



GREAT LAKES
ECOREGION NETWORK

RÉSEAU ÉCORÉGIONAL DES
GRANDS LACS
ET DU SAINT-LAURENT

<https://www.greatlakesecoregion.org/>

December 2, 2024

Véronique Hiriart-Baer
Canadian Great Lakes Executive Co-Chair
Director General Freshwater Management
Canada Water Agency

Teresa Seidel
U.S. Great Lakes Executive Co-Chair
Director, U.S. Environmental Protection
Agency

RE: GLEC Plans for GLWQA

Dear GLEC Co-Chairs,

In July 2024, the Great Lakes Ecoregion Network (GLEN) sent you two letters on the upcoming review of the GLWQA. The first letter provided detailed suggestions for the process for the review of the GLWQA. [See https://www.greatlakesecoregion.org/files/ugd/f9e2d6_2dde5ad0553e4bbca1e1316b619aa8cc.pdf.] The second letter provided a list of types of changes that should be considered for the GLWQA. [See https://www.greatlakesecoregion.org/files/ugd/f9e2d6_ab327edf26c341eeaf7b4989d958caae.pdf]

We contacted you requesting a meeting to discuss our recommendations, but we never heard back except for an acknowledgement of receipt of our letters.

On September 26, 2024, as GLEC observers, we received your document on “the scope and nature of the GLWQA.” The report summarizes the review as follows: “the review will examine improvements in the operation and effectiveness of the Annexes and Key Articles examining these through the lens of the triennially-established Binational Priorities for Science and Action (BPSAs).” It goes on to say this is “an opportunity to improve operations

and the delivery of commitments without amending and renegotiating the existing Agreement.”

We are very disappointed with this approach to the review. In your e-mail on September 26, you asked for comments on your plan, which we are providing in this letter.

We have three major concerns:

1. **Focus is limited to Binational Priorities for Science and Action:** These priorities are three-year science and action plans, which are updated regardless of the wider Agreement. The commitments specify dates for completing various actions, and the report delineates which actions were or were not completed in the specified time range. Success is defined as completed actions (not necessarily having the anticipated effect or ecological outcomes) by the specified date. They are not evaluations of efficacy of these actions, lessons learned, or needs for new approaches.

Limiting the review to the science and action priorities precludes a larger assessment of the GLWQA and its overall goals and progress toward them (or lack thereof). Moreover, a limited review further precludes analysis of gaps and needs that have emerged in the region’s rapidly changing environment since revisions in 2012. A three-year review will not provide this longer-term perspective of the 2012 Agreement’s strengths and/or limitations. Further, while a three-year retrospective may provide some feedback on near-term incremental approaches, it will not provide the longer view on the Agreement itself, nor will it reveal where there may be a need for fundamental changes or new paths forward.

2. **No consideration of New Issues and Guiding Principles:** In its response to input received from many organizations, GLEC stated that it isn’t necessary to add any new topics or guiding principles to the Agreement because the Agreement isn’t “constraining” or “limiting.” GLEC goes on to say: “The review might help identify additional activities related to these topics, but they would be discussed and considered outside of this focused review.”

A few examples of how some GLWQA annexes are now limited are:

- a. Climate Change Annex is focused on sharing information – not developing Great Lakes action plans
- b. Science Annex is focused on remediation techniques, indicators and measures. It is not focused on research to help us better understand the complexity of the Great Lakes system.
- c. Protecting sources of drinking water is not included in the Agreement.
- d. The “physical integrity” purpose of the Agreement is not adequately addressed in the Agreement.

- e. Guiding principles of environmental justice, ecological resilience, regenerative capacity, need to be added to the Agreement are not included.

While these could be discussed and considered outside of this focused review, not including them doesn't give these topics the same gravitas or clear intention of action that their inclusion in the Agreement would provide. The GLWQA is a whole approach where each part affects the other parts.

- 3. Lack of Public Involvement in Review:** We were shocked to not see references in GLEC's workplan to the public role in the review. Throughout the plan it describes roles for Annex co-leads and the GLEC secretariats and in December 2024 presenting their findings and recommendations to GLEC, and then in December 2025 at the Great Lakes Public Forum. We are assuming that there will be other opportunities for the public to make input, but the lack of reference to this does not give us confidence. We were pleased to have the co-chairs of Annex 3 on Chemicals of Mutual Concern send their draft response for GLEC to the Annex 3 Extended Sub-Committee, including its non-government members, for comment before sending them on to GLEC. But we have not had similar requests or opportunities related to other Annexes.

We are people and organizations who work throughout the Great Lakes and St. Lawrence River basin on these and other issues at the basin-wide, regional and local levels. We bring energy and determination to this work, as well as public and political support, which are essential if we are to achieve the goals of the GLWQA. Public input builds better policy and builds public constituencies for Great Lakes conservation, restoration and protection and the institutions that lead this work.

We urge you to:

- expand the review to the full Agreement;
- include urgent topics such as climate, drinking water, and the slow pace and narrow scope of Chemicals of Mutual Concern; and,
- engage in a robust public engagement process.

We request the opportunity to meet with you on this matter.

Yours sincerely,



Chair, Great Lakes Ecoregion Network



Vice-Chair, Great Lakes Ecoregion Network