

Liz Mikel
Conservation and Source Protection Branch
40 St Clair Ave W, 14th Flr
Toronto, ON M4V 1M2

June 25, 2021

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

Dear Ms. Mikel,

The National Farmers Union – Ontario (NFU-O) is an accredited farm organization representing thousands of sustainable family farmers in Ontario and has advocated for farm families across Ontario and Canada since 1969. Members work together to achieve agricultural policies that ensure dignity and income security for farm families, while protecting and enhancing rural environments for future generations. The NFU-O collaborates locally, nationally and internationally to research, educate, and share effective solutions that lead to a better world for farm families and their communities.

The NFU-O appreciates the opportunity being given to comment on the **Regulatory proposals (Phase 1) under the Conservation Authorities Act**.

We were pleased to see that the consultation addressed the role of Conservation Authorities in the face of “worsening impacts of climate change”, and outlined the role of Conservation Authorities within their core programs to “assess risks associated with natural hazards including impacts of climate change”.

Members of the NFU-O are deeply concerned about our changing climate and how it impacts our ability as farmers to continue to produce food. As farmers, we are looking for ways to adapt to the changing climate and to make the necessary changes to decrease greenhouse gas emissions on our farms. The rainfall, snow falls, water levels, and temperature data across watersheds that Conservation Authorities have collected and will continue to collect, incorporate into modelling, and make available to the public will be needed to help us understand how the climate is changing.

The NFU-O supports the clearer delineation of the mandated programs and services that a Conservation Authority must deliver, as well as the non-mandated programs and services a Conservation Authority may provide on behalf of a municipality. However, we would recommend that the land stewardship programs, especially the agricultural stewardship programs, be included in the core mandate of the thirty-six Conservation Authorities across Ontario.

The NFU-O recognizes the ability Conservation Authorities have in responding innovatively and effectively to the needs and priorities of local communities, including farmers. Their staff have

a strong track record of working with farmers and farm organizations to source funding for and deliver regionally significant projects designed to implement agricultural best management practices to improve soil health, increase biodiversity and enhance natural areas, such as wetlands, on our farms. In addition, Conservation Authorities provide important on-the-ground expertise to farmers in mitigating soil erosion, maintaining healthy soils and preventing nutrient run-off.

The role that Conservation Authorities have in providing watershed level planning will become even more vital as development pressures increase in Ontario. Their science-based watershed information will continue to be absolutely vital in steering development to the most appropriate places, protecting our agricultural land base, including ecological features and services, and minimizing risks to the environment and to people.

The Phase 1 consultation has also included the proposed regulation to require Conservation Authorities to establish community advisory boards, that can include members of the public, to provide advice to the authority. The NFU-O strongly recommends that these community advisory boards include diverse representation from the local agricultural community, and that they do not replace existing agricultural advisory committees. This is essential to the ongoing care and stewardship of our agricultural lands in Ontario. Farmers are active land stewards within watersheds across Ontario and therefore have a perspective and experience that would make them valuable members of a community advisory committee.

As well, we would recommend that the prescribed regulation, ‘ensuring that a variety of members are sought, including youth and indigenous representatives’, be revised to ‘ensuring that a variety of members are sought, including youth and representatives from BIPOC communities’, in order to be more fully inclusive.

Thank you again for the opportunity to provide comments on **Regulatory proposals (Phase 1) under the Conservation Authorities Act.**

Sincerely,



Don Ciparis
President, National Farmers Union - Ontario