June 22, 2021

Honourable David Piccini
Minister of Environment, Conservation and Parks
777 Bay Street, 5th Floor
Toronto, Ontario, M7A 2J3

Dear Minister Piccini:

Let me begin by congratulating you on your new appointment as Minister of Environment, Conservation and Parks. I trust you will find your new cabinet position fulfilling as you address important issues that impact Ontario both today and tomorrow.

I am writing regarding the review of the regulatory proposals for the Conservation Authorities Act.

Leading out of the debate on Bill 229, we recognize it is time to create a regulatory framework that works for conservation authorities, our member municipalities, and the thousands of clients we serve every year. It is important we find common ground, and together focus on protecting Ontario’s watersheds. Conservation Ontario and its members are committed to partner with you and your officials, to implement the regulations.

Conservation Ontario has submitted a detailed response to the EBR posting, however, I wanted to also provide you and your office with an overview of our suggestions which include six broad themes:

First - Conservation Authorities need a speedy completion of both phase one and phase two of the consultation process in order to meet the tight timelines for delivering on Transition Plans to implement the Province’s proposed changes.

Second - Many of the proposed changes require substantial work to implement with new reporting requirements that will entail both additional one-time and ongoing costs that will need to be addressed.

Third - The core watershed-based resource management strategy being recommended by the Province is a promising first step in what needs to be a process in recognizing the value of a watershed-based approach throughout the review of the Conservation Authorities Act.

Fourth - Passive recreation opportunities should be classified as mandatory programs and services in order to continue to allow public access to these lands and waters through things like hiking trails and boat launches.
Fifth - Nature-based solutions such as private land stewardship protects and restores the watershed’s green infrastructure (e.g. forests, wetlands, riparian buffers) which helps to reduce and mitigate the risk of flooding and erosion and should be designated as mandatory programs and services under Natural Hazards.

Sixth - The mandatory Community Advisory Boards being proposed by the Province need to be flexible and not duplicate the work of the Conservation Authority Boards.

As we move forward, I urge you to keep in place the Minister’s Conservation Authorities’ Working Group which has assisted in the phase 1 regulations and is currently assisting in the development of the second phase of the regulations.

Conservation Ontario looks forward to working with you and your officials to create partnerships that allow us to achieve our mutual objectives of protecting people, property and the environment.

I would request an early meeting with you to discuss both the completion of the regulatory regime arising out of Bill 229 and to discuss how Conservation Ontario can assist in achieving the important environmental priorities contained in the Made-in-Ontario Environment Plan.

Thank you for your consideration.

Regards

Andy Mitchell
Chair, Conservation Ontario

c.c. Kim Gavine, General Manager, Conservation Ontario