

Submitted on Wed, 12/02/2020 - 10:12

**Application ID: 28531**

Submitted values are:

Bill or item of business: **Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020**

**Full name**

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**Paste submission**

2 December 2020

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Standing Committee on Finance and Economic Affairs  
99 Wellesley Street West, Room 1405,  
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Toronto, ON M7A1A2

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

I am writing in response to the proposed Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020. I am deeply concerned about the proposed changes to the Conservation Authorities Act and the Crown Forest Sustainability Act, 1994 and wish to see Schedule 6 and Schedule 8 withdrawn in their entirety from Bill 229.

As a historian and professor at York University who has written on the history of conservation authorities and their significance to public recreation and ecological resilience in Ontario's watersheds, I am deeply concerned by the rollbacks in the authority and reach of the conservation authorities embodied in Schedule 6. Limiting the scope and powers of conservation authorities in the ways proposed in Schedule 6 will erode the capability of these bodies to manage watersheds in an integrated way, protecting our cities and countrysides from the flooding and soil erosion that were so apparent when the authorities were created in the 1940s and have become even more pressing concerns in the context of climate change. In particular, the proposal to remove conservation authorities' status as independent public bodies in land use planning will

remove fundamental expertise and an important check to ensuring public safety and ecologically-informed watershed management in our planning processes. Ontario can and must do better.

The rollbacks proposed in Schedule 8 to the Crown Forest Sustainability Act, 1994 (CFSA) are alarming in their removal of protections for endangered species (contained in the Endangered Species Act, 2007) from the two-thirds of Ontario's land base to which the CFSA applies. I am concerned by the proposal in Schedule 8 to exempt all forestry operations from mandatory consideration of species at risk protection and recovery mandated by the Endangered Species Act, 2007(ESA). Given climate change and global biodiversity loss, this is not the time to roll back protections for endangered species. The proposed removal of the ability of the Minister to issue orders in circumstances when there is imminent danger to a species-at-risk removes another important oversight function from the Act. I don't believe that the proposed replacement oversight for species-at-risk protection contained within the proposed Schedule 8 of the CFSA provide the necessary detailed oversight and enforcement mechanisms already contained within the ESA.

Protecting the integrity of our watersheds and the diversity of plant and animal species in Ontario safeguards our economies and the future of our province. Nicking away at these protections, as these proposed changes seek to do, is not in the interests of Ontarians or the land, water, plants and animals we depend upon.

Sincerely,  
Jennifer Bonnell