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**Comments on Bill 229,
Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020**

Our society is facing challenges that have grown exponentially; climate change, [biodiversity loss](#), pollution and now infectious disease outbreaks from wildlife. The United Nations, Canada and most nations now confirm that we need more conservation and even rebuilding of natural assets to reduce the harm we have done to our natural world.

This is not simply an emotional attachment to nature and beauty, it is a scientific fact, we cannot continue to degrade our natural environments and maintain our health. The 2020 Biodiversity Goals and Targets for Canada were developed collaboratively by federal, provincial, and territorial governments, Indigenous organizations and governments, with input from a diversity of stakeholder groups.

Our local Conservation Authorities are a critical part of the provincial and municipal infrastructure developed over the decades to strengthen our natural environment. Ontario has worked in the past with member municipalities and other partners to identify and develop watershed programs to meet these challenges. The municipalities were levied a cost and they provided funds to implement those programs. Even with this support Ontario has only protected 11% of its territory. Meanwhile Canada's stated goal is to protect 17% of the land and inland waters. The Conservation Authorities are a key resource to provide the knowledge and planning ability to help our province and municipalities to progress toward this ambitious and necessary goal.

The proposed changes of Bill 229 will restrict Conservation Authorities from levying their member municipalities to just the mandatory programs listed in the consultation paper. Non mandatory services are extensive and ongoing. These services have been developed with local municipalities over the decades through mutual consultation.

Watershed stewardship has been promoted by working with landowners and municipalities to protect and restore headwater areas, flood plains, river valleys, wetlands, shorelines, soils and water conservation projects. Under the new legislation it appears these would become a voluntary service that municipalities would no longer be required to pay for. The Conservation Authorities would need to obtain agreements with each municipality individually to offer these services. This could become very cumbersome and time consuming requiring staff and resources to be dedicated ongoing to negotiations for annual funding. These programs could become subject to changing political representatives and resulting policy lurch.

Watershed stewardship services are core services in rural Conservation Authorities such as the Maitland Valley. The primary land use is agriculture and undependable funding will make it difficult for conservation authorities to retain qualified stewardship staff. These services would become a negotiable budget line every year. There is no guarantee from year to year if municipalities will support this service or not. In fact there could become considerable pressure to reduce expenditures suddenly thus causing immediate layoffs and losses of experienced staff and ongoing programs.

Another non mandatory service is recreational amenities such as trails on conservation areas. The legislation proposes that conservation authorities would be unable to levy their member municipalities for funding to support recreational amenities such as trails, privies and picnic shelters. The Conservation Authorities would have to develop an agreement with the local municipality for funding to maintain any recreational infrastructure. The majority of MVCA's conservation areas have trails for the public to use, most of which are available for public use without charge.

The lack of clear guidelines in the consultation guide makes it difficult for the Conservation Authorities to know what support the Provincial Government will provide in the future with respect to programs and funding.

The community advisory board may be a good source of input to keep the programs of the Conservation Authorities relevant and appropriate to the Community aspirations. The members will be appointed by each conservation authority. Again it is unclear as to how the associated costs of operating a Community Advisory Board will be paid for.

We are asking the Ontario Government to recognize the important value of our Conservation Authorities and to fund them appropriately so they can help our province do its part in achieving our [National Biodiversity Goals](#) as stated below. These were the Goals to reach for 2020. We have not accomplished these goals. Southern Ontario has less than 1% of it's natural lands protected.

The myriad problems our communities face such as climate change, biodiversity loss, infectious disease outbreaks from wildlife and pollution are complex. Responding to these challenges will require all levels of government as well as local communities to work together to achieve coherent and effective management of our Conservation needs. The Conservation Authorities are a critical component to translate these National and Provincial Goals to local Municipal Actions.

Goal A. By 2020, Canada's lands and waters are planned and managed using an ecosystem approach to support biodiversity conservation outcomes at local, regional and national scales.

- Target 1. By 2020, at least 17 percent of terrestrial areas and inland water, and 10 percent of coastal and marine areas, are conserved through networks of protected areas and other effective area-based conservation measures. [More information on Target 1...](#)
- Target 2. By 2020, species that are secure remain secure, and populations of species at risk listed under federal law exhibit trends that are consistent with recovery strategies and management plans. [More information on Target 2...](#)
- Target 3. By 2020, Canada's wetlands are conserved or enhanced to sustain their ecosystem services through retention, restoration and management activities. [More information on Target 3...](#)
- Target 4. By 2020, biodiversity considerations are integrated into municipal planning and activities of major municipalities across Canada. [More information on Target 4...](#)
- Target 5. By 2020, the ability of Canadian ecological systems to adapt to climate change is better understood, and priority adaptation measures are underway. [More information on Target 5...](#)