



Dec 2, 2020

VIA email

Standing Committee on Finance and Economic Affairs
 99 Wellesley Street West
 Room 1405, Whitney Block
 Queen's Park
 Toronto, ON
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Attn: Amarjot Sandhu, MPP, Chair: amarjot.sandhu@pc.ola.org
 Julia Douglas, Clerk: comm-financeaffairs@ola.org

CC: Hon. Rod Phillips, Minister of Finance: rod.phillipsco@pc.ola.org
 Hon. Doug Ford, Premier of Ontario: doug.fordco@pc.ola.org

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

On behalf of ProtectNatureTO, please find for the assistance of the Standing Committee our recommendation, as discussed below, that:

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and consequential amendments) and Schedule 8 (proposed changes to the Crown Forest Sustainability Act, 1994) both be withdrawn in their entirety from Bill 229.

About ProtectNatureTO

ProtectNatureTO is a coalition of over 20 nature- and stewardship-based organizations advocating for the protection of wildlife and natural areas across the City of Toronto.

Bill 229 is the most recent proposal in a disturbing and undemocratic trend, starting with Bill 55, Strong Action for Ontario Act (Budget Measures), 20127, of using omnibus budget measures bills to make substantive changes to environmental laws and thereby sidestepping the public's EBR rights.

ProtectNatureTO has on-going concerns regarding the lack of opportunity for meaningful public input, absence of appropriate engagement with Indigenous communities, and expedited legislative process. Proceeding with significant legislative amendments affecting forests, species, waters, and lands should not occur when many First Nation communities are unable to consult directly with their members due to the ongoing COVID-19 pandemic.

On Schedule 6:

In particular, Schedule 6 takes away the powers of conservation authorities to protect, enhance and restore watersheds and natural heritage systems. In times of climate and biodiversity crisis and manifesting increased risk of flooding, this is backwards and undermining Ontario resilience. We need Conservation Authorities as the independent experts to do their jobs and bring science-based solutions forward in watersheds we all rely on for our well-being.

Remove Schedule 6, proposed changes to the *Conservation Authorities Act* and consequential amendments for following reasons:

1. Indigenous people and Indigenous knowledge will not be represented in membership of conservation authorities
2. Narrowing of duties of conservation authorities' members is counter to the watershed approach needed to build climate resilient communities for the future
3. Narrowing the objects and powers of conservation authorities is counter to the watershed approach needed to build climate resilient communities for the future
4. Removing conservation authorities' status as independent public bodies in land use planning will set integrated watershed management back decades
5. New procedures are being introduced without indication of whether matching third party rights of appeal in the public interest will be provided

In context of Toronto, ecosystem approach based on watershed planning was instrumental for identifying of remaining natural heritage, carrying independent environmental assessments, monitoring and important role in overall managing of natural environment.

Conservation Authorities pioneered ecosystem approach to watershed planning that has been a pillar of progressive - long term vision for Ontario rural areas and urban centres, crucial for supporting of regional biodiversity, healthy watersheds and building of sustainable cities.

This CA's oversight role safeguarding that city growth will not overwhelm it's natural heritage system and watersheds is now crucial than ever:

"In the urban context, the planning priority is to ensure that we benefit from the natural system while not unduly impairing natural processes. The state of ecosystem's health is vitally important to Metropolitan Toronto.

Too often in the past, we have considered green space as an afterthought, what was left over after development took its course. We now realize that if any natural spaces are to remain, we must take a pro-active approach to saving them."

Metropolitan Waterfront Plan, Metropolitan Planning Department, Feb 1994

[The Metropolitan Waterfront Plan \(1994\)](#)

TRCA role as The City's Partner in Managing the Natural Environment' is firmly anchored in the City Official Plan:

"The TRCA: The City's Partner in Managing the Natural Environment The Toronto and Region Conservation Authority plays an important role in managing Toronto's natural environment.

The Authority:

-safeguards, manages and restores watercourses, lakes, woodlands, wetlands and natural habitat;

-protects life and property from flooding and erosion through watershed planning, monitoring and maintenance efforts and its regulation under the Conservation Authorities Act; and

-provides educational and recreational opportunities for the public.

The Authority's "Living City" vision focuses on three objectives: healthy watercourses and shorelines, regional biodiversity and sustainable communities.

The TRCA was a partner in the City's Natural Heritage Study which provided the basis for identifying the natural heritage system for the Plan, as well as advancing TRCA's Living City vision. The Plan sets the stage for the City and TRCA to continue its partnership to create the healthy and sustainable integration of natural ecosystems and human communities in the City and the region beyond."

[OPA 262, BY-LAW No. -2015 To adopt Amendment No. 262 to the Official Plan of the City of Toronto with respect to the Environmental Policies and Designation of Environmentally Significant Areas.](#)

On Schedule 8

Remove Schedule 8, proposed changes to the *Crown Forest Sustainability Act, 1994*

Schedule 8 exempts forestry operations from protecting and recovering endangered species to facilitate an ill-advised doubling of logging in the province. We need forests to provide habitat for all of Ontario's rich biodiversity including its threatened wildlife like boreal caribou and Blanding's turtle. We don't want to see our forests converted into empty, tree farms. We also need healthy forests, especially the Boreal Forest, to help us stave off the worst impacts of climate. Intact boreal forests are one of the best natural solutions to climate.

If enacted, Schedule 8 will oust the protection for endangered species, contained in the *Endangered Species Act, 2007* and not replicated in the CFSA, from most of the Ontario landscape.

Sincerely,

Lenka Holubec on behalf of ProtectNatureTO