



June 30, 2015

Mr. Gordon Walker, Chair Canada Section  
International Joint Commission  
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Ottawa, ON K1P 6K6

Ms. Lana Pollack, Chair U.S. Section  
International Joint Commission  
2000 L Street, NW, Suite #615  
Washington, DC 20440

Re: **Comments on *Ten Year Review of the International Joint Commission's Report on "Protection of the Waters of the Great Lakes" (draft, May 19, 2015)***

Dear Commissioners Walker and Pollack:

Thank you for the opportunity to provide comments on the *Ten Year Review of the International Joint Commission's Report on "Protection of the Waters of the Great Lakes" (draft, May 19, 2015)*. These comments are provided on behalf of the members of the Council of Great Lakes Industries (CGLI). CGLI is a binational non-profit organization representing the common policy interests of Canadian and US industrial organizations that have significant assets in the Great Lakes region. The mission of CGLI is to promote the growth and vitality of the region in harmony with its human and natural resources (sustainable development).

Continued dependable access and reliance on Great Lakes water resources is a critical Great Lakes industry need. CGLI has coordinated industry stakeholder cooperation and participation throughout the development and implementation of the Great Lakes – St. Lawrence River Basin Sustainable Water Resources Compact and Agreement, The resulting governance structure regarding Great Lakes water resources management provides important oversight while maintaining the flexibility needed to allow regulatory jurisdictions to respond to local water use needs. As indicated in the draft Ten Year Review report, this structure provides a critical framework that serves the region's needs.

Continuing implementation of the Compact/Agreement consistent with the draft report's 2015 Recommendation 1 will protect the resource. While vigorously implementing the Compact, however, it is important for resource managers and decision makers to have available and to utilize high quality data and information to assess potential impacts on Great Lakes ecosystems. When they do so, as is highlighted by 2015 Recommendation 2, the Compact/Agreement Decision Making Standard does provide the precautionary approach needed to support jurisdictional water management actions.

As demonstrated in the report, the numbers associated with the region's water resources are huge, which means that collecting and managing water use data and related information is a huge, but critical, undertaking for Great Lakes water resources managers. Expectations regarding the estimation of "consumptive use" quantities need to be interpreted in the context of the precision capable in the measuring and reporting of quantities of the magnitude represented in the Great Lakes system. As stated in Recommendation 3, the Great Lakes states and provinces

should continue to investigate improved water balance methodologies in terms of both measurement and interpretation. However, it is equally important to apply standard statistical analysis methodologies appropriate to the magnitude of the system and not try to force conclusions from the numbers beyond the precision afforded by whatever methodology is applied.

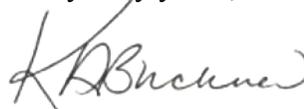
As indicated in 2015 Recommendation 4, the multiple agencies involved in collecting and managing water use information and analyses—especially the federal agencies listed in the recommendation—must continue to coordinate and share new knowledge about the Great Lakes system to inform decision-making under the Compact. Moreover, scientific advancements should be encouraged and incorporated, as suggested by 2015 Recommendation 5. It is critical for federal agencies to collaborate with state and provincial jurisdictions and stakeholders in these efforts. The Regional Body and Compact Council must seek to enhance opportunities for full scale collaborative events that update and seek input to policy decisions and the science and data that support such decisions. Events should include agency, academic, jurisdictional and stakeholder consultations. Report authors should consider adding the need for the convening periodic water resource science forums to these recommendations.

Groundwater is an important part of Great Lakes water resources. 2015 Recommendation 6 highlights the need to focus on groundwater protection within the Great Lakes basin. However, it is important to consider that the concerns regarding supply quantity and quality that are reflected in this recommendation most likely apply only in localized areas. These situations must be managed at the local jurisdictional level and should not be considered to be a systemwide or Great Lakes-basin level issue.

The region's infrastructure is the backbone of the regional economy. As noted in 2015 Recommendation 7, broad-based public and private sector collaboration is an important element in addressing infrastructure improvement needs. However, the focus in this recommendation on "water conservation potential" is too restrictive. The key to well-managed water use in the Great Lakes region is enhanced water stewardship. It is not the quantity of water withdrawn for use that is important, it is the stewardship of water use that leads to sustainability. A slight revision of this recommendation would satisfy this need (i.e. "... increase funding to close the region's water infrastructure deficit and support/encourage a water stewardship focus region wide").

CGLI appreciates the opportunity to provide these comments and looks forward to working with IJC commissioners and staff as this review moves forward. Please contact us for any needed additional information or clarification.

Very truly yours,



Kathryn Buckner, President

cc: Ms. Tris Morris, Director  
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