

Why is the Great Lakes Basin Sustainable Water Agreement Important to Ontario?

This document has been prepared by the staff of the Canadian Environmental Law Association (CELA) to assist those making submissions to the governments on the Draft Great Lakes Water Management Initiative documents released by the Council of Great Lakes Governors in July 2004. We have tried to focus our comments on issues as they pertain to Ontario. **This Initiative is long overdue and has the potential to secure and sustain the waters of the Great Lakes in the future, if some crucial improvements are made. We urge you to take the time to make submissions on these changes to the Ontario government at their upcoming hearings in September or in writing to the Minister of Natural Resources and the Council of Great Lakes Governors by their October 18, 2004 deadline.** We have provided information on how to comment and the hearings locations at the end of this document.

Summary of Recommendations

1. Action needed to make the Agreement Commitments Legally Binding

Ontario and Quebec should act to legally bind themselves to the Great Lakes Basin Sustainable Water Agreement and its appendices by promulgating their provisions into new or existing laws.

2. Strengthen and bind Great Lakes States and Provinces to In-Basin Conservation Programs

To improve our stewardship of the ecosystem, strong water conservation programs with timetables and targets for all sectors in the Basin need to be established and implemented. Commitments to do this should be made binding in both the Compact and the Agreement. These programs should have the same provisions as those imposed on applicants from outside the Basin so that they cannot be deemed discriminatory.

3. Make Public Participation and Enforcement Equitable throughout the Basin

The U.S. Compact has provisions in Section 3.9 for enforcement setting out remedies, equitable relief and cost recovery that are not paralleled in the Agreement. Provisions for equitable rights and due process without penalty should be part of the Agreement and promulgated into the laws of Ontario and Quebec.

4. Shorten Implementation Timetable

The International Joint Commission has recently released their three year review of progress on the recommendations made in February 2000, *Protection of the Waters of the Great Lakes*. It recommends that

"...federal, state and provincial governments should not authorize or permit any new removals and should exercise caution with respect to any new or increased consumptive use until such standards (implementing their responsibilities under The Great Lakes Charter) have been promulgated or until 24 months have passed, whichever comes first".

We recommend that the Compact and the Agreement be promulgated within two years of final drafting. We recommend that no major diversions, withdrawals or new or increased consumptive use be permitted until laws are in place in all jurisdictions.

5. Due Process and Transparency in the Regional Review

Little is stated in the Compact and Agreement about the nature of public involvement in the Regional Review of proposals. Procedures addressing the nature of the review, evidence, transcripts, intervenor status and transparency need to be developed and included in the Agreement and Compact.

6. Improved and Consistent Cumulative Data Collection

Cumulative withdrawal data above and below the trigger level should begin to be collected now by all jurisdictions regardless of whether the Compact and Agreement have been implemented. We recommend that all data on withdrawals over 20,000 liters be submitted to a central database immediately.

7. Eliminate Discriminatory Trigger Levels

The Compact and Agreement could be seen to be discriminatory between applicants from within and outside the basin because they have a different trigger level for diversions (1 million gallons a day) and for consumptive uses (5 million gallons a day). This could provoke trade implications. In-Basin uses should have the same restrictions expected of out of Basin users.

8. Revert to 30-day Averaging

The 120-day averaging period for withdrawals could lead to unnecessary harm to the ecosystem. The Compact and the Agreement should use a 30-day averaging period for all withdrawals.

9. Return Flow Requirements

We recommend changes requiring return flows to be "as close as possible to the point of withdrawal" and be returned to the same surface or aquifer source it came from. This would prevent unnecessary harm.

10. The Chicago Diversion

Canadians want a voice in any future requests for increases in the Chicago Diversion. Future increases to the Chicago Diversion should be subject to Regional Review as set out in the Agreement.

11. Delete the Twelve-Mile Exemption for Return Flows

There should be no exceptions to return flow provisions. This provision appears to be accommodating one municipality but could set a harmful precedent. This provision should be deleted.

Other Recommendations

Other work that will need to be done for a decision support system for effective implementation of the Great Lakes Basin Sustainable Water Resources Agreement and the Great Lakes Water Resources Compact.

The Basin Water Resources Management Program promised in the Great Lakes Charter of 1985 needs to be implemented to guide and improve future water management.

Research on best efficiency and conservation practices for all sectors with public involvement is badly needed.

Studies are needed to define harmful impacts from lowered lake levels.

Further studies on the impacts of climate change on the Great Lakes and the St. Lawrence River.

Programs are needed to ensure that all waters returned to the Great Lakes, St Lawrence River basin are not introducing further invasive species.

Most importantly governments will need to allocate staff and resources to implement the transition to these water protection programs and work to make them self-sufficient without penalizing those in need.

Background:

The Great Lakes Charter

The Great Lakes Charter was signed in 1985 in order to set out a regional strategy for protecting the Great Lakes in the event of a proposal for a major diversion or consumptive use of Great Lakes and St. Lawrence River waters. However this agreement was non-binding. In the decades that followed Great Lakes water levels were in a high cycle. This led to neglect or inadequate action on several provisions of the Charter.

Inadequate Action

Charter provisions for prior notice and consultation among the eight Great Lakes states, Ontario and Quebec, and progress on the collection of uniform data were

inadequate. The important commitment to establish a Basin Water Resources Management Program was never fulfilled. In 1998, the Nova Group proposal to ship water from Lake Superior to the Far East caused the provincial, state and federal governments to re-examine the strength and adequacy of the legal foundations of their water management authorities. They concluded they were inadequate for the challenges expected to come from an increasingly water-short world both within and outside the basin.

International Joint Commission Reference Recommendations

These findings were reinforced in the recommendations to the governments made by the International Joint Commission (IJC) in their February 2000 report, *Protection of the Waters of the Great Lakes*. Foremost among the IJC recommendations was a call for new legally binding standards to protect the integrity of the ecosystem of the Great Lakes and govern decision-making on individual and cumulative withdrawals and consumptive uses to limit harm to the Great Lakes.

This is what the eight governors and two premiers set out to do when they signed Annex 2001 to the Great Lakes Charter, committing to have draft binding agreement(s) by 2004. A Working Group that included representatives of each jurisdiction was formed to draft these agreements and an Advisory Committee representative of Basin stakeholders was invited to periodically review and comment on their progress. The Canadian Environmental Law Association (CELA) was on this Advisory Group Committee.

Proposed Draft Agreements

Because of substantial differences between state, provincial and federal water laws and other constitutional impediments to all jurisdictions signing one agreement, these negotiations have resulted in two separate agreements.

1. The U.S. Great Lakes Basin Water Resources Compact

The Great Lakes Basin Water Resources Compact (hereafter referred to as the Compact) legally **binds** the eight Great Lakes states together in a system to review withdrawal proposals and to manage, protect, and conserve the integrity of the Great Lakes Basin. The U.S. Congress will need to approve this compact. Similar compacts are in use to manage other shared waters in the U.S. such as the Chesapeake and the Delaware and Susquehanna River watersheds. Ontario and Quebec will not be party to the compact. As well, there are no precedents or the will for the two Provinces to enter into their own binding compact.

2. Canadian Provinces and U.S. State Agreement

The Great Lakes Basin Sustainable Water Resources Agreement (hereafter referred to as the Agreement) outlines all of the regional obligations to implement the intent of the Annex. It will be signed by all the Great Lake Premiers and Governors **however, it is not legally binding** in the opinion of the Provinces. It includes the decision-making standard that will be used to evaluate withdrawal

proposals in Appendix I and the Decision-making Procedure Manual in Appendix II that contains important procedures for jurisdictions to use in evaluating withdrawals. However it also has crucial guidance for setting up long-term water management programs, information collection improvements, regular program reports and most importantly requirements for water conservation programs within the basin.

Ontario and Quebec must legally bind themselves to these arrangements by incorporating the Great Lakes Basin Sustainable Water Agreement and its appendices into law. It will be important for citizens of both Provinces to let their governments know they expect this to happen.

Ontario's Place in the Basin

When you prepare your comments there are important things to consider as Ontarians. Because the Great Lakes watershed boundaries extend far inland in Ontario many communities depend on the Lakes for their water supplies. In 1998 for all withdrawals excluding hydropower, Ontarians used more water than other jurisdictions in the Great Lakes at 35.1%. Michigan used 18.7%, Wisconsin 14.0%, New York 10.1%, Ohio 6.5%, Indiana 6.4%, Illinois 4.9%, Minnesota 1.2%, Quebec 2.9% and Pennsylvania 0.2%.

Ontario laws already prohibit water transfers out of the major water basins in the Province and new source protection legislation with a watershed management focus is expected in 2004. It will include strengthened water permitting regulations. Quebec has prohibited all water transfers out of the Province. Quebec has embarked on a package of ambitious water reforms for new programs, laws and regulations that will also shift focus to watershed management.

Ontario already has the most restrictive and advanced water-permitting program in the Basin. It requires approvals for all withdrawals over 50,000 liters per day (13,200 U.S. gallons). Reforms to the Province's water-taking permitting system now underway as a result of Walkerton will mean that Ontario will be closer than any other Basin jurisdiction to having many of the recommendations in the Agreement in place.

There is a very uneven playing field in the Basin and many different practices in water management among the ten Great Lake and St. Lawrence River jurisdictions. See the charts we have attached from the Great Lakes Commission 2003 report *Toward a Water Resources Management Decision Support System*. They show that five states merely register withdrawals rather than regulate them with permitting systems. Among jurisdictions, there are many differences in which sectors' water use are measured or permitted or exempted all together. Indiana, Michigan, Ohio and Wisconsin have no or very limited conservation programs. Although they have new improved legislation pending, the State of Michigan is the only state to have failed to regulate water withdrawals over two million

gallons a day. Ontario is already demonstrating that it is possible to regulate all withdrawals over 50,000 liters but most jurisdictions refuse to consider registration or permitting at this level. This begs the question. Why then does Ontario need to adopt the agreement into law?

Overall Advantages to the Great Lakes St. Lawrence River Region

Once implemented, the Compact and the Agreement will mean that all jurisdictions will have to be at the table to make decisions on diversions, large withdrawals and consumptive uses over the trigger level. This ecosystem approach is very important to demonstrate our stewardship of the Great Lakes to the rest of the world. This is also very important for Canadians because it is likely most proposals for diversions will come from areas near the U.S. watershed boundaries of the Basin that are now experiencing water shortages or from the U.S. southwest where aquifers are being rapidly depleted.

The Agreement and the Compact are more protective than *The Boundary Waters Treaty of 1909* and the U.S. *Water Resources Development Act (WRDA)* because they include all of the watersheds of the Great Lakes, St. Lawrence River ecosystem. The Treaty excludes ground water and tributaries flowing in and out of the basin from its provisions and WRDA excludes groundwater.

For the first time there will be a set of conditions that will require that environmental impacts and alternatives to withdrawals be considered. Since the Great Lakes Charter and WRDA, these decisions have been made largely on a political basis.

The Compact and the Agreement define diversions as being both out of Basin and between each Great Lake (intra-basin). This is an important protection for Ontario where there continues to be proposals to transfer water between Great Lake watersheds.

Where before there were no requirements of those seeking regional approval for large withdrawal proposals, for the first time Applicants will have a long list of regional requirements to fulfill. These requirements will act as a major deterrent to many. These conditions include:

- Demonstrating there is no reasonable alternative, including conservation of existing supplies,
- Requirements to return waters withdrawn back to the Great Lake watershed from which it was taken,
- Demonstrating that the withdrawal will result in no significant individual or cumulative harm to the water quantity or quality of the Great Lakes,
- Requirements that conservation planning has been carried out, and
- Demonstrating that improvement measures will be implemented to the physical, chemical or biological integrity of the waters and water dependent natural resources of the Great Lakes Basin.

A goal of consensus among all jurisdictions has been set and provisions have been made for dispute resolution and public involvement.

Advantages to Ontario

There will be a place at the table for Ontario when new Great Lakes Basin water diversion proposals are made.

Ontario will need to begin to cumulate all of their Great Lakes withdrawal data in order to establish a current use baseline and to begin to track and understand cumulative impacts of water withdrawals. Cumulative data on all the permits already granted is not currently available.

Ontario will need to consider the impacts of and measure return flow of water permitted for withdrawal. This has not yet been a condition of permits. This will make it clearer when and where there is water loss through consumptive use and where there has been over-allocation of water to applicants or water is being wasted or inefficiently used.

Ontario will need to improve its knowledge of the interaction of ground and surface water in the Great Lakes Basin. Over time the Province should acquire better tools and resources for groundwater mapping and aquifer sustainability.

There will be additional pressure to reduce exemptions now allowed from the permitting system in Ontario such as the exemption for livestock operations.

Conservation measures set out in Appendix B of the Agreement go well beyond what is in place now in Ontario and other jurisdictions in the Basin although as we address in the next section there is much more room for improvement.

All of these new programs will be very important to the new Ontario Source Protection laws now being drafted to require watershed plans.

In the opinion of the Canadian Environmental Law Association these advantages will give us a much bigger toolbox to protect the Great Lakes and St. Lawrence River ecosystem. This will ensure that we are no longer relying on crisis management and political persuasion to manage our most precious resource.

Areas where the Agreement and Compact need Strengthening **Conservation**

Great Lakes Residents and other North Americans are the largest wasters of water in the world. While there has been some improvement, we still use a third to a half more water than other developed countries. In the Annex negotiations there was a reluctance to make water conservation for the region part of the legally binding part of the Agreement and Compact. However the terms of the Compact and Agreement are requiring applicants outside the Basin seeking large withdrawals and diversions to have conservation programs in place. Most

importantly we should let our governments know that strong conservation programs with timetables and targets for all sectors in the Basin need to be established and implemented. Commitments to do this should be binding aspects in both the Compact and the Agreement. Almost all water conservation over time will prove to be economically feasible. We need to keep in mind that only one percent of the waters of the Great Lakes is renewable from runoff, return flow and rainfall. The rest of the water was deposited long ago from glacial melt. The more we conserve the bigger margin of error we give ourselves for unknown impacts of future droughts and climate change impacts.

Equity and Parity between the Compact and the Agreement

It is troubling that the US compact does not contain references to the Agreement, its Appendix I, the Decision Making Standard and Appendix II, the Decision Making Procedure Manual. This limits its legally binding terms to adjudication of diversion, withdrawal and consumptive use proposals. However Part 2 of the Agreement Procedure Manual includes requirements to improve overall on-going water management below the trigger levels, conservation, information gathering and reports on progress. It is important to recommend that the Compact and the laws promulgated by Ontario and Quebec include these so that all jurisdictions are bound by law to improve their stewardship.

The Compact contains a section 3.9 on enforcement which references how the US public can require hearings, recover costs, require compliance in US courts. We need to request that the laws promulgating Ontario and Quebec's Agreement obligations contain parallel provisions so that the public on both sides of the Great Lakes have equal rights to due process without penalty.

Due Process and Transparency in the Regional Review

The negotiators have made it the responsibility of the jurisdiction where the withdrawal proposal has been made to provide the technical reports and assessment of the projects and to encourage public participation at this level. However very little is clear about how Regional Reviews will be conducted. Will they be formal hearings with parties represented by lawyers and formal submission of evidence or will they be "in camera" reviews and only include the jurisdictions? Will these deliberations be public and will transcripts be required or will there simply be a declaration of conformity with the standard issued? Imagine a withdrawal proposal in your local area that might go to regional review. Let the government know what level of involvement, access and transparency you would want during the regional review.

Areas of Controversy

The Implementation Timetable

There have been suggestions from the U.S. negotiators that implementation of new programs in eight legislatures and the approval of Congress will take up to ten years. The ENGOs on the Advisory Committee and others have asked that it take no more than five years. In August 2004 the IJC Review of progress on the

recommendations made in their February 2000 was released. This report suggests these standards and procedures could be in place in two years.

Trigger Levels and Thresholds for Regional Review and for Data Collection

The trigger levels for regional review were hotly and continuously debated over the three years. There was regrettably little sound science to support the threshold at which a withdrawal would harm the Great Lakes and St. Lawrence River. It was generally agreed that no single diversion would have demonstrable impacts on the whole ecosystem but would most certainly have local impacts. However it was also agreed that harm would come from the cumulative impacts of all small and large withdrawals over and under the trigger levels. What is perhaps most important is that we have the ability to change these trigger levels over time as we better understand the complex relationships between water levels and the well-being and integrity of the ecosystem.

Cumulative withdrawal data above and below the trigger level should begin to be collected now by all jurisdictions regardless of whether the Compact and Agreement have been implemented. We recommend that all data on withdrawals over 20,000 liters be submitted to a central database.

It is valuable for you to paint a picture of what local impacts would occur in your region from a withdrawal, diversion or consumptive use of these sizes.

One issue you may want to address is the issue of discrimination. Are we discriminating between applicants from within and outside the basin if we have a different trigger levels for diversions of 1 million gallons a day and for consumptive uses of 5 million gallons a day? Could this have trade implications?

Consumptive Use and the 120-day Average

Some uses of water are consumptive and do not return water to the Great Lakes. One of these uses is agriculture. Crops take up and retain water are harvested so this water leaves the Basin. The more effectively that water is delivered and taken up by crops, the more efficient irrigation practices are. For other sectors consumptive uses can usually be avoided or controlled. Agriculture has argued that there should be a 120-day averaging period for withdrawal, diversion and consumptive use proposals over the trigger levels. This covers the growing season in the Great Lakes. Previously the Charter and other programs called for a 30-day average.

Farming operations that exceed the trigger levels would be huge by Ontario standards. Ontario's water permitting threshold of 50,000 liters was set to reflect the use by medium to large sized farms. Would we want farms of this size to be exempt?

By increasing this average by ninety days we may be allowing other large and harmful uses to disappear under the radar. CELA recommends that the Compact and the Agreement revert to 30-day averaging periods.

Return Flow Requirements

Many jurisdictions, including Ontario, do not measure or record return flow adequately in their water management regimes. The Compact and Agreement require return flow to the Lake basin or the St. Lawrence River it was withdrawn from. If this distance is far from the point at which the water is withdrawn ecological harm could occur. We recommend changes requiring return flows to be "as close as possible to the point of withdrawal" and be returned to the same surface or aquifer source it came from. This would prevent unnecessary harm.

Increases in the Chicago Diversion

There are different degrees of sensitivity among Great Lakes jurisdictions about the Chicago Diversion (see Compact Section 3.10 and Article 203 11 of the Agreement). The Chicago diversion has been authorized by the U.S. Supreme Court to remove an average of 3,200 cfs (91 cms) from Lake Michigan to the Mississippi River. Historically, this diversion has been a matter of discussion and litigation for at least one hundred years. Canada has objected through diplomatic notes and other communications to each of the proposals to increase the Chicago Diversion. It is highly likely that further increases will be proposed. It has been argued that because Lake Michigan is wholly within the boundary of the U.S., it is not a shared boundary water.

The terms of the U.S. Compact and the Agreement apply to all other increases in diversions. There appears to be differences about whether future increases in the Chicago diversion would be exempted. The language of the U.S. compact states that no such diversion, as authorized by the U.S. Supreme Court decree is subject to the decision-making standard or regional review under the compact. Any proposed increase in the Chicago Diversion would be sought through an amendment to the Supreme Court decree and would not fall under the Compact provisions. The Compact commits the States to seek formal input from the Provinces of Ontario and Quebec and to facilitate the appropriate participation in any future proceedings to amend the decree. There is doubt that Canada or the Provinces would receive standing in the U.S. Supreme Court. Even if the Provinces received standing - would the U.S. Supreme Court consider their views?

The Agreement proposes to exclude the existing U.S. Supreme Court authorization for the Chicago Diversion from all the provisions of both the Decision Making Standard and Regional Review **as of the effective date** that the Agreement is signed by all jurisdictions. However, it is implied that any increases after that date should be subject to the Agreement.

Twelve Mile Exemption for Return Flows

There has been much discussion of areas just outside the surface water boundaries of the Great Lakes Basin seeking new water supplies from the basin. Over time these boundaries **might** be altered to include groundwater that is proven to be part of the Great Lakes Watershed as we understand more about the relationship between ground and surface water. However any relaxing of the Basin boundaries or exemptions for areas outside those boundaries at this time could set a bad precedent.

In the latest draft of the Decision Making Standard (Section 4 Jurisdictional Review for Diversions C.) we recommend deleting the following language. "An Individual jurisdiction may grant an exemption to this return flow requirement only when the applicant demonstrates that the diversion of Great Lakes Basin Water is less than 250,000 gallons (947,000 liters) per day average in every 120 day period and is exclusively for public water supply uses in areas less than 12 miles (19.3 kilometers) from the Basin boundary where adequate quantities of potable-quality water are not available..."

This seems to have been designed to resolve the problem of one particular municipality rather than subjecting their proposal to the terms others will be required to comply with.

Conclusions

Problems with water security already exist in the Great Lakes and St Lawrence River Region. Groundwater pumping in Wisconsin from areas outside the Basin is reversing flows to Lake Michigan. Areas north of Toronto, around Walkerton and in the Waterloo region in Ontario are considering pipelines to move water between watersheds. Make sure that you let the governments know about water allocation, scarcity problems and concerns about long-term sustainability in your community.

Other Needs

While this Draft Great Lakes Water Management Initiative is a giant step forward into the 21st century, it is by no means a panacea that will resolve our water supply problems. Much more will need to be done.

The Basin Water Resources Management Program promised in the Great Lakes Charter of 1985 needs to be implemented to guide future water management.

Research on best efficiency and conservation practices for all sectors with public involvement is badly needed.

Studies are needed to define harmful impacts from lowered lake levels.

Further studies on the impacts of climate change on the Great Lakes and the St. Lawrence River.

Programs are needed to ensure that all waters returned to the Great Lakes, St Lawrence River basin are not introducing further invasive species.

Most importantly governments will need to allocate staff and resources to implement the transition to these water protection programs and work to make them self-sufficient without penalizing those in need.

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#### How to make Comments

1. The draft agreements are posted until October 18, 2004, on the Environmental Bill of Rights Registry for public comment at [www.ene.gov.on.ca/envision/env\\_reg/ebr/english/index.htm](http://www.ene.gov.on.ca/envision/env_reg/ebr/english/index.htm) (Registry Number PB04E6018).

If you wish to comment on the draft agreements, please contact the Ontario Ministry of Natural Resources by fax at (705) 755-1267, or by mail to:

Paula Thompson, Senior Policy Advisor  
MNR Water Resources Section, Lands and Waters Branch  
300 Water Street, P.O. Box 7000  
Peterborough, Ontario, K9J 8M5  
PHONE: (705) 755-1218 FAX: (705) 755-1267

2. You should also send comments to the Council of Great Lakes Governors directly by e-mail at [Annex2001@cglg.org](mailto:Annex2001@cglg.org) (electronic comments will be posted to the Council of Great Lakes Governors website at <http://www.cglg.org>), by fax at (312) 407-0038, or by mail to:

David Naftzger  
Executive Director  
Council of Great Lakes Governors  
35 East Wacker Drive, Suite 1850  
Chicago, Illinois 60601 U.S.A.

## Ontario Hearing Locations

Monday, September 13, 2004 - Thunder Bay Public meeting 7:00pm-9:00pm  
Victoria Inn, 555 West Arthur Street Kensington Room  
Phone: (807) 577-8481 Website: [www.victoriainn.ca/ThunderBay/](http://www.victoriainn.ca/ThunderBay/)

Tuesday, September 14, 2004 - Sault Ste. Marie Public meeting 7:00pm-9:00pm  
Water Tower Inn, 360 Great North Road Courtyard Room  
Phone: (705)949-8111 Website: [www.watertowerinn.com](http://www.watertowerinn.com)

Monday, September 20, 2004 – Toronto Public Meeting and Open House 5:00pm-9:00pm (Presentations at 6 pm) Regional Meeting Hosted by the Council of Great Lakes Governors  
Novotel Toronto Centre, 45 The Esplanade Champagne and Alsace Ballrooms  
Phone: (416) 367-8900 Website: [www.novotel.com](http://www.novotel.com)

Tuesday, September 21, 2004 – Windsor Public meeting 7:00pm-9:00pm  
Ramada Plaza Hotel and Suites, 430 Ouellette Ave. Guard Room  
Phone: (519) 256-4656 Website: [www.ramadawindsor.com](http://www.ramadawindsor.com)

Wednesday, September 22, 2004 – London Public meeting 7:00pm-9:00pm  
Best Western Lamplighter Inn, 591 Wellington Road S. Chelsea 1 Room  
Phone: (519) 681-7151 Website: [www.lamplighterinn.ca](http://www.lamplighterinn.ca)

Tuesday, September 28, 2004 - Kingston Public meeting 7:00pm-9:00pm  
Ambassador Resort Hotel, 1550 Princess St. London Room  
Phone: (613) 548-3605 Website: [www.ambassadorhotel.com](http://www.ambassadorhotel.com)

