



Testimony to the International Joint Commission

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My name is Elizabeth Hendriks and I am the policy advisor for the freshwater program for WWF-Canada (different from WWF-USA). Thank you to the IJC (International Joint Commission) and commissioners for the invitation to speak here today on Plan 2014. I want to commend the IJC for getting a regulation proposal on such an intricate issue in such a complex region to this point in the process.

WWF is one of Canada's largest and oldest conservation organizations, with staff and offices across the country including, Toronto and Montreal, providing us strong presence in the Lake Ontario-St. Lawrence River region.

Our work is science-based and solutions oriented. Our freshwater program is aimed at protecting and restoring the health of Canada's aquatic ecosystems so that we and future generations can benefit from the many values they provide – from clean water and recreational opportunities to habitat for fish and waterfowl.

We have been following the development of the regulation plan with great interest since we profiled the St. Lawrence in our report, "Canada's Rivers at Risk" in 2009. In this report, which focused on alteration of river flows, we highlight the poor and declining health of the St. Lawrence River, largely due to the highly regulated nature of the river. We feel that Plan 2014 has the potential to have a national and global impact and can demonstrate the best in innovative governance, adaptive management, and large scale aquatic ecosystem restoration.

We are pleased with Plan 2014, as it sets out to restore aquatic biodiversity, something obviously near and dear to WWF's heart. But a plan is not a solution – its implementation is. That is why we chose to focus our testimony on three points: governance, adaptive management, and aquatic restoration because these pieces will be what ensure the plan can deliver the intended impact. We will submit a longer submission online but today,

Let me begin with **Governance:**

The literature on water issues – from local to global – points to governance as the heart of water challenges. The Lake-Ontario – St. Lawrence region is no exception. Given the complexities of the environmental system and the range of stakeholders and interests in the region, the governance structure detailed in Plan 2014 will be instrumental in ensuring the considerations of all interests are evaluated in an accountable and transparent manner.

There needs to be broader and more diverse representation of interests engaged in decisions in an ongoing way. We believe that for the plan's implementation to be a success, that the Board of Control, in some way, reflects a broader range of interests. Whether through membership of the Board of Control or through an advisory board, we would like to see this reflection in Plan 2014. In particular, an ecologist with understanding of Lake Ontario's wetlands, coastal processes and riverine habitats in the lower St. Lawrence River. A range of other stakeholders including First Nations, shipping, riparian property owners, conservation organizations and a reflection of the diverse geography should also be represented in some way.

I will now move into our comments on **Adaptive Management:**

Adaptive management is crucial for ensuring that Plan 2014 can meet its goals and balances interests as the amount of water in the system changes with a changing climate. The key to adaptive management is to create an ongoing process of improving knowledge about the system. That means a commitment to long-term monitoring, to assess the impacts of the Plan's implementation, and to adapt it, as the region evolves. Impacts of Plan 2014 need to be monitored and the results interpreted to detect whether it is meeting its goals.

The four key environmental performance indicators that have been identified for monitoring: wetland vegetation, bird communities, northern pike, and muskrat are appropriate indicators grounded in scientific research and reflective of local ecosystem dynamics. These performance indicators were identified during the LOSLR Study and subsequent follow-up as being highly significant in terms of representing broad ecosystem response, being sensitive to water level changes, and representing a relatively high degree of scientific certainty.

Monitoring representatives, with expertise in ecology and shoreline erosion for example, should be engaged to analyze and report the outcomes of monitoring activities and implications for plan operation. Results of relevant existing monitoring programs should be used as much as possible, for example Lake Ontario Lakewide Management Plan to

ensure existing information sources are being used and new efforts don't duplicate, but rather complement, what is already happening to monitor Lake and River health.

In Ontario and Quebec regionally relevant conservation authorities, already have monitoring programs. Engaging these types of organizations, who already work on the ground, will help ensure a thorough network of monitoring systems and a monitoring network needs to be set up and put into action as early as possible in order to provide baseline data.

It is recognized that there is a need to secure other governmental funding, in addition to the Commission's budget, to implement an adaptive management plan. There needs to be sufficient funding in place for long-term, extensive monitoring and implementation of the adaptive management plan.

Finally, I would like to discuss **Ecosystem Restoration:**

We can't be more pleased that the IJC has gone to such great lengths to restore the Lake Ontario and St. Lawrence River to a more natural flow regime. It is a historic opportunity to exercise principles of sound water management ensuring the most effective restoration of habitat for the survival of birds, mammals, fish, and our communities along the shores.

The demise of the wet meadow habitats shows how the current regulation plan has damaged the region's ecology but studies show how Plan 2014 will provide relief. For example, muskrats are a 'keystone' and a healthy muskrat populations represent stronger ecosystem. Plan 2014 will restore more natural fluctuations to Lake Ontario and enable muskrats to return to the coastal marshes. This will benefit the lake and river ecosystem. This will also provide a boost to the economy by increasing recreational opportunities like fishing, hunting and trapping, boating and bird watching to name a few.

Coastal restoration and resilience in the region will depend on institutionalizing adaptive thinking for better response to extreme weather events, and understanding the win-win-win potential. Win-win-win potential being: benefits for critical wetlands; improved economy by restoring recreational environment; and smarter community building and infrastructure.

While returning the region to more natural flows is by far the most effective restoration tool other strategies include:

- Assess shoreline vulnerabilities and Enhance Natural shoreline
- Update Mapping and Planning
- Resilience and adaptive implementation
- Public engagement

I'd like to make one final comment on communications. With the public and stakeholders increasingly interested in and concerned about the health of our waters, the success of the plan and implementation would benefit greatly from enhanced communication with stakeholder and the public. For Governance, ensuring decisions are transparent is largely dependent on communications. Likewise, it is through the communication plan that adaptive management becomes an iterative process. Understanding and communicating the impacts of Plan 2014 to stakeholders and the public creates the feedback loop of adaptive management. We recommend pairing the implementation process with a clear communications strategy.

In conclusion,

We are pleased and very encouraged to see this important plan make it to public and technical hearings, which we take as a signal that it is moving closer to implementation. There is well documented environmental degradation and well researched benefits of returning to more natural flows in this region.

We believe that for the plan's implementation to deliver on the benefits it set out to, the governance system need to better reflect the diversity of interests, and the adaptive management approach needs to include a network of monitoring and to be effectively resourced with people and money.

After so many years of reviewing a new regulation approach we encourage the IJC and ultimately the respective Federal Governments to work quickly to finalize and implement such a local, national, and internationally important regulatory plan for the health and wellness of our environment and our communities.

Again, thank you for the opportunity to speak here today and I look forward to the discussion.