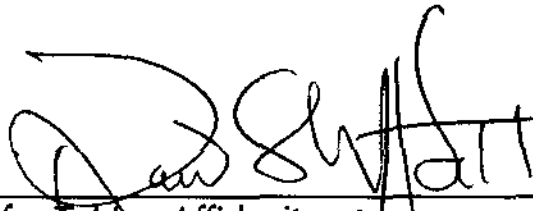

This is Exhibit E
to the Affidavit of Neal Ferguson
sworn this 29 day of November, 2005

A handwritten signature in black ink, appearing to read "David S. Hatt". The signature is written in a cursive style with a large initial "D" and "S".

Commissioner for Taking Affidavits, etc.

THE WALKERTON INQUIRY

The Honourable Dennis R. O'Connor, Commissioner

180 Dundas St. W., 22nd Floor
Toronto, ON M5G 1Z8

Tel: Toronto Area (416) 326-4498
Outside Toronto Area 1-877-543-8598
Fax: (416) 327-8782



LA COMMISSION D'ENQUÊTE WALKERTON

L'honorable Dennis R. O'Connor, Commissaire

180, rue Dundas Ouest, 22 étage
Toronto, ON M5G 1Z8

Tél: Région de Toronto (416) 326-4498
À l'extérieur de Toronto 1-877-543-8598
Télé: (416) 327-8782

January 30, 2001

By facsimile to 416-363-2746

Elizabeth Christie
30 St. Patrick Street, Suite 900
Toronto, Ontario
M5T 3A3

Dear Ms. Christie:

Re: Sierra Legal Defence Fund - The Walkerton Inquiry

Thank you for your letter to James Van Loon of January 23, 2001. I would like to advise you that you are authorized to bill for time spent meeting with Mr. Harry Swain on October 17, 2000 and January 11, 2001, to a maximum of nine hours.

On October 3, 2000, I wrote to advise you that Mr. Mark M. Orkin, Q.C., had been appointed as the independent assessor for parties with funding in Part I. Your legal billings should be submitted directly to him:

Mr. Mark M. Orkin, Q.C.
1401-111 Richmond St. West
Toronto, Ontario M5H 2G4
(416) 363-4108 (tel)
(416) 365-9276 (fax)

Mr. Orkin will also determine your appropriate fee level as counsel. You may contact him directly and provide him with the information necessary to enable him to make that determination.

I would like to ask that in future you indicate to us in advance any uncertainty with respect to billing for Inquiry-related activities. It is our understanding that any future billing on your part will relate to your client's participation in Part IB. I understand that you will shortly receive a letter clarifying the Commission's policy with respect to funding in Part II. One point this letter will confirm, as previously communicated by Mr. Swain and Mr. Van Loon, is that we do not generally expect that parties will need to retain legal services in Part II.

Finally, in terms of funding in Part IB, I reiterate that the Ministry of the Attorney General has advised that its funding guidelines for the Inquiry include (a) a maximum of 10 hours per counsel per hearing day on which a party is entitled to be present according to his or her interests or perspectives, and (b) 20 hours of preparation per counsel prior to the Inquiry per grant of standing. Further, the Ministry is prepared to treat days on which a witness is being interviewed by Commission counsel as a day for the payment of counsel fee rather than as part of the pre-hearing preparation.

Thank you again for your continuing contribution to the Inquiry and we look forward to your involvement in the Part IB hearings.

Yours very truly,



Gus Van Harten
Executive Assistant to the Commissioner

c.c: Mr. Mark M. Orkin, Q.C., Independent Assessor
Mr. James Van Loon

THE WALKERTON INQUIRY

APPLICATION FOR STANDING AND FUNDING

Submitted on behalf of the Canadian Association of Physicians for the Environment, the
Council of Canadians, and Great Lakes United

**ELIZABETH CHRISTIE
DOUGLAS CHAPMAN**
Barristers & Solicitors
Suite #300 - 106 Front Street East
Toronto, ON M5A 1E1

Telephone No.: 1-416-368-7533
Facsimile No.: 1-416-363-2746

**Solicitors for the Canadian
Association of Physicians
for the Environment, Great
Lakes United and the
Council of Canadians**

APPLICATION FOR STANDING AND FUNDING

Table of Contents

	<u>Page</u>
A. Introduction	1
1. Coalition Participants	2
(a) Canadian Association of Physicians for the Environment	2
(b) Council of Canadians	4
(c) Great Lakes United	4
2. Legal representation by Sierra Legal Defence Fund	5
B. Standing for part II	5
1. Interest	5
(a) Canadian Association of Physicians for the Environment	6
(b) Council of Canadians	7
(c) Great Lakes United	8
(d) Sierra Legal Coalition Interest and Perspectives	9
2. Sufficiently Affected	9
C. Standing for part I	10
D. Other Participants	11
(a) Canadian Environmental Law Association	11
(b) Environment Probe	12
(c) Canadian Environmental Defence Fund	12
(d) Sierra Club - ALERT	13
(e) Ontario Public Health Association	14
E. Funding for parts I and II	14
(a) Insufficient Financial Resources	14
(b) Intended Use of Funds	15
(c) Nature of the Coalition's Interests and Record of Concern	15
(d) Special Experience or Expertise	15
(e) Efforts to Form a Group with Others of Similar Interest	15
(f) Funds Required	16
F. Financial Administration	18

Appendices

Financial Statements of:	<u>Tab</u>
Canadian Association of Physicians for the Environment	A
Council of Canadians	B
Great Lakes United	C
Sierra Legal Defence Fund	D

THE WALKERTON INQUIRY

APPLICATION FOR STANDING AND FUNDING

Submitted on behalf of the Canadian Association of Physicians for the Environment, the Council of Canadians, and Great Lakes United

A. INTRODUCTION :

The Sierra Legal Defence Fund brings this application for full standing in Part II of the Walkerton Inquiry, and for full standing for the issues of interest and special standing (as described in Freya Kristjanson's August 18, 2000 letter to potential applicants regarding standing) for the remainder of Part I of the Walkerton Inquiry, on behalf of a coalition consisting of the Canadian Association of Physicians for the Environment (CAPE); the Council of Canadians, and Great Lakes United (GLU) (hereinafter the "Sierra Legal Coalition"). As provided by the Inquiry's Rules of Procedure and Practice, the different interests and perspectives of the coalition participants have been consolidated in this coalition to most efficiently present these perspectives to the Inquiry.

The members of the Sierra Legal Coalition are all non-profit groups with a history of interest and work on water quality issues, not only in Ontario but nationally and internationally

C. STANDING FOR PART I

The Sierra Legal Coalition seeks full standing for those issues of interest outlined above and special standing for the remainder of Part I of the Inquiry. As outlined in Freja Kristjanson's August 18, 2000 letter on standing to potential applicants, special standing for Part I may grant the party:

1. Access to documents collected by the Commission subject to the Rules of Practice and Procedures;
2. Advance notice of documents which are proposed to be introduced into evidence;
3. Advance provision of statements of anticipated evidence;
4. Opportunity to suggest witnesses to be called by Commission counsel, failing which an opportunity to apply to the Commissioner to lead the evidence of a particular witness;
5. Opportunity to review transcripts at Commission office and to purchase a copy if desired; and
6. Right to make closing submissions.

The Sierra Legal Coalition seeks full standing for Part I in the issues of interest outlined in the application for standing in Part II in order to permit counsel to participate in the hearing in Part I to ensure that these issues are fully aired before the Commissioner. The Sierra Legal Coalition will work closely with the other participants to minimize its participation in Part I and any overlap in issues, cross-examinations and submissions. The Sierra Legal Coalition seeks special standing for the remainder of Part I of the Inquiry in order to have timely and complete access to all information produced in Part I. Much of this information will be pertinent to the interests and perspectives we propose to represent at Part II of the Inquiry, and it will be essential to have

access to this information to provide complete, yet efficient, representation of the interests and expertise of the Coalition.

D. OTHER PARTICIPANTS

(a) Canadian Environmental Law Association

We have had discussions with Paul Muldoon, Executive Director of the Canadian Environmental Law Association (CELA), regarding the interests of our respective clients in the Walkerton Inquiry. It would appear from our discussions that our clients' interests will not overlap to any significant extent, but rather, the Sierra Legal Coalition's interests and input will complement those of CELA's clients, the Concerned Walkerton Citizens (CWC). We and Mr. Muldoon are agreed that the interests of the Sierra Legal Coalition and those of the CWC are separate and distinct, and that these two groups should not join together to form a larger coalition. It is our view that in the interests of maximizing the efficiency and effectiveness of this Inquiry process, the two groups, and the Commissioner, are best served through separate representation of these organizations. We have further agreed with Mr. Muldoon that we will work cooperatively throughout the Inquiry process to ensure that we minimize the overlap of our presentations or other participation.

It should be noted that Kapil Khatter, the representative of the Canadian Association of Physicians for the Environment, in the Sierra Legal Coalition, sits on the Board of Directors of the Canadian Environmental Law Association. Mr. Muldoon has agreed that there is no apparent

conflict of interest for Dr. Khatter, and has indicated that CELA is content with Dr. Khatter's involvement in the Coalition.

(b) Environment Probe

We have had discussions with Elizabeth Brubaker, Executive Director of Environment Probe regarding the interests of the Sierra Legal Coalition and Environment Probe at the Walkerton Inquiry. It is our understanding that Environment Probe intends to focus on the positive aspects of privatization and water pricing. The Sierra Legal Coalition will, to the extent that it addresses these issues, take an adverse position to Environment Probe. We and Ms. Brubaker have agreed that it is inappropriate for the Sierra Legal Coalition and Environment Probe to be joined into a larger coalition because of conflicting and adverse interests.

(c) Canadian Environmental Defence Fund

We have had discussions with David Donnelly, Acting Executive Director of the Canadian Environmental Defence Fund regarding the interests of the Sierra Legal Coalition and the Canadian Environmental Defence Fund Coalition at the Walkerton Inquiry. We understand that the Canadian Environmental Defence Fund has retained private counsel to represent its interests together with the interests of Pollution Probe and six to nine local environmental organizations. The Sierra Legal Coalition is comprised of leading health experts (CAPE), the longest standing Great Lakes - St. Lawrence River water quality organization (GLU), and the largest social and environmental issue watchdog organization in Canada (Council of Canadians).

The Coalition will be represented by lawyers with the Sierra Legal Defence Fund, an organization with substantial expertise in public interest environmental law, and with internal legal and scientific resources that will be, in our view, invaluable to the Commission. The Sierra Legal Defence Fund will require limited financial resources to facilitate legal representation of the Coalition at the Inquiry. This Coalition will address the issues as outlined above, and offers a unique national and international perspective to the Inquiry. It is our intention to work closely with counsel for the CEDF coalition to ensure that there is no unnecessary overlap of participation or presentations.

(d) Sierra Club - ALERT

We have had lengthy discussions with Paula Boutis and Don Mills of the Sierra Club - ALERT collective and their prospective counsel, Paul Vogel of Cohen Highley. We have discussed, in detail, the possibility of Sierra Club - ALERT joining the Sierra Legal Coalition and developing a co-counsel arrangement with Cohen Highley. However, after examining the options closely, all parties concerned have concluded that the unique nature of the issue of intensive farming and manure management, as distinct from the issues of particular concern to the members of the Sierra Legal Coalition, is best served through independent representation. We have agreed with Mr. Vogel that we will work cooperatively throughout the Inquiry to ensure that there is no unnecessary overlap of participation or presentations.

(e) Ontario Public Health Association

We have had lengthy discussions with Peter Elson and Paul Callanan of OPHA, and discussed in detail the possibility of OPHA joining the Sierra Legal Coalition. It was ultimately decided that OPHA's participation in the Inquiry would be more effective as part of a coalition of Ontario public health organizations.

E. FUNDING FOR PARTS I AND II

(a) Insufficient Financial Resources

Legal representation will be provided to the Sierra Legal Coalition by the Sierra Legal Defence Fund for both Parts I and II of the Inquiry. Subject to available funding, the legal services of Elizabeth Christie and Douglas Chapman will be provided together with the necessary legal assistance and research services through a junior lawyer.

The members of the Sierra Legal Coalition do not have sufficient financial resources to enable them to adequately represent themselves in this Inquiry. The Sierra Legal Defence Fund does not have sufficient financial resources to provide adequate representation to the Sierra Legal Coalition. Attached as Appendices "A" to "D" to this application are copies of financial statements for the Canadian Association of Physicians for the Environment, Great Lakes United, Council of Canadians and the Sierra Legal Defence Fund. These statements are submitted in strict confidence.

(b) Intended Use of Funds:

The Coalition members will provide their expertise on a volunteer basis, subject to some future need for specific expert work that requires funding, at which time the Coalition may apply to the Inquiry for such funding. At this time, the Sierra Legal Coalition seeks funding from the Inquiry only for legal representation and research.

(c) Nature of the Coalition's Interest and Record of Concern

Please see the application for standing above

(d) Special Experience or Expertise

The members of the Sierra Legal Coalition have special expertise and experience with respect to the Commission's mandate, as outlined above in the application for standing. In particular, this Coalition brings the perspective of national and international environmental organizations to the Inquiry and offers well established expertise in the areas of interest to the Coalition.

(e) Efforts to Form a Group with Others of Similar Interest

The Canadian Association of Physicians for the Environment, Great Lakes United and the Council of Canadians have determined that they share similar interests in the Inquiry and have,

therefore, formed the Sierra Legal Coalition. We have had discussions with all other known environmental and health participants or groups, and have determined that this Coalition has the most common interests and as a Coalition will be able to provide its input to the Inquiry in the most efficient and effective manner.

(f) Funds Required

The Sierra Legal Coalition seeks funding for counsel at the hourly rates that we understand are to be determined by Management Board of Cabinet, based on their respective year of call to the Bar.

Counsel: Douglas Chapman - 37th year of call to the Bar

Elizabeth Christie - 7th year of call to the Bar

One junior lawyer to be retained pending funding

Disbursements: The Sierra Legal Coalition seeks funding for disbursements in accordance with the rates that we understand are to be determined by Management Board of Cabinet.

Part II:

The Sierra Legal Coalition seeks funding for Part II of the Inquiry in accordance with the application for standing set out above. In particular, the Coalition seeks sufficient funds to retain a junior lawyer on a ½ time basis to conduct research for the lawyers and members of the Coalition into the issues of interest to the Coalition. This junior lawyer will also review the documents filed with and distributed by the Commission, coordinate Coalition review of the

documents, draft submissions and assist in the preparation of presentations at the public meetings. It is requested that funds be advanced to the Sierra Legal Defence Fund sufficient to retain this junior counsel for 6 months, with the option of requesting additional funds if the Inquiry extends beyond 6 months. Funds are sought on an hourly basis at Management Board rates for Mr. Chapman and Ms. Christie to supervise junior counsel, review documents, communicate with clients, draft submissions, prepare for and make submissions at public meetings or elsewhere as the Commission dictates. Because the duration and extent of Part II of the Inquiry is as yet unknown, it is impossible to estimate how much time will be required of counsel to the Coalition. The Sierra Legal Coalition is, however, committed to working with other parties to ensure that there is no unnecessary overlap in effort where issues of interest are similar.

Part I:

The Sierra Legal Coalition seeks funding for Part I in accordance with its application for standing above. The Coalition seeks sufficient funds to enable a junior lawyer to be retained on ½ time basis (in addition to the ½ required for Part II) to conduct research into the issues of interest to the Coalition as they relate to Part I, monitor the hearings in Walkerton (primarily through communication with Commission Counsel and counsel for the other parties rather than through attendance at Walkerton) and the documents received, and assist in preparation for any cross-examinations that become necessary. It is proposed that funds be advanced to the Sierra Legal Defence Fund to retain this junior counsel for 6 months, with the option of requesting additional funding if the Inquiry extends beyond that length of time. Funding is also sought on an hourly basis at Management Board rates for Mr. Chapman and Ms. Christie to supervise the

work of the junior lawyer, prepare for any cross-examinations that become necessary to ensure that the interests of the Coalition are sufficiently represented, and conduct those cross-examinations in Walkerton. Because the extent to which Part I will overlap with the regulatory and policy concerns of the Coalition is unknowable at this time, it is impossible to estimate how much time will be required. However, it is this Coalition's intention to limit its role in Part I as much as possible by working with the other parties and their counsel, and participating only when absolutely necessary.

F. FINANCIAL ADMINISTRATION

The Sierra Legal Coalition proposes that the Sierra Legal Defence Fund will be responsible for the administration and control of funds advanced by the Inquiry in accordance with the funding applications for Parts I and II. Advanced funds shall be held by the Sierra Legal Defence Fund and applied on account of invoices rendered monthly for legal services and research. The Sierra Legal Defence Fund will account to the Inquiry for all such funds received and disbursed on a monthly basis. Disbursements shall be paid by the Sierra Legal Defence Fund and all invoices shall be forwarded monthly to the Inquiry for reimbursement.

DATED at Toronto, this 25th day of August, 2000.

**ELIZABETH CHRISTIE
DOUGLAS CHAPMAN**
Barristers & Solicitors
Suite #300 - 106 Front Street East
Toronto, ON M5A 1E1

Telephone No.: 1-416-368-7533
Facsimile No.: 1-416-363-2746

**Solicitors for the Canadian
Association of Physicians
for the Environment, Great
Lakes United and the
Council of Canadians**

TO: **THE WALKERTON INQUIRY**
22nd Floor - 180 Dundas Street, W.
Toronto, Ontario
CANADA M5G 1Z8

**ATTN.: The Honourable Dennis R. O'Connor,
Commissioner**

Telephone No.: 1-416-326-4498
Facsimile No.: 1-416-327-8782

C.A.P.E.

BALANCE SHEET
(Unaudited)

May 31, 2000

ASSETS

CURRENT ASSETS

Cash	\$ 50,713.85
Accounts Receivable	128.21
Prepaid Expenses & Deposits	1,098.92
	<u>-----</u>
	\$ 51,940.98
	<u>=====</u>

LIABILITIES AND SURPLUS

CURRENT LIABILITIES

Accounts Payable	\$ 147.66
Deferred Revenue	48,490.00
	<u>-----</u>
	48,637.66

SURPLUS

Balance, Beginning of Year	5,437.98
Surplus (Deficit) for the Period	(2,134.66)
	<u>-----</u>
	3,303.32
	<u>-----</u>
	\$ 51,940.98
	<u>=====</u>

as well. Their interests in the Inquiry lie in three broad areas central to the mandate of Part II of the Inquiry and which may arise tangentially in Part I:

1. Systemic problems with drinking water quality and regulation in Ontario, particularly relating to: (i) policies of downloading of responsibility onto municipalities and privatization; (ii) lack of an integrated approach to water quality management due to the division of responsibility for water quality between different levels of government, and between different parts of the same level of government, and (iii) enforcement mechanisms and lack of enforcement capacity;
2. Primary prevention of contamination of water sources through education, regulation of industry, agriculture and land use planning, and through water protection and monitoring regimes; and
3. The importance of access to information or "right to know" about water quality.

It is our view that the Sierra Legal Coalition members offer the Inquiry a wide national and international perspective on these issues which needs to be heard.

1. COALITION PARTICIPANTS

(a) Canadian Association of Physicians for the Environment

The Canadian Association of Physicians for the Environment (CAPE) was founded in 1993 as a membership organization for health professionals. CAPE is the Canadian representative of the International Society of Doctors for the Environment (ISDE), an international federation of physicians' organizations concerned with the environment. In the fall of 1994, ISDE recognized 24 national and regional affiliates and had individual members in 50 countries, for a combined total of about 20,000 members. ISDE is headquartered in Switzerland

and sponsors a Scientific Center and International School on Environment and Health, based in Italy. ISDE is officially recognized by the United Nations as a non-governmental organization. As an active member of the ISDE, CAPE looks at environmental and health issues not only from a Canadian perspective, but also from an international one. The organization is committed to the protection and promotion of human health by addressing issues of local and global environmental degradation.

CAPE does this by seeking:

- to better understand how local and global environmental degradation affects human health;
- to educate its members, other physicians, other health professionals, the public and policy makers about the issues;
- to be a resource on how local and global environmental degradation affects human health;
- to take actions that will contribute to the protection and promotion of human health by addressing issues of local and global degradation; and
- to work with other organizations, nationally and internationally, that share CAPE's concerns.

CAPE's overarching priority is children's environmental health. Because children are more vulnerable to the toxic effects of pollutants, CAPE believes their safety should be its goal. The quality of drinking water, for instance, must be regulated at a level safe enough for the youngest child, not just for the average adult.

Contact: Kapil Khatter
Phone: (416) 463-7695

(b) Council of Canadians

Founded in 1985, The Council of Canadians is a citizens' watchdog organization comprised of over 100,000 members and 50 chapters across the country. Strictly non-partisan, the Council lobbies Members of Parliament, conducts research, and runs national campaigns aimed at putting some of the country's most important issues into the spotlight: safeguarding our social programs, promoting economic justice, renewing our democracy, asserting Canadian sovereignty, advancing alternatives to corporate-style free trade, and preserving our environment.

The Council plays a leadership role within the Blue Planet Project, an international coalition of organizations opposed to the commodification of water.

Contact: Brent Patterson
Phone: (416) 469-0238

Contact: Kim Phillips
Phone: (416) 588-5571

(c) Great Lakes United

Great Lakes United (GLU) is an 18-year-old coalition of environmental, conservation, labour and community organizations from throughout the Great Lakes and St. Lawrence River Basin. GLU has approximately 175 member groups. GLU's mission is to develop and maintain a healthy ecosystem in the Great Lakes and St. Lawrence River basin. GLU fulfills its mandate by promoting and co-ordinating citizen action, building strong grassroots leadership, educating citizens and policy-makers, and developing and advocating for effective policy initiatives.

Contact: John Jackson
Phone: 519-744-7503
Fax: 519-744-1546

2. LEGAL REPRESENTATION BY SIERRA LEGAL DEFENCE FUND

Legal representation for the Coalition will be provided by the Sierra Legal Defence Fund. The Sierra Legal Defence Fund is a non-profit environmental law organization which was founded in 1989 in order to give environmental organizations access to legal representation. The Sierra Legal Defence Fund has substantial expertise in public interest environmental law, and extensive experience co-ordinating collective action amongst environmental groups. Sierra Legal Defence Fund has, in its own right, expertise in water quality issues having, amongst other things, prepared a report on Ontario waste-water violations, and a National Sewage Report Card, which rate the treatment methods and discharges of 21 Canadian cities.

B. STANDING FOR PART II

1. INTEREST

The Sierra Legal Coalition represents clearly ascertainable interests and perspectives that are essential to the Inquiry's mandate in Part II (as per Rule 46(b) of The Walkerton Inquiry, Rules of Procedure and Practice). The specific interests, perspectives, and proposed participation of the coalition's members are outlined below.

(a) **Canadian Association of Physicians for the Environment**

Since its inception, CAPE has taken an interest in issues of water quality. CAPE co-sponsored a North American conference on Water and Human Health in 1996. The organization brings a special perspective to the Walkerton inquiry as a group of physicians who work at the frontlines treating the victims of environmental contamination. CAPE's national and international experience and its expertise on children's environmental health offer the inquiry a particular set of skills. The group has a thorough knowledge of children's special characteristics and how these make them more vulnerable to pollution. CAPE is also well suited to help the inquiry place the issue of Ontario drinking water safety in the broader context of environmental health protection in Canada and the world.

CAPE will produce commentaries on the following proposed Commission Papers (proposed in "Walkerton Part 2: Study List" draft for discussion, August 17, 2000):

1. Management of social risks;
3. The history of drinking water pollution outbreaks in Ontario; and
5. Drinking water standards.

CAPE members would also like to participate in the production of studies 1 and 5.

(b) :: Council of Canadians

The Council has a long-standing interest in drinking water issues. In early 1999, the Council launched its campaign to ban the bulk export of Canadian water and to head off what it sees as the gradual commodification and privatization of a public resource. More recently, it began the Blue Planet Project, an international effort to protect the world's fresh water from the growing threats of trade and privatization. From March 16-22, 2000, activists from Canada and more than a dozen other countries met in The Hague to oppose the trade and privatization agenda of the Second World Water Forum and to kick start an international network to protect water as a common resource and a basic human right. That network will have its first opportunity to address the growing world water crisis from its own perspective, when municipal leaders, water experts and activists from around the world meet in Vancouver, July 5-8, 2001, to attend "Water for People and Nature: An International Forum on Conservation and Human Rights." Although the Council has been primarily active on the issue of commodification and trade of water, its experience has led to the development of expertise in a number of areas central to the mandate of the Commission.

The Council offers the Inquiry expertise in three areas. First, it has extensive knowledge about the effects of privatization and downloading of governmental responsibility. Second, as Canada's leading citizens' watchdog organization, it has long been an advocate for the public's right to information, and can inform the Inquiry on the importance of public access to information regarding drinking water quality. Finally, the Council will bring to the Inquiry the perspective of its international experience on drinking water issues. The Council will comment on proposed Commission Papers on:

4. Ontario machinery of government;

11. Management and organizational behaviour.

(c) Great Lakes United

GLU has a substantial interest in water quality issues. A major focus of GLU's work over the past eighteen years has been on water quality and water quantity issues. GLU has a clean production task force, which focuses on developing ecologically sustainable production systems by supporting efforts to phase out persistent toxic substances, prevent pollution, and conserve raw materials and energy, and to support environmental and economic justice for communities and workers affected by the transition to clean production. GLU's sustainable waters task force focuses on developing a comprehensive basin-wide water conservation policy, which will lead to co-operation and coordinated action by all levels of government with jurisdiction over Great Lakes waters.

GLU will bring to the Inquiry its expertise on primary prevention of contamination of source waters, and the perspective of an organization which has been long involved in coordinating international efforts to improve water quality in the Great Lakes basin. GLU will produce commentaries on proposed Commission Papers on:

4. Ontario machinery of government;

5. Drinking water standards;

6. Water pollution – sources of contamination; and

12. Communications.

(d) Sierra Legal Coalition Interests and Perspectives

As outlined in section A above, the Coalition members share interests in three broad areas central to the mandate of Part II of the Inquiry, and offer the Inquiry a wide national and international perspective on these issues which needs to be heard. In addition to commenting on selected Commission Papers, all members of the Coalition intend to participate in the public meetings convened in Part II of the Inquiry, and to take such other steps in Parts I and II so as to ensure that the three areas of interest outlined in section A above are thoroughly vetted. In particular, we wish to ensure that issues of access to information and proper enforcement are canvassed, as these issues appear to be given little attention in the list of proposed Commission Papers.

2. SUFFICIENTLY AFFECTED

In addition to the clearly ascertainable interests and perspectives which warrant standing for the Sierra Legal Coalition, the Coalition warrants standing by virtue of the fact that its members are sufficiently affected by Part II of the Inquiry (as per Rule 46(a) of The Walkerton Inquiry, Rules of Procedure and Practice). As outlined above in sections A.1 and B.1, the members of the coalition are all currently engaged in ongoing enterprises related to water quality. The recommendations produced as a result of the Inquiry will likely substantially affect the outcome of these enterprises and the course of their future efforts in this area.

C.A.P.E.

STATEMENT OF REVENUE AND EXPENDITURES
(Unaudited)

11 Months Ended May 31, 2000

	Current YTD	Prior YTD
REVENUE		
Donations and Memberships	\$ 6,485.00	\$ 4,425.00
Foundations	3,215.00	795.00
Interest and Other Income	522.00	12.96
	-----	-----
	\$ 10,222.00	\$ 5,232.96
EXPENDITURES		
Administrative Support	2,349.00	1,062.00
Bank Charges	27.60	18.23
Committee Meetings	263.07	0.00
Communications	2,690.35	1,629.92
Fund Raising	1,051.97	392.25
Newsletter	1,565.35	845.25
Office	2,094.55	1,363.40
Programs	0.00	250.00
Professional Fees	2,304.77	0.00
Prospect Campaign	0.00	0.00
Travel	10.00	0.00
	-----	-----
	12,356.66	5,561.05
	-----	-----
SURPLUS (DEFICIT) FOR THE PERIOD	\$ (2,134.66)	\$ (328.09)
	=====	=====

COUNCIL OF CANADIANS

STATEMENT OF REVENUE AND EXPENDITURE

For the year ended, August 31, 1999

REVENUE

Memberships and contributions \$3,069,969
Program funding and contributions \$126,236
Interest \$38,701
Product Sales and other contributions \$20,364

TOTAL \$3,255,270

EXPENDITURES

Branch funding \$252,397
Campaigns \$1,891,951
Meetings and conferences \$29,380
Newsletters \$157,852
Administration \$620,773

TOTAL \$2,952,353

Excess of Revenue over expenditures for the year: \$302,917

The surplus has been allocated for core projects, and none of the funds are available for funding participation in the Walkerton Inquiry.

Financial statements

Fiscal year 1999 continued a successful trend for Great Lakes United. Our budget has increased steadily for the past three years and each corporate entity making up Great Lakes United—Great Lakes United, Inc., Great Lakes United Canada, Inc., and the Great Lakes United Foundation—shows a surplus for the year.

Great Lakes United—United States

GREAT LAKES UNITED, INC.
STATEMENT OF FINANCIAL POSITION
December 31, 1999
(With Comparative Totals for 1998)

ASSETS	Unrestricted	Temporarily Restricted	1999 Total	1998 Total
Cash and cash equivalents	\$ 78,111	\$ 31,295	\$ 107,406	\$ 132,833
Prepaid expenses	2,480	-	2,480	4,062
Pledges receivable	104,702	85,000	189,702	60,334
Due from related parties	<u>18,210</u>	-	<u>18,210</u>	<u>13,148</u>
Total current assets	201,483	96,295	297,778	200,377
Furniture and equipment	47,428	-	47,428	44,891
Less: accumulated depreciation	<u>(38,515)</u>	-	<u>(38,515)</u>	<u>(32,989)</u>
	<u>8,913</u>	-	<u>8,913</u>	<u>11,902</u>
Total assets	\$ 210,396	\$ 96,295	\$ 306,691	\$ 212,279
LIABILITIES AND NET ASSETS				
Accounts payable	\$ 20,043	\$ -	\$ 20,043	\$ 6,022
Net assets:				
Unrestricted	190,353	-	190,353	83,585
Temporarily restricted	-	96,295	96,295	124,062
	<u>190,353</u>	<u>96,295</u>	<u>286,648</u>	<u>207,647</u>
Total liabilities and net assets	\$ 210,396	\$ 96,295	\$ 306,691	\$ 212,279

Great Lakes United—United States (continued)

GREAT LAKES UNITED, INC.
STATEMENT OF ACTIVITIES AND CHANGES IN NET ASSETS
For the Year Ended December 31, 1999
(With Comparative Totals for 1998)

	Unrestricted	Temporarily Restricted	1999 Total	1998 Total
Support and revenue:				
Contribution and grant revenue	\$ 190,301	\$ 258,597	\$ 451,898	\$ 337,973
Other revenues:				
Other	29,793	-	29,793	37,283
Interest	<u>5,097</u>	-	<u>5,097</u>	<u>5,221</u>
	<u>225,191</u>	<u>258,597</u>	<u>486,788</u>	<u>380,480</u>
Net assets released from restrictions:				
Satisfaction of donor restrictions	<u>(286,364)</u>	<u>(286,364)</u>	-	-
Total support and revenue	514,565	(27,767)	486,798	380,490
Operating expenses	<u>410,324</u>	-	<u>410,324</u>	<u>381,570</u>
Change in net assets before equipment capitalization	104,231	(27,767)	76,464	18,920
Equipment capitalized	<u>2,537</u>	-	<u>2,537</u>	<u>6,317</u>
Change in net assets	106,768	(27,767)	79,001	24,237
Net assets - beginning of year	<u>83,585</u>	<u>124,062</u>	<u>207,647</u>	<u>183,410</u>
Net assets - end of year	\$ 190,353	\$ 96,295	\$ 286,648	\$ 207,647

Great Lakes United—United States (continued)

GREAT LAKES UNITED, INC.
 SCHEDULE OF REVENUES AND EXPENSES
 For the Year Ended December 31, 1998
 (With Comparative Totals for 1998)

	1998	1997
Revenue:		
Contributions	\$ 298,206	\$ 280,344
Grants	83,802	88,629
Memberships:		
Organizations	6,250	6,078
Individuals	6,165	10,502
Other	925	
Annual meeting	6,415	5,747
Internal	5,087	5,224
Other	658	1,344
Fundraising and other	5,726	2,807
Fiscal agency fees	3,020	10,515
	488,788	390,490
Net assets released from restrictions:		
Satisfaction of donor restrictions		
Total support and revenue	488,788	390,490
Operating expenses:		
Salaries and wages	169,878	140,509
Payroll taxes and benefits	16,538	22,702
Annual meeting expense	2,188	
Bulk service charge	668	425
Conferencing and discounts	7,431	
Contracted services	24,919	48,391
Depreciation	4,910	5,241
Equipment purchases	4,165	6,859
Insurance	3,071	3,813
Miscellaneous	828	3,547
Postage	4,869	10,181
Printing and photocopy	12,799	13,346
Professional services	5,128	6,960
Rent and utilities	7,822	5,548
Repairs and maintenance	8,482	2,293
Supplies	1,970	6,207
Travel	18,448	407
Telephone	74,450	14,337
	410,324	361,570
Change in net assets before equipment capitalization	78,464	18,920
Equipment capitalized	2,837	5,317
Change in net assets	\$ 75,627	\$ 13,603

Great Lakes United—United States (continued)

GREAT LAKES UNITED, INC.
 SCHEDULE OF PROGRAM INTRICAS AND LOSS NETS
 For the Year Ended December 31, 1998

Source	Joint	Non-Joint	State	Other	State	Other	State	Other	State	Other	State	Other	State	Other	State	Other	State	Other
Contributions	1,400	145,000			55,343			14,766	36,200		40,428		1,200	1,200				
Grants																		
Memberships:																		
Organizations	943																	
Individuals	509																	
Other	88																	
Annual meeting	1,175																	
Internal	500																	
Other	2,671																	
Fundraising and other	1,400																	
Fiscal agency fees	2,807																	
Total support and revenue	9,997	145,000			55,343			14,766	36,200		40,428		1,200	1,200				
Net assets released from restrictions:																		
Satisfaction of donor restrictions																		
Total support and revenue	9,997	145,000			55,343			14,766	36,200		40,428		1,200	1,200				
Operating expenses:																		
Salaries and wages	169,878	145,000	1,177	38,000	34,261			35,617	4,531									
Payroll taxes and benefits	16,538			12,027	6,150			2,675	18,9									
Annual meeting expense	2,188																	
Bulk service charge	668																	
Conferencing and discounts	7,431																	
Contracted services	24,919																	
Depreciation	4,910																	
Equipment purchases	4,165																	
Insurance	3,071																	
Miscellaneous	828																	
Postage	4,869																	
Printing and photocopy	12,799																	
Professional services	5,128																	
Rent and utilities	7,822																	
Repairs and maintenance	8,482																	
Supplies	1,970																	
Travel	18,448																	
Telephone	74,450																	
Total	298,206	145,000	1,177	38,000	34,261			35,617	4,531									
Change in net assets before equipment capitalization	78,464	145,000		12,173	1,189			14,811	1,969									
Equipment capitalized	2,837																	
Change in net assets	\$ 75,627	\$ 145,000		\$ 12,173	\$ 1,189			\$ 14,811	\$ 1,969									

Great Lakes United—Canada

GREAT LAKES UNITED CANADA, INC.
STATEMENTS OF FINANCIAL POSITION
(Stated in Canadian Currency)
December 31,

ASSETS	1998	1998
Cash	\$ 69,261	\$ 6,517
Accounts receivable	18,480	18,555
Equipment, net of accumulated depreciation of \$1,809 (\$1,374 - 1998)	468	701
Total assets	\$ 88,209	\$ 25,773

LIABILITIES AND NET ASSETS	1998	1998
Accounts payable	\$ 3,483	\$ 600
Accounts receivable	25,743	18,804
Due to related parties	22,312	20,000
Total liabilities	51,538	39,404
Net assets	36,671	8,369
Total net assets	\$ 88,209	\$ 25,773

GREAT LAKES UNITED CANADA, INC.
STATEMENTS OF ACTIVITIES AND CHANGES IN NET ASSETS
(Stated in Canadian Currency)
For the Year Ended December 31,

	1998	1998
Support and grant revenue:		
Support and grant revenues	\$ 78,948	\$ 86,165
Other	968	3,442
Interest income	588	90,007
Total support and revenue	80,478	79,614
Operating expenses	49,709	78,632
Change in net assets	30,767	11,170
Net assets - beginning of year	8,369	(3,827)
Net assets - end of year	\$ 38,136	\$ 8,369

18

Great Lakes United—Canada (continued)

GREAT LAKES UNITED CANADA, INC.
SCHEDULE OF REVENUES AND EXPENSES
(Stated in Canadian Currency)
For the Year Ended December 31, 1998
(with comparative 1998 totals)

	General Operations	Environment Canada	Great Lakes United Foundation	Health Care Without Harm	Niger Exchange	Ronaldh Foundation	Strategy St. Laurent	Action 21	Total 1998	1998
Revenues:										
Support and grant revenue	\$ -	\$ 18,835	\$ 7,800	\$ 4,458	\$ 34,265	\$ 8,500	\$ 11,000	\$ -	\$ 78,848	\$ 86,165
Other	968	-	-	-	-	-	-	-	968	3,442
Interest income	1,327	18,935	7,800	4,458	34,255	2,500	11,000	-	80,478	90,007
Operating expenses:										
Salaries and wages	-	3,484	3,722	900	831	-	2,000	-	10,537	41,462
Payroll taxes and benefits	380	821	622	-	206	-	-	92	2,001	4,918
Contracted services	1,213	-	2,800	1,500	1,500	-	5,000	-	11,713	4,597
Travel	1,320	3,378	773	450	5,817	-	2,433	-	12,848	17,447
Audit and legal	144	-	-	-	-	-	-	-	1,220	1,848
Bank service charges	-	-	-	-	-	40	-	-	184	131
Telephone	-	519	-	894	-	-	111	416	1,884	2,048
Printing, photocopying and other	50	122	128	228	40	79	247	102	1,060	3,103
Depreciation	435	-	-	-	-	-	-	-	435	415
Small equipment and supplies	-	73	61	64	818	-	-	628	1,322	368
Rent	-	1,282	-	885	-	-	1,200	904	4,269	3,548
Other	2,147	-	70	-	165	-	-	-	2,382	(828)
	6,869	9,658	7,800	4,458	8,888	119	11,000	2,140	68,708	78,527
Change in net assets	\$ (4,142)	\$ 9,273	\$ -	\$ -	\$ 25,369	\$ 2,381	\$ -	\$ (2,140)	\$ 36,747	\$ 11,170

19

Great Lakes United Foundation

GREAT LAKES UNITED FOUNDATION
STATEMENTS OF FINANCIAL POSITION
 (Stated in Canadian Currency)
 December 31,

ASSETS	1999	1998
Cash	\$ 11,009	\$ 7,310
Due from related parties	6,102	8,753
Current assets	16,111	14,063
Computer equipment	1,200	1,200
Less accumulated depreciation	820	680
	240	520
Total assets	\$ 16,351	\$ 14,583
LIABILITIES AND NET ASSETS		
Unrestricted net assets	\$ 16,351	\$ 14,583
Total liabilities and net assets	\$ 16,351	\$ 14,583

GREAT LAKES UNITED FOUNDATION
STATEMENTS OF ACTIVITIES AND CHANGES IN NET ASSETS
 (Stated in Canadian Currency)
 For the Years Ended December 31,

	1999	1998
Support and revenue:		
Memberships	\$ 4,018	\$ 3,725
Donations	6,718	938
Interest income	87	145
Other	17	80
Total support and revenue	10,840	4,888
Expenses:		
Operating expenses	1,232	495
Grant expenses	7,890	-
Total expenses	9,122	495
Change in net assets	1,808	4,373
Net assets - beginning of year	14,583	10,210
Net assets - end of year	\$ 16,391	\$ 14,583

Great Lakes United—Foundation (continued)

GREAT LAKES UNITED FOUNDATION
SCHEDULES OF REVENUES AND EXPENSES
 (Stated in Canadian Currency)
 For the Years Ended December 31,

	1999	1998
Revenues:		
Memberships	\$ 4,018	\$ 3,500
Donations	6,718	938
Interest	87	145
Foreign exchange	17	80
Other	-	225
	10,840	4,868
Operating expenses:		
Depreciation	240	240
Postage, printing and other	274	255
Travel	718	-
	1,232	495
Grant expense	7,890	-
Excess of support and revenue over expenses	\$ 1,808	\$ 4,373

SIERRA LEGAL DEFENCE FUND SOCIETY

1999-2000 BUDGET			
REVENUE			\$ 583,051.00
EXPENSES			
Salaries & Compensation			\$ 428,600.00
Office Expenses			99,780.00
Human Resources			7,552.00
Capital Assets			15,185.00
Fundraising			2,900.00
Communication			12,244.00
Litigation			17,396.00
Science/Research			17,004.00
General Expenses			28,200.00
TOTAL EXPENSES			\$ 611,857.00
SURPLUS (DEFICIT)			\$ (28,806.00)