



April 15, 2015

Laura Blease
Senior Policy Advisor
Ministry of the Environment
Integrated Environmental Policy Division
Land and Water Policy Branch
135 St. Clair Avenue West, Floor 6
Toronto, ON
M4V 1P5

RE : Bill 66 – PROPOSED GREAT LAKES PROTECTION ACT, EBR # 012-3523

Dear Ms Blease,

The Georgian Bay Association (GBA) is supportive of Bill 66, the Great Lakes Protection Act, as it introduces important new legal and policy tools to help safeguard, restore and protect Ontario's portion of the Great Lakes. Our comments and concerns are detailed below.

As per our EBR submissions on the previous two iterations of the Great Lakes Protection Act, (specifically, Bill 100 introduced June 2012 and Bill 6 introduced February 2013 that died on the order paper), we believe that the water in the Great Lakes is such a valuable resource that it behooves our governments to proactively steward it for this and future generations. Water quantity and water quality should both be protected. Where there has been degradation, plans should be put in place for remediation. But it is equally important that, where there has been no perceived degradation, plans should also be put in place for preservation.

We believe that Bill 66, together with the previously tabled Great Lakes Strategy, will spark renewed interest in the Great Lakes by focussing public attention and government resources across all appropriate Ministries on the urgency of the issues at hand.

Of specific importance to us in this version of the Great Lakes Protection Act are:

- The acknowledgement of the need to address climate change.
- The acknowledgement of the importance of watersheds.
- The empowerment of the Minister of Natural Resources and Forests to set wetland target(s).
- The government's commitment to reducing or eliminating harmful pollutants.
- The commitment to monitor and report on ecological conditions.
- The emphasis on Geographically Focussed Initiatives (GFIs) including a simplified process for approving GFIs.
- The enhanced public engagement through consultation prior to directing that a geographically focussed initiative (GFI) proposal be developed. This enhanced public engagement includes allowing members of the public to bring forward requests to establish targets for GFIs.

- The government's commitment to have regular progress reports tabled in the Legislature.

While on the whole we are very supportive of Bill 66 we share the concern raised by CELA, Environmental Defence and others re the exemptions provision that has been introduced in this proposed Legislation. As written the intent of this exemptions provision is unclear to us. We do not understand under what circumstances it could be used, and the implications on the otherwise strong language in the Bill.

Once Bill 66 is passed by the Legislature it will be important that the government ensures that adequate budgets are allocated for implementation, applying integrated watershed management principles to decision-making and aligning Great Lakes policy to meet local, provincial, federal and international commitments. Time is of the essence. As the Preamble to Bill 66 states, "three of Ontario's four Great Lakes are in decline." We must act quickly to enact Bill 66 and make use of the new tools provided by the proposed legislation to protect the Great Lakes in the face of continued population growth and urbanization and threats to water quality and quantity, including eutrophication, and climate change.

We look forward to continuing to work with the Ontario government as it refines and rolls out the Great Lakes Protection Act and implements the Great Lakes Strategy.

Yours Sincerely,

A handwritten signature in brown ink, appearing to read 'RD', followed by a horizontal line.

Bob Duncanson
Executive Director
Georgian Bay Association

cc: Gord Miller Environmental Commissioner of Ontario
Sarah Rang, MOE