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Mr. David O'Toole
Deputy Minister of Natural Resources
6th Floor, Room 6643, Whitney Block
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Email: David.O'toole@Ontario.ca

Dear Deputy Minister O'Toole:

Re: Request for a Provincial Strategy on Waterpower Development

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization with a focus on healthy river ecosystems all across Ontario. ORA members represent numerous organizations such as the French River Delta Association, Vermilion River Stewardship, CPAWS-Ottawa Valley, Friends of Temagami, Paddle Canada, Whitewater Ontario, Mississippi Mills Riverkeepers, along with many other stewardships, associations, and private and First Nations citizens, who have come together to support healthy river ecosystems in Ontario and to ensure that development affecting Ontario rivers is environmentally, ecologically and socially sustainable.

In recent months there have been numerous policy and legislative changes geared towards streamlining the approvals process and making it easier for developers to bring green energy projects into the electricity grid. These changes included the Lakes and Rivers Improvement Act, FIT II, Budget Bill 55, the proposed amendment to the Class C EA for Waterpower, EBR Posting - Renewable Energy on Crown Land; and most recently the Water Management Plan Guidelines Policy has come up for review. Another occurrence that raised the bar of concern and put into question who MNR is really working for, was the recent flawed and misleading MNR commissioned report entitled, "Economic Impact of Waterpower Projects on Crown Land in Ontario" (Report).

ORA has submitted our comments on most of the above changes referenced below^{1, 2, 3, 4}, so it is not necessary to repeat our numerous concerns; however, it is mentioned to point out the tidal wave of policy changes geared towards making it easier, quicker and more lucrative to develop waterpower on Crown land – and just to help swallow the bitter pill, a newly released MNR Report which gives the false impression to the public that it is all worth it because 9,900 jobs will be created. None of these proposed policy changes improve stakeholder consultation

¹ [ORA Submission – FIT Review](#)

² [ORA Submission – Bill 55](#)

³ [ORA Submission – Proposed Amendment to the Class C EA for Waterpower](#)

⁴ [ORA Submission – Renewable Energy on Crown Land – EBR 011-6005](#)

or strengthen environmental, ecological or social protection, and only serve the developers who will reap billions in profits from the backs of ordinary citizens.

The type of waterpower encouraged by the Green Energy Act, Green Economy Act, and FIT Program uses cycling and peaking strategies to maximize energy output, and there are many studies listing their numerous negative impacts on the riverine ecosystem. So this fact alone supports the need for an overall waterpower strategy.

A provincial waterpower strategy must be established to ensure responsible development that embraces and incorporates:

- The United Nation's Millennium Ecosystem Approach into its legislation and policy, where it would instruct developers to "*assess the consequences of ecosystem change for human well-being and provide the scientific basis for action needed to enhance the conservation and sustainable use of those systems and their contribution to human well-being.*"
- A comprehensive assessment of the net benefit vs. cost of the physical, biological and socio-economic impacts of a hydroelectric proposal on the local communities.
- Authentic and inclusive science, research and best practices.
- Policy and legislation that embraces sustainable development, "that meets the needs of the present without compromising the ability of future generations to meet their own needs."
- Climate change and cumulative effects are a mandatory scientifically based consideration before a site is even released for development.
- The highest priority for protection of endangered species, fisheries, habitat, water quality, water quantity, riverine ecosystems, and public health and safety.
- Fully transparent, effective and authentic First Nation, public, stakeholder and municipal consultation and participation.
- Developer profits and access to public assets be given the lowest priority.
- Green Energy power generation is proven to be green before it is incorporated into the green energy grid and FIT Program.
- The possibility of a no outcome to development.

We already had much of the above before the Green Energy Act was introduced in 2009; but since then, in the name of "green energy", our environmental, ecological and social laws, protection and justice have been eroded. The whole foundation of the Green Energy Act and its mandate for renewable energy was to "*better protect the environment*" and to "*create a culture of conservation*" – but instead our finite supply of fresh water is being compromised with increased hydroelectric dam development. Access to clean water is essential to life.

Also, Ontario has a surplus of power, as stated in a report by George Vegh, Chair of the Electricity market Forum, "*The supply-side challenge now is therefore not driven by the need to procure new generation capacity, but to manage supply to meet the needs of electricity customers*", and "*under the Medium Growth scenario, the forecast for demand is flat and it is not until 2027 that peak demand is expected to grow by 1,000 MW. Even under the High Growth scenario, peak demand does not grow by 1,000 MW until 2022. Under the Low Growth scenario – which appears to be higher than where demand is trending – peak demand does not increase*

by 1000 MW prior to the end of the Plan term (2030)."⁵ So, there must be a serious discussion on whether new waterpower generation is even necessary, especially when there are numerous waterpower facilities already in place that are out of commission for need of repair or could be refitted, efficiencies made, fish passage provided, and environmental flows improved.

ORA supports OFAH's letter dated 3 October 2012, and requests that the Ontario government develop a provincial waterpower strategy through consultation with First Nations, the public, stakeholders, municipalities, industry, and conservation and environmental groups. Ontario needs a waterpower strategy that is fair, scientifically based, balanced, and inclusive, to consider where it makes sense to build hydroelectric dams vs. where it does not make sense, or even whether it makes sense at all.

This provincial waterpower strategy will help our government refocus its policies on what is truly important to the people of Ontario and to our future generations.

ORA looks forward to an opportunity to discuss this proposal with you and your staff.

Respectfully,



Linda Heron
Chair, Ontario Rivers Alliance

Cc: Honourable Dalton McGuinty, Premier - DMcGuinty.mpp.co@liberal.ola.org
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⁵ Reconnecting Supply and Demand, How Improving Electricity Pricing can Help Integrate a Changing Supply Mix, Increase Efficiency and Empower Customers, Report of the Chair of the Electricity Market Forum, George Vegh, December 2011, P-3 & 4.