

April 3, 2017

Mr. Gordon Walker, Chair Canada Section
International Joint Commission
234 Laurier Avenue West, 22nd Floor
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 *First Triennial Assessment of progress on Great Lakes Water Quality (draft, January 2017)***

Dear Commissioners Walker and Pollack:

Thank you for the opportunity to provide comments on the *First Triennial Assessment of progress on Great Lakes Water Quality (draft, January 2017)*. These comments are provided on behalf of the members of the Council of Great Lakes Industries (CGLI). CGLI is a binational nonprofit 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).

Report Focus

Focusing the first Triennial Assessment of Progress (TAP) report on Great Lakes Water Quality Agreement 2012 (GLWQA) objectives is a good approach. As was evident during the recent public meetings held throughout the Great Lakes basin, people have diverse views regarding the status of the Great Lakes and the future focus of any additional management action. All of these views are important and need to be addressed. The 2012 revisions to the GLWQA provide an orderly means for categorizing, prioritizing, and identifying specific measures that resource managers can use. Viewing Great Lakes protection needs within the context of the GLWQA objectives is an important example for all to follow.

Applying the Science

Presenting the TAP draft in narrative vs. scientific style also makes a lot of sense. As was reflected by citizen comments provided during the public meetings, the science that is provided through most Great Lakes status presentations can be difficult to grasp. The narrative approach advances the desire of IJC Commissioners to encourage public in the triennial review process by “the public,” or non-science community.

However, it is also important to make this effort a “two-way” proposition. Not only is it advantageous to encourage the public to provide lay-person input, focus, and impact assessment recommendations to inform Great Lakes policy, but it is also necessary to “take the science” to the public. Understandable explanations of scientific findings that reflect the science that

underlies observed water quality outcomes, the “cause and effect” associated with the outcomes, and best practices for moving forward are needed. The TAP process provides an opportunity for the Commission to help non-scientific members of the public understand why policy decisions cannot always be made in ways that reflect public preferences, hypotheses, or popular beliefs.

The Progress Report of the Parties

In response to the Commission’s request for reaction to comments in the draft TAP report about the Progress Report of the Parties (PROP), CGLI agrees with the need for more collaboration between the governments and stakeholders. CGLI also agrees with many of the general PROP shortcomings that are cited in the draft TAP report. However, as acknowledged to some degree in the draft TAP, limitations on resources available to the Parties are responsible for many of the shortcomings. It would be helpful if the PROP more completely acknowledged and explained this reality. Perhaps the Commission could recommend to the Parties that a transparent prioritization process is needed that explains why some actions can be taken immediately and others must be deferred. Actions that best serve the Great Lakes ecosystem given available resources should be prioritized.

IJC Outreach

CGLI concurs that a key objective of the draft TAP report is to provide a mechanism for publicly reporting the results of Great Lakes management actions. However, any outcomes communicated to the public must be tied to specific monitoring data, research, and other scientific information. Tying results to science strengthens the connection between the public and Great Lakes science and research at a time when strong public support is needed to retain funding for environmental science programs. The need for enhancing “environmental literacy” is mentioned in the TAP discussion on climate change. This need is much broader than that and should be emphasized in other sections of the draft TAP report, too.

Assessment Statements

The draft TAP report assessment statements are of value. However, caution is urged on “second guessing” PROP report conclusions regarding significance, status, and outcomes pertaining to certain Great Lakes stressors. This is especially true in the chemical impact sections. Chemical impact science is complicated and requires multiple studies to establish cause and effect. Selecting best study protocols is difficult and a task best completed in concert with representatives of the chemical industry. Enhanced collaboration is needed in this area.

It has been said that, overall, better collaboration on science is needed throughout all Great Lakes programs. At the same time, the draft TAP report includes two examples of excellent efforts for organizing, vetting, and carrying out work aimed at accomplishing GLWQA objectives: the work undertaken by the committees focused on Annex 6 (Invasive Species) and Annex 7 (Habitat and Species). The Commission should commend these Committees on their work and recommend that the collaborative processes and work practices used by these groups serve as models by other GLWQA objective and/or Annex working groups. In addition to the excellent work and outcome of these committee activities, the implied priorities expressed regarding these particular stressors, relative to potential for impacts on the Great Lakes ecosystem, should be highlighted to (perhaps) attract more funding for these restoration efforts.

Thank you for the opportunity to provide comments, which we offer as a high level overview of the draft TAP report. As you are aware, Dale Phenicie (CGLI's Technical Director) serves as a member of the IJC Science Priority Committee and is currently participating in that group's detailed review of the draft TAP report. He will be submitting more detailed comments to the SPC co-chairs.

Please contact us for any needed additional information or clarification.

Very truly yours,

COUNCIL OF GREAT LAKES INDUSTRIES



Kathryn Buckner, President



Dale K. Phenicie, Technical Director

cc: Trish Morris, Director
International Joint Commission
Great Lakes Regional Office
100 Ouellette Ave., 8th Floor
Windsor, ON N9A 6T3