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Ministry of Natural Resources
Policy Division
Broader Landscape Approach
300 Water Street, Floor 5
Peterborough Ontario
K9J 8M5

Dear Sirs:

**Re: Taking a Broader Landscape Approach
Framework for Modernizing Ontario's Approach to Natural Resource Management
EBR-011-7540**

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, CPAWS-Ottawa Valley, Friends of Temagami, Paddle Canada, Whitewater Ontario, Vermilion River Stewardship, Mississippi Riverwatchers, 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.

ORA shares many values with the Ontario Ministry of Natural Resources (MNR) as expressed in your Biodiversity Strategy, strategic direction, and Statement of Environmental Values. We support exercises that take a strategic landscape approach with an aim to reduce overlap and eliminate duplication, provided it is done with a precautionary approach, and that the baby is not thrown out with the bathwater.

The provincial government already has an appropriate toolkit of legislation and policy to protect and enhance ecosystems, while at the same time ensuring that development proceeds sustainably. However, there appears to be conflicting priorities between the push for development projects under the Green Energy Act, and the mandate of protecting the environment and natural resources, and nowhere is this more evident than in waterpower development with its numerous and well documented negative effects. For this reason we have tested and reviewed the framework largely by using the development of additional waterpower as our chosen example.

In the course of our review we found that the current framework is flawed by not expressly embedding the overall requirement for projects to be environmentally and ecologically sustainable at both the local and regional scales.

ORA is very concerned that this environmentally significant framework may be a mere exercise in addressing fiscal realities without ensuring that all development is ecologically sustainable. We also wish to ensure that the framework provides clear direction that all ecological, natural heritage and social risks are to be appropriately identified, transparently communicated to the public, and effectively mitigated.

The Basis of ORA's Concerns

We are pleased that the Ministry appears to be undertaking a landscape approach to development, but for reasons stated above we are less than confident that this exercise will lead to any improvement in the protection and conservation of Ontario's natural resources. In fact, if not implemented carefully, such an approach could weaken efforts to protect the environment.

ORA recently made a request to the Deputy Minister of Natural Resources to develop a provincial waterpower strategy, and on 31 December 2012, ORA received a response which seems to fly in the face of the stated intent of this framework. The letter indicated that, for very unclear reasons, MNR does not support our request to develop a provincial waterpower strategy. This was surprising, as it could have been the essence of a strategic landscape approach, and is long overdue.

In addition, ORA has expressed concern over a recent report endorsed and commissioned by the Ministry entitled, *Economic Impact of Waterpower Projects on Crown Land in Ontario* (Report). This Report was so narrowly focused that it only looked at the benefits of waterpower, and totally ignored the significant negative collateral ecological damage that projects such as waterpower can and do have on the environment, communities, and public health and safety - let alone address the need to consider and account for these serious effects.

To make matters worse, we were recently informed by the Renewable Energy Manager that even though the Report was admittedly a narrowly focused Report; it would nevertheless be used as a tool to assess the feasibility of future waterpower proposals in Ontario, both individually and collectively. If this Report is used as an assessment tool, then evaluation of the net benefits of any future waterpower proposals will be extremely skewed, and would present a biased and distorted view to the public of the benefits and costs of such projects, as well as their sustainability.

The Minister of Natural Resources also informed ORA, "*in addition to the AECOM Report, my ministry also undertook research associated with these subjects: best management construction practices for waterpower development; bat and bird mortality monitoring and mitigation for wind power development; best management practices for waterpower development and sturgeon; economic impacts of wind power development on Crown land; and field assessments of impact mitigation for eel and sturgeon.*"

ORA is concerned that if this approach is used with all projects having potentially serious individual and cumulative impacts, the province's natural resources could be placed at great and unnecessary risk. ORA has grave concerns that the proliferation of these types of unbalanced reports clearly illustrates the dangerous direction in which this Ministry is moving.

The commissioning of the aforementioned faulty Report, and others, has eroded our trust and confidence at a time when we are also being asked to accept that streamlining, and a shift in priorities or emphasis, is in the best interests of the citizens of Ontario and the province's natural

environment.

"The natural world, its biodiversity and its ecosystems are critically important to our well-being and economic prosperity, but are consistently undervalued in conventional economic analyses and decision making." UK National Ecosystem Assessment¹

Public Consultation

This is a pivotal EBR posting, as it lays the framework for modernizing Ontario's approach to natural resource management, and will have a significant impact on the province's environment, as well as public, stakeholder, and First Nation's interests.

It has been very onerous to prepare comments on this EBR posting during the busy holiday season, and for this reason there are likely many that will not be able to provide comments in time.

ORA requests that this EBR posting be extended for an additional 30 days for public comment, given its overall significance to environmental protection in the future. This is not a document that should be rushed. If MNR is truly committed to public input, then all four EBR postings with deadlines in January should be provided with an additional 30 days to allow an adequate response by all interested parties. Further, we are disappointed that the comments to this posting will not be responded to.

ORA requests that in future the public and First Nations are afforded ample opportunity for real and meaningful participation – a minimum of 60 days on all postings, and those posted within time periods falling within or shortly after the busy holiday season, should be afforded an additional 30 days.

The True Value of Ecosystem Services

It is ORA's strong opinion that the true value of biodiversity and ecosystem services must be reflected in any decisions to develop, expand or assess policies, proposals, or land use. Therefore we request that this need be clearly reflected in the framework.

We are not confident that the Ministry intends to consider this critical aspect in project proposals if their current approach to waterpower is any indication. For instance, the current drive to expand renewable energy to stop global warming by closing down coal fired plants would be honourable if it weren't contradicted by encouraging so-called "run of river" and "modified run of river" hydroelectric proposals. These types of projects are the furthest thing from green due to the significant, well-documented and broadly known negative impacts that such projects can and do have on water quality, water quantity, thermal regime, fisheries, habitat, aquatic biodiversity, and the potential risk to public health and safety. The effects of such projects cannot always be effectively mitigated and the government's past track record suggests that the requirements to mitigate will be minimal, if at all.

The FIT Program, with its 50% peaking bonuses offered to produce power during peak demand hours, encourages developers to maximize power output at the potential expense of the environment, and places our freshwater, fisheries, and public safety at extreme risk. If any incentives are to be offered it should be for developers to do no harm.

¹ The Natural Choice: Securing the Value of Nature – P-6

ORA recognizes the importance of renewable energy projects, but we are very concerned that they are being encouraged at all costs. The framework does not address nor provide information on how such projects and related environmental issues will be addressed, it does indicate that all development must be sustainable and leaves the door open to faulty, biased and unsustainable approaches. These fundamental issues must be addressed up front.

Businesses and corporations drive the economy and are important, but we and our future generations have to live in this environment, drink the water, and enjoy the numerous recreational pastimes derived from our natural resources - all the while maintaining our most important investment - property values.

“At a fundamental level, all economies and businesses depend directly or indirectly on the conservation of biodiversity and the sustainable supply of ecosystem services.”²

If development damages or diminishes ecosystem services, it will place our wildlife and natural environment at greater risk. Corporations and investors must recognize the value of investing in projects that make a positive contribution back to society – ethical investments that do not exclude environmental, societal, and cultural costs.

“Nature is sometimes taken for granted and undervalued. But people cannot flourish without the benefits and services our natural environment provides. Nature is a complex, interconnected system. A healthy, properly functioning natural environment is the foundation of sustained economic growth, prospering communities and personal wellbeing.”³

For instance, it is often cited by developers and government policy makers that hydroelectric generation is a clean form of renewable energy that helps reduce greenhouse gas (GHG) emissions; however, recent research reveals that this form of power generation can result in a significant increase in these emissions, and is actually a double edged sword. *“Newly flooded reservoirs release GHGs due to the decomposition of biomass covered by the flooded reservoir as explained above. In addition, when considering new reservoirs, there is an additional GHG effect that should be considered. That effect is the elimination of a terrestrial biological community and its replacement by an aquatic biological community. Since each biological community has a net GHG effect due to respiration of plants and animals, as well as their natural fixing or releasing of carbon during their growth and decay, there may be a substantial net GHG effect per year from this change in ecology.”⁴*

“Hydropower is popularly misunderstood as both a renewable energy source and low-carbon. While water is a renewable natural resource, healthy aquatic ecosystems are not. And while hydropower dams do not burn fossil fuels, their total lifecycle carbon emissions are greater than other renewables. Recent research of Canadian dams indicate that “in addition to any indirect emissions from facility construction, newly flooded boreal reservoirs may emit CO₂ at a rate close to 32 to 63% that of the least emitting natural gas plant.”^{5,6} Flat-water reservoirs have significantly higher temperatures than free-flowing rivers, and much higher rates of evaporation, or consumption, than naturally flowing rivers. Attributing just half of this evaporation to hydroelectric use makes hydropower the most water consumptive of all major electricity sources.”⁷

² Business and Ecosystems: Markets for Ecosystem Services, New Challenges and Opportunities for Business and the Environment. World Council for Business and Sustainable Development, 2007 p.2

³ The Natural Choice: Securing the Value of Nature – P-3

⁴ William Steinhurst, et al; Hydropower Greenhouse Gas Emissions State of the Research, 2012 – P-16

⁵ William Steinhurst, et al; Hydropower Greenhouse Gas Emissions State of the Research, 2012 – P-10

⁶ Burning our Rivers: The Water footprint of Electricity, by Wendy Wilson, Travis Leipzig & Bevan Griffiths-Sattenspiel, P-26

⁷ Burning our Rivers: The Water footprint of Electricity, by Wendy Wilson, Travis Leipzig & Bevan Griffiths-Sattenspiel, P-25

Reducing greenhouse gas emissions is a laudable goal provided it proceeds thoughtfully and carefully. It does not make sense to sacrifice environmental values in the rush to develop green energy projects.

ORA has reviewed this policy framework, and offer the following comments:

1. Do you have any comments about MNR moving toward managing natural resources over broader areas and longer time frames?

1. Adopting a modern and sustainable approach

- a. A Broader Landscape Approach:** If modern and sustainable means taking the best of technology, coupled with the intention of carefully and objectively balancing management decisions with protection of the environment and public health and safety, then a broader landscape approach could be very effective. There should be no need to simplistically trade off one value for another without stringent requirements for effective mitigation, nor without clear and transparent public, stakeholder and First Nation consultation on what the trade-offs will be.
- b. Modern and Sustainable:** If modern and sustainable means taking the best of technology, coupled with the intention to promote development at all costs, and without taking all positive and negative impacts into account, then it will not be a sustainable approach.
- c. Landscape-scale Approach:** There is no one-size fits all solution to successfully establishing or implementing a landscape-scale project. All development proposals are different, will have differing impacts at local and regional scales, and need to reflect and meet local and regional challenges and opportunities. Furthermore, the potential cumulative effects must be clearly identified and addressed. There is no clear indication in the framework if or how these effects will be identified and addressed, yet this should be the foundation of a landscape approach.
- d. Streamlining:** ORA agrees it could be a good idea to streamline and reduce duplication; however, this must be tempered by ensuring that the best interests of the public, First Nations, and the environment, both provincially and locally, are effectively considered and protected. Policy and legislation to protect the environment should be strengthened while eliminating unnecessary redundancies. Any streamlining of legislation and policy should be done with great care and thought and with clear and transparent consultation over the details being contemplated.
- e. Cumulative Effects:** The cumulative effects of climate change, all projects having potential long term effects on the environment and society (e.g., hydroelectric generating facilities, water control structures, waste water treatment facilities, mining/industrial effluent discharge, land/water use, and total water taking on a river system) must all be considered and weighed to determine the potential risks to public health and safety, as well as environmental sustainability, before any decision to approve or deny a development. Clear and transparent public communication/consultation should always be undertaken before such projects are approved. As noted above, while the framework briefly mentions cumulative effects, it does not mention if how cumulative effects will be identified, nor that they will be

- addressed effectively. This should be a founding pillar of the framework.
- f. **Destroying and Replacing Habitat:** While we are supportive of a landscape approach (appropriately balanced with local interests), in no way can we support a landscape approach that is used as an excuse to destroy fish, wildlife or their habitat in one area because the same species and habitats are available elsewhere within the regional landscape. Such an approach will only serve to further erode Ontario's already beleaguered resources.
 - g. **Up to Date Local Resources Information:** ORA is concerned that MNR lacks an appropriate mix of up to date local resource information, and is rapidly losing touch with the natural resources they are mandated to protect. The report acknowledges the need to have local information in some circumstances but we feel its importance has been de-emphasized in the framework and should be strengthened considerably.
 - h. **Climate Change:** Climate change and its effects on water quality and water quantity must be fully considered and planned for in all permits and approvals.
 - i. **Project Decommissioning:** With climate change upon us, and scientists predicting a future of increasing temperatures and extreme drought resulting in evaporation of surface water resources, lower water levels and river flows, many projects may become economically unviable in the medium to long term. For this reason all projects involving substantial infrastructure (e.g., dams) should have provisions for decommissioning in all project approvals. These provisions should clearly identify the decommissioning requirements to be undertaken by developers for if/when these projects are no longer environmentally, ecologically, socially and/or economically viable, and abandonment occurs. The framework should identify the need to make provisions, and clearly identify decommissioning requirements.
2. **Manage at appropriate scales:**
- a. **Appropriate Scales:** ORA agrees that using ecological function and structures to identify ecologically meaningful scales of management is essential. However, as the framework mentions, there will be a need for local data collection as well, depending on circumstances. ORA believes that this data collection should be funded by proponents but carried out by government to avoid real or perceived biases.
 - b. **Net Benefit or Loss:** Measuring impacts/benefits over the short and long-term is essential with climate change considerations being an ever-growing challenge. Objective and careful identification of net benefits and costs at the appropriate scale must be carried out for all projects and any trade-offs of one value for another must be clearly identified and factored into this calculation. The value and need for calculations of all net benefits and costs to the environment and to society is obvious and should be embedded in the framework. Failure to carefully consider these costs and benefits in the past has led to highly damaging and costly consequences in the past. For instance the huge collateral, and on-going ecological and economic damage caused by such projects as the St. Lawrence Seaway and Moses-Saunders Generating Station on the St. Lawrence River, or the major cumulative ecological effects of the series of dams and hydro-electric facilities that were allowed to be installed with no mitigation on the Ottawa River watershed. We recommend that the need for careful and complete evaluations of the net benefits and costs be clearly embedded within the framework.

- c. **Local Needs Must Also be Considered:** We agree that watershed and/or landscape approaches should be used to manage natural resources. However, such approaches should be carefully balanced with local information, needs and considerations, within the big picture. This is essential to making wise and sustainable decisions in land/water management. It is therefore important that effects on the local environments and local communities be carefully evaluated and assessed for all major projects.
- d. **Management Unit Sizes:** Management unit sizes must be relevant and specific to populations, communities and/or ecosystems, climate, precipitation, and land/water use.
- e. **Larger Scale Management:** Using watersheds and sub-watersheds as the basis for water/land management at larger scales is imperative, provided they are used effectively, and carefully identify and effectively mitigate all individual and cumulative effects on the ecosystems and local populations.
- f. **An Ecosystem Approach:** ORA agrees that basing management decisions on an ecosystem approach is essential to a healthy, vibrant and balanced natural environment, provided that impacts on local environments are clearly and transparently identified and mitigated routinely in the approvals process.
- g. **Management at Appropriate Scale:** Managing on too fine or large a scale, especially if using a faulty cost-benefit analysis such as the one currently developed as a model for use with waterpower projects on crown land, could have dire consequences on the local citizens, stakeholders, First Nations, and the environment.

3. Integrate and coordinate:

- a. **Maintain Science, Research & Monitoring:** ORA agrees that coordination of programs and resources, as well as clear regulatory guidelines with other agencies and organizations is essential; however, it is imperative that science, research and monitoring programs are maintained – this function cannot be handed over to developers whose driving interest is in profits. MNR's time, expertise and resources should be on a fee-for-service basis, and charged back to the developer.
- b. **Meaningful Public Consultation:** Ensure management decisions are informed through authentic and meaningful engagement of public, stakeholders and First Nations. This EBR posting is the perfect example of inadequate time allowed for meaningful public comment over the holiday season.
- c. **Sustainability:** Ensure environmental sustainability and continuation of all social, cultural and economic benefits and values are the No. 1 Goal.
- d. **Integrate and Coordinate:** ORA agrees that coordinating and integrating programs and resources is efficient and necessary. For instance, for a truly integrated approvals process, the Water Management Plan (WMP) and Permit to Take Water must be negotiated and approved at the same time as the Environmental Report, and before the Statement of Completion. This alone would save time and resources, and ensure operating strategies are true to that suggested in the Environmental Report.
- e. **No Gaps in Protection:** There should be no gaps in protection for any project having an effect on the environment. Unfortunately gaps often occur; for instance, WMPs remain in draft form for several years, leaving hydroelectric operations without binding conditions to protect the public, environment and the riverine ecosystem. There must be no gaps in

- protection, and this should be clearly articulated in the framework..
- f. **Net Benefit or Loss must be Determined:** Evidence-based policy, informed by sound science is essential – as long as the focus of the science and information is accurate, unbiased, and encompasses both positive and negative impacts on the environment. The framework should clearly provide direction to objectively and transparently assess the net benefit and costs to the environment and local communities.
 - g. **Environmental Sustainability Must have Precedence over Profits:** Ensuring Ontario resources contribute to a healthier and more sustainable future for its people and communities must take priority over prospering economically from its resources. Long-term sustainability of social, environmental, and economic benefits to communities and industries is essential to our well-being and to that of our future generations. The vital ecological and economic contribution of wetlands, fisheries, and healthy fresh water, must be explicitly recognized within the framework as providing crucial economic, social and health benefits to local communities and the citizens of Ontario.
 - h. **Fox in the Hen-House:** Partnerships will be essential to monitoring and building programs to ensure sustainable resource management objectives – as long as the fox is not put in charge of the hen-house. Crucial data collection programs should be carried out without perceived or real biases and should not be conducted by proponents with vested interests.
4. **Assess, manage and mitigate risk:**
- a. **Core Management Priorities:** Ensuring that risks to the environment and public health and safety are minimal must be a primary management priority and explicitly stated within the framework. If MNR truly places risk-based decision making as a high priority – then it must be possible to stop a project, rather than approving projects with risky, unproven and/or ineffective mitigation measures.
 - b. **Risk Assessment:** The risk assessment process to be used is not clearly identified nor described in the document yet, and this process will be fundamental to the success or failure of the framework - this is a fundamental flaw. The process of assessing the risks should be clearly described and made available to the public for comment.
 - c. **Projects with Substantial Potential Long-term Impacts:** In order to protect the public, First Nations and the environment, all projects having potential long-term effects (e.g. all waterpower projects) must be assessed on a finer, more detailed and science intensive scale, and take into account all potential cumulative effects.
 - d. **The Provincial Flood Forecasting and Low Water Monitoring Program:** This is a poor example to use - in spite of last year's extreme drought conditions with some streams and rivers going completely dry, there was not one instance of a Level 3 protocol being initiated. It is only window dressing to say you have a policy – but to be effective it must actually be applied.
 - e. **Broad Scale Must Not Exclude a Finer Scale Approach:** It is essential to recognize that finer-scale, more detailed assessment and management efforts are necessary within a broader management approach – especially on proposals that pose any risk to the public, First Nations or the environment. The framework identifies this but we think that this is a critical aspect that needs further elaboration

- f. **Greenhouse Gas Emissions (GHG):** Site specific analysis must continue for waterpower projects. It cannot automatically be assumed that projects such as hydroelectric facilities significantly decrease GHG emissions, when according to a Canadian study, “*The largest sources of GHGs for newly constructed hydropower are biomass decomposition from reservoir flooding and construction of the facility. Along with methodological disparities, biomass decomposition is the largest source of uncertainty in the GHG emission estimates for hydropower. Emission uncertainties from biomass decomposition may remain large, as the relevant modeling is complex. Further research, both theoretical studies and field measurements, should be considered prior to new construction decisions. **Site-specific assessments will be particularly valuable.***”⁸ And this same study recommends, “*Consideration of the net effect of replacing terrestrial biome with an aquatic biome in the case of new flooding in estimating long-term net GHG emission rates.*”⁹

5. Focus science and information resources

- a. **MNR Must Maintain a Strong Science Sector:** ORA encourages MNR to continue on with a strong science presence. It is imperative that this science be conducted by MNR staff, and not by proponents or their agents. MNR should have a more neutral approach from that of private developers whose interests can be skewed (or perceived to be biased). Developers can provide funding on a fee-for-service basis to MNR to conduct the science program, provided it is carried out with no interference in the actual work - including final analyses and reporting.
- b. **Balanced Assessment is Essential:** The focus of science and monitoring programs on broader-scale management approaches must also be balanced with finer-scale, more local assessment and consideration. Development proponents should be required to fund these exercises through fee-for-service.
- c. **A True Assessment of Net Benefit or Loss:** As noted earlier, it is imperative that reports and studies assess not only the positive impacts of development, but also take into the account all the potential negative impacts in order to establish a true net benefit or loss. This means full-cost accounting of their individual and cumulative environmental, ecological and social costs.
- d. **Broad and Inclusive Tools:** All tools or models developed to assess and manage over broader landscapes must also be broad and inclusive in their scope to accurately assess their net benefit or loss.
- e. **No One Size Fits All Approach:** As mentioned earlier, research and monitoring programs at appropriate scales is essential. It is unlikely that a one size fits all approach will be appropriate – especially with climate change, water quality and quantity, and invasive species becoming more and more of an issue.
- f. **Cumulative Effects:** Again, accurate identification of cumulative effects must be a strong requirement in any development proposal, and the risks must be clearly assessed through a comprehensive study. Effective mitigation of cumulative effects is fundamental.

6. Manage adaptively

⁸ Hydropower Greenhouse Gas Emissions, State of the Research, by William Steinhurst, Patrick Knight, and Melissa Schultz, P-20

⁹Hydropower Greenhouse Gas Emissions, State of the Research, by William Steinhurst, Patrick Knight, and Melissa Schultz, P-21

- a. **Strong Monitoring and Assessment:** The key to managing adaptively must involve a strong monitoring and assessment policy.
 - b. **Too Much Risk – Grounds for Denial:** Risky decisions must no longer be made with the intent of adaptation if it doesn't work out – these types of decisions can put ecosystems and public health and safety at extreme risk. Too much risk must be grounds for denial of a project/permit.
 - c. **Stakeholder Involvement is Essential:** Meaningful public, stakeholder and First Nation involvement are essential to create a truly inclusive and transparent adaptive management strategy.
2. **What aspects of the current system or programs could change? Which should remain the same?**
1. **No Negative Impacts:** Permits that do not impact in a negative way on the environment or public health and safety could become more streamlined and computerized.
 2. **Site Specific Approvals:** All projects having potentially significant effects including waterpower/mining permits, approvals and assessments must remain site specific with full scientific and research level engagement of MNR staff. Their cumulative impacts must also be identified and mitigated effectively.
3. **Do you feel that there are additional or different goals that should be included in this framework?**
1. **A Strong Focus Ecosystem Approach:** ORA suggests that adopting a strong ecosystem approach is critical to any landscape approach. However, conserving and enhancing biodiversity, fish populations and fisheries, wildlife populations, endangered species, species at risk, public health and safety, and control of invasive species should all continue to be strong mandates of MNR, and therefore should be expressly recognized within the framework.
 2. **Priorities Must be Refocused:** ORA would like to see preservation of our fresh water resources and public health and safety placed at the top of MNR's list of goals, and expressed clearly within this framework. There appears to have been a shift away from the need to conduct objective, thorough environmental reviews, particularly in the cases of proposed green energy projects.

Ontario has had a surplus of power for some time now, and does not need to focus on new generation. *"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)."*¹⁰

And yet, this government's agenda of promoting "Green/Renewable Energy" has taken unreasonable precedence, seemingly at all costs. This is unfortunate and if this continues such projects (known to have long term impacts lasting for a century or more) will potentially be developed to the detriment of Ontario's environmental, natural heritage and socio-economic fabric.

¹⁰ 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,

ORA recommends a more thoughtful, balanced and strategic approach to the development of energy projects. There is no need to rush and repeat the same mistakes of the past. MNR needs to refocus and take a more balanced approach to such major development proposals, many of which are known to cause serious, and ongoing environmental harm. The government, in its rush to address fiscal realities, does not need to encourage investment in such projects by eliminating or watering down thorough environmental reviews at both the local and regional landscape levels. If a project cannot afford to implement effective mitigation it should not be allowed to proceed. We are concerned that the framework does not reflect the strong need for environmental protection and sustainable development.

3. **Incentives to Do No Harm:** New policies must include incentives to developers to improve existing developments, and to plan for new facilities where conservation of biodiversity and ecosystem services is in perfect balance with the drive for profits. There should be preference and/or incentives offered to do no harm, and to provide true green and renewable energy.
 4. **Strong and Unbiased Science:** If the current framework does not address the need to take policy stands based on strong, current and unbiased science, then there is a high probability that faulty and flawed approaches and misconceptions will continue to be perpetuated in the rush to encourage investment in development. Major projects such as waterpower need to be carefully and objectively considered and evaluated in terms of net benefits and costs to the environment and society, and evaluated in terms of their mitigation potential as they can have substantial and significant consequences lasting often for a century or more. This framework must clearly identify this need when taking a landscape approach.
4. **Do you agree with the proposed elements and considerations, or should different ones be included?**
1. All the comments above can be applied to this question.
 2. **Dam Decommissioning:** The long term approach must also take into account up-front decommissioning provisions for waterpower developments in the event they are no longer viable or sustainable in the future. Loss of economic feasibility is a very likely probability for some projects.
 3. **Intervener's Fees:** Issue-focused stakeholder engagement would be effective; however, intervener's fees to assist the public and First Nations in fully participating in the consultation process would be an essential component of this type of policy.
5. **What outcomes would you like to see with respect to the management and use of natural resources in Ontario?**
1. **Truly Sustainable Development:** ORA would like to see sustainable development where:
 - a. **Consultation:** The public is actually consulted, not just informed, and has the opportunity to have real and meaningful input.
 - b. **Trust:** The public, stakeholders and First Nations can trust MNR to look out for the best interests of the environment, public and First Nations.
 - c. **Sustainability:** Development that is truly environmentally, ecologically and socially sustainable.
 - d. **A Possibility of a No Outcome:** If the environmental, ecological or socio-economic costs of a proposed development exceed the net benefit, then there must be a possibility of a no outcome.
 - e. **No Trade-offs:** There should be no simple trading off of one value for

another without a requirement for strong public and First Nations consultation, and without requirements for strong and effective mitigation of harmful effects.

There is insufficient detail in this framework to enable a fair assessment, and we ask that more details and elaboration be included in the next draft of this framework. Providing strong protection of the environment, and ensuring that all development proceeds in a sustainable fashion, should be core mandates and goals of this framework, but these or similar words are noticeably absent from the document. This does little to instill confidence in the intent of the framework. We suggest that these objectives be clearly embedded in the framework.

Using rivers as an example, the following quote seems appropriate to the development of this framework: *“Water is perhaps our most vital ecosystem service that our natural environment provides. As the inevitable impacts of climate change become evident, our freshwater resources and the ecosystems they support will become respectively less reliable and resilient. Smart water policies allow us to mitigate the worst aspects of global warming today, while the consequent improvements in water quality and river health will provide a critical buffer as humanity and nature adapt to the climate of tomorrow.”*¹¹

The example of a “Shift in Ecological Emphasis” used on P-11 is a poignant reminder that the Great Lakes are already in great distress from overdevelopment and are at greater risk as climate change proceeds. A primary focus must therefore be on protecting and improving water quality in the Great Lakes, and hence in the rivers that feed them. Any landscape level approach or framework should clearly recognize and articulate this need; however, the current framework does neither. We hope and suggest that this be corrected in the next draft.

The success of this policy will depend on what is driving the shift to managing over broader regions and time. The protection of Ontario’s natural resources, while at the same time ensuring that natural resource development proceeds in a sustainable fashion, is a huge responsibility that requires time, diligence and thoughtful consideration. We sincerely hope that this is not a mere short-term exercise in cost cutting while clearing the path for unsustainable development.

ORA requests further involvement in outreach and consultation on this matter, and thanks you for this opportunity to comment.

Respectfully,



Linda Heron
Chair, Ontario Rivers Alliance

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¹¹ The Carbon Footprint of Water, by Bevan Griffiths-Sattenspiel & Wendy Wilson - P-3

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