

October 30, 2015

The Honourable Bill Mauro
Ministry of Natural Resources and Forestry
Suite 6630, 6th Floor, Whitney Block
99 Wellesley Street West
Toronto, Ontario M7A 1W3

Dear Minister Mauro,

Re: EBR Registry Number 012-4464: Wetland Conservation in Ontario: A Discussion Paper

We, the undersigned organizations, commend your ministry for its leadership in developing a strategic plan for Ontario's wetlands. There is a clear need for such a plan to better protect wetlands across the province.

The discussion paper is an important first step in developing the strategy. In response, we highlight four major policy priorities for our organizations.

1. The overarching goal of the strategic plan for Ontario wetlands should be to achieve a net gain in wetland habitat and function. The historic decline of wetlands in Ontario is of deep concern. South of the Canadian Shield, more than 70 percent of the original wetlands have been lost, with losses exceeding 85 percent in some areas. Across the province, wetlands continue to be threatened by land conversion, alterations to natural water levels, invasive species, pollution and climate change. In order to reverse the trend of ongoing wetland loss the strategic plan should aim to achieve an overall net gain in wetland habitat and function.

2. Provincially Significant Wetlands and coastal wetlands should be strictly off limits to all forms of development. In many if not most cases, restored wetlands cannot fully compensate for the loss of naturally occurring wetlands. Policy should be strengthened to better protect existing wetlands. Outright protection must be afforded for the province's most significant, rare and valuable wetlands.

3. Wetland evaluation must be expedited in order to identify Provincially Significant Wetlands and ensure protection measures and policies are applied.

The failure to evaluate wetlands to determine whether they are provincially significant is a critical problem that undermines the achievement of policy objectives. The determination of provincial significance is a key policy driver for wetland protection, yet


most wetlands in Ontario are unevaluated. This problem is particularly severe in the north. Even south of the Canadian Shield almost half of the wetlands are still awaiting evaluation. Wetlands under threat from approved or pending development should be a priority for evaluation. To protect wetlands in the interim, policy should require that wetland evaluation occur prior to development approvals.

4. Compensation, also known as biodiversity offsetting, should be employed only as a final option within a clear mitigation hierarchy that prioritizes avoidance of impacts and aims to achieve a net gain in wetland habitat and function. We recognize that biodiversity offsetting can create new opportunities to advance wetland conservation goals through the positive engagement of many sectors of society. At the same time, however, offsetting involves a trade-off that presents considerable risks if not sufficiently circumscribed through policy and effectively implemented and overseen. Extreme caution is needed in developing policy to ensure that intended conservation outcomes are achieved and that there is an equitable distribution of social costs and benefits. Policy should set strict limits to offsetting with respect to Provincially Significant Wetlands and coastal wetlands, ensuring that current protections are upheld or strengthened.

In closing, we would like to reiterate our support for this initiative, which enjoys broad support across sectors. The development of a wetlands strategy represents a significant opportunity to improve the state of Ontario's biodiversity and to mitigate and enhance our resilience to the impacts of climate change.

We trust that our comments above will be taken into account and look forward to ongoing involvement in the development of the strategic plan.

Yours truly,



Caroline Schultz
Executive Director

Ontario Nature



Theresa McClenaghan
Executive Director and
Council

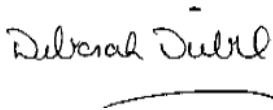
Canadian Environmental
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Jack Gibbons
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Linda Heron
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Dan McDermott
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Cc: Eleanor McMahon, Parliamentary Assistant to the Minister of Natural Resources and Forestry

Cc: Rebecca Zeran, Conservation Programs Advisor, Ministry of Natural Resources and Forestry