

# Chapter 1

## Section 1.24

Ministry of the Environment, Conservation and Parks  
 Ministry of Natural Resources and Forestry  
 Ministry of Agriculture, Food and Rural Affairs

Follow-Up on 2021 Value-for-Money Audit:

# Reporting on Ontario's Environment

## RECOMMENDATION STATUS OVERVIEW

|                   | # of Actions Recommended | Status of Actions Recommended |                                     |                       |                         |                      |
|-------------------|--------------------------|-------------------------------|-------------------------------------|-----------------------|-------------------------|----------------------|
|                   |                          | Fully Implemented             | In the Process of Being Implemented | Little or No Progress | Will Not Be Implemented | No Longer Applicable |
| Recommendation 1  | 2                        |                               |                                     |                       | 2                       |                      |
| Recommendation 2  | 5                        |                               |                                     |                       | 5                       |                      |
| Recommendation 3  | 1                        | 1                             |                                     |                       |                         |                      |
| Recommendation 4  | 1                        | 1                             |                                     |                       |                         |                      |
| Recommendation 5  | 1                        |                               |                                     |                       | 1                       |                      |
| Recommendation 6  | 2                        |                               | 1                                   |                       |                         | 1                    |
| Recommendation 7  | 1                        |                               | 1                                   |                       |                         |                      |
| Recommendation 8  | 1                        |                               |                                     |                       | 1                       |                      |
| Recommendation 9  | 1                        |                               |                                     |                       | 1                       |                      |
| Recommendation 10 | 1                        | 1                             |                                     |                       |                         |                      |
| Recommendation 11 | 2                        | 2                             |                                     |                       |                         |                      |
| Recommendation 12 | 1                        |                               |                                     |                       | 1                       |                      |
| Recommendation 13 | 1                        |                               |                                     |                       | 1                       |                      |
| Recommendation 14 | 1                        | 1                             |                                     |                       |                         |                      |
| <b>Total</b>      | <b>21</b>                | <b>6</b>                      | <b>2</b>                            | <b>0</b>              | <b>12</b>               | <b>1</b>             |
| <b>%</b>          | <b>100</b>               | <b>29</b>                     | <b>10</b>                           | <b>0</b>              | <b>57</b>               | <b>5</b>             |

Note: The Ministry of the Environment, Conservation and Parks was tasked with **Recommendations 1, 2, 5, 8, and 12**. The Ministry of Northern Development, Mines, Natural Resources and Forestry (now the Ministry of Natural Resources and Forestry) was tasked with **Recommendations 3, 6, 9, and 13**. The Ministry of Agriculture, Food and Rural Affairs was tasked with **Recommendations 4, 7, 10, and 14**. The Treasury Board Secretariat was tasked with **Recommendation 11**.

## Overall Conclusion

The Ministry of the Environment, Conservation and Parks (Environment Ministry); the Ministry of Natural Resources and Forestry (Natural Resources Ministry); the Ministry of Agriculture, Food and Rural Affairs

(Agriculture Ministry); and the Treasury Board Secretariat (which was not an auditee in the original audit but still subject to a recommendation), as of October 23, 2023, have fully implemented 29% of actions we recommended in our *2021 Annual Report*. The Ministries have made progress in implementing an additional 10% of the recommended actions.

Although the Province has not produced comprehensive state-of-the-environment reports, the Natural Resources Ministry and Agriculture Ministry indicated that they consider relevant published state-of-the-environment reports as part of their internal program evaluations and will continue to do so. We also found that the Agriculture Ministry has now developed and finalized policies on providing regular updates to the public on its environmental strategies, policies and plans, and on posting its environmentally related reports on the Environmental Registry.

However, the ministries have indicated that 57% of the recommended actions will not be implemented. Notably, the Environment Ministry indicated that it will not be preparing and releasing a comprehensive state-of-the-environment report, and asserted that ministries can continue to collaboratively produce credible, informed, consistent and beneficial reporting without the assistance of an advisory panel. Further, the Environment Ministry and Natural Resources Ministry will not be developing policies or frameworks requiring regular public reporting on progress implementing their environmental strategies, policies and plans, and will not post all their environmental reports on the Environmental Registry.

While Treasury Board Secretariat started requiring all ministries to complete an annual attestation on compliance with applicable legislation, ministries are not required to report on meeting policy commitments, and the provided guidance and template form are unclear as to the attestation's time frame.

The status of actions taken on each of our recommendations is described in this report.

## Background

Understandable and easily accessible environmental reporting makes people aware of environmental conditions, benefits, problems and risks (for example, air pollution that can affect people's breathing, or the spread of Lyme disease), and helps people understand whether environmental goals are being met (for example, decreasing the amount of waste disposed per person

per year). In Ontario, regularly sharing information on the state of the environment would allow the Legislature, scientists and the public to question the underlying reasons for changes in Ontario's environment and provide relevant information to improve understanding. Similar to provincial reporting on the province's finances, reporting to the public on the state of its environment would increase transparency, accountability and informed decision-making.

To be able to report this picture, however, there needs to first be effective monitoring of Ontario's environment, natural resources, wildlife and agriculture. Indicators can be used to assess the state of the environment and the Province's progress in achieving targets, objectives and goals, as our Office previously observed within the 2020 report *Setting Indicators and Targets, and Monitoring Ontario's Environment*. Other jurisdictions have regularly reported to the public on the overall state of the environment for years, citing several benefits. Dozens of European countries are required to release state-of-the-environment reports at least every four years and the United States Environmental Protection Agency has publicly reported on more than 80 peer-reviewed environmental indicators since 2008. Since 1996, Australia has been commissioning and tabling comprehensive, independent reports on the state of its environment. Federally, Canada has released three five-year state-of-the-environment reports, and now updates a suite of indicators online as new information becomes available. The provinces of Saskatchewan and Yukon regularly release state-of-the-environment reports, as required by their legislation.

Our audit found that, in Ontario, there has been no regular reporting on the overall state of the environment. The Province did produce regular reports summarizing information on air quality, forests and protected areas. However, the Province was not adequately reporting to the public on the overall state of the environment and natural resources, providing progress reports on meeting environmental goals and targets, or meeting legislated deadlines and policy commitments for public reporting.

Responsibility for monitoring, reporting on and improving the state of Ontario's environment and natural resources falls primarily to the Ministry of the Environment, Conservation and Parks (Environment Ministry) and the Ministry of Natural Resources and Forestry (Natural Resources Ministry). (Note that subsequent to our 2021 audit, the former Ministry of Northern Development, Mines, Natural Resources and Forestry was divided in June 2022 into three separate ministries: the Ministry of Northern Development, the Ministry of Mines, and the Ministry of Natural Resources and Forestry.) The Ministry of Agriculture, Food and Rural Affairs (Agriculture Ministry) plays a key role in monitoring, reporting on and improving the environmental sustainability of Ontario's agriculture.

Some of our significant findings were:

- Ministries did not always meet legislated deadlines and policy commitments to report on issues related to the environment, and were not held accountable. For example, the Environment Ministry was late releasing the 2019 Great Lakes progress report, which was required under the *Great Lakes Protection Act, 2015*, and did not fulfill legislated requirements to release 2013, 2014 and 2018 annual reports under the *Lake Simcoe Protection Act, 2008* (but instead included the content of these annual updates in its five-year reports). Ministries faced no consequences for failing to meet reporting requirements and commitments.
- The Environment Ministry had stopped regularly reporting on the overall state of Ontario's water quality. The Ministry previously released Water Quality in Ontario reports between 2009 and 2016, but stopped this comprehensive reporting in 2016. Information on the state of Ontario's water quality, including inland lakes, the Great Lakes, streams and groundwater, was being published in a variety of different reports and report formats which were harder for the public to access and understand.
- Ministries did not publicly report on wild pollinators, the health of soil or pesticide use. The Natural Resources Ministry and Agriculture Ministry had little data to report on wild pollinators, such as bees, butterflies and hummingbirds, because neither ministry monitored them provincially—despite their essential role in Ontario's crop production and sustaining the health and diversity of wild plants. We also found that neither the Agriculture Ministry nor the Environment Ministry collected and reported information on the amount, type, timing and location of the application of pesticides to agricultural lands.
- In 2019, the Natural Resources Ministry cut funding to the Ontario Biodiversity Council (Council), which had reported publicly on the state of Ontario's biodiversity since 2008. The Council had released reports on the biodiversity indicators in 2008, 2010, and 2015, and updated indicators online in 2021. Between 2015 and 2018 provincial support for the Council dwindled to approximately \$10,000 a year until it was cut completely in 2019. No funding has been provided since then.
- The three ministries were not taking advantage of the Environmental Registry to inform the public of the release of reports related to the environment. Under the *Environmental Bill of Rights, 1993*, the Environmental Registry (a website maintained by the Environment Ministry since 1994) provides a “means of giving information about the environment to the public.” Some of the reports that had not been posted included the Air Quality in Ontario reports, Water Quality in Ontario reports, Minister's Reports on Toxics Reduction, progress reports on the 2018 Made-in-Ontario Environment Plan, annual reports related to the Provincial Wildlife Population Monitoring Program, and reports related to diseases and pests that affect managed honey bees.
- The Natural Resources Ministry did not plan to release to the public its prepared report on the state of the province's natural resources. The Ministry informed us in June 2021 that it would use the prepared State of Ontario's Natural Resources Report as an internal document to

inform program and policy decisions but did not plan to share the current report with the public because it had not sought or received approval from the new Natural Resources Minister to do so.

We made 14 recommendations, consisting of 21 action items, to address our audit findings.

## Status of Actions Taken on Recommendations

We conducted assurance work between April 2023 and September 2023. We obtained written representation from the Environment Ministry, Natural Resources Ministry, Agriculture Ministry and the Treasury Board Secretariat that, effective October 30, 2023, they have provided us with a complete update of the status of the recommendations we made in the original audit two years ago.

## Comprehensive Reporting

### Recommendation 1

*So that decision-makers, industry, stakeholders, and the public are regularly and consistently provided with a comprehensive assessment of the state of Ontario's environment, whether it is getting better or worse, and how effectively it is being managed, we recommend that the Ministry of the Environment, Conservation and Parks work with the Ministry of Northern Development, Mines, Natural Resources and Forestry, Ministry of Agriculture, Food and Rural Affairs, and Environment and Climate Change Canada and other relevant partners to:*

- *prepare and publicly release state-of-the environment reports every five years, describing the drivers of change, pressures on natural and physical resources, the state of the environment (including air, water, land, climate, biodiversity and ecosystems), how the environment has changed, the impacts of changes, and forecasts for the state of the environment and potential impacts in the future; and*

- *table these reports in the Legislative Assembly.*

**Status: Will not be implemented.**

**The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.**

### Details

In our 2021 audit, we found that the Environment Ministry did not report on the overall state of Ontario's environment. Although the Environment Ministry, Natural Resources Ministry and their partners and agencies published information on the condition of Ontario's environment and natural resources, these reports did not allow for an easy, effective, comprehensive and objective evaluation of the overall state of the environment – an issue our Office noted more than 20 years ago. In our *2000 Special Report on Accountability and Value for Money*, we noted that, while the Environment Ministry periodically published reports and news releases on its activity in key environmental areas, these documents generally described recent Ministry successes or initiatives and lacked objective appraisals of the quality of Ontario's environment. To ensure that the Environment Ministry's progress in managing the environment is measured and communicated in an objective manner, in 2000 we recommended that a state-of-the-environment report should periodically be prepared using a set of comprehensive outcome measures that assess the quality of and changes to the environment over time. More than 20 years later, we found that the problem remained. As a result, the public, businesses, stakeholders and decision-makers still did not have a clear, comprehensive picture of the general state of the environment at any given period of time or of changes over time, nor of the connections and interactions between the different areas of the environment, such as water, air and natural resources.

In our follow-up, we found that the Environment Ministry has no plans to prepare and release a comprehensive state-of-the-environment report, describing the pressures on the environment, how the environment has changed, the impacts of those changes, and projections for the state of the environment.

The Ministry noted that it continues to make environmental reports of interest available to the public online (at Ontario.ca) and location-specific environmental data available on the Ontario Data Catalogue. Since the release of our report, these have included the Air Quality in Ontario Reports, the Minister's annual reports on drinking water, the Chief Drinking Water Inspector's annual reports, the Minister's Annual Report on Lake Simcoe (2019-2020) and regular progress reports on Ontario's species at risk. In addition, the Ministry has worked to improve the format of its reports. For example, since 2021, the Ministry has released the State of Ontario's Protected Areas Report with a new modern format that includes individual indicator reports that can be updated as new information becomes available.

In 2020, the Ministry also commissioned a peer-reviewed report (Ontario Provincial Climate Change Impact Assessment) to better understand the risks of climate change to Ontario's residents, communities, systems and sectors. The information in this report is intended to help prioritize investments, policy making and decision-making focused on adaptation. (Although this report was submitted to the Minister in January 2023, the Ministry did not publicly post this report on its website until August 2023.)

Moreover, the numerous ministries' reports and information sources on the environment do not allow for an easy and effective evaluation of the overall state of Ontario's environment. More than 20 years ago, our Office reported on the lack of comprehensive, objective reporting on the state of Ontario's environment. In our 2000 Special Report on Accountability and Value for Money, we noted that the Environment Ministry periodically published reports and news releases on its activity in key environmental areas but these documents generally described recent Ministry successes or initiatives. They generally lacked objective appraisals of the quality of Ontario's environment.

To ensure that the Environment Ministry's progress in managing the environment is measured and communicated in an objective manner, we recommended in 2000 that a state-of-the-environment report should

periodically be prepared using a set of comprehensive outcome measures that assess the quality of and changes to the environment over time. A state-of-the-environment report, which is required and produced in several other jurisdictions, can act as a mechanism to help monitor progress toward achieving environmental goals, targets and quality. Such a report could also be used to objectively report on Ontario's progress in meeting established provincial, national and international environmental standards and commitments.

In May 2023, our Office released a report, *The State of the Environment in Ontario*, which was conceived as an illustration of what can be prepared and provided to the public, based on available information. The report is meant to contribute to the discussion of the benefits of public reporting on the state of the province's environment and serve as an accountability mechanism for the Province to inform the people of Ontario objectively about how well it is doing in protecting the environment.

## Recommendation 2

*So that Ontario's environmental reporting is credible, informed, consistent and beneficial in improving environmental protection and management policies, programs and initiatives, we recommend that the Ministry of the Environment, Conservation and Parks, in consultation with the Ministry of Northern Development, Mines, Natural Resources and Forestry and the Ministry of Agriculture, Food and Rural Affairs:*

- *establish a scientific advisory panel to provide independent, expert advice on the focus, priority issues and content of state-of-the-environment reports, as well as the research, monitoring and data needed to provide robust, comprehensive and effective reporting;*
- *develop and implement a transparent process for appointing qualified experts to this panel;*
- *define, in consultation with this panel, a set of core environmental indicators, and consistently collect the data needed to regularly report on the status of these indicators and changes over time;*

- *include in state-of-the-environment reports a description—in the context of the report’s findings—of what policies, programs and initiatives currently exist, what new policies, programs and initiatives are proposed or planned, and what analysis will be undertaken to identify any other policies, programs and initiatives needed; and*
- *use published state-of-the-environment reports in internal program evaluations.*

**Status:** Will not be implemented.

**The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.**

### Details

As discussed in **Recommendation 1**, our 2021 audit found that the Environment Ministry did not report on the overall state of Ontario’s environment. By contrast, several other provinces, territories and international jurisdictions use environmental indicators to publicly report on the state of the environment and progress toward meeting environmental targets and goals. Some engage with independent experts and panels to author or review this work.

For example, Australia’s state-of-the-environment reports are required by law to be tabled every five years. To ensure that they are highly credible and robust, these reports are authored by a panel of independent experts, using the best available evidence, and a rigorous consultation, peer-review and fact-checking process. Similarly, in North America, the indicators in the United States Environmental Protection Agency’s Report on the Environment are externally peer-reviewed by experts in relevant scientific fields to ensure that they are useful, meet the indicator definition and criteria, and are properly documented and scientifically sound. Only indicators that pass this review are included in the Report on the Environment. In addition, the entire report is reviewed periodically by the Environmental Protection Agency’s Science Advisory Board.

In our follow-up, we found that the Ministry will not be implementing this recommendation. The Ministry asserts that the Environment Ministry, Natural Resources Ministry and Agriculture Ministry can continue to collaboratively produce credible, informed, consistent and beneficial reporting without the assistance of an advisory panel.

### Recommendation 3

*To improve environmental protection and natural resource management policies, programs and initiatives, we recommend that the Ministry of Northern Development, Mines, Natural Resources and Forestry use published state-of-the-environment reports in internal program evaluations.*

**Status:** Fully implemented.

### Details

In our follow-up, we found that, although the Province has not yet published comprehensive state-of-the-environment reports (see **Recommendation 1**) that could be used to inform internal program evaluations, the Ministry indicated that it already considers relevant published state-of-the-environment reports as part of its internal program evaluations and will continue to do so. The Ministry noted that its 2018 Guide to Policy Evaluation references the inclusion of annual reports and/or monitoring reports as examples of the data that should be gathered to support policy evaluations. The Ministry stated that this guidance is intended to support all internal program and policy evaluations. When asked for a list of all program evaluations conducted since 2010, the Ministry provided a list of 12 policy evaluations rather than program evaluations. While the Ministry asserted that, in practice, policy evaluations examine all aspects of a policy (including design, implementation and outcomes), we found that some recent policy evaluations did not assess the effectiveness of related programs, lacking information on the program’s staffing resources, expenditures, performance measures and outcomes.

#### Recommendation 4

*To improve the environmental sustainability of Ontario's agriculture and the effectiveness of environmental protection and management policies, programs and initiatives, we recommend that the Ministry of Agriculture, Food and Rural Affairs use published state-of-the-environment reports in internal program evaluations.*

**Status: Fully implemented.**

#### Details

In our follow-up, we found that, although the Province has not yet published comprehensive state-of-the-environment reports (see **Recommendation 1**) that could be used to inform internal program evaluations, the Agriculture Ministry uses science and reports about the state of the environment to inform and evaluate its strategies and programs. For example, in preparation for the Sustainable Canadian Agricultural Partnership—a five-year (2023–2028) investment by federal, provincial and territorial governments to strengthen and grow Canada's agriculture and agri-food sector—the Ministry undertook program evaluations based on recent science. This included a review of evidence from the On-Farm Applied Research and Monitoring (ONFARM) program, a four-year, applied research initiative that began in 2019 that supports soil health and water quality research on farms across Ontario.

The Ministry also reported using information from various published reports to assess and improve the Canada-Ontario Agreement for Great Lakes Water Quality and Ecosystem Health, and the Lake Simcoe program.

#### Recommendation 5

*To provide the public with regular and comprehensive information on the overall state of Ontario's water quality for decision-making, policy and program development, and holding the government accountable for progress, we recommend that the Ministry of the Environment, Conservation and Parks review its current water reporting and provide biennial summarized reporting to*

*the public as well, as part of a future regular, comprehensive state-of-the-environment reporting.*

**Status: Will not be implemented.**

**The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.**

#### Details

Our 2021 audit found that the Environment Ministry previously released Water Quality in Ontario reports between 2009 and 2016, summarizing the results of multiple monitoring programs, including key findings on the Great Lakes, inland lakes, streams and groundwater, but stopped this comprehensive reporting in 2016. Stakeholders found these consolidated publications on the state of all water resources valuable, as they provided Ministry analysis of the collected data besides the raw data itself. However, the Ministry stopped issuing these reports in 2016, as it moved to posting data on the Ontario Data Catalogue. Although the posted data supports various water-related reports (including the Minister's annual drinking water report, the Minister's Reports on Lake Simcoe, Ontario's Great Lakes Strategy Progress Report, and the Canada-US State of the Great Lakes Reports), posted data was not summarized to explain what it means (for example, the underlying reasons for observed results and the impacts on people and the environment). Moreover, the Environment Ministry did not publicly report water withdrawal, consumption and availability quantities.

In our follow-up, we found that the Ministry has no plans to provide the public with regular, comprehensive, summarized reporting on the overall state of Ontario's water. The Ministry asserts that it reported on the state of Ontario's water while avoiding duplication by producing regular reports, for example on drinking water, Lake Simcoe, and the Great Lakes; supporting the Canadian government on compiling reports; making data publicly available on the Ontario Data Catalogue; and continually reviewing the Ministry's environmental reporting. However, as discussed in **Recommendation 11**, several reporting requirements related to the state of Ontario's

water (for example, the Great Lakes and Lake Simcoe) have not been promptly met.

### Recommendation 6

*So that Ontarians are fully informed regarding the province's natural resources, and that the Ministry efficiently and effectively meets its statutory and policy requirements for public reporting, we recommend that the Ministry of Northern Development, Mines, Natural Resources and Forestry:*

- *regularly release consolidated information on the state of Ontario's natural resources (including on aggregates, fisheries, forests, oil and gas and, in co-operation with the Ontario Biodiversity Council, aspects of Ontario's biodiversity);*

**Status:** In the process of being implemented.

#### Details

Our 2021 audit found that the Natural Resources Ministry had been planning a State of Ontario's Natural Resources Report since 2017 to unify the Ministry's public reporting (including legislated reporting on forests and protected areas) into one easily navigated online report. Ministry staff had indicated that consolidated reporting would reduce duplication in separate reports, improve consistency in messaging and make it easier for Ontarians to access information on the province's natural resources. However, during our audit, the Ministry informed us that, rather than release the prepared report to the public, it would instead use it as an internal document to inform program and policy decisions.

During the course of our audit, we also learned that, as part of the government's commitment to balance the budget, in 2019 the Ministry ended financial support for the Ontario Biodiversity Council (Council)—a group of volunteer stakeholders and scientists who have reported to the public since 2008 on the state of Ontario's biodiversity in support of commitments in Ontario's Biodiversity Strategy.

In our follow-up, we found that the Ministry worked with the Council to support the development of a

summary of updates (released December 2021) on 26 indicators that assessed progress achieving the 15 targets identified in Ontario's Biodiversity Strategy. Also, in March 2022, the Ministry released for the first time ever, consolidated information on the state of Ontario's natural resources (including consolidated information on aggregates, fisheries, oil and gas, forests and biodiversity) in a State of Ontario's Natural Resources (SONR) Report (2021). However, the Ministry does not have a schedule for updating and releasing this report on a regular basis.

- *work with the Ministry of the Environment, Conservation and Parks to include relevant areas of this reporting in any future regular, comprehensive state-of-the-environment reporting [as described in Recommendation 1].*

**Status:** No longer applicable.

#### Details

As discussed in **Recommendation 1**, our 2021 audit found that the Environment Ministry did not report on the overall state of Ontario's environment. Although the Environment Ministry, Natural Resources Ministry and their partners and agencies published information on the condition of Ontario's environment and natural resources, these reports did not allow for an easy, effective, comprehensive and objective evaluation of the overall state of the environment.

In our follow-up, we found that the Natural Resources Ministry is willing to share information with the Environment Ministry (the lead ministry) to include in any future regular, comprehensive state-of-the-environment reporting. However, as discussed in **Recommendation 1**, the Environment Ministry has no plans to prepare and regularly release comprehensive state-of-the-environment reporting.

### Recommendation 7

*To understand and inform the public about the types and amounts of pesticides applied to Ontario crops, detect trends in pesticide use and environmental impact, and inform policy development, decision-making and the*



*public, we recommend that Ministry of Agriculture, Food and Rural Affairs develop and implement an approach for collecting and publicly reporting information on agricultural pesticide use.*

**Status:** In the process of being implemented.

### Details

Our 2021 audit found that, between 1973 and 2013, the Agriculture Ministry collected detailed pesticide-use data using a voluntary survey, and publicly released summary reports every five years. The survey provided information on the types, amounts and use of pesticides on agricultural crops, and reportedly was useful in estimating pesticide use; tracking trends in pesticide use; and supporting studies that evaluated pesticide risks. Early surveys were also used to gauge the local and overall effectiveness of a pest management program that was completed in 2002. According to the Agriculture Ministry, it stopped conducting these surveys due to low response rates. The Ministry received more than 1,200 submissions for the 1998, 2003 and 2008 mail-in surveys, but received only 475 submissions for the 2013 online survey. While the Agriculture Ministry does not have a mechanism to require mandatory reporting of agricultural pesticide use, it told us that it was reviewing its approach for collecting information and exploring options that may provide more robust data on pesticide use.

In our follow-up, we found that the collection of pesticide use and environmental monitoring data is being investigated at the federal-provincial-territorial level to support common interests for improved access to data for policy development and scientific review of pesticide registrations. The Ministry indicated that it continues to participate in these discussions to ensure that any potential solutions will consider Ontario's needs, including those identified by our Office's recommendation. In fall 2022, the federal Pest Management Regulatory Agency continued engagement and consultations to complete a technical scan and analysis with the agriculture sector; develop potential pilots; and engage partners on key elements of the path forward. Next steps for the agency will be to develop a proposed

framework for data-collection strategies and consult on the proposal in fall 2023.

The Ministry is also continuing to explore options with industry that may provide more robust pesticide-use data to complement environmental monitoring data. According to the Ministry, if a viable option is identified for collecting pesticide-use data, it will work with industry to implement a pilot project to evaluate its effectiveness. For example, the Ministry met with the Ontario Fruit & Vegetable Growers Association in fall 2022 and summer 2023 to discuss options for data collection.

## Ministries Not Reporting Progress Implementing Environmental Strategies, Plans and Policies, or Progress Toward Targets

### Recommendation 8

*To promote accountability, transparency and progress on achieving published goals, objectives and targets, we recommend that the Ministry of the Environment, Conservation and Parks develop and implement policies and frameworks that require regular reporting to the public on progress in implementing all its environmental strategies, policies and plans.*

**Status:** Will not be implemented.

The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.

### Details

The Province's numerous environmental strategies, policies and plans contain objectives and key actions to achieve overarching goals. However, our 2021 audit found that the Environment Ministry had not regularly reported publicly on progress implementing some of its strategies, policies and plans, and the resulting outcomes. For example, the Environment Ministry had not reported publicly on Ontario's progress in meeting waste diversion targets, or the outcomes of actions to reduce greenhouse gas emissions, which contribute to global climate change. Effective progress reporting can help a ministry explain to the public what steps have

been taken to implement actions and tactics, and the outcomes of implementing these actions in achieving stated objectives and targets.

In our follow-up, we found that the Environment Ministry has no plans to develop and implement a policy or framework that would require regular reporting to the public on progress implementing its environmental strategies, policies and plans. The Ministry noted that it had reported publicly on progress implementing several environmental strategies, policies and plans, such as in the Minister's annual reports on drinking water, Great Lakes strategy progress report, Lake Erie Action Plan annual update, Lake Simcoe reports, Air Quality in Ontario reports and others. The Ministry indicated that it will consider additional opportunities for reporting to enhance the public's understanding of the Ministry's progress in implementing its environmental strategies, policies and plans.

Our Office noted that, despite the release of some progress reports, others have been incomplete or delayed. For example, under the *Great Lakes Protection Act, 2015*, the Environment Minister must prepare a progress report at least once every three years. The Environment Ministry published one Great Lakes progress report in 2016, which indicated the Ministry's intention to report again in three years using a suite of performance measures to track progress. However, the second report, which was due in 2019, was not tabled in the Legislature and released publicly until May 2023.

Moreover, the Ministry did not fulfill legislated requirements to release 2013, 2014 and 2018 annual reports under the *Lake Simcoe Protection Act, 2008* (but instead included the content of these annual updates in its five-year reports). The Ministry also did not release the Minister's 2019-2020 annual report on Lake Simcoe until October 2022 and, as of June 2023, has not yet released the 2021 annual report on Lake Simcoe. The Ministry asserted that the *Lake Simcoe Protection Act, 2008* does not provide a specific timeline for the release of annual reports, and that the Ministry is working toward releasing the 2021 report.

In addition, the *Cap and Trade Cancellation Act, 2018* requires the Minister of the Environment,

Conservation and Parks to prepare a climate change plan and regular reports on progress. The Ministry released brief, high-level summaries in 2019, 2020 and 2021 that focus on outputs and do not report the status of recent greenhouse emissions relative to Ontario's 2030 target; the estimated emissions in each sector; the outcomes and expected contribution that taken actions have had on reducing emissions; nor revised emissions forecasts based on progress implementing the plan. Moreover, there was no public update in 2022.

Finally, although the Ministry released its first five-year progress report on the *Strategy for a Waste-Free Ontario: Building a Circular Economy* in February 2023, the progress report does not even mention, let alone report on progress achieving, the strategy's waste diversion targets: to divert 30% of Ontario's total waste generated by 2020, 50% by 2030 and 80% by 2050.

### Recommendation 9

*To promote accountability, transparency and progress on achieving published goals, objectives and targets, we recommend that the Ministry of Northern Development, Mines, Natural Resources and Forestry develop and implement policies and frameworks that require regular reporting to the public on progress in implementing all its environmental strategies, policies and plans.*

**Status:** Will not be implemented.

**The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.**

### Details

Our 2021 audit found that, like the Environment Ministry (see **Recommendation 8**), the Natural Resources Ministry had not regularly reported publicly on progress implementing some of its strategies, policies and plans, and the resulting outcomes. For example, the Natural Resources Ministry had not released regular reports on progress conserving wetlands, adapting to climate change, preventing the spread of invasive species, or implementing fish and wildlife management strategies.

In our follow-up, we found that the Natural Resources Ministry will not be developing a policy

or framework that requires regular reporting to the public on progress implementing all its environmental strategies, policies and plans, as recommended by our Office. Rather, decisions regarding regular public reporting on progress implementing the Ministry's environmental strategies, policies and plans will be made on a case-by-case basis.

The Ministry has not drafted public reports describing progress made implementing actions and tactics, and meeting goals, objectives and targets, contained in a number of its environmental strategies, policies and plans. This includes the Strategy for Wolf Conservation in Ontario (2005); Ontario Invasive Species Strategic Plan (2012); Biodiversity: It's In Our Nature (2012); and Naturally Resilient: MNR's Natural Resource Climate Adaptation Strategy (2017). The Ministry noted that none of these strategies, policies or plans actually commit to reporting to the public on progress. Similarly, while the Ministry has not produced a report on progress implementing Ontario's Provincial Fish Strategy (2015), the Ministry noted that the strategy does not explicitly require it but includes actions such as communicating fisheries information that focuses on status and trends, rules and regulations, best management practices, and open data. The strategy states that progress toward achievement of the strategy's goals, objectives and outcomes will be measured regularly and reported on through provincial State of Resource Reporting.

### Recommendation 10

*To promote accountability, transparency and progress on achieving published goals, objectives and targets, we recommend that the Ministry of Agriculture, Food and Rural Affairs develop and implement policies and frameworks that require regular reporting to the public on progress in implementing all its environmental strategies, policies and plans.*

**Status: Fully implemented.**

### Details

Our 2021 audit found that, like the Environment Ministry and Natural Resources Ministry (see **Recommendations 8 and 9**), the Agriculture Ministry had not

regularly reported publicly on progress implementing some of its strategies, policies and plans, and the resulting outcomes. For example, the Agriculture Ministry had not reported publicly on progress in implementing Ontario's soil health strategy or the former Pollinator Health Action Plan (2016).

In our follow-up, we found that the Ministry has developed and finalized a policy on providing regular updates to the public on its environmental strategies, policies and plans. The policy indicates that policy/program leads of strategies, policies and plans that meet specified criteria should develop a process for regular public reporting and publicly communicate the key components of the process (for example, a schedule and description of reporting).

## Ministries Missing Public Reporting Deadlines in Legislation and Policies by Several Years

### Recommendation 11

*So that ministries' legislated and policy requirements and deadlines for reporting to the public are met, and so that ministries are held accountable for failing to meet these responsibilities, we recommend that the Treasury Board Secretariat:*

- *require ministries, either as part of or separate from the Certificate of Assurance process, to itemize, attest to and report annually to Treasury Board Secretariat on their compliance with all applicable legislation and meeting of policy commitments; and*
- *annually report the results of this ministry reporting to the Treasury Board.*

**Status: Fully implemented.**

### Details

Our 2021 audit found that ministries were not always meeting legislated deadlines and policy commitments to report on issues related to the environment, and were not held accountable. For example, the Environment Ministry was late releasing the 2019 Great Lakes progress report, which is required under the *Great*

*Lakes Protection Act, 2015*, and had not fulfilled legislated requirements to release 2013, 2014 and 2018 annual reports under the *Lake Simcoe Protection Act, 2008* (but instead included the content of these annual updates in its five-year reports). Despite a commitment in *A Wetland Conservation Strategy for Ontario: 2017–2030* to initiate public reporting on progress in 2020, the Natural Resources Ministry had not developed a framework for progress reporting and no data has been collected. Because ministries faced no consequences for failing to meet reporting requirements and commitments, we recommended that Treasury Board Secretariat hold ministries accountable for failing to meet these responsibilities, and attest annually on their compliance with applicable legislation and meeting of policy commitments.

In our follow-up, we found that, starting with the 2023/24 Strategic Planning Process, all ministries were directed by Treasury Board Secretariat to complete an attestation indicating whether or not the ministry, to the best of its knowledge, was compliant with all applicable legislation, such as the *Environmental Bill of Rights, 1993*, the *Human Rights Code* and the *Public Service of Ontario Act, 2006*. If not in compliance with any applicable legislation, the ministries were asked to describe where the ministry was not compliant, provide a rationale for the ministry's current non-compliance and outline actions underway to move the ministry toward compliance. Neither the provided guide nor the template form is clear as to the time frame to which the attestation applies. Further, the template does not require ministries to report on their meeting of policy commitments.

In fall 2022, 27 ministries, as well as the Premier's Office and the Office of the Lieutenant Governor, submitted their confirmations of compliance to Treasury Board Secretariat. Three ministries signed the attestation without clearly indicating whether or not they are in compliance with applicable legislation. Moreover, several ministries modified the wording of their attestation to confirming whether they were "substantially" compliant with applicable legislation.

## Public Could Be Notified and Provided Environmental Reports Through Environmental Registry

### Recommendation 12

*So that Ontarians can readily find and access information about all environmental reports, publications, and research, we recommend that the Ministry of the Environment, Conservation and Parks post all its reports related to the environment on the Environmental Registry.*

**Status: Will not be implemented.**

**The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.**

### Details

Our 2021 audit found that the Environment Ministry, Natural Resources Ministry and Agriculture Ministry were not taking advantage of the Environmental Registry to inform the public of the release of all their reports that relate to the environment. Under the *Environmental Bill of Rights, 1993*, the Environmental Registry (a website maintained by the Environment Ministry since 1994) is to provide a "means of giving information about the environment to the public." However, the ministries were not fully using this centralized source of public information to notify the public of all their environmental reports. For example, the Environment Ministry had not posted any of its Air Quality in Ontario reports, Water Quality in Ontario reports, Minister's Reports on Toxics Reduction, or progress reports on the 2018 Made-in-Ontario Environment Plan.

In our follow-up, the Environment Ministry indicated that it will not post all its reports related to the environment on the Environmental Registry. Rather, the Ministry asserted that it uses various methods to provide environmental-based information to the public, including the Environmental Registry, as appropriate.

Since the release of our report in 2021, the Ministry has released several environmental reports, some of which were posted on the Environmental Registry as recommended (for example, regular progress reports

on species at risk, the Progress Report on the Strategy for a Waste-Free Ontario, and the 2021 State of Ontario's Protected Areas Report) while others were not. These include the Minister's Annual Report on Lake Simcoe, 2019-2020; the 2021 update on the Made-in-Ontario Environment Plan; the 2020 Air Quality in Ontario Report; the 2018-2021 Minister's Reports on Toxics Reduction; the 2023 Guide to Eating Ontario's Fish; the 2021 and 2022 Environmental Penalty Annual Reports; the 2016-2020 Environmental Penalties Five Year Review; the Chief Drinking Water Inspector's Annual Reports; the Minister's Annual Reports on Drinking Water, and the 2023 Ontario Provincial Climate Change Impact Assessment.

Moreover, the Ministry did not alert the public to the release of many of these reports, for example, through news releases or social media posts. As mentioned in our 2021 report, the Environmental Registry allows members of the public to register to receive email alerts when notices with specified keywords are posted on the Registry—even if the released reports are not promoted through social media or other communications channels. Given the Environmental Registry's well-established reputation and extensive use as a source of information about government environmental decisions, it would be sensible and beneficial for ministries to use the Registry as a central site for informing the public about all important environmental activities and developments, regardless of whether more detailed information is provided on other government websites.

### Recommendation 13

*So that Ontarians can readily find and access information about all environmental reports, publications, and research, we recommend that the Ministry of Northern Development, Mines, Natural Resources and Forestry post all its reports related to the environment and natural resources on the Environmental Registry.*

**Status:** Will not be implemented.

The Office of the Auditor General of Ontario continues to support the implementation of this recommendation.

### Details

As discussed in our follow-up of **Recommendation 12**, our 2021 audit found that the three ministries were not taking advantage of the Environmental Registry to inform the public of the release of all their reports that relate to the environment. For example, the Natural Resources Ministry had posted some but not all of its forest-related reports, and had not used the Environmental Registry to inform the public of the 2010 and 2015 State of Ontario's Biodiversity reports, or its annual reports related to its Provincial Wildlife Population Monitoring Program.

In our follow-up, we found that, given the volume of publications it produces, the Natural Resources Ministry is not contemplating posting all its reports related to the environment and natural resources on the Environmental Registry. Rather, the Ministry committed to continue making environmental reports and publications available to the public using a wide variety of methods, including posting to the Environmental Registry, as appropriate. We found that the Ministry had used the Environmental Registry to notify the public of the release of a few reports (its Five-Year Environmental Assessment Report on Forest Management and State of Ontario's Natural Resources—Forests 2021 report) but had not posted all its recent reports related to the environment and natural resources on the Environmental Registry. This includes the State of Ontario's Biodiversity 2020 Report, released by the Ontario Biodiversity Council (of which the Ministry of Natural Resources and Forestry is a member), and the State of Ontario's Natural Resources Report (2021). The Ministry noted that it had decided to post the State of Ontario's Natural Resources Report to Ontario.ca, which is public and accessible. However, the Ministry did not alert the public about the release of this report, for example, through a news release or social media.

### Recommendation 14

*So that Ontarians can readily find and access information about all environmental reports, publications and*

*research, we recommend that the Ministry of Agriculture, Food and Rural Affairs post all its reports related to the environment, and the environmental sustainability of Ontario's agriculture, on the Environmental Registry.*

**Status: Fully implemented.**

### **Details**

As discussed in our follow-up of **Recommendations 12** and **13**, our 2021 audit found that the three ministries were not taking advantage of the Environmental Registry to inform the public of the release of all their reports that relate to the environment. For example, we had found that the Agriculture Ministry had not posted its reports related to diseases and pests that affect managed honey bees, many of which were also not available elsewhere online.

In our follow-up, we found that the Ministry has developed and finalized a policy on posting its environmentally related reports on the Environmental Registry. The policy indicates that policy/program leads of reports that meet specified criteria should post a bulletin notice on the Environmental Registry informing the public of the report's release and including attachments and links to the report where applicable. In 2021, the Ministry migrated its webpage with links to its annual apiculture winter loss reports (2017–2022) describing honey bee colony winter mortality and the management practices used by beekeepers to monitor and control pests and diseases. Although the Ministry did not post the 2021 and 2022 reports (or earlier reports) on the Environmental Registry for public notice, it intends to post the 2023 report and subsequent reports on the Environmental Registry going forward.