Submitted: John Jackson – February 25, 2026

Government Papers Inadequate

From: Great Lakes Ecoregion Network

The Great Lakes Ecoregion Network (GLEN) wishes to express its regret that the Parties were unable to produce timelier, more thorough, and/or actionable reports on the status of Parties' progress under the Great Lakes Water Quality Agreement (GLWQA) and the state of the health of the Great Lakes. We realize that U.S. federal agencies are under considerable strain from staffing cuts, budget cuts, and the cessation of many science programs., There also have been, and continue to be, losses of federal staff in Canada, although not to such a significant degree as in the United States. This situation places constraints on the capacity of public agencies. Still, it goes without saying (but it seems that it must be said) that meaningful public engagement on either report would have benefited from more than a few weeks opportunity to review and consider the reports prior to the triennial public forum. In December 2024, the Great Lakes Executive Committee promised to publish these reports in July of 2025. The Parties seem to have lost capacity for seriously engaging the wide and diverse Great Lakes community concerned about the health and future of the Great Lakes. 2 The recently released 2025 Progress Report of the Parties (PROP) is largely an assessment of staff and Annex Committee activities, including reports completed, or deadlines met or missed, but it lacks analysis of real-world ecological outcomes and impacts related to those actions and Great Lakes Water Quality Agreement goals. We can conclude from the report that staff were busy over the last three years, but there is almost no context or content describing what difference that activity made in terms of the health or vitality of the Great Lakes. Similarly, the State of the Great Lakes 2025 Report (SOGL), like its predecessors, uses metrics that have little actionable value for ongoing strategies. Averaging a range of conditions and concluding the lakes as a whole are "Fair" and the trend is "Unchanging" offers no guidance on specific threats or solutions. Do we want to remain "Fair?" Are we comfortable with "Unchanging" conditions? This generalized approach to assessing the lakes fails to identify specific areas where we need significant change, or where a particular trend (e.g., the crash of Great Lakes whitefish populations) is alarming and needs attention, science, and resources. The indicators are too broad, and averaging all five lakes and connecting channels provides a description that has little meaning for lake health, and doesn't relate to any particular community's lived experience or needs. It's like doing a health assessment on five family members, one of whom has a chronic illness, one of whom has incurable cancer, one of whom is diabetic but managing with medications, and two who are relatively healthy but still have challenges and saying, "overall the family health is fair." It isn't helpful to the general or specific needs within that "family." The subindicators do provide more insight. However, brief mentions on a concern as significant as PFAS don't shed light on the lack of a comprehensive strategy to address those chemicals across the region, nor recent evidence that PFAS may be linked to immunosuppression in eaglets. While an indicator on treated drinking water quality is important, it is insufficient. It implies that water quality only needs to be as good as what comes out of the treatment plant and the quality of ambient waters and source waters hardly matters. Source water protection has been a long-standing priority for many lake advocates, and needs more attention. The lack of assessment on the extent and composition of coastal wetlands is a sorry statistic. The ecological value of healthy coastal wetlands has been widely known for decades, and

yet, with the exception of some important localized wetland restoration projects, broader strategies for intentional wetland restoration and protection throughout the Great Lakes system never seem to get any traction. While the charge for both of these reports may be bound within current interpretations of the Parties' obligations under the GLWQA, the Parties should consider an independent evaluation of what the PROP and SOGL can really accomplish to drive better protection and restoration for the Great Lakes. The current approach may not be producing the tools that are most needed in the Great Lakes protection "toolbox." Both reports lack prescriptive strategies for what needs to be done in the chemical, physical 3 and biological Great Lakes environment, as well as the practical strategies for who should take action, , and by when. Does the burden for this analysis now fall on the IJC's Triennial Assessment of Progress? Historic assessments, such as the 2005 "Prescription for Great Lakes Ecosystem Protection and Restoration," provided an analysis of the ecological state of the Great Lakes and the stressors or drivers that posed the greatest threats to eco- logical stability. That report is one of the reasons the United States pursued the priorities within the Great Lakes Restoration Initiative. We need that level of analysis again, as the stressors identified 25 years ago remain, and new ones, especially those driven by warming waters and extreme weather, exacerbate ecological stresses in the system. One of the drivers behind the lingering "Fair but Unchanging" status is the impact from the extraordinary loss of regulatory, scientific, and technical support staffing in both federal and state public agencies in the U.S. over the last decade (or more), including the impact on enforcement of essential statutes such as the U.S. Clean Water Act. As noted, there also have been losses of federal staff in Canada, and new cuts were announced last week. This cumulative impact needs deeper analysis. A small group of concerned leaders formed the Great Lakes Ecoregion Network following the 2022 PROP and SOGL reports. Our aim was to encourage transboundary discourse and consultation among leaders and the concerned public about long-term strategies to safeguard the vitality and resilience of the Great Lakes and the many living systems, including human communities, which depend upon them. On September 27, 2022 we released "The Great Lakes Water Quality Agreement at Fifty," our critique of the state of the Great Lakes Water Quality Agreement in its fiftieth year and our recommendations for the directions that we need to take in the future. We are attaching this document (and its "Highlights" summary) again as little has changed over the last three years in terms of the needs and directions we identified in the report. We urge you to include 3 these ideas and recommendations in that report when developing your TAP. We also would appreciate the opportunity to discuss with you our report and its relevance for your TAP report. For the fair Great Lakes to be truly great, Great Lakes, we need a strong transboundary partnership between governments at multiple levels, the public, and the private sector. The IJC can play a unique and critical role in shaping the aspirations and approaches through which those partnerships can act effectively. We submit these materials in this spirit for your consideration.

On behalf of the Great Lakes Ecoregion Network, John Jackson, Canada, and Jane Elder, United States.