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LONG-TERM THINKING FOR TODAY'S ISSUES

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## Re: ERO 019-2986 Regulatory Proposals (Phase 1) under the Conservation Authorities Act

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO recognizes the value of Conservation Authorities (CAs) where they are established across the province as providing significant services especially related to natural hazard management and water quality and quantity monitoring and protection at a watershed level. Conservation Authorities also manage significant areas of naturally sensitive lands to better enable them to address natural hazard and water management issues. The CFFO supports the increased focus on CAs core mandates. It is important that CAs are able to fulfill and focus on their core mandates.

In order to ensure CAs are best able to fulfill their core mandates, the CFFO calls for the province to:

- Provide resources to support mandatory service costs for CAs
- Include farm-focused stewardship extension as part of core mandate
- Include passive uses of CA owned and managed lands as part of core mandate
- Include an agricultural representative on Community Advisory Board for any CA with no separate Agricultural Advisory Committee

### Mandatory Services

#### Conservation Authority Resources

Conservation Authorities are each unique, covering vastly different land areas within their jurisdictions, serving different population bases, and working with varying numbers of municipalities. This also means that the resources of each conservation authority vary greatly, with funding coming from different sources and the percentage of total funding from these sources also varying by CA.

Rural CAs are often disadvantaged because of the significantly smaller populations within their jurisdictions that will then translate into smaller tax base for municipalities which is the source of municipal levies. This also means fewer opportunities for CAs to raise funds directly from user fees. These same rural CAs often also have large jurisdictions and may be managing significant parcels of CA owned or controlled land. Some CAs have more mandated programs than others to fulfill as well. Beyond the municipal levies, provincial funding should consider the land area that the CA serves.

**The CFFO requests that the province make additional funding available to ensure CAs can meet their core mandates regardless of the population in the area they serve or the total core mandated programs they are required to fulfill.**

### Private Land Stewardship Extension Services

The CFFO has long supported government calls to ensure that Conservation Authorities (CAs) are fulfilling their core mandates across the province. Focus on core mandate needs to consider the broader value of CAs within the community that allows them to effectively achieve this mandate.

The “Regulatory Proposals Consultation Guide: Regulations Defining Core Mandate and Improving Governance, Oversight and Accountability of Conservation Authorities” outlines the important role of CAs related to Risks of Natural Hazards. Part of their core mandate in this regard is to “manage risks associated with natural hazards,” which is further explained by saying this, “may include prevention, protection, mitigation, preparedness and response.”

CA stewardship extension helps to protect, improve and expand aspects of the natural landscape including healthy farmland, wetlands and woodlands. These then help to mitigate flooding and drought and improve water quality by managing water flows effectively across the broader landscape.

Stewardship programs that include direct extension to farmers and other landowners should fall under the core mandate of CAs. Instead, these programs are listed as an example of “non-mandatory programs and services on behalf of a municipality.”

**The CFFO requests that stewardship extension programs be included as part of the core mandate under “managing risks associated with natural hazards.”** Without this core mandate status, the CFFO is concerned that these programs may be stopped, or subject to fluctuating funding. That would mean that the significant benefits of these programs will be lost or significantly reduced.

The biggest risk in both of these scenarios is the loss of local expertise and established relationships of trust with CA staff that have allowed these programs to work successfully. It is well documented that trust relationships are vital to successful extension. Many CA staff have worked hard to establish trust with local farmers and have significant local knowledge from their experience and work. Farmers speak highly of these programs as positive experiences with local CAs. Stable effective relationships require stable funding. It is important that funding for stewardship extension recognizes the importance of people and relationships in the overall success of these programs.

### Passive Uses of CA Owned Lands

**The CFFO requests that CA activities related to passive uses of CA owned or controlled lands should be included in the core mandates under “conservation and management of lands.”** Uses such as hiking trails and boat launches do not tend to bring direct revenue from user fees, but still require CA staff time

and resources to facilitate safe and proper use. Poor maintenance and supervision can result in problems for farmers, particularly where these properties abut farming properties. The CFFO is concerned that failing to include the associated costs for these uses as part of the core mandate may result in properties being poorly maintained or supervised, closed to the public, or in worst case scenarios, sold and lost as conservation lands entirely.

## Community Advisory Boards

The CFFO is concerned that the new requirement for a Community Advisory Board for each CA will put at risk established Agricultural Advisory Committees that serve CAs across the province. **The CFFO wants to see encouragement in the regulations for CAs to continue the role of existing Agricultural Advisory Committees.**

We recognize that currently legislation permits one appointed agricultural representative to serve on CA Boards. We also see significant value in agriculture representation, by a farmer with a valid FBR number, on the newly required Community Advisory Boards. **The CFFO requests that the regulations require the Community Advisory Board to include an agricultural representative for any CA with no separate Agricultural Advisory Committee.**

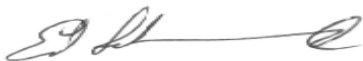
It is also important to consider the many different types of farming and farm organizations across the jurisdiction of the CA. We have three established Accredited Farm Organizations (AFOs) and many different commodity organizations reflecting the diversity of farming as a whole. **Wherever possible, consideration should be given to including diverse agricultural representation across representatives serving on the Community Advisory Board and the CA Board.**

## Conclusion

The CFFO values the watershed level work of conservation authorities across the province. We also support the importance of focus on conservation authorities' core mandates including those related to the risk of natural hazards, managing conservation authority owned and controlled lands and protecting, monitoring and managing water quality and quantity. The CFFO requests that the province provide resources to support mandatory service costs for CAs, include farm-focused stewardship extension as part of CAs core mandate, include passive uses of CA owned and managed lands as part of core mandate, and include an agricultural representative on Community Advisory Boards for any CA with no separate Agricultural Advisory Committee.

We appreciate this opportunity to provide input, and thank you for your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario