

April 18, 2022

International Joint Commission
Canadian Section
234 Laurier Avenue West, 22nd Floor
Ottawa ON K1P 6K6
Canada

Submitted via email: commission@ijc.org

To whom it may concern,

Re: Expedited Review of Plan 2014 Phase 1 Report

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA is appreciative of the Great Lakes-St. Lawrence River Adaptive Management (GLAM) Committee's recognition of significant issues resulting from the flooding events in 2017 and 2019 and responding with a process for an expedited review of Plan 2014.

The Phase 1 investigation resulted in the development of a Decision Support Tool (DST). This is a computer-based tool that allows the Board to visualize the potential impacts of different water-level scenario decisions. While we are happy that the DST does include impact to agriculture as one of the metrics, we are beyond disappointed that it only considers "agricultural land on the lower river" (p. IX). This does not take into account the devastating impacts the flooding events of 2017 and 2019 had on Ontario farms along the Great Lakes - St. Lawrence system. While we recognize that the expedited review had to begin somewhere, we implore the GLAM Committee to include the potential impacts on Ontario farms into the metrics considered within the DST going forward. It will assist the committee in better understanding the full implications of their decisions regarding the management of water levels.

We understand the amount of uncertainty the Board faces when making real-time decisions on water levels. The GLAM project and resulting DST allow the board a “better sense of who is being impacted by extremes, the severity of those impacts and whether their deviation strategy can improve conditions.” (p. 104). Increasing the amount of information available within the DST can only add to the credibility of the difficult decisions the Board must make.

A number of figures in the report compare actual observed water levels (with the deviations from Plan 2014), pre-project (i.e., if outflows were not regulated) and levels had Plan 2014 been followed without deviation. It would have been very helpful for the interested and impacted communities if some of the analysis was included on what the water levels would have been under the previous water-level plan prior to implementation of Plan 2014. We recommend that this analysis be incorporated into future phases of this work.

OFA appreciates the opportunity to provide comments on the Expedited Review of Plan 2014 Phase 1 Report and we remain available to discuss the above comments further.

Sincerely,



Peggy Brekveld
President

cc: The Honourable Marie-Claude Bibeau, Minister of Agriculture and Agri-Food Canada
The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs
Wendy Leger, Co-Chair Great Lakes-St. Lawrence Adaptive Management Committee &
Head – Boundary Waters Issues Unit, Environment and Climate Change Canada
OFA Board of Directors