

November 30, 2020

Amarjot Sandhu, MPP, Chair, Standing Committee on Finance and Economic Affairs
Julia Douglas, Clerk
99 Wellesley Street West
Room 1405, Whitney Block
Queen's Park Toronto, ON M7A 1A2

Dear Mr. Sandhu and members of the Standing Committee:

The Ontario Council of the Canadian Federation of University Women (CFUW Ontario Council) is writing to express our deep concern regarding proposed changes to both the *Conservation Authorities Act* and the *Crown Forest Sustainability Act, 1994* as proposed as part of omnibus budget bill, Bill 229, Schedule 6 and Schedule 8 respectively.

Ontario has an outstanding system of conservation authorities whose work is essential to ensuring Ontario's natural environments are protected, our drinking water kept safe, appropriate flood management is undertaken, and that biodiversity in Ontario is protected.

Unlike many jurisdictions, Ontario has the enviable distinction of managing its natural environments using a watershed approach. Nature does not observe municipal boundaries. This is why it is so critical that our natural environments and the resources in them not be managed by municipalities or with an emphasis on municipal perspectives. The watershed approach to management ensures that management is undertaken in a manner that aligns with how ecosystems function. This is why the proposed changes to the *Conservation Authorities Act* are so concerning - they move away from a watershed management approach and instead shift critical decisions to municipalities, who's individual needs are different from those of an entire watershed.

We therefore recommend that the management of its natural environment continue to use the watershed approach.

Proposed changes to the *Conservation Authorities Act* in Schedule 6 of Bill 229 would restrict the role of conservation authorities in development decisions and give the provincial government, including the Minister of Natural Resources and Forests, the power to issue permits without the input or recommendations of conservation authorities. Such decisions would ignore the vast expertise that lies within the conservation authorities. With climate change, increasing human

population size, loss of biodiversity, and other pressures on our natural environment, it is more critical than ever that fact-based decision-making be adhered to and that the wealth of expertise that exists within our conservation authorities not be ignored, circumvented, or undermined.

We recommend that decision making concerning development be fact-based, and that conservation authorities continue to advise the government

If the proposed changes to the *Conservation Authorities Act* are allowed to proceed, it will constrain conservation authorities' mandate, result in the most important environmental protections being stripped away, and amount to developers writing their own permits and ignoring environmental protections that are so fundamental to our province. With the extreme challenges of climate change that our world is faced with, Ontario needs the role of conservation authorities enhanced, not constrained or reduced.

We ask the Government of Ontario not to proceed with these proposed changes in Schedule 6 of Bill 229.

We are also very concerned about the changes proposed in Schedule 8 of Bill 229, which proposes to repeal provisions of the *Crown Forest Sustainability Act, 1994* and exempt Crown Lands from provisions under the *Endangered Species Act, 2007*. These changes are completely antithetical to what Ontario needs. Ontario Crown forests are often comprised of unique forest ecosystems and forest ecosystems of value, many of which contain endangered or threatened species. To allow forestry on provincial Crown lands which is exempted from protecting endangered species through the *Endangered Species Act* puts Ontario's biodiversity at risk and gives logging companies cart blanche in their activities. This is not responsible resource development.

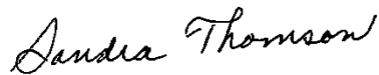
We therefore recommend that the proposed changes in Schedule 8 be removed from Bill 229.

In summary, we are concerned about the loss of the potential loss of the watershed approach for wetlands management and the loss of the expertise of the members of the conservations authorities for decision-making as proposed in Schedule 6 and the exemption of Crown Lands from certain provisions of the *Endangered Species Act, 2007* as proposed in Schedule 8.

CFUW ONTARIO COUNCIL

Ontario Council of the Canadian Federation of University Women (CFUW) is a voluntary, self-funded, non-profit organization involved in advocacy, lifelong learning and community action with 49 clubs across the province, affiliated with CFUW, a national non-partisan organization with clubs across Canada, which has NGO consultative status with the United Nations.

A clean, safe environment, for both our own health and that of the planet, is one of our main concerns.



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