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August 31, 2012

Ms. Carolyn O'Neill
Manager, Ontario Ministry of the Environment
Integrated Environmental Planning Division,
Land and Water Policy Branch, Great Lakes Office
135 St. Clair Avenue West, Sixth floor
Toronto, ON M4V 1P5

**Re: Response of the Ontario Environment Industry Association to EBR
Registry Number 010-6418 (Great Lakes Protection Strategy)**

Dear Ms. O'Neill:

On behalf of the Ontario Environment Industry Association (ONEIA), we are writing to offer our comments on Ontario's Draft Great Lakes Strategy.

ONEIA is the organization representing Ontario's more than 3,000 environmental technology, service and product firms. This sector is a significant economic force in our province, accounting for \$8-billion of our annual GDP and employing more than 65,000 people. With more than \$1-billion of exported goods and services, the environment industry is well positioned to grow quickly in coming years, taking advantage of a worldwide annual market of more than \$700 billion.

The Association is broadly supportive of the proposed Great Lakes Strategy and we are pleased to offer the following points:

General Position

The Great Lakes and St. Lawrence River Basin is one of the world's most important environmental assets and, as such, can benefit from the type of focus that the Strategy, and the accompanying Great Lakes Protection Act (Bill 100), can offer. The Great Lakes are also an incredibly important *economic* ecosystem whose health has impacts far beyond Ontario. According to the Brookings Institution, if the Great Lakes basin was a separate country, it would represent one of the world's largest economies, with a GDP of more than \$4.5 *trillion* each year.¹

Over our 20-year history, the core principle of ONEIA has been that the economy and the environment are not mutually exclusive but are, instead, inexorably linked. Our engagement of government is premised on the ability of our member firms to deliver business solutions that solve environmental problems while creating growth and employment.

In this light, ONEIA offers the following for your consideration:

¹ Please see www.brookings.edu

Achieving the Great Lakes Strategy's economic objectives will rely upon moving forward with Water Opportunities and Water Conservation Act.

The major focus of the Strategy is on protecting and enhancing Great Lakes ecosystems. Given this focus, ONEIA is pleased to see included in the Strategy the goal of "Ensuring environmentally sustainable economic opportunities and innovation". Our comments will concentrate on this goal and the Strategy's "Priorities for Action."

In 2010, the Province created an important policy instrument in the *Water Opportunities and Water Conservation Act*. From the perspective of the environment and cleantech industry, this initiative should, if properly implemented, provide economic development opportunities for Ontario companies while delivering environmental benefits. The legislation was intended to:

- Create innovation and economic opportunities for Ontario companies;
- Lay the foundation for new Ontario jobs; and,
- Develop Ontario as a leader in new technologies, water conservation and treatment.

ONEIA and its members supported this initiative and we were quite pleased to see the reference to the Water Opportunities Act in the Great Lakes Protection Strategy, specifically its stated priority:

"...through the Water Opportunities Act...take a broader view of water usage, and drawing connections between improvements in the management and quality of our water resources, and the promotion of innovative technologies and solutions from Ontario companies".

Specific actions include:

"Developing a long term economic development strategy that will establish a series of goals and actions to make a cohesive and globally competitive water sector" (Pg. 57(d)).

While we welcome linking the two initiatives, ONEIA and Ontario water companies have grown concerned in the past year about the inconsistent implementation of the Water Opportunities Act and its place within the government's broader approach to the environment and economy. We are now doubly concerned that this delay may also endanger the economic goals of the Great Lakes Protection Strategy.

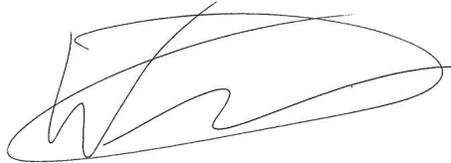
For example, Action Item (g) on Page 57 prioritizes "...encouraging industrial practices that minimize water consumption, recycle water, use reclaimed wastewater....for business operations or processing". The potential to drive innovation and job growth from provisions such as these is considerable. ONEIA is very concerned that by bundling these provisions within such a large and complex strategy, Ontario may fail to complete the actions required to develop and stimulate this market sector.

RECOMMENDATION: ONEIA recommends that the actions related to economic growth, innovation and job creation be developed using a team

approach. We recommend that the MOE begin a dialogue with the environment and cleantech sector, related Ministries (e.g. MEDI, MOI, MMAH, MNR), municipalities and other stakeholders to develop a timetable to implement the remaining provisions of the Water Opportunities and Water Conservation Act in order to ensure that its contribution to the Great Lakes Protection Strategy is realized in a timely fashion.

ONEIA looks forward to continuing working with the government of Ontario and other organizations to create a progressive and supportive policy environment for Ontario water firms. Questions and feedback should be addressed to our Water Subcommittee Chair, Alex Keen, at akeen@altech-group.com / (416) 467-5555, ext. 223 and Alex Gill, our Executive Director, at agill@oneia.ca / 416-531-7884.

Yours truly,



Derek Webb
*Chair, ONEIA Board of Directors
Executive Vice-President, Biorem*



Alex Gill
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