



Ontario
Home Builders'
Association



Ducks Unlimited Canada
Conserving Canada's Wetlands



OSSGA
ONTARIO STONE, SAND
& GRAVEL ASSOCIATION



Ontario
Federation of
Agriculture



CANADIAN WIND
ENERGY ASSOCIATION | ASSOCIATION CANADIENNE
DE L'ÉNERGIE ÉOLIENNE

December 8, 2016

The Honourable Kathryn McGarry
Minister of Natural Resources and Forestry
Suite 6630, 6th Floor, Whitney Block
99 Wellesley Street West
Toronto, Ontario
M7A 1W3

Re: Proposed Wetland Conservation Strategy for Ontario – On-going Review

Dear Minister McGarry,

Over the last 12 months, the Ontario Home Builders' Association, Ontario Federation of Agriculture, Ontario Waterpower Association, Ontario Stone, Sand & Gravel Association, Canadian Wind Energy Association, Canadian Solar Industries Association and Ducks Unlimited Canada (Ontario) have met on several occasions to discuss our common interests in advancing wetland conservation in Ontario. Those discussions have resulted in two joint submissions to MPP Eleanor McMahon Minister, at the time the Parliamentary Assistant for the Ministry of Natural Resources and Forestry. We would like to summarize the key points arising from our most recent discussions and the previous joint submissions, for your consideration.

We have put forward four key principles and areas of consensus which we consider to be fundamental to strengthening the current wetland policy framework, namely:

- 1) A statement of general support for conservation of wetlands and the essential ecosystem services they provide.

- 2) The need for higher quality information and mapping to better inform landowners and other stakeholders about the location, value and sustainability of wetlands; and the recognition that not all wetlands are equal.
- 3) Support for the mitigation/compensation hierarchy and consideration for offsetting measures premised on a market-based benefits exchange model (that matches up offset providers with offset seekers), and
- 4) The need for harmonizing different wetland definitions in different pieces of legislation and policy.

We also want to stress how critical it is from our perspectives that a successful wetlands strategy be implemented by a clear, straightforward framework, one that has strong buy-in from impacted stakeholders including industry and affected land owners. We also see a great opportunity to leverage a new wetland framework to advance other key priorities of the provincial government, notably climate adaptation and mitigation, improved biodiversity, and cleaner, reliable water supplies.

In recent discussions, our group reached agreement that, in order to be make real gains, Ontario needs a single, overarching wetland policy like other Canadian jurisdictions have adopted. The rationale is clear: while we have 20+ wetland-related policies and legislation intended to protect wetlands, they're not working...we're still losing wetlands and seeing wetland degradation. And, in some cases, those policies even work at cross purposes. Given the considerable variation in landscapes across Ontario, implementation of a single overarching policy would require flexibility in its application. In addition to stronger protection to high-value wetlands, such a policy would also need to include the mitigation hierarchy and offsetting – in the form of wetland restoration – where impacts are unavoidable. We believe this type of approach will support a sustainable economy as well as a healthy environment.

We are pleased to see that the draft MNRF wetland strategy released in August is consistent with the aforementioned four key principles. However, owing to the critical importance of the mitigation hierarchy in preventing the net loss of wetlands, we recommend that the final wetland strategy be revised to include a clear commitment to incorporate the mitigation hierarchy into appropriate provincial policy.

Lastly, there is a strong consensus in our group that substantially more investment and resources are necessary in order to stop the net loss of wetlands, and effectively implement new/amended policies. One specific area requiring more resources is improved wetland mapping (one of three actions in the strategy prioritized above all others), including ground-truthing where applicable.

The expertise garnered by our collective industrial and conservation practices, navigating the labyrinth of regulations, legislation and agencies that govern wetlands on a daily basis, provides the Ontario government with a unique opportunity to draw on our knowledge and our commitment to supporting a strong wetland policy for the province. As such, we welcome the opportunity to work with your government to help design and implement a cohesive province wide wetland policy that sets clear objectives and streamlines the path to success. This approach will help provide industry the certainty it needs to invest further in jobs and growth, while ensuring that wetlands and associated habitats are afforded the most appropriate protection and resources they deserve.

We are committed to playing an active role in the on-going review, development and implementation of improved wetland policies and the broader wetland strategy. We would appreciate the opportunity to discuss these recommendations and comments further with you and your officials.

Sincerely,



Joe Vaccaro
CEO
Ontario Home Builders' Association



Lynette Mader
Manager of Provincial Operations
Ducks Unlimited Canada – Ontario



John Gorman
President
CanSIA



Ashlee Zelek
Manager, Environment & Education
Ontario Stone, Sand &
Gravel Association



Paul Norris
President
Ontario Waterpower Association



Brandy Giannetta
Ontario Regional
Director,
Canadian Wind Energy
Association (CanWEA)



Keith Currie
President
Ontario Federation of Agriculture

c. Jason Travers, Director, Natural Resource Conservation Policy Branch, MNRF
c. Ala Boyd, Manager, Natural Heritage Section, MNRF