

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 Ottawa Riverkeeper, please find our recommendation to the Standing Committee, as discussed below, that: Schedule 6 (proposed changes to the Conservation Authorities Act and consequential amendments) be withdrawn in their entirety from Bill 229.

About Ottawa Riverkeeper

Ottawa Riverkeeper is a not-for-profit organization dedicated to protecting the health and future of the Ottawa River and its tributaries. We work with individuals, community groups and all levels of government to promote river stewardship and collective action on issues that affect our ability to safely swim, drink and fish from our local waterways. Ottawa Riverkeeper fulfills its mission by raising awareness, educating, empowering and inspiring action; disseminating science-based information, and encouraging responsible use of the Ottawa River for the enjoyment and benefit of all.

When examining bill 229, and specifically schedule 6, Ottawa Riverkeeper had a number of concerns for how the proposed reforms to the Conservation Authority Act threaten to harm the Ottawa River watershed. We believe that these changes will have irrevocable changes to the rivers, lakes and wetlands in our region.

Need to remove Schedule 6 from Bill 229 to ensure Conservation Authority Act continues to provide protections for our rivers and communities

For more than 70 years, these government agencies, along with the 32 others across the province. In the Ottawa River watershed, there are four Conservation Authorities, the North Bay Mattawa, Mississippi Valley, Rideau Valley, and South Nation, that represent four smaller watersheds. There are also large parts of the Ottawa River watershed, such as Renfrew County and the area Lake Temiskaming, that do not have Conservation Authorities.

Ottawa Riverkeeper recognises the important role that Conservation Authorities have played when it comes to protecting people and property from the potential damage of flooding, such as the devastating events that our community was subjected to in 2017 and 2019. The rising water

caused thousands of riverfront residents to be evacuated, resulted in millions of dollars in property damages, and destroyed some precious wetland habitats.

In the aftermath of the 2019 flooding events, the Ontario government commissioned Ontario's Special Advisor on Flooding Report to Government: An Independent Review of the 2019 Flood Events in Ontario. Earlier this year, it also released Protecting People and Property: Ontario's Flooding Strategy. How will the proposed changes to Schedule 6 of Bill 229 incorporate the findings and recommendations from these reports?

Simply put, it does not whatsoever.

In 2019's Independent review of the 2019 flood events in Ontario, the Special Advisor Doug McNeil recommended that the province consult and collaborate with Conservation Authorities for flood management. The Special Advisor referenced on numerous occasions Conservation Authorities important technical understanding of watersheds, development of tools such as flood maps, and how they implement these to support decision making. However, with the proposed changes within Schedule 6, the "watershed approach" that Conservation Authorities apply and that the Special Advisor on Flooding highlighted as beneficial, will no longer be able to be applied, significantly changing how Conservation Authorities contribute not just to flood preparation but also mitigation. They are able to play this role, because as noted, Conservation Authorities work throughout their watersheds to ensure the protection of wetlands, forests, and other green infrastructure to reduce the impacts of flooding.

In 2020's Flooding Strategy, the Ontario government advised that flood risks must be tackled collaboratively. Strong partnerships between all parties, including Conservation Authorities, along with municipalities, and Indigenous peoples, among others, were mentioned as key.

The previous reports make one sound piece of advice clear: Conservation Authorities are critical to helping warn local people and providing them with timely information on flooding during flooding events. Furthermore, they apply an effective watershed approach to help mitigate flooding, rather than solely focusing on the flood zone. However, rather than applying this advice, the Ontario government has chosen to ignore the facts. Instead, it undermines the partnerships that support making our communities resilient in the face of flooding.

How do the changes to Schedule 6 of Bill 229 prevent Conservation Authorities from effectively protecting bodies of water in Ontario?

Schedule 6 reduces Conservation Authorities' decision-making power.

Imagine that a company wants to build new office buildings on the beautiful wetland near your home where several species of fish, turtles, and birds live. Under the new changes, it would no longer be the Conservation Authorities, who know the science of local wetlands best, the species the wetland supports, the fish, turtles and birds, along with the contribution to groundwater infiltration and surface water flow, who would decide to issue permits for the project or not. It would now be the Minister of Natural Resources and Forests who would hold the power of approval.

In other words, decisions to develop in ecologically sensitive areas that could damage our rivers and wetlands would now be political, rather than based entirely on science, as they should be. This is a huge risk. It could leave communities at the mercy of decisions made simply for political gain, municipality by municipality, when instead, they should be considering the impacts on your rivers and wetlands.

This is exacerbated by the narrowing of the objects and powers of Conservation Authorities impacting not just their operations but the ability to study and investigate, access to land throughout their watersheds, and to complete research. In addition, changes to which authority issues permits and on what premise, will further erode Conservation Authorities ability to fulfill theirs mandate.

Conservation Authorities have been around since 1946 - they run their programs on a watershed scale. Their administrative boundaries match a very meaningful real-world ecological landscape. This very smart approach allows issues to be addressed across municipal boundaries and is envied around North America. It is important to remember that the purpose of conservation authorities as laid out in the Conservation Authority Act is to: provide for the organization and delivery of programs and services that further the conservation, restoration, development and management of natural resources in watersheds in Ontario.

Schedule 6 of Bill 229 eliminates a very competent and necessary middleman. Apart from protecting natural resources, Conservation Authorities provide a link between the provincial government and local communities most affected by natural issues, such as flooding. With Schedule 6, collaboration and sharing expertise at a local level is in danger, which in turn, makes it more difficult for us to combat natural disasters that devastate our communities and environment. Given the increasing effects of global climate change, flooding like the one that ravaged municipalities in 2017 and 2019 will only continue to increase. That's why the Ontario government scaling back the vital Conservation Authorities puts politics first, and nature and people second.



For the protection of our rivers and communities, Ottawa Riverkeeper strongly recommends that Schedule 6, in its entirety, be withdrawn from Bill 229 and that the Ontario government take immediate actions to ensure that the current mandate of the conservation authorities is maintained and enhanced.

Sincerely,

A handwritten signature in blue ink, which appears to read "Elizabeth Logue", is positioned below the word "Sincerely,".

Elizabeth Logue
Ottawa Riverkeeper