

February 25, 2022

Maria Vavro
Conservation and Source Protection Branch
40 St Clair Ave W, 14th Floor
Toronto, ON
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Submitted via email: maria.vavro@ontario.ca
and submitted online via Environmental Registry of Ontario (ERO)

Dear Maria Vavro,

Re: ERO #019-4610: Regulatory and policy proposals (Phase 2) 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 appreciates this opportunity to provide input to ERO #019-4610: Regulatory and policy proposals (Phase 2) under the *Conservation Authorities Act*.

Section 14(4.0.1)(d) of the *Conservation Authorities Act* establishes that an agricultural sector representative on a CA Board is not permitted to vote on “a resolution relating to any budgetary matter that is presented at a meeting held under section 16. 2020, c. 36, Sched. 6, s. 2 (5).” We remain disappointed that the agricultural representative is not permitted to vote on all issues put before the Board, including budgetary matters. Given these limitations imposed by the legislation, we believe that it is imperative that the proposed regulation permits agricultural representatives to have meaningful input into discussions and decisions about setting and charging fees.

Furthermore, fees for programs and services, including permits, should reflect the actual cost to deliver the program, service, or permit. Conservation authority fees should never be a source of revenue. Additionally, the timelines for commenting on an application or issuing a permit, once the conservation authority has received a complete application should be as short as possible. Fees indicate that a property owner wants to undertake a specific project, building, etc. on their property. Unnecessary delays in commenting on an application or issuing a permit can easily shift the project into the next building season, adding unnecessary costs as well as foregone income. Conservation authority staff and boards dealing with permit and project applications need to be cognizant of the negative consequences of unnecessary delays. We further recommend that Conservation Authorities publicly post estimated timelines for decisions on applications and permits.

Finally, is there a means of standardizing the fees or a fee-range across the province? The current proposal does not provide any guidance or guidelines for standardizing fees charged by conservation authorities. This could lead to significant disparities across regions for residents, including as it pertains to applications that require review/approval by a CA.

We trust our opinions and recommendations will be given due consideration in this consultation.

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors