

Bill 229, Protect, Support and Recover from COVID-19 Act, 2020 – Schedule 6

Submission to Standing Committee on Finance and Economic Affairs

From: Christian Farmers Federation of Ontario

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LONG-TERM THINKING FOR TODAY'S ISSUES

December 2, 2020

Standing Committee on Finance and Economic Affairs

Attention: Amarjot Sandhu, MPP, Chair

Room 1405 Whitney Block

Queen's Park

Toronto, ON M7A 1A2

Electronic Submission:

Re: Bill 229, Protect, Support and Recover from COVID-19 Act, 2020

Dear Amarjot Sandhu,

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.

Request to Remove Schedule 6, Conservation Authorities Act, from Bill 229

The CFFO has significant concerns about many of the proposals made in Schedule 6 concerning changes to the *Conservation Authorities Act*. The proposed changes are broad-reaching and have the potential to significantly change the ability of conservation authorities to effectively achieve their mandate. We recommend that Schedule 6 should be removed from *Bill 229 Protect, Support and Recover from COVID-19 Act, 2020*. It is vital that government allow for full consultation and broader public input on the proposed changes.

Key Concerns

The CFFO is concerned that some of the proposed changes may add delays and costs for CAs and those seeking permits. Other proposals may impede conservation authorities (CAs) from being able to effectively fulfill their mandates. In particular, the CFFO raises concerns about the following proposals outlined in Bill 229.

Members of the CA and Duties of Membership

The current practice of appointing both municipal councillors and members of the public to serve on conservation authority boards allows flexibility for municipalities to fill these roles with those best suited to serve. This practice also protects against the risk of overburdening municipalities that serve small populations or fall within more than one watershed. Citizens appointed to serve CAs may be former municipal councillors, or other respected citizens. We do not support the proposed change that only elected municipal councillors may serve as appointed members of CAs.

The current model of having conservation authorities operate at a watershed level is working well, and it is the right model for natural hazard and water quality protection. The CFFO strongly supports the watershed level model that CAs are intended to facilitate. Part of operating at a watershed level means that members of a conservation authority must work together for the best interests of all within the watershed, not for the particular interests of one municipality over another. We do not support the proposed change that members appointed by municipalities “shall generally act on behalf of their respective municipalities.”

Appointment of Agricultural Sector Representative

The CFFO is supportive of the proposal to have the Minister appoint an agricultural sector representative as a member of a CA. It is important that the representative is well respected within the local agricultural community, and is a member of an Ontario Accredited Farm Organization. All

Accredited Farm Organizations should be consulted on the process for selecting agricultural representatives for appointment. It should also be clear that the representative represents all farmers in the region, regardless of farm organization membership, and works along with the rest of the CA membership in the interests of the watershed as a whole.

Objects

It is important that all CAs are able to adequately meet their core mandates, including natural hazard protection, conservation and management of lands under their control, source water protection and other mandates prescribed by the province. The province needs to ensure all CAs have adequate funding to allow them to consistently deliver on these core mandates.

The many stewardship projects and programs offered by conservation authorities contribute to the core mandates of conservation authorities and deliver significant benefits to the watershed as a whole. CA-run stewardship projects and programs help to create and protect aspects of the natural landscape including healthy farmland, wetlands and woodlands that mitigate flooding by absorbing heavy rainfalls and significant snowmelts effectively into the broader landscape. The CFFO supports a broad view of how stewardship programs fit within conservation authority core mandates. Partnerships and programs focused on stewardship and education contribute to the overall effectiveness of CAs in achieving their core mandates. These should continue to be included in defined CA mandatory programs and services.

Permits Issued by Minister

It is important that the process for permits remains clear, both in terms of who has the authority to issue permits and the basis on which permit decisions will be issued. Where permits can be issued either by a conservation authority or the Minister directly, this makes the process and the basis for decision-making unclear and inefficient. We recommend that permitting authority clearly remain with conservation authorities.

Stop Orders

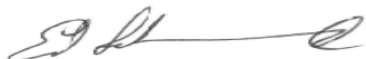
The CFFO does not support removal of the power to issue stop orders from CAs. Without the power of issuing stop orders, CAs may not be able to effectively protect against natural hazard risks or enforce the need for or conditions of appropriate permits. CFFO requests that Section 30.4 of the Act remain in effect.

Conclusion

The CFFO has significant concerns about the proposed changes to the *Conservation Authorities Act* proposed in Schedule 6 of *Bill 229 Protect, Support and Recover from COVID-19 Act, 2020*. We request that Schedule 6 be removed from Bill 229 so that it may be considered separately with full consultation. We have also specifically outlined some of our key concerns with the proposed changes. Proposals in Schedule 6 put watershed-based management at risk and impede conservation authorities (CAs) from being able to effectively fulfill their mandates.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President

Christian Farmers Federation of Ontario