



TOWNSHIP OF SOUTH FRONTENAC

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November 26, 2020

Honourable Sylvia Jones
Solicitor General
George Drew Building, 18th Floor
25 Grosvenor St
Toronto ON
M7A 1Y6

Dear Honourable Sylvia Jones:

Re: Schedule 6 of Bill 229

Please be advised that the Council of the Township of South Frontenac passed the following resolution at their meeting held November 24, 2020:

"WHEREAS the Province has introduced Bill 229, *Protect, Support and Recover from COVID 19 Act - Schedule 6 – Conservation Authorities Act*; and

WHEREAS municipalities believe that the appointment of municipal representatives on CA Boards should be a municipal decision; and the Chair and Vice Chair of the CA Board should be duly elected; and

WHEREAS changes to the legislation will create more red tape and costs for the conservation authorities, and their municipal partners, and potentially result in delays in the development approval process; and

WHEREAS municipalities require a longer transition time to put in place agreements with conservation authorities for non-mandatory programs; and

WHEREAS the municipalities in our three watersheds value and rely on the natural habitats and water resources within our jurisdiction for the economic health and well-being of residents and our communities; and

WHEREAS we rely on the watershed expertise provided by local conservation authorities to protect residents, property and local natural resources on a watershed basis by regulating development, undertaking watershed scale studies and planning, and engaging in reviews of applications submitted under the *Planning Act*.

THEREFORE, BE IT RESOLVED:

1. THAT the Province of Ontario delay enactment of clauses affecting municipal concerns
2. THAT the Province of Ontario provides a longer transition period up to December 2022 for non-mandatory programs to enable coordination of CA-municipal budget processes
3. THAT the Province respects the current conservation authority/municipal relationships
4. AND THAT the Province of Ontario work with conservation authorities to address concerns by repealing and/or amending changes to the *Conservation Authorities Act* and the *Planning Act*.

Carried."

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We are concerned that Schedule 6 undermines the ability of conservation authorities to make non-political, technical decisions based on science. It does this by allowing the Minister to overrule the decisions of conservation authorities. Schedule 6 will also interfere with the fiduciary duty of a conservation authority board member. Board members have to think of watershed-wide interests in making decisions. We are also concerned that Schedule 6 limits the enforcement powers of conservation authorities. We have to agree with the Canadian Environmental Law Association (CELA) assessment of Schedule 6 of Bill 229, *“the package of amendments as proposed are likely to set back watershed planning and implementation of an ecosystem-based approach by decades. As such, CELA recommends Schedule 6 not be enacted in its present form and instead be withdrawn in its entirety from Bill 229.”*

Yours truly

Angela Maddocks

Angela Maddocks
Clerk

c.c. Honourable Doug Ford, Premier
Honourable Rod Phillips, Minister of Finance
Honourable Jeff Yurek, Minister of the Environment, Conservation and Parks
Andrea Horwath, Leader, Official Opposition
Steven Del Duca, Leader, Ontario Liberal Party
Mike Schreiner, Leader, Green Party of Ontario
Sandy Shaw, Critic, Finance and Treasury Board
Ian Arthur, Critic, Environment
Peter Tabuns, Critic, Climate Crisis
Quinte Conservation Authority
Cataraqui Region Conservation Authority
Rideau Valley Conservation Authority
Association of Municipalities of Ontario
Ontario Municipalities

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