

From: [Don McLean](#)
To: [Eowyn Spencer](#)
Subject: Action needed on wetland protection
Date: Saturday, March 18, 2023 9:19:30 PM

Dear Eowyn,

Could you please share this letter with the Board members of the GRCA.

I have been examining the problematic changes made to the Ontario Wetland Evaluation System by the current provincial Progressive Conservative government. I think there is a great need and clear reasons for federal government intervention to challenge these changes. So I'm urging GRCA board members to ask the federal minister of the Environment Steven Guilbeault and his colleague Jonathan Wilkinson, the Minister of Natural Resources, to urgently act in defence of wetlands and their benefits.

As you know the changes to the OWES have many disturbing aspects. These include the abolition of the category of wetland complexes; the elimination from scoring of the presence of endangered species and their habitat; and the removal of required oversight of wetland evaluations by provincial ministry officials. This appears to leave us with a situation where a landowner or developer can hire someone to evaluate or re-evaluate wetlands and the only remaining required oversight is at the municipal level where there is no or very limited ecological expertise. It appears that the expertise of the Conservation Authorities is also bypassed both by changes to the OWES and by Bill 23 rules that forbid CA advice to municipalities. I believe you are disturbed by these changes. Conservation Ontario has strongly expressed these concerns on your behalf but without achieving the necessary changes.

However, the federal government can and should intervene to advance the CA and public concerns about the changes to the OWES. The OWES originated in 1980 as a joint federal-Ontario project where the Canadian Wildlife Service played a key role. This was entirely reasonable and appropriate because there are multiple federal interests and responsibilities associated with the protection of wetlands. Specifically, these include federal responsibilities for the protection and recovery of endangered species, and for the protection and enhancement of fish habitat. The federal government has also long been constitutionally mandated to ensure Indigenous Rights and the implementation of treaties with First Nations. More recently, federal responsibility has been recognized, including by the courts, to address the climate crisis, and wetlands play crucial roles in sequestering carbon and limiting the effects of extreme weather events. Recently, the federal government hosted the 15th Conference of the Parties on the UN Convention on Biodiversity and committed Canada to protection of at least 30 percent of our nation's lands and waters by 2030. I would argue the protection of our remaining wetlands is crucial to Canada's successful implementation of this Convention. For further evidence of the critical role of the federal government I invite you to review this short federal public service announcement currently on social media at <https://youtu.be/bDoAK7iyweA>.

In light of all of these reasons, I urge your Board to publicly urge the federal government to press Ontario's government to repeal the recent changes to the OWES and to consult thoroughly with Conservation Authorities on these matters.

Sincerely,

Don McLean