely absent or minimized in terms of importance with respect to Ontario's water resources. The Province is to be commended on their efforts to include ecological needs and ecosystem needs within watershed management planning. However the basic and minimum needs of the ecological environment need to be more clearly defined. An explanation of how to define and quantify these in terms of water use, conservation, efficiency and measurement is still needed. Additional studies are required to provide more reliable and thorough information on what values these have. From there, the ecological and ecosystem needs should be a strong consideration with managing Ontario's water resources.

Water Conservation and Efficiency Strategy

The concerns Conservation Ontario submitted in response to the 2007 Great Lakes – St. Lawrence River Basin Draft Regional Water Conservation and Efficiency Objectives (EBR # 010-1447) posting strongly identified the need for an Integrated Watershed Management (IWM) approach which is reiterated here. A multi-pronged integrative approach speaks to water for multiple purposes within the Great Lakes – St. Lawrence Basin including improvement of the waters and water dependent resources, protection of ecological integrity and sustainable water use.

The proposed strategy should include guiding principles and a mission statement to focus the efforts on priority issues and the overall goals of the strategy. While objectives are valuable they have different but equally relevant roles in water management. Targets, that are measurable, achievable and implemented in a logical order, are needed to ensure proper monitoring and reporting occurs and that progress occurs at an acceptable pace. To effectively engage stakeholders in this process targets need to be realistic within the timeframe for implementation.

The efforts of forward thinking water users that have developed and implemented water conservation strategies well in advance of provincial initiatives needs to be recognized and celebrated. Early implementers can not be expected to reduce their impacts even further when percent reduction targets are set across the board. At the same time we need to recognize the successes of our water conservation leaders in the municipal, industrial, commercial, institutional and agricultural sectors that demonstrate that conservation is not a "spectator sport" but a widely accepted business practice that makes sense for all to embrace.

Aggressive targets, that include innovative Best Management Practices (BMPs) such as grey water reuse, should be set to provide early implementers and "spectators" with achievable goals. For example, current plumbing and building codes need to be revisited to prevent disincentives to innovative conservation approaches, like grey water reuse, that are standard practice in other jurisdictions.

- other examples of approaches that could be implemented include:
 - o Any new home built in Ontario, outfitted with water efficient *off the shelf* plumbing and appliances which can achieve 130 L/cap/day (approximately half of the current provincial per capita average).
 - o aim for all toilets in the province to be 6L flush or less by 2020

Water Charges

By eliminating the term "conservation charge" the opportunity to apply "administrative charges" to the development of water conservation strategies has been reduced. The charges are already too low based on what can be included under the administration heading which could have generated minimal revenue for the province to offset the cost of implementing a conservation strategy.

When implementing Phase 2 water charges, applying for a change in the charge rate may become a good motivator for industries or individual companies to become more active in water conservation and water efficiency practices. However, upon applying to change the charge rate, a site-specific assessment must be completed. A standard procedure with specific requirements to conduct the assessment, preferably by an impartial assessor, is crucial when conducting and reviewing applications and assessments to avoid antagonism among the Phase 1 water users.

The best option for charging water users who withdraw from a municipal water system would be to stay consistent with how non-municipal water users are currently being charged (as part of Phase 1). Option #2, which would require industrial and commercial water users to report their annual water-taking volumes to the Ministry, would ensure consistency when administering charges. This approach would spare municipalities the cost of administering the program without the possibility of recovering their own costs. However, as with any permitting process, there must be checks and measures set in place for this option to ensure accurate water volume reporting by commercial and industry water users. This option would drastically simplify the reporting requirements of the municipalities, while still providing updated information required by the Ministry.

- for example
 - o The Ministry's set threshold value of 7.3 million Litres/year requires further explanation as to how this would be the annual threshold value.
 - o Golf courses should be considered 100% consumptive for the volume of water that is applied for turf watering.

Intra-basin Transfers

A process is needed to ensure adequate consultation occurs with both the CA whose watershed the water is being transferred out of and the CA whose watershed the water is being transferred into. Addressing these transfers at a watershed level might require additional consultation with surrounding CAs whose watershed could also be impacted. As well, additional clarification on the application of the exemption criteria for intra-basin transfers is required.

Thank you again for the opportunity to provide comments regarding the proposed paper. If you have any questions regarding these comments please contact me at (905) 895-0716 ext. 226.

Sincerely,

Charley Worte
Source Water Protection Manager

CC: All Conservation Authorities, CAOs/GMs.