

June 15, 2021

Liz Mikel
Conservation and Source Protection Branch
40 St Clair Ave W, 14th Floor
Toronto, ON
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Sent via email to: ca.office@ontario.ca
and submitted online via Environmental Registry of Ontario (ERO)

Dear Ms. Mikel,

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

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA is pleased to have the opportunity to provide our comments to ERO 019-2986: Regulatory proposals (Phase 1) under the Conservation Authorities Act.

Ontario's conservation authorities provide a watershed level planning perspective that transcends municipal borders, one that OFA supports and one that deserves support, not only from the province but also from municipalities.

Before addressing the proposed amendments, OFA emphasizes that there is only one Ontario landscape, meaning that the full range of land uses found across Ontario; urban, rural, agricultural, natural heritage, cultural heritage, and mineral extraction, must share that landscape. Inherent in this perspective is recognition that our agricultural areas not only provide us with food, fibre and fuel, but also a broad range of environmental and ecological goods and services that benefit all Ontarians. These environmental and ecological goods and services, in alphabetical order, include, aesthetic and recreational space, air quality (oxygen production, carbon sequestration, climate regulation), biodiversity, nutrient cycling, pollination services, soil erosion control, water cycling (purification, retention, flood mitigation, groundwater recharge), and habitat for wildlife and endangered species.

There is also the additional expectation from the province that Southern Ontario in general, and the Greater Golden Horseshoe in particular, will accommodate virtually all future population and job growth, and the infrastructure necessary to support that projected growth. Accommodating that growth will consume agricultural lands and natural heritage features, thereby placing even greater demands on the remaining non-urbanized land to fulfill societal expectations to provide environmental and ecological goods and services along with food, fibre and fuel.

Ontario's agricultural lands are a finite and shrinking resource. Based on the 2016 Census, Ontario farms encompassed 12.3 million acres or less than 5% of Ontario's land area. Comparing the 2011 and 2016 censuses showed a decline in the area of farms from 12.6 million acres in 2011 to 12.3 million acres in 2016, equal to a loss of 63,940 acres/year or 175 acres/day. Ontario cannot sustain continuing losses of agricultural land while maintaining our ability to produce food, fibre and fuel from our limited and declining agricultural land base.

OFA emphasizes that the principle resource-based land use within the areas of Ontario where conservation authorities operate is agriculture. Provincially, the protection of Ontario's prime agricultural areas for their long-term agricultural use is a key objective.

OFA supports the clearer delineation of the mandatory programs and services an authority must deliver as well as those programs and services it provides for or on behalf of a municipality and other programs and services. We acknowledge the benefits of consistency in those mandatory programs and services an authority must deliver across Ontario's thirty-six conservation authorities.

OFA recommends that land stewardship programs, such as agricultural stewardship programs, be deemed mandatory programs to be delivered by the conservation authorities. These land stewardship programs often provide benefits towards water quality and quantity which support the conservation authorities' key mandate.

This consultation stipulates that a regulation will be developed to require a "Community Advisory Board" that would include members of the public to advise the CA board, with an effort to ensure it represents the geographic range of the jurisdiction. However, of even greater importance is to ensure that this advisory board requires agricultural representation. As significant landowners and stewards, it is essential that the agricultural perspective is represented. Also, the mandated Community Advisory Board must not replace any existing agricultural advisory committees.

There are some logistical considerations to work out in transitioning conservation authorities to this new approach. For example, are there implications to existing programs or projects that the authorities are committed to delivering and/or supporting that may or may not be part of their core mandate? As an example, we question if ecological/wetland offsetting policy falls under core mandates. How will this be addressed for Conservation Authorities that have or are developing these policies? Similarly, how will important projects like the existing Total Phosphorous Management programs accommodated? How will these be addressed? Also, there needs to be consideration for the impact these changes may have to areas that are not covered by conservation authorities as many of these jurisdictions model their program delivery on nearby authority protocols. How will these issues be identified and addressed?

We understand that the subsequent consultations will look at municipal levies and the funding for organizational / operational costs. It will be important to recognize the inequities between conservation authorities based on differing populations and property tax base. It is essential that in developing these next regulations, that an authority's ability to deliver those mandatory programs and services should not be jeopardized by an authority's limited financial resources.

OFA appreciates this opportunity to provide its perspectives and recommendations on the phase 1 regulatory proposals under the *Conservation Authorities Act* and look forward to contributing to the phase 2 consultation.

Sincerely,



Peggy Brekveld
President

cc: The Honourable Ernie Hardeman, Minister of Agriculture, Food, and Rural Affairs
OFA Board of Directors