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**Via Email**

Standing Committee on Finance and Economic Affairs  
99 Wellesley Street West  
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**Standing Committee on Finance and Economic Affairs Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020**

Good afternoon, my name is Elizabeth Hendriks and I am the Vice-President of Restoration and Regeneration at WWF-Canada. A science-based conservation organization, WWF-Canada, in partnership with foundations, governments, businesses, communities, individuals and our supporters, have worked to conserve Canada's ecologically important regions for over 50 years.

I want to thank the committee for the opportunity to speak on Bill 229. On behalf of WWF-Canada we recommend Schedule 6 (the proposed changes to the Conservation Authorities Act and consequential amendments) be withdrawn in its entirety from Bill 229.

We also strongly object to Schedule 8 and support removing it. We have read the Canadian Environmental Law Association and Wildland Leagues written submission and support those comments as well.

It is WWF-Canada's analysis that the proposed changes to the *Conservation Authority Act* will threaten the future of the province's natural environments by minimizing the scope and power of Conservation Authorities (CAs) and place businesses, communities, and small municipalities at a disadvantage for growth — a growth that considers the environment and the economy.



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The proposed overhaul comes as communities across the province continue to deal with the ongoing threats of climate change and biodiversity loss, as well as a global pandemic that's plunged the world into a recession. At a time when the province is facing unprecedented pressures, we need to strengthen the cooperative role between core institutions to ensure transparency, efficiencies and best practices that ensure communities and nature will thrive.

Despite its name, Bill 229 undermines Ontario's ability to "protect, support and recover." In particular, Schedule 6 erodes CA's roles in planning and their ability to manage lands containing natural hazards and wetlands, build flood resilience in the face of climate change, and preserve critical natural features. We learned from the Walkerton Crisis, Hurricane Hazel, and the significant impact of the flooding seasons in the past three to five years that planning at a watershed scale is the right path forward to protect, support and recover our communities.

Since 1946, Conservation Authorities have protected our environment at the watershed level by keeping development in safe zones and away from sensitive and flood-prone areas. We need our CAs to continue to have ecosystem oversight and planning authority in development so they can protect the natural environment along with public health and safety while maintaining clarity and consistency for economic development.

Our environment is crucial to rebuilding our financial and general wellbeing following a particularly difficult year.

In Ontario, GDP is heavily dependent on nature: farming contributes \$47.7 billion; forestry \$18 billion; tourism \$34.1 billion; and even fishing, hunting and trapping contribute \$13.2 billion. Stressing or destroying vital ecosystems will not only have an enormous economic impact, but also huge environmental and social costs.

Some of the more prescriptive changes, such as new procedures and yet-to-be determined regulations, will have unintended consequences potentially imposing red tape that will be counter-productive to the government's stated desire to help conservation authorities modernize and operate with greater focus, transparency and efficiency.

In this time of uncertainty, businesses need environmental protection and safeguards to be clear and concise and not continually left to the development of future regulation. Introducing this uncertainty will put Ontario businesses behind best practices. We have seen incredible successes such as Lake Simcoe Conservation Authorities stormwater management policies having the backing of BILD (the voice of the home building, land development and professional renovation industry in the GTA).

In the Region of Waterloo, as cultures and expectations of developers have shifted, so too have developers' sophistications around designs. Some companies have begun to view site rehabilitation as a public responsibility and work collaboratively with GRCA, getting to better restoration outcomes rather than viewing CAs as a hurdle.

The point is, a good company is able to rise to the spirit of safeguarding regulations for stewardship and quality control as a part of the matter of doing good business. If Schedule 6 passes, by allowing a back-door process to get special treatment from the Minister's office, the general competence of the industry will be dragged down alongside the gains in land-use practice and the important unified culture we have created over the years.

The proposed changes also authorize the Minister of Natural Resources and Forestry to overturn a CA's decision to not issue a development permit, politicizing the process and removing the opportunity for science-based decision making. These changes would also allow developers to fast-track approvals and appeal decisions they do not agree with, without affording the same opportunity for citizens. The result could be development that is unsafe or damaging to the natural environment without holding space for community voices.

A global pandemic is not the time for the Ontario government to make ambiguous changes to core environmental oversight and structure. Rolling back globally recognized Conservation Authorities and land-use management practices will **not** put us in a place of competitive advantage after the crisis of the pandemic has lifted.

If we are serious about building back better and ensuring our ability to recover from this pandemic, we cannot dismantle the planning and development institutions that allow us to deliver a strong economy and strong environment — nor can we put our municipalities at further risk in the middle of a climate and biodiversity crisis.

Allowing Conservation Authorities oversight in the planning and development process helps us protect vital biodiversity and our ability to adapt to climate change. This is a much-needed long-term approach to two problems that aren't going away soon, even when the pandemic does.