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Re: Bill 229, Schedule 6 - Changes to the Conservation Authorities Act

Introduction

I am a long time resident of Oakville and former employee in the science sector of Fisheries and Oceans Canada. I spent 36 years working as a Great Lakes researcher and Science Division Manager. During my career I was fortunate to be part of the great progress made dealing with environmental issues such as phosphorus and contaminant load management, but also witnessed the demise of science-based decision making under recent governments both federally and provincially.

I am writing because of my deep concern about changes being proposed under Budget Bill 229 as it relates to oversight on development within watersheds in Ontario.

Ever since Conservation Authorities (CAs) were formed, following the devastating impact of Hurricane Hazel in the 1950s, CAs have played a key role in integrated watershed planning in Southern Ontario. In fact, these agencies have been the “poster child” for sound environmental management and watershed planning in North America. Why change this and weaken the role of an organization that has provided sound watershed management for 70 years and benefits the public interest? CAs are currently filling a key role in environmental management since other Ministries such as OMNR and MECP have been devastated by budget cuts by your gov’t. This gov’t already severely damaged CAs with heavy budget cuts in 2019. CAs are the last line of defence against poorly planned development. The logical step would be to increase funding and responsibilities for CAs, not implement Schedule 6, since other Ministries have become “lame ducks” when it comes to environmental management.

The proposed changes seek to hand off more responsibility and decision making to local municipalities. ***This is a flawed approach.*** Local governments are short-term political institutions with boundaries that dissect watersheds. The watershed-based CAs ensure an ongoing, integrated and ecosystem-based approach to development to ensure that actions in one part of a watershed do not affect other parts of the ecosystem downstream. The proposed fragmented approach to decision making comes at a time when more than ever, we need integrated, science-based decision making to mitigate the impacts of intense weather events brought on by climate change.

In addition, changes to the makeup of CA boards and giving institutions such as LPAT final oversight, departs from science-based decision making and proper public representation. Groups like LPAT do not have the scientific expertise to provide proper oversight on environmental issues. As a result, decisions are going to favour development at great environmental costs. Under the proposed changes, the loss of a protected wetland in Pickering through a development that will be approved if Schedule 6 goes ahead, is just one example where political-based decision making will cause irreparable harm.

Proposing these changes as part of an Omnibus Bill is not transparent. The right that citizens have to comment through proper consultations and posting on the Environmental Bill of Rights has been taken away. This is reminiscent of Stephen Harpers approach to changing The Federal Fisheries Act, an important piece of federal environmental legislation, by hiding it in his Omnibus bill of 2012. Proper dialogue with the public, CAs, other agencies and developers would go a long way to streamlining the approval process and provide proper oversight on development. It appears that the only consultation thus far has largely favoured developers.

This government already has a poor reputation when it comes to protecting natural resources. Proposed weakening of protection for the Oakridge's Moraine (Premier Ford backpedalled on this proposal because of public outcry during his campaign), cancelling of tree planting programs, changes to the Endangered Species Act, fighting the carbon tax, proposed slaughter of Cormorants, lack of climate change policy, slashing budgets of CAs, OMNRF and MECP and getting rid of the Environmental Commissioner's Office are just a few examples that reflect this governments lack of dedication to protecting natural resources.

Lastly, the pandemic has shown that now more than ever, people need "green space". If anything we need more green space, not less. The heavy public use of CA lands, provincial parks and municipal green spaces during the pandemic reflects this need. It is of dire importance to protect the green space we have and protect more for future generations. I am not opposed to development but decisions must be based on science and good planning and work for the benefit of all, not just developers.

I demand that you remove Schedule 6 from the budget bill and restart a proper, PUBLIC dialogue with our communities, municipalities and CAs to create a sound set of organizations and guidelines that efficiently looking after the public good rather than favour private interests.

I request a response to my letter outlining how your government is going to improve the protection of our lands and waters rather than damaging the good work of the Conservation Authorities.

Sincerely,
Scott Millard.
Great Lakes Research Biologist
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