Public Input Coordinator
MNRF - PD - Resources Planning and Development Policy Branch
300 Water Street, 2nd Floor, South Tower, Peterborough, ON, K9J 3C7

Submitted to the Environmental Registry of Ontario and by email to wetlands@ontario.ca

November 24, 2022

Re: Proposed Updates to the Ontario Wetland Evaluation System (ERO No. 019-6160)

To the Public Input Coordinator,

Thank you for the opportunity to comment on the proposed updates to the Ontario Wetland Evaluation System (OWES) as part of Bill 23, the proposed *More Homes, Built Faster Act, 2022*.

We submit these remarks in our capacity as conservation scientists on behalf of Wildlife Conservation Society (WCS) Canada. WCS Canada (www.wcscanada.org) is a national non-government organization with a mission to save wildlife and wild places in Canada through science, conservation action, and by inspiring people to value nature. WCS Canada scientists have been leading research and policy development in the far north in Ontario for two decades. Our expertise is in land use planning, impact assessment, and conservation and science research focused on intact forests, freshwater, and peatlands, and the wildlife and fish that rely on these ecosystems. We are affiliated with global WCS programs in more than 60 countries in the world and active at the science-policy interface in Canada and internationally.

We have co-signed a letter to Minister Smith outlining our major issues with the proposed updates to the OWES, and append a copy of this letter for your consideration.

The proposed changes to the OWES are highly unlikely to meet the stated purpose by Ontario of increasing housing in Ontario. According to the ERO posting, “streamlining” the wetland evaluation process is necessary to support the construction of 1.5 million new housing units. However, a shortage of land isn’t the cause of the housing shortage in Ontario[1].

[1] Report of the Ontario Housing Affordability Task Force. February 2022. Available online: https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf

Further, it is critical to understand and acknowledge that Ontario has already lost much of its wetland heritage, with over 70% of wetlands in southern Ontario having already been destroyed[2]. Perhaps even more concerning is that the rate of wetland loss is accelerating – the rate of wetland loss between 2011–2015 was considerably higher than the rate for the decade between 2000–2011[3]. And yet, remaining wetlands in southern Ontario alone still provide an estimated $19 billion in ecosystem services per year[4], ranging from habitat for waterfowl and sport fish to pollution removal and increased resilience to climate change through flood control. The protections that have been provided to provincially significant wetlands under the Provincial Policy Statement (PPS) support not just our wildlife and natural heritage, but also healthy cities and farms and are essential under emerging "One Health" approaches[5]. Wetland protection under the PPS is been a cornerstone of sustainable development in Ontario, and the OWES has been upheld in Ontario Courts and adjudicative tribunals, including the Ontario Municipal Board.

Draining wetlands to build houses therefore will not address the housing shortage and will leave residents living in southern Ontario facing increasing costs to compensate for the loss of ecosystem services that these functioning wetlands were providing, including facing increasing damages from flooding and other extreme weather events. As the population of Ontario grows, we need policies to halt and reverse the decline of wetlands, and not to facilitate their continued loss.

Our other major concerns relate to the proposed changes themselves. First, we are concerned that under the proposed changes, wetland complexes will no longer be considered during wetland evaluation. Wetlands are inherently connected systems[6], and ignoring that basic hydrological connectivity has no scientific basis, and will surely invite the piecemeal disassembly of wetlands in Ontario. Second, the decision to abandon consideration of endangered and threatened species habitat during wetland evaluation will lead to further habitat losses for species that are already the most vulnerable and already in decline. Third, the removal of provincial oversight and coordination will decentralize and obfuscate training, certification, and designation processes for wetland evaluations, which will largely be left to wetland evaluators, who are often hired by proponents.

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[2] Ducks Unlimited Canada. 2010. Southern Ontario Wetland Conversion Analysis. Barrie, ON.

[3] Ontario Biodiversity Council. 2021. State of Ontario's Biodiversity: Extent of Wetland and Wetland Cover. Available online: https://sobr.ca/indicator/loss-of-wetlands/

[4] Aziz T. and P. Van Cappellen. 2019. Comparative valuation of potential and realized ecosystem services in Southern Ontario, Canada. Environmental Science and Policy 100: 105-112.

[5] World Health Organization. 2017. One Health. Available online: https://www.who.int/news-room/questions-and-answers/item/one-health

[6] Leibowitz S.G. et al. 2018. Connectivity of streams and wetlands to downstream waters: an integrated systems framework. Journal of the American Water Resources Association 54: 298-322.

While the proposed changes to the evaluation system are focused on southern Ontario, there are also consequences of such modifications to the OWES system for northern Ontario, including the far north in Ontario.

The far north in Ontario contains vast wetlands, including the majority of the Hudson Bay Lowland, the largest wetland complex in North America, and the second largest peatland complex in the world[7]. These wetlands provide globally, nationally, and provincially significant ecosystem services, including as a globally important carbon stock[8], and offsetting a third of Ontario's annual emissions[9]. The peatlands of the Hudson Bay Lowland are estimated to store ~30 to 35 billion tonnes of carbon, which is ~128 billion tonnes of CO_2, or around 175 years of Canada's current annual reported GHG emissions. These peatlands have contributed to an overall net global cooling effect since their initiation ~8000 years ago and are active carbon sinks, that are predicted to remain carbon sinks in the future, in all but the worst climate warming scenarios[10]. These wetlands also provide critical habitat for endangered species such as caribou and comprise vital stopover habitat and breeding grounds for shorebirds (including numerous species at risk) and endemic plants. They are also the homelands of many First Nations under Treaty No. 9 and as such support the inherent, Aboriginal and Treaty rights of Anishnabeg and Cree Nations across northern Ontario.

These wetlands in the far north in Ontario require special consideration and were already ignored under the current OWES and other relevant Ontario environmental legislation including impact assessment under Ontario's Environmental Assessment Act and the *Far North Act, 2010*. The vast majority of the largest wetland complex in North America is not adequately mapped and has never been assessed under the current OWES.

Given the provincial, national, and global importance of these wetlands, as well as the development being contemplated in the Ring of Fire region, these wetlands require an evaluation system that honours Indigenous Knowledge systems, is grounded in science, and includes the many values of wetlands for people, wildlife, and the climate. These wetlands also require an evaluation system that informs proactive watershed-level planning. This planning would establish thresholds for values that are important to First Nations, as well as globally important values like carbon stocks and wildlife habitat, and would set targets for Indigenous-led protection in advance of industrial development and in consideration of climate change.

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[7] Keddy P.A. et al. 2009. Wet and wonderful: the world's largest wetlands are conservation priorities. BioScience 59: 39-51.

[8] Harris L.I. et al. 2021. The essential carbon service provided by northern peatlands. Frontiers in Ecology and the Environment 20: 222-230.

[9] Far North Science Advisory Panel. 2010. Science for a Changing Far North. Available online: http://wbn.scholarsportal.info/node/5794

[10] Qiu C. et al. 2022. A strong mitigation scenario maintains climate neutrality of northern peatlands. One Earth 5: 86-97.

By taking the opposite approach, and weakening the OWES to remove protection for provincially significant wetlands, to remove consideration as habitat for endangered species, and to remove consideration of wetland complexes, the government has made OWES entirely ineffectual for these provincial and globally significant wetlands in the far north in Ontario.

In summary, the consequences of these changes for the far north of Ontario, and the lack of transparency and lack of adequate public consultation in this process are both alarming. These represent sweeping and far-reaching changes to environmental protections for the entire province, disingenuously embedded within legislation intended for the purpose of accelerating housing development primarily in southern Ontario.

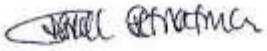
We recommend that the proposed changes to the OWES be rescinded immediately. We further recommend that the province develops an evidence-based approach to address the housing needs in this province – without dismantling critical wetland protections and functions, and without leaving the people in Ontario to shoulder the cost of paying for the loss of the many services and benefits that wetlands are providing under a changing climate.

We would be happy to discuss these comments further.

Sincerely,

Constance O'Connor, PhD
Director, Ontario Northern Boreal Program

Daniel Kraus
Director, National Conservation



Cheryl Chetkiewicz, PhD
Director, Indigenous Communities and Conservation

Justina Ray, PhD
President and Senior Scientist