
**COMMENTS ON DISCUSSION PAPER
HEALTHY GREAT LAKES, STRONG ONTARIO**

**PRESENTED TO THE
MINISTRY OF THE ENVIRONMENT, INTEGRATED ENVIRONMENTAL
PLANNING DIVISION, LAND AND WATER POLICY BRANCH
GREAT LAKES OFFICE**

**DURING PUBLIC CONSULTATIONS ON
DISCUSSION PAPER'S FIVE GOALS AND NINE PROPOSED STRATEGIES**

**BY
NATURE QUÉBEC**

May 15th, 2009



INTRODUCTION

Nature Quebec is very pleased and supportive of the Ministry of Environment of Ontario's approach, to have begun in a most transparent and pro-active way, the process of preparing the renewal of the next Canada-Ontario Agreement (COA) with its "Discussion Paper on the five proposed Goals and nine Strategies. Nature Quebec thanks you for this opportunity to try and help in preserving and developing "jointly" in a sustainable manner our Great Lakes and St-Lawrence river. We appreciate the approach taken by the Ministry of the Environment of Ontario (MOE) to consult the Ontario population and furthermore, allow equal opportunity to a wider audience outside of Ontario, allowing many "Interested Parties", to read and also comment the proposal. We wish to mention that Nature Quebec isn't a "specialist" of the previous Great Lakes Plans or Canada-Ontario Agreements, but over the past few years, we have come to follow along and participate in the capacity that we could on common issues with fellow NGOs, stakeholders, governments and agencies. Nature Quebec is however, much familiar of Federal-Provincial St-Lawrence Plans in Quebec since their beginning in early 1990 and we have come to keep our hope that both "sister plans" would some day merge in terms of addressing a core of similar goals and objectives amongst other more specific regional priorities.

In our view, this 59 day period chosen during april and may is a very good timeframe to allow maximum participation and time for all interested parties and general population to understand the content of the proposal and to express ideas on the proposed goals and strategies.

This approach is a clear signal to us that MOE has a modern and integrative vision that could, if matched by neighbouring governments and support by interested parties (ie: Quebec's MDDEP and SAIQ, Environment Canada-Quebec region, NY state, etc), really push our next Great Lakes and St-Lawrence river Plans towards a new bold step with a comprehensive management mind set and from there, a complementary approach to problem solving aiming ultimately towards our Sustainable Development.

Nature Quebec has been involved on the St-Lawrence river since the late 1980's and up in the Great Lakes since 1996. Over the years with first our ad hoc visits and then our gradual involvement on trans-boundary water issues, we (our members) have come to realize how close and important, the relationship between what was happening in the Great Lakes region was to our daily reality here at home, on the "lower" St-Lawrence river. In Quebec, we are used to the terms "Laurentian Basin" to describe lake Nipigon, the Great Lakes, the St-Lawrence river, its Gulf right to the Atlantic ocean. For the purpose of our work upstream, we use the terminology "Great Lakes and St-Lawrence river Basin (GLSLB)" because people have a better sense of belonging and stewardship towards it.

We would like to add that we (Nature Quebec), are very proactive in our work on the GLSLB, in promoting the ecosystemic approach in the management of the Great Lakes and St-Lawrence river basin. We strive for a permanent overall vision of the Basin, that will allow Governments at all

levels in all jurisdictions, to better understand the many natural processes including those deep inside the tributaries that are the life source of the Great Lakes and St-Lawrence river. At Nature Quebec, we feel that in this way, Governments would address urgent needs with support from local organisations, to develop prevention measures, restoration projects and protection initiatives, that would last by complementing larger “action plans” at lake wide level. Furthermore, it would enhance the way historical uses of these waters by us, have been managed and their impacts foreseen and acted upon. Granted, that requires much more comprehensive cooperation between Parties, but this document and it’s openness, like we said, is a serious step in the right direction.

GENERAL COMMENTS :

Comment no 1 :

Nature Quebec would like to make one general comment on the Goals and Priorities, in that the St-Lawrence river should be identified at all times right next to the terms Great Lakes. This important gesture will go a long way helping people to identify themselves with these important issues.

Comment no 2 :

Nature Quebec is hoping that Lake-based and watershed-based collaborations on the Great Lakes, should be expanded soonest to gradually tie with (in our case) their Quebec counterparts. Quebec has now 40 formally created watersheds committees. The watershed organizations located on the eastern end of Ontario, should meet and work closely with their counterparts on the western end of Quebec, ideally all the way to lac St-Pierre (Trois-Rivières) where the Great Lakes influence ends. If need be, Nature Quebec is willing to assist or facilitate making the bridge between the Ontario watershed basin organisations and their Quebec counterparts. This action should from the start, involve both provincial environmental departments, to ensure they are in agreement with the process, information exchanges, potential projects ideas to develop, joint monitoring for example on water quality, pesticides and fertilizers uses, contaminated sediments, récréo-tourism activities, educational activities, share studies reports on impacts and adapting to climate changes, share the efforts of climate change adaptation, evaluate, compare mitigation measures, etc.

Comment no 3 :

Quebec and Ontario must work closer in being successful at keeping the ecosystem away (like you say) from any “tipping point” of ill health and ensuring that the resilience of critical portions of the ecosystem isn’t compromised because one side took one action while the other didn’t do the right complementary action that would have either minimized the impacts of a given common issue (ie: aquatic invasive species, etc), slow down/better control the negative impacts and/or at

best solved it. Like the document mentions, “stressors and threats are combining and are exacerbated by climate changes”. We know how past hot summers (with heat waves) have caused inconvenience for older people and also children. We should not wait to see similar difficult periods arise more frequently with potentially serious cumulative impacts when we are already aware the climate is going warmer and not the opposite. There are efforts and large costs to be made by all parties now to prevent the worse and do the right thing. For sure these efforts and costs are less than what we will have to assume if we fail to act now in various prevention efforts rather than later in reaction.

Comment no 4 :

Yes the Great Lakes are vulnerable to climate changes, but so is the St-Lawrence river and in particular the lower St-Lawrence (between Cornwall and Trois-Rivières). On the river, people do not benefit from a predictable clean static water level that fluctuates “slowly” even with climate change impacts. Instead users on the lower river, must make do with unpredictable water levels that can fluctuate (high or low) rapidly in terms of “feets”. One must also be aware the “lower” St-Lawrence river water quality deteriorates when for example, at low water levels, toxic sediments (often, natural toxic sediments, not only industrial or municipal contaminants) can be exposed and allowed to be put back in suspension with the wave actions, turbulences, etc. During these difficult times of low water levels on the St-Lawrence river, one can expect an identical situation on the tributaries which carry then, a heavy agricultural load into the St-Lawrence impacting severely its already diminished water quality . Quebec and Ontario and all Great Lakes jurisdictions, must develop cooperative tools/mechanisms/agreements on different fronts, to allowing them to work together with local organisations to push as far back as possible, permanent losses that will likely arise otherwise.

ANSWERS TO THE SPECIFIC QUESTIONS :

Q1 : “To what extent do these Goals and Strategies deal with the stresses and threats that your Great Lakes-St-Lawrence river community faces, as well as the benefits that you want to protect”:

Answer 1A :

Other than “influence the Bi-national agenda” these Goals and Priorities are very close to ideas folks here in Quebec think of right a way, about the protection of the future of the St-Lawrence river... and of the Great Lakes. The main reason that “influencing the Bi-national agenda” isn’t on many people’s radar, is simply because of lack of information. People do not know or make the immediate connections between the roles of all the jurisdictions involved upstream on the Great Lakes. Unfortunately, a too many people do not even realize the Great Lakes even exists, let alone numerous upstream levels of governments managing the St-Lawrence waters. We feel this situation does also prevail upstream regarding the role of the St-Lawrence river as an integral part of this vast ecosystem.

Q2 : “Are there other goals for the Great Lakes-St-Lawrence river that you would like to see”:

Answer 2A :

Nature Quebec feels that the “bi-national” nature of the Great Lakes and portion of the St-Lawrence river, commands that the “bi-national agenda” in the Priorities, should in fact be moved within the Goals. It is true that the bi-national aspect belongs that much more to the Federal government of both countries; however, what happens on the “ground” and very much “on” and “in”, the waters of the Great Lakes, their shoreline, on the bottom of the lakes, is a basic primary responsibility of the province (s) and Great Lakes States and even further down to the cities and municipalities. By upgrading the” bi-national agenda” from a Priority to a Goal, the COA Partners, would in our view, trigger a message of a modern vision that will change the way we think on the management of theses waters. The vision changes and then so do the perspectives and means to take a better handle on relevant issues

Answer 2B :

“Strong communities” should really be also specific about the St-Lawrence river communities and their stewardship of the river... and the Great Lakes. There should be a fresh signal here that Ontario wants/intends to develop a vision with Quebec to work together on the river and build an ecosystemic approach with a capacity to identify, understand and respond efficiently to common issues with stakeholders, ZIPs and RAPs, First Nations, municipalities and communities. No more ecological frontier between Ontario and Quebec (and New York) on the St-Lawrence river. Nature Quebec feels strongly that together, we can really make better lasting progress on common issues.

Answer 2C :

“Governance and Accountability” should be a Goal of the next COA (and St-Lawrence Plan) because the relative image perceived by the public has eroded much over the years. These two issues seem to be at the heart of many problems on the Great Lakes and St-Lawrence river. Too many jurisdictions involved in the management aspect and on many given issues and no clear responsible party to look towards to get answers. Nature Quebec feels it is because the responsible authorities acting on the Great Lakes are too numerous, possibly too far from “Ground level” allowing at times, duplication to take place or no action to take place. Some actual federal responsibilities should be partnered even more with the Province and Great Lakes States, along with the powers and financial capacities that are required for having people closest to the activities, impacts and local population, clearly responsible for attaining anticipated results. The aquatic invasive species is an example of this.

“Complexity” is an euphemism in the Great Lakes and St-Lawrence river Region. Again, Nature Quebec isn’t saying Ontario is the sole responsible actor or that it should solve all the problems on it’s own and quickly. What we hope for by having “Governance and Accountability” as a Goal, is a new signal that will pave the way towards greater transparency, better general understanding by the stakeholders and the general population of who is responsible for what. Granted, in the Great Lakes and upper St-Lawrence river, the U.S. and the States have their share of responsibilities and the work, but what would it really take for all Parties to dust-off old procedures and way of working in the region to upgrade to a noticeable extent the “Governance and Accountability”, piece of all involved. Ontario might be the right “promoter” to send a strong signal aiming at doing just that with possibly lower costs for greater performance, better lasting results and population support all across.

Q3 : “What other strategies should be identified for action to protect the Great Lakes and St-Lawrence river” :

Answer 3A :

Wherever the word Great Lakes is mentioned in the Strategies, it should be added “and St-Lawrence river”. This is in our view, a very unfortunate ever single lasting bad “habit” that we wish would be corrected yesterday. For some unknown reason to us, ALL authorities be it from governments, universities, cities, elected officials, citizens, etc etc consistently use this wrong “Great Lakes” motto instead of “Great Lakes and St-Lawrence river” as the way of always describing the Great Lakes to the detriment or exclusion of it’s “outlet/outflow” namely the St-Lawrence river, as if it had no existence whatsoever. To us this is an absolute non-sense. This way of speaking of or describing the Great Lakes without their single “outlet/outflow” namely the “St-Lawrence river” has served well but one single purpose which is to alienate from people’s mind, their integrated co-existence and shared future for ever. Nature Quebec would certainly expect the Ontario government to respectfully be pro-active in ensuring this is corrected at least within

it's own direct field of influence and be a strong defender of the clear and special place the St-Lawrence river holds for the entire Great Lakes and St-Lawrence region.

Answer 3B :

Under “Enhance lake-based and watershed-based planning and action” should also be mentioned, “Grounwatershed” planning and action.

Answer 3C :

Nature Quebec feels that “Water regulations” should be a Strategy of the next COA. As you know, the waters of lake Ontario and St-Lawrence river, that of the lake Superior and any “future” water regulation on the Great Lakes and St-Lawrence river waters, are and will be managed by the International Joint Commission (IJC). That being said, both Ontario and Quebec should aim at having a modernized vision on how these waters should be regulated. The point being that (respectfully said) the IJC has no real jurisdiction over both Provinces but their decisions on water regulation (largely thru the International Board of Control which role might change or regress some day) can have major consequences for the cities, municipalities and citizens living on the shores of these waters in both Provinces. Nature Quebec feels that over the past fifty years of regulation for the lake Ontario and St-Lawrence river, much has changed if only to mention the population's desire to be involved consistently on he decision making process on issues that affect their daily lives. Just on this very point, the IJC hasn't develop a permanent capacity to allow it to happen in a durable fashion. We know Plan 1958D with deviations, we are aware of the previous attempts over the past fifty years, to change the Orders of Approvals and regulation Plan, we know “vaguely” what is in the works over the coming year to come out with a new regulation plan. But what is also needed more so now, is a permanent multi-stakeholder advisory panel which will have the capacity, mandate and financial support needed to allow it to advise the Authorities how to balance the burden of adaptation to climate change for the entire region concerned (lake Ontario to Quebec city) allowing each activity sector, cities and municipalities, the environment, etc, to do what is required of them in the respect of their counterparts.

Even if it is a responsibility of the IJC to regulate these waters, the Ontario government thru possibly the next COA, should ensure that the right jurisdiction who has the legal responsibilities towards it's electorate, has a much direct role into what has historically and understandably be under the auspice of the IJC. This isn't to say the IJC cannot do what it is mandated to do, it is to say that there are limits to what an “independent non-elected body” like the IC can do in a provincial jurisdiction. If this situation is left unchecked for the coming years, we anticipate major problems will arise especially in cities and municipalities, navigational waters, etc because “grey areas of responsibility” will allow important reflections and measures that should have been thought thru and done, were left to “others” to do. Nature Quebec is willing to discuss this more if needed.

Answer 3D :

Nature Quebec feels that Great Lakes and St-Lawrence river “water Security” should possibly be added as a Strategy. This isn’t to say that the province must develop an “army” to protect or combat potential security threats. It is likely that the provinces and the federal government are doing things related to water security. Rather, Ontario (and Quebec) should put on it’s population’s radar, that it intends to “gradually” instigate a “joint water security” agenda in the province’s toolbox. The time is right to do so as we have the time to think at what could be the potential water threats in the coming decades that could cripple local economies, endanger the health of our citizens, weaken firefighting capacity, threaten the safe commerce of goods, water quality, etc etc. This new Strategy must not be a “secret one” but rather a transparent “light” activity/effort at while the work is being done, people will develop a capacity at seeing or noticing water situations that they will want to report and see corrected. This is an activity that ties in with adapting to climate change. When water will become rare, we as a society, especially in large cities, will become very vulnerable to quantity, quality issues, infrastructures, weak points in the water sources, collection and distribution systems. The best way to ease our way in these situations, is to have the knowledge, culture of conservation and fair share and plans that cover those angles with an educated population in support of the Strategy in place.

Q4 : “Do you see the role of Government, local and Aboriginal communities, business, environmental organizations, changing with these strategies” :

Answer 4A :

Yes we do to some extent; in some aspects as mentioned previously in question 3. In regards to the Canadian Federal government, people are more and more aware of the “de-regulation/smart regulation” efforts taking place within the jurisdiction of the Federal government in Canada. This started many years ago and keeps on going as we speak. One of the main problem is that the power and money do not flow “down” where some of the most important activities are sometimes picked up for example, by the provincial governments or cities and municipalities or in many instances, NGOs. In COA, the Governments should ensure that with these “Goals and Priorities”, important stakeholders like cities and municipalities, are being supported adequately in order to follow up thru their “eventual part” of the next COA. Nature Quebec feels that it is way too much for government employees, to on top of doing their own “job”, having to in addition, accomplish COA requirements without additional funding and sufficient manpower resource. Likewise for NGOs with strong capacities to clean up the Great Lakes and St-Lawrence river hot spots; as an example, RAPs and LaMPs, ZIPs, should have sufficient support to achieve modern goals, interactions, with specific responsibilities, within a given timeframe that can only be accomplished with adequate funding and technical support.

Answer 4B :

These “Goals and Priorities” command a much stronger formal interaction/collaboration between Ontario and Quebec, New York and the First Nations. Jurisdictions must learn to collaborate much more in the future in light for example, of the coming climate change impacts. Nature Quebec cannot envision Ontario and Quebec working separately and getting maximum results on adapting to climate changes and preventing cumulative impacts.

Answer 4C :

One of the main changes that has to happen with this next COA (and hopefully St-Lawrence Plan) is to curtail to a maximum duplication and the “silo work culture” that still exists in many key departments/jurisdictions. Complex and multi-jurisdictional challenges the Great Lakes and St-Lawrence river face today and in the future if only to protect the gains achieved over the years and make progress on the Strategies. Having a holistic view is key to better management and educated decision making and command that all levels and jurisdictions collaborate and work closely together. To achieve this, we urge COA to get the collaborative tools/mechanisms required in place. Nature Quebec is willing to assist in this goal, to the capacity that it can.

Q5 : “How could the province best act on delivering these proposed strategies with it’s stakeholders and others, including Aboriginal communities (for example, education and outreach, voluntary measures by industry, municipal/provincial/business/other, and agricultural stewardship programs, etc)” :

Answer 5A :

We would like to mention here, that the way the St-Lawrence Plan as worked in Quebec, with the equal participation of the federal and provincial government, co-chairing and using different “working groups” like one for “Agricultural”, “Industries”, “Navigation”, “Climate change” etc, (comparing with the proposed Strategies) that call on the presence and participation in each group, of specialists from relevant governmental agencies, representatives from many activity sectors concerned and a number of environmental NGO or others, to act towards the priorities together, has proven to be a pretty good way to deliver on “strategies here”. These working groups must however be supported for coordination, etc. You probably already know all this. One element Nature Quebec feels would be important, is that a place should be made for upstream stakeholders and governments to play a role.

Answer 5B :

On the bi-national agenda priority, possibly, Ontario could invite participants from Quebec and New York to be involved and contribute in reaching genuine workable avenues of collaboration.

Q6 : “In your view, are some Strategies more important in achieving a healthier Great Lakes-St-Lawrence river ecosystem than others and, if so, which ones and why. What do you see as the Strategies for your Great Lakes-St-Lawrence river community and the whole Great Lakes-St-Lawrence ecosystem” :

Answer 6A :

Nature Quebec believes that all nine Strategies are very relevant and yes, we feel some are more important in achieving a healthier ecosystem, without compromising the full relevance of the other Priorities. To us, “Adapt to climate change” is THE no 1 Strategy : At Nature Quebec we feel that the “permanent” and gradual loss of the ice cover on the Great Lakes is a sufficient warning signal that the waters levels and the water quality will be greatly affected in the short term by the severe evaporation or warmer trend of climate, whether it is a climate change or a normal climate trend. The more we wait to do now what we know is needed to prepare ourselves, for example, prepare cities to adapt to climate changes impacts, the more complex and costly and difficult it will be to finally do so later down the road. Our No 2. Strategy is : “Priority lake-based and watershed planning and action”, because it represents a recognised workable approach that gives lasting positive results with the participation of a maximum stakeholders involvement across the Basin with a lot of popular support. Our No 3 Strategy is : “Protect human and ecosystem health from toxics and pathogens”, because it addresses a genuine population concern requiring action rapidly to at least manage if not eliminate foreseeable risks; it also helps us better prepare on tougher risks and make authorities sensitive to population needs.

Our No 4. Strategy is : “Understand and deal with ecosystem change”; although a lot of work is accomplished in this field, there are a lot of remaining information available now, scientific evidence regarding how the ecosystem is changing sometimes at local or regional level and also how fast it is happening in many farther away areas, for which science has proven evidence. What is missing is our attention and decisive action thru amongst other things, financial support by governments, application of the law, support for the science community new research, etc. to get the work done. Our No 5. Strategy is : “Clean up the Great Lakes and St-Lawrence river hot spots and the legacy of past pollution”, we know where the hot spots are, what is needed is money and engagement from governments to respond in an acceptable and transparent manner. Our No 6. Strategy is : “Restore Great Lakes and St-Lawrence river habitats and protect biodiversity”. An ongoing challenge that must be pursued if we are serious about the survival of the Great Lakes and St-Lawrence river species and in many instances, their economic benefit to society thru many family activities.

Nature Quebec feels that the following Strategies can be developed at the same time as the others are addressed : Strategy No 7. : “Develop sustainable Great Lakes and St-Lawrence economic opportunities”; Strategy No 8. : “Influence the bi-national agenda”; Strategy No 9. : “Increase appreciation and stewardship of the Great Lakes and St-Lawrence river”.

Answer 6B :

Nature Quebec would like to submit under this no 6 question, that in view of the importance and future potential environmental impacts historical stakeholders the likes of “Commercial navigation” might have on the entire Great Lakes and St-Lawrence river ecosystem, that they get a much closer attention from Ontario and Quebec governments (and from the eight Great Lakes states) thru possibly a Strategy specifically dedicated to them. After the many years that we, at Nature Quebec have been involved across the Basin and from what we have been able to understand of the way the commercial navigation industry is routinely or “repeatedly” acting regarding the elaboration of futuristic avenues to ensure their sustainability, we see a definitive disconnect between their reality and that of the rest of society. In our opinion, this disconnect is also the result of blind or wishful support from federal departments, including agencies, departments, etc. The harm we anticipate will impact the Great Lakes waters to some extent, but it will surely seal the faith of the “lower St-Lawrence river” between Cornwall and Trois-Rivières.

In short, studies to evaluate scenarios to ensure their sustainability over the next fifty years, did not involve the public to any credible extent. The industry only swears by “BIGGER IS BETTER” in term of ship size and lock size like for the Poe lock on lake Superior. For the lower St-Lawrence river, what is at stake is the actual failure to get a true public involvement on the vision of what we, as a society, wish for the St-Lawrence to look like in fifty years time. Do we want short sea shipping to develop, do we want a transfer station on the river to download cargo from ships from Europe onto lakers, do we want to stop dredging the river to allow bigger ships to get to Montreal port, do we want to gradually stop the maintenance dredging on the river to let water out of the navigation channel for other users near shore during the coming long lasting low water level periods. So far, the maritime industry is really doing its homework and the rest of us (society) are not even aware of what is at stake. They are doing what they should be doing, on many front, just look at the Green marine initiative, the Continental gateway in the making to “match” the Pacific and Atlantic Gateway. But in these legitimate work, instead of wanting to use “softpath approach” to mitigate their footprint right across the board, they are thinking of using underwater “heavy duty” works and possibly dams across the St-Lawrence river to artificially raise the level of water to allow their fleet including the Post panamax size ships, to keep coming thru the river to Montreal.

Like we said earlier, it does concern a bit more the lower St-Lawrence river, but in our opinion, it is a clear example of an inter-jurisdictional issue that is way too much under the federal spell, but for which Ontario and Quebec should be really collaborating along with an array of interested Parties because, the impacts are very much at the hearth other much “ground level” activities like wetlands, spawning areas, habitats, fishing, recreo-tourism, water intakes, erosion, risks increase for oil spills, etc etc. Should there be a prioritization of the uses we do of the waters of the Great Lakes and St-Lawrence river? How else could we prevent the waters from receding within the navigation channel during low water level periods and keep enough water to sustain life and other important economic activities like Recreational boating in the floodplain and at marina entrances, etc... Anyhow, food for thoughts... Both provinces have the legitimate right to ensure

activities like commercial navigation, evolve in a manner such that it will be viable and will allow other activities to also flourish during hard times in terms of low water levels. Ensuring the efforts in the making, aiming at fairness to all users, are well explained to the general public and interested parties and ensures a place of choice for their involvement in the decisional process, as this will ultimately affect their lives and livelihood.

We would conclude on this point by mentioning that the St-Lawrence Plan since 1998, has what is called a “Commercial navigation committee” that regroups many different stakeholders from maritime industry to environmental groups like Nature Quebec, etc etc. This committee is in our view, a good mechanism to begin discussions and work on these long term common issues. But we would all gain much if it had the potential to add a few key upstream Ontario representatives and stakeholders to get their input. So, maybe the next COA could set-up a “Navigation committee” as a “workgroup” or Strategy” with a capacity to invite downstream stakeholders to be participants. In any case, both Quebec and Ontario should be interacting on these two.

Q7 : “Are there some Strategies that in your view should be deferred, modified or emphasized at this time given the current state of the economy in Ontario and, if so, which ones” :

Answer 7A :

This is a very difficult question to answer as each Strategy has a definite need, priority and purpose in the puzzle of having a lasting healthy Great Lakes and St-Lawrence river ecosystem. In our view, we would prefer that all nine Priorities be implemented soonest. But in having to suggest a choice to assist, “Increase appreciation and stewardship of the Great Lakes and St-Lawrence river” must be given a level of priority more important than never before. It is a known fact that of the 40 million people around the Great Lakes and St-Lawrence river, a very very small minority are aware of the basic information regarding the life functions of the Great Lakes and St-Lawrence river. This lack of knowledge must be checked to ensure that the next generation is much more aware of the myth of water abundance in the entire Region. That the Great lakes waters are only regenerating by a mere 1% annually.

Q8 : “What do you think is the top proposed Strategy for the Great Lakes-St-Lawrence river and why” :

Answer 8A :

In our view, “Adapt to climate change” is the No 1 Strategy”. It is becoming more and more evident on the numerous Great Lakes/St-Lawrence river issues that Nature Quebec is involved in, that the adaptation to climate changes is a major concern to everyone and a challenge in the mid-term for activity sectors, scientific community and all governments. In regards to the St-Lawrence river and especially the “lower” St-Lawrence river, the cumulative impacts of climate change, are

a major concern to the stakeholders. We feel that there are so many priorities to tackle regarding the very upfront and major impacts that are anticipated to hurt or change the Great Lakes that minor ones will be missed or deferred for lack of adequate funding, lack of agreement between parties or oversight because of insufficient knowledge. For us on the St-Lawrence river, these small impacts if allowed to add-on for some length of time, could by interaction or domino effect, trigger major unforeseen impacts on the water quality and/or quantity and/or availability at time of great needs by the population. We hope that COA involved parties take good notice of what the GIECC is saying we can likely expect in terms of impacts in the next foreseeable decades within the Great Lakes and St-Lawrence river System. Along with their listing of impacts, the GIECC is also enumerating a great list of “recommendations” as to how we could best prepare to face these challenges. Just in terms of what the cities and municipalities should be doing, is tremendous and will require leadership and follow-up from the Ontario (Quebec government in Quebec) government in the short, medium and long term. If we can get these actors prepared we will have done a lot to “adapt”. There are all the others who will be greatly affected, not the least, agricultural community. The energy sector, the industrial sector who all need the Great Lakes and St-Lawrence river waters. Mitigation is also an important component of adapting to climate changes.

Q9 : “Is there any Strategy that in your view might make matters worse for either the environment or the economy or both” :

Answer 9A :

Please, none. But we would add, that too partial an implementation on any of these Priorities, is likely not to help to the degree needed to steer away from any tipping points facing the Great Lakes and St-Lawrence river.

Q10 : “What factors in your view are outside the control of the province in protecting the Great Lakes and St-Lawrence river from harm. Does the proposed list of Strategies reflects these factors” :

Answer 10A :

In Nature Quebec’s view, there are no possible factors that could be outside of the control of the province in protecting the Great Lakes and St-Lawrence river from harm (harm to us is a serious threat or impact). What this means, is that if there is evidence of harm to the Great Lakes and St-Lawrence river, it is the duty of any jurisdiction to do “DUE DILIGENCE” and act in a reasonable way to prevent/correct/stop a “harmful” situation.

That being said, Nature Quebec feels very strongly, that what is happening in the (other jurisdiction) neighbouring province of Quebec and/or the State of New York is largely or very

much outside the control of Ontario. We feel this factor isn't reflected in the actual nine Strategies.

Does this mean that Ontario should satisfy itself with this situation and think only of its own home challenges and pursue the course? : We certainly hope not.

Nature Quebec proposes that Ontario be a strong advocate in ensuring and taking the first steps that on common issues/activities regarding this shared precious Great Lakes and St-Lawrence river ecosystem, all three jurisdictions and interested Parties, be sitting around a table to develop a joint, complementary action plans that will minimize investments and ensure maximum returns for the Great Lakes and St-Lawrence river ecosystem, components and users. It is possible, it requires vision and leadership and tenacity. Nature Quebec is willing to assist in the capacity that it can. We at the same time, feel that Ontario and Quebec are already collaborating on many issues, like the Agreement on the Basin water resources. Possibly, Quebec is also collaborating some on the Great Lakes Regional Collaboration and other initiatives involving the Great Lakes. The point that Nature Quebec wants to make is that we must be present and contribute everywhere we can because we have a great capacity to contribute once we know the facts and develop the relationships; but all this takes years of efforts to build. The diplomatic participation is necessary for sure, but participation at many lower levels is a definite must also to get things done.

Q 11 : “Recognizing that lake ecosystems take a long time to change, what do you suggest should be the first focus for action to ensure that Ontario is on a path of success in managing the Great Lakes and St-Lawrence river for the benefit of all and for future generations” :

Answer 11A :

The focus has to be at the local, regional level, where small ecosystemic changes occur first and can be detected much sooner at that level than at a larger scale. This is why, in our understanding of the Strategy regarding “Enhance lake-based and watershed (and groundwater-based)-based planning and action”, this is a key components that will support action at the local level on small lakes and tributaries and groundwatersheds that feed into the Great Lakes and are their life source. Already communities know what is happening in their watershed and are expecting concrete action to mitigate and/or adapt to some of the small changes before they cumulate and become unmanageable and affect adversely the Great Lakes and St-Lawrence river. These kind of actions should be taken using also, the watershed committees in Ontario in collaboration with their Quebec “watershed counterparts” thru the ROBVQ (Réseau des Organismes de Bassins Versants du Québec). Also, the RAP's should work closely with the ZIP committees on the lower St-Lawrence river. In any case, the next 2010-2015 COA, St-Lawrence Plan and the soon coming “St-Lawrence Integrated Management Plan” from the Quebec government, should all collaborate in coordinating these interrelations towards common or complementary goals and objectives, accountability process and reporting mechanisms.

Q 12 : “Who, in your view, must be involved in short-term and long-term strategy setting for managing the health of the Great Lakes-St-Lawrence river. What should their role be” :

Answer 12A :

Nature Quebec feels very strongly that the province of Quebec has a lot to gain by collaborating with upstream authorities largely because we are so tremendously dependant from the decisions that are made or that will occur in the years ahead upstream from us, regarding the waters of the Great Lakes and upper St-Lawrence river. Likewise, these decisions also have impacts on the St-Lawrence’s environment/biodiversity and ultimately on our economy by their influence on the numerous water users. We also feel that the Great Lakes region has a lot to benefit from what Quebec does downstream regarding the waters of the Great Lakes in that their perpetual “investments” in time, resources and efforts are recognized and pursued by the downstream jurisdictions for future generations. Sharing, preserving and developing in a sustainable manner the downstream water resources represents a genuine engagement from all jurisdictions, to move goods across the world right into the hearth of the continental United States, passing thru Quebec, Ontario, the New York state and the Great Lakes states. We would also stress that this movement of goods using the St-Lawrence river, passes thru one major sensitive area, the Lac Saint-Pierre, a UNESCO Biosphere and RAMSAR site within the zone of influence of the Great Lakes on the St-Lawrence river.

Speaking on adapting to climate changes for the Great Lakes and St-Lawrence ecosystem, this is a perfect example if Quebec and Ontario could get to tune their thoughts, decision making processes and actions in a comprehensive way, both partners could gain more so on the long term on sustaining water uses, quality of environment, energy production and on the economy side as well. Having listened to a GICC representative speak on climate change impacts on the Great Lakes and St-Lawrence river System, one can understand that the jurisdictions will have complex, controversial water appointments to make in the future. There will be changes in water distribution, timings, quality and magnitude of impacts. The management of our water resources will be much more challenging and water quality goals will be more difficult to reach. We know now that the entire region is/will be vulnerable to temperature extremes, like more intense precipitations and winter rain and floods. In cities, taste and odour problems will be more frequent. Our scientific experts tell that past climate data is no longer relevant to define the future. Quebec and Ontario would gain by collaborating very closely if only to mainstream climate impacts information into a “bi-lateral” decision making processes allowing to plan adaptation/preparedness in a more informed manner, exploring risks and vulnerability and hedge against potential impacts, managing and planning in building the resilience of the Great Lakes and St-Lawrence river ecosystem instead of weakening it by acting independently.

When the federal government is present, Nature Quebec feels that we must protect jurisdictional “powers” whether it is regarding Ontario or Quebec or any other provinces in Canada. In that sense, as an example, we are involved in a relatively new initiative or group called “FLOW Group” (Forum for Leadership On Water). In this group, while we seek a strong federal action on water, Nature Quebec with the other members, are keen that any “future” involvement on water by the federal government must be in full respect of jurisdictional powers of the provinces. We at Nature Quebec, feel that cooperative mechanisms involving the federal government, should be developed in such a way that they are attractive to provinces by having a “horizontal” approach rather than “top down” one. This is very much justified by the fact that although the federal parties can have historical jurisdiction on some water issues, the burden and costs of planning, implementing, adapting, mitigate and/or follow-up is more often than not, with the Provinces and ultimately, in many cases, with the cities and municipalities and/or specific activity sectors. Possible example of this is with the International Joint Commission (IJC) with the Lake Ontario/St-Lawrence river regulation plan, the Great Lakes Water Quality Agreement, etc.



Fondée en 1981, l'Union québécoise pour la conservation de la nature (UQCN) est un organisme national à but non lucratif devenu Nature Québec en 2005.

Nature Québec souscrit aux trois objectifs principaux de la Stratégie mondiale de conservation :

- maintenir les processus écologiques essentiels et les écosystèmes entretenant la vie;
- préserver la diversité génétique de toutes les espèces biologiques;
- favoriser le développement durable en veillant au respect des espèces et des écosystèmes.

Nature Québec réfléchit sur l'utilisation de la nature dans l'aménagement du territoire agricole et forestier, dans la gestion du Saint-Laurent et dans la réalisation de projets de développement urbain, routier, industriel, et énergétique. Les experts des commissions Agriculture, Aires protégées, Biodiversité, Eau, Énergie et Foresterie, au cœur du fonctionnement de Nature Québec, cherchent à établir les bases des conditions écologiques du développement durable.

Résolument engagé dans un processus qui vise à limiter l'empreinte écologique causée par les usages abusifs, Nature Québec participe aux consultations publiques et prend position publiquement pour protéger l'intégrité biologique et la diversité des espèces sur le territoire québécois lorsque des projets de développement fragilisent les écosystèmes et les espèces biologiques.