



Golden Horseshoe  
Food and Farming  
Alliance

Hon. Doug Ford,  
Premier of Ontario  
Room 281  
Legislative Building, Queen's Park  
Toronto, Ontario M7A 1A1

Hon. Jeff Yurek, MPP  
Minister of the Environment, Conservation and Parks  
777 Bay Street, 5<sup>th</sup> Floor  
Toronto, Ontario M7A 2J3

Premier Ford and Minister Yurek,

Re: Impact of Bill 229, Protect, Support and Recover from Covid-19 Act 2020 with  
Respect to proposed amendments to the Conservation Authorities Act and the  
Planning Act

We are writing this letter in response to the proposed changes to the Conservation Authorities Act and are encouraged that the Act continues to offer protection to the watershed residents for conservation, restoration, source water protection and natural resource management. However, as the proposed changes are implemented, there will continue to be strong protection for only **some** of the current management offered to natural hazards, wetlands, natural features and the mitigation of climate change.

We feel that by changing the Act, the government have improved transparency at the Conservation Authority level and seek to cut red tape, but in doing so, have created several instances that are concerning to the Board of the Golden Horseshoe Food and Farming Alliance.

Our concerns are as follows:

**1. No Consultation on Environmental Matters**

Inclusion of the changes to the Conservation Authorities Act within Bill 229 eliminates the requirement of public consultation to the Act. We would request that the changes be removed from Bill 229 and provide the consultation that is required for laws that impact the environment. Pushing them through in this way, while it maybe expedient for the government, misses the opportunity to get this bill right.

## 2.

### **Governance**

Removal of the citizen representatives from the Conservation Authority Boards would leave only political representation at the table. Not all politicians have a depth of knowledge of conservation and natural resource management and citizen representatives are often subject matter specialists with a significant interest in the natural environment.

The mix of political and citizen representation on a board makes for better decision making at the Board level that takes into consideration the whole watershed and not a particular municipality.

Directing political representation to think only about their own jurisdiction and not the watershed as a whole can lead to fragmentation at the Board level that is contrary to the collective management of the watershed. In some cases, there may be clear conflicts of interests arise leading to acrimony and deadlock at the Board Level.

We support the placement of an agricultural representative at the Board level as many lands within the watersheds are agricultural lands that can positively coexist with natural heritage features.

## 3. **Removal of Decision Making at Authority Level**

Authorization for the Minister of Natural Resources and Forestry to issue an order to take over and decide a development permit application instead of the Conservation Authority presents serious implications. We have seen the dangerous escalation of the use of Ministerial Zoning Orders under the Planning Act and feel that this move could also be used to push short term development gains that may lead to long-term environmental disasters.

Instead of using this heavy-handed approach, decisions and comments required by Conservation Authorities should be held to stated timelines supported by appropriate scientific analysis and study. As a commenting body, the final decisions on development should be left at the municipal and watershed level and not escalated to the provincial level. Political decisions that are not supported by data and science will not protect the environment for the long term.

Directing appeals to the LPAT hearings will only serve to overburden an already struggling system.

## 4. **Decreasing Enforcement Powers**

Proposed changes would remove the ability of the Conservation Authority to issue stop work orders when unauthorized development occurs on environmentally sensitive areas and flood plains are not a positive move. If the enforcement powers are not available, the Conservation Authorities must resort to the more expensive and complicated injunction process for stopping infractions.

As development pressures mount, municipalities have experienced increased illegal fill operations, dumping and filling of wetlands, unauthorized building and trespass by

motorized vehicles in areas of natural significance. Removal of the powers of enforcement from the Conservation Authority, downloads the responsibility for enforcement to the municipality and bylaw enforcement without clear direction. This download will lead to confusion and extra cost at the municipal level to address unlawful activities.

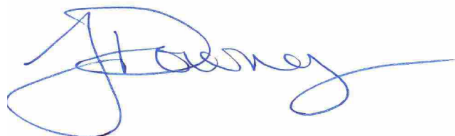
#### **5. Municipal Funding for Conservation Authorities**

Municipalities support Conservation Authorities in their efforts in watershed protection, flood control, source water protection and climate change mitigation. However, municipalities need more predictable budgeting control on the dollars allocated to the C.A's. Significant C.A. budget increases put pressure on municipal budgets when efforts are underway to limit the increases to the resident.

Many of the Conservation Authorities work very collaboratively with the agricultural community and are looked on as positive partners in protection of source water, flood prevention and natural resource management. As it happens, there are also Authorities that are doing no more than enforcing the letter of the law and do not seek positive outcomes for all involved. Some of this culture can be changed by increasing transparency, defining mandatory natural hazard management and focusing the efforts of the Conservation Authorities is admirable.

The Alliance feels however that there are some significant unintended consequences in the Bill as it is written and urge you to listen to stakeholder suggestions in this regard.

Regards,



Johanna Downey  
Chair  
Golden Horseshoe Food and  
Farming Alliance

#### **About the Golden Horseshoe Food and Farming Alliance**

The Golden Horseshoe Food and Farming Alliance (GHFFA) The **Golden Horseshoe Food and Farming Alliance (GHFFA)** is a partnership between the regional municipalities and Federations of Agriculture in Niagara, Peel, Halton, York, and Durham, and the cities of Hamilton and Toronto, the Greenbelt Foundation, Durham College, Niagara College, Conservation Authorities, and the Ontario Ministry of Agriculture, Food and Rural Affairs. The Alliance seeks to identify

pathways for a more integrated and coordinated approach to food and farming viability in the area to ensure that the Golden Horseshoe retains, enhances and expands its role as a leading food and farming cluster.

Cc Sylvia Jones