



LONG-TERM THINKING FOR TODAY'S ISSUES

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Re: ERO 019-4610 Regulatory and Policy Proposals (Phase 2) 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 emphasis that CAs should focus on 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 increased resources to support costs for mandatory services for CAs with demonstrated need
- Ensure staffing costs are included in corporate administrative costs, regardless of category 1, 2 or 3 programs staff work to operate
- Provide clear guidelines of reasonable costs for services where user fees will be charged

Proposed Municipal Levies Regulation

The CFFO is supportive of the proposal to “maintain consistency with current budget and municipal levy processes” as well as “using and adopting existing voting and apportionment methods and practices.” These methods have been effective, for the most part, and allow for local flexibility. The CFFO supports use of the two voting methods (one member-one vote/weighted voting) and the three apportionment methods (modified current property value assessment, by agreement, and by authority decision) as set out in the proposal.

The CFFO is concerned about the emphasis in the proposal on requirements for CAs to “provide a summary of how the authority considered opportunities for self-generated revenue.” Opportunity for CAs to operate with self-generated revenue vary greatly, often based on proximity to significant populations.

CAs 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 and potential resources of each conservation authority vary greatly, with the percentage of total funding from municipalities, user fees, and government grants 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 levees. 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.

Rural CAs have larger properties to manage with fewer resources. Poor maintenance and supervision can result in problems for farmers, particularly where these properties abut farming properties. CAs need to ensure they have the necessary resources to properly maintain and supervise their properties.

The discussion paper highlights that currently across all CAs, 56.6% of funding comes from municipal levees, self-generated revenue accounts for 33.6% and provincial grants only 6%, with federal government grants at 3.8%. It is clear from these numbers that an increase in provincial support, especially for rural CAs with few opportunities to increase funding through municipal levees or self-generated revenue, is necessary.

The CFFO requests that the province make additional funding available to CAs with demonstrated need in order to ensure all 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.

We emphasize also the CA services and programming that work directly with farmers, be it permitting or private landowner stewardship extension services, rely on relationships of trust with CA staff to be effective. Successful programs and services come from staff who have local expertise and who have worked to establish relationships of trust with local residents. Many CA staff have worked hard to establish trust with local farmers and have significant local knowledge from their experience and work. CAs should work to foster positive experiences and good working relationships with farmers. Stable effective relationships require stable funding. ***It is important that funding for CA staff, regardless of their role in category 1, 2 or 3 programs, continue to be funded under the “administrative costs” that***

allow CAs to operate effectively as an organization. This will ensure stable staff, ongoing local expertise and the opportunity to establish and maintain relationships of trust between CA staff and local residents, including farmers.

Proposed Minister’s Regulation for Determining Amounts Owed by Specified Municipalities

It is important that specified municipalities have an opportunity through the budget consultation and voting process to have a say in the municipal levees for which they will be responsible. The outlined proposal indicates that “both appointed members from the participating and specified municipalities together” will vote on these levees by weighted vote. The CFFO supports this proposal.

Proposal for Minister’s Published List of Classes of Programs and Services for which a Conservation Authority May Charge a Fee

The CFFO is supportive of the value of self-generated revenue through user fees, where the user pay principle is appropriate. However, the repeated emphasis on self-generated revenue through user fees indicates that likely these will become both more common and that fees are likely to increase for services where these fees can be charged. The CFFO is concerned that this will unfairly burden farmers with higher costs for services like permits (under category 1 and 2) and stewardship extension services (under category 3).

The CFFO requests clear guidelines of reasonable costs for services under these categories, and a clearer recognition of the value of these services for the broader public through shared funding to support these services offered by CAs.

Complementary Proposals to Increase Transparency of Authority Operations

The CFFO supports easy access to CA governance information on CA websites as outlined in the proposal.

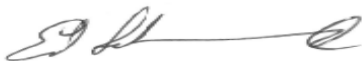
Conclusion

The CFFO values the watershed level work of conservation authorities across the province. We also support the importance that CAs focus on their 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 provincial government provide more resources to support costs for mandatory CA services, ensure staffing costs for all programs are included in corporate administrative costs, and offer clear guidelines on reasonable costs for services where user fees can be charged.

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

