



CANADIAN INSTITUTE FOR
ENVIRONMENTAL LAW AND POLICY

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February 8, 2007

Caroline Cosco, Senior Policy Analyst
Land and Water Policy Branch
135 St. Clair Avenue West, 6th floor
Toronto, Ontario M4V 1P5

Via Facsimile (416) 314-3918

**Re: Proposed Legislative Amendments to the *Ontario Water Resources Act*,
Registry # AA07E0001**

Dear Ms. Cosco,

I am writing on behalf of the Canadian Institute for Environmental Law and Policy (CIELAP) to provide comments on the proposed amendments to the *Ontario Water Resources Act (OWRA)* to implement the Great Lakes - St. Lawrence River Basin Sustainable Water Resources Agreement (the Agreement), signed on December 13, 2005 by Ontario, Quebec and the eight Great Lakes states. CIELAP was founded in 1970, with the mission to provide leadership in the research and development of environmental law and policy that promotes the public interest and sustainability.

CIELAP participated as a member of the Ontario government's Annex Advisory Panel during negotiation of the Agreement. CIELAP commends the provincial government for its important leadership during the negotiations with other jurisdictions that led to the Agreement. The leadership shown by Ontario resulted in a final Agreement that was much stronger than the earlier version proposed.

CIELAP strongly supports the proposed legislative amendments to the *OWRA* in order to implement the Agreement, particularly in relation to inter-basin diversions and intra-basin transfers. We understand that additional protections may be necessary to ensure sustainable water resources in the Great Lakes - St. Lawrence River Basin. These outstanding issues exist which may need to be addressed later in regulations pursuant to the enabling provisions being added to the *OWRA* at this time. CIELAP looks forward to working with the provincial government in the future to address these issues.

Advancing the Environmental Agenda

Thank you for the opportunity to provide input on these proposed legislative amendments. Please contact me, or Maureen Carter-Whitney, CIELAP's Research Director, if you wish to discuss any of these comments further.

Yours sincerely

A handwritten signature in black ink that reads "Anne Mitchell". The signature is written in a cursive, flowing style.

Anne Mitchell
Executive Director

Cc: Hon. Laurel Broten, Minister of the Environment
Gord Miller, Environmental Commissioner of Ontario