

December 2, 2020

Standing Committee on Finance and Economic Affairs
99 Wellesley Street West
Room 1405, Whitney Block
Queen's Park
Toronto, ON M7A 1A2

Re: Bill 229, Protect, Support, and Recover from COVID-19 Act (Budget Measures), 2020

On behalf of the Community Climate Council, please find, for the assistance of the Standing Committee, our recommendation, as discussed below:

Schedule 6 (proposed changes to the Conservation Authorities Act and consequential amendments) and Schedule 8 (proposed changes to the Crown Forest Sustainability Act, 1994) both be withdrawn in their entirety from Bill 229.

Open letter to the Ontario Government, Standing Committee on Finance and Economic Affairs, to Reconsider Recent Amendments to the Conservation Authorities Act

Earlier this month, the Conservation Authorities Act, R.S.O. 1990 was amended to “improve public transparency, accountability and consistency in conservation authorities’ operations”¹. These updates significantly affect and diminish the role of thirty-six conservation authorities in Ontario, including Credit Valley Conservation (CVC) and Toronto and Region Conservation Authority (TRCA), operating in the Region of Peel.

The Community Climate Council addresses this open letter to the Premier of Ontario, Mr. Doug Ford, and the organizations working with the Provincial Government. We have serious concerns relating to the changes in the Conservation Authorities Act that hinder the Conservation Authorities from keeping the Province and its people safe from natural hazards. As such, we are urging the Government and those working with the Government to take action in support of the recall of these concerning provisions.

For many decades, Conservation Authorities in Ontario have been working with Indigenous and non-Indigenous communities to protect, secure and restore natural ecosystems, in particular watersheds, making them resilient to the changing climate and hazards like flooding and wildfires. With more than 90% of Ontario’s population living in a watershed, Conservation Authorities serve and protect a large community.

However, their role and authority to protect Ontario’s environment, people and their property is massively affected by the following changes to the Act²:

¹ Environment Registry of Ontario: Modernizing conservation authority operations - Conservation Authorities Act (<https://ero.ontario.ca/notice/013-5018>)

² Government of Ontario: Natural resource management and climate change (<https://www.ontario.ca/page/natural-resource-management-and-climate-change>)

- **Development Decisions beyond Conservation Authorities:** The Conservation Authorities' decision-making is informed by their scientific information through their watersheds management programs that ensures developments in Ontario take place in appropriate places, without causing harm to the environment or the surrounding population. The change in the regulation now limits the Conservation Authorities' ability to provide input to municipal planning applications, which will lead to permitting decisions and appeals regarding development in watersheds.
- **Changes to the Governance of Board:** Municipal representatives on the Board have been instructed to act in the interests of their municipality which may contradict the best interests and values of the Authorities in terms of addressing watersheds issues and potentially putting more people and infrastructures at risk of flooding and other natural hazards.
- **Removing Authorities' role to independently appeal decisions made around permits and municipal planning applications.** This takes away the ability of Authorities to enforce regulations, address environmental violations, and remedy problems that exacerbate risks of natural hazards and negative environmental impacts. This change not only limits the Conservation Authorities' role in upholding environmental values, but it will also levy more costs and cause more delays than status quo when appeals will go through courts.

These changes must be retracted, studied, and reassessed so that the Conservation Authorities can continue their ecosystems regeneration and protection work towards a resilient, climate-compatible and ecologically sustainable Ontario.

Now more than ever, this unprecedented year has demonstrated the need to protect our environment and sensitive natural areas, such as watersheds, and to continue to work collectively to mitigate climate change impacts. We urge the Government of Ontario, through Premier Doug Ford, to withdraw the aforementioned proposed amendments.

The Community Climate Council believes that we, and other organizations, that work with the Government have an opportunity and responsibility to use our leverage to publicly and privately call on the Government of Ontario to recall and reconsider the proposed changes, for continued protection and preservation of the natural lands and people of Ontario.

We urge you to remain optimistic and to make your voice heard by signing this letter in solidarity with the Conservation Authorities who keep us, our properties, our ecosystems, and our infrastructure safe.