**THOUGHTS ABOUT CHANGES TO THE OWES MANUAL**

As former Coordinator of the OWES Course all for Wetland Evaluators of Ontario, I am alarmed by the proposed changes to the manual. The OWES Manual has been used to evaluate wetlands in Ontario for the past 40 years. It was designed by experts on a scientific basis and an important point is that it was specifically designed to evaluate wetlands in a biologically relevant and consistent manner so that wetlands can be objectively compared. (ie You don’t want to change the scoring system that has been used to evaluate thousands of wetlands.)

If I had to sum up my reaction in a few words, I would say “*I think that the proposed changes to the OWES Wetland Manual will undo 40 years of wetland conservation in Ontario and make it difficult to protect wetlands in the future. I don’t see any scientific justification for the changes and it looks to me as if the changes have been made to devalue the OWES system in an attempt develop wetlands that have rightfully been set aside for the people of Ontario*.”

 **PROBLEMS WITH THE PROPOSED CHANGES TO THE OWES MANUAL – IN BRIEF**

Rather than going over the document page-by-page, I will focus on 5 summarized themes:

1. **The Role of the MNRF has been Removed:**

The MNRF is fundamental to the evaluation of wetlands. The MNRF supplies information, guidance, experience, quality control and an unbiased overview to wetland evaluation. No offence to wetland evaluators but they might have only a week of OWES training before they start evaluating wetlands; they depend on the MNRF for guidance and for eventual approval if the evaluation is complete and competent. Without the role of the MNRF, wetland evaluation is in the hands of wetland evaluators (without quality control) who are working for whoever is paying them (likely a developer or a municipality). This slants the system strongly in favour of development.

As a rough comparison - can you imagine any government saying “if you take a week-long tax course, you can just pay the amount of tax that you figure out; no need to consult us”? Of course not! The government knows that oversight vastly improves accuracy and honesty. In the same way, oversight is required to ensure that the wetland evaluation process is complete, accurate and unbiased. I THINK THAT POINT “A” IS THE MOST SERIOUS FLAW OF THE PROPOSED CHANGES.

1. **The Concept of Wetland Complexes has been Removed:**

Throughout the document, all references to wetland complexes have been scrubbed, yet wetland complexes have real biological value. There might be bits of upland habitat separating bodies of closely spaced wetlands but if those wetlands are within 750 metres of each other and ecologically linked, they function as a larger wetland and they deserve to be recognized as such. The birds, mammals, reptiles, amphibians, insects, etc., that live in that wetland complex are all mobile and they can use all parts of a wetland complex.

Imagine taking a large Provincially Significant Wetland and dissecting it into small parts; “Here is a patch of swamp, and a patch of marsh, and a patch of bog, and another patch of swamp, and a pool of emergent plants”, and so on. Breaking it down like that would considerably reduce the wetland score of each of the components even though the entire wetland deservedly should have Provincially Significant value because it functions as a whole. In the same way, dissecting parts of a wetland complex and considering them individually is essentially “gerrymandering” a wetland to artificially reduce its score. I THINK THAT THIS IS THE SECOND-MOST-SERIOUS FLAW.

On page 20, the manual refers to “cases where very closely grouped wetlands function together as one”; i.e. it doesn’t use the term “wetland complex” yet the above statement recognizes that such things exist and have value.

1. **There are Fewer Clear Guidelines and Much Less Information is Considered:**
* Pgs 4-6 – Much less emphasis on carefully collecting all info related to rare species or hydrology;
* No need to consult the MNRF for their knowledge of those topics;
* No need to consult widely for info from other knowledgeable sources (also on pg 11);
* Pgs 7-8 – Mapping updates can take place without an evaluation;
* An application is considered “complete” once it is received by a decision-maker;
* Pgs 47-63 – Many instructions, much information, and any guiding role for the MNRF are all taken away.
* ALL OF THIS GREATLY WEAKENS THE EVALUATION.
1. **There are SO** **MANY References to Re-evaluating Wetlands:**

If the point of streamlining the manual is to hurry up and evaluate the rest of Ontario’s wetlands, then why is so much emphasis placed on **re-evaluating** wetlands? It seems that the point of changing the manual is to rescore wetlands that have already been done. The application of these altered circumstances – the proposed lack of oversight in Item A, the proposed divisions of Wetland Complexes in Item B, the reduced attention to valuable wetland details in C – would act to reduce wetland scores. Is that the point? You can well imagine that the consequences would be that some PSWs would no longer be protected and those based on wetland complexes would be dismantled.

In fact, unless a wetland is one large continuous body with quickly discernable hydrology and readily observable rare species, it would suffer devaluation under the proposed OWES rules. On top of that, the lack of objective oversight by the MNRF, the probable tendency of evaluators to find in favour of whoever is paying them, and the apparent need to reach hasty decisions without collecting all the usual information bodes poorly for properly documenting the value of wetlands. However, it bodes well for developers wishing to remove protected status from PSW-rated wetlands.

1. **There are Other Odd Features:**
* Pg 14 - You should ask the owner for permission to go on their property but you don’t have to tell them that you are doing a wetland evaluation. <Honestly - can you think of any other reason for this besides someone trying to find out if a wetland can be downgraded before buying the land for development?>
* Pg. 15 – An evaluator can have an unqualified person do the work for them as long as they check over the work. <This seems like just another way to rush things along, to reduce expertise and to further decrease quality control.>

Most changes to the OWES Manual don’t make sense to me … except through the lens of facilitating the development of lands that are currently blocked by OWES evaluations. Speakers at a recent public webinar about Bill 23 said that well-connected people were buying up land with Provincially Significant Wetlands, and in greenbelts, for cheap prices (because they currently can’t be developed) but then banking on changing the rules and the wetland evaluations. At the time I heard this, I didn’t know what to think … yet those circumstances would absolutely explain the proposed changes in the OWES Manual.

Very recently, there have been articles further fleshing out what appears to be going on in the background of Bill 23; here is just one example of such an article. [https://apple.news/A7QRTQKkGSJeFaD86OB\_Qcw](https://nam12.safelinks.protection.outlook.com/?url=https%3A%2F%2Fapple.news%2FA7QRTQKkGSJeFaD86OB_Qcw&data=05%7C01%7C%7C62fc6e25c7b949b8a46a08dac89da160%7C84df9e7fe9f640afb435aaaaaaaaaaaa%7C1%7C0%7C638042876584602227%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=rzddBtE%2FxRQlsutg5%2FdWDnIPV14zxNOLqM0Fj0I1ZJg%3D&reserved=0)

If Bill 23 is in fact the right thing to do then I think that it should: 1) bear the light of scrutiny with ample opportunity for full public disclosure/discussion; 2) not require the exclusion of key knowledgeable players such as the MNRF and Conservation Authorities; and 3) not require rewriting (more precisely devaluing) the rule book on how wetlands should be scored. Quite frankly, it seems like the wrong thing to do and the wrong way to go about it.