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***Celebrating Over 30 Years of Wildlife Habitat Conservation  
Célébrons plus de 30 ans de conservation des habitats fauniques***

September 8, 2016

Ministry of Natural Resources and Forestry  
Policy Division  
Natural Resources Conservation Policy Branch  
Natural Heritage Section  
300 Water Street  
Peterborough, ON K9J 8M5

**RE: Comments on Draft: A Wetlands Strategy for Ontario 2016-2030 (EBR Posting 012-7675)**

On behalf of Wildlife Habitat Canada, I am pleased to provide comments on Ontario's Draft Wetlands Strategy.

Wildlife Habitat Canada (WHC) is a national, not-for-profit, non-governmental, charitable conservation organization that was established in 1984. Through its grant program, WHC has invested over \$50 million in support of more than 1,500 conservation projects across Canada. The major component of our work involves wetland and waterfowl conservation, as our main source of funding is the Canadian Wildlife Habitat Conservation Stamp, purchased by migratory bird hunters with their federal migratory game bird hunting permit.

Overall, we are pleased that Ontario has recognized the importance of wetland conservation and the need to develop a comprehensive strategy to "*ensure that wetlands are valued, conserved and restored.*"

The first section of the document, which provides information on wetlands in Ontario, is useful and well-written; however, as it is essentially 17 pages of background information, to provide this at the front of the document obscures the actual Strategy, which should be the main focus.

The vision, as stated, is good.

The four strategic directions (awareness, knowledge, partnership and policy), while laudable, result in vague outputs which will have questionable impact on wetlands actually being conserved (i.e., the most important outcome).

With respect to the two targets:

Target 1: "*By 2025, Ontario's significant wetlands are identified and conserved to sustain essential ecosystem services.*"

The expectation that it will take another decade just to identify significant wetlands will, in itself, lead to critical further loss of wetlands in southern Ontario.





Target 2: “By 2030, the net loss of wetlands in Ontario is halted in areas where wetland loss has been greatest.”

This target is inappropriate for two reasons. Firstly, net loss of wetlands is presently impossible to measure due to inadequate inventory and monitoring information. Secondly, the target becomes easier to achieve as wetland loss becomes worse. In areas where all wetlands have been lost, this target is already met.

It is unclear from the document whether the government is committed to implementing the Strategy. New funding would be required for science (research, inventory, and monitoring), policy (planning, communications and partnership development) and operations (including stewardship and compliance). Following years of funding erosion within MNRF, the option of “funding from within” is only achieved by cutting other important natural resource management programs.

The existing legal and policy infrastructure for wetland management remains the fundamental weakness of the Strategy. The description of the existing policy framework in the document as the “*wetland-related natural heritage policies under the Provincial Policy Statement*” aptly describes the present vague and confusing government accountability framework which contributes to the continuing loss of wetlands, particularly in Southern Ontario. It is unclear what the existence of this Strategy will do to resolve this issue. This is a Strategy led by a government agency (MNRF) which has no effective legal framework to manage and conserve wetlands.

In summary, while the overall vision for conserving Ontario’s wetland in a government strategy is a positive development, there are several improvements which could be made to the Strategy. The provision of a legal framework, such as a Wetlands Conservation Act, and new funding to implement the Strategy are two essential ingredients for success.

Thank you for the opportunity to comment.

Sincerely,

Cameron C. Mack  
Executive Director  
Wildlife Habitat Canada

