

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

February 24, 2022

Dear Maria Vavro,

Re: Regulatory and Policy Proposals (Phase 2) under the Conservation Authorities Act ERO # 019-4610

Thank you for the opportunity to provide comment on the *Regulatory and Policy Proposal Consultation Guide: Regulations regarding Municipal Levies, Conservation Authority Budget Process, Transparency, and Provincial Policy for the Charging of Fees by Conservation Authorities*. It is understood that the effective date of these proposed regulations and provincial policy is to align with municipal and conservation authority calendar year budget cycles, beginning January 1, 2023 to ensure that, “conservation authority 2024 budget and levy processes would follow the updated regulations.”

KCCA’s 2023 budget development will begin imminently to compliment and coincide with the budget processes of member municipalities. The 2023 budget and levy are expected to be in draft format by mid-summer with draft approval as early as August/September. This provides ample time to communicate and seek feedback from member municipalities before the final budget and levy are approved at the Authority’s Annual General Meeting in February 2023. Consequently, an effective date of January 1, 2023 would mean the Authority’s 2023 Budget - to be approved in February 2023 – would be out of compliance with the proposed regulation.

KCCA respectfully asks that consideration be given to clearly state that the proposed budget and levy processes are to be effective for the 2024 CA Budget – and not simply effective for January 1, 2023.

In regard to the *Proposal for Minister’s Published List of Classes of Programs and Services for which a Conservation Authority may charge a fee*, it is understood that the Minister intends to determine and publish a list of ‘classes of programs and services’ for which a CA may charge a fee. KCCA recommends that the list be maintained at a high level providing local flexibility to account for any and all “entry fees”, “user fees” and “reservation fees” that a CA may develop in the pursuit of self-generated revenue based on the user pay concept. Furthermore, should there be a fee for a user-pay system that is not included in regulation, a CA should be permitted to apply for an exemption from the Minister of the Environment, Conservation and Parks.

These comments are submitted on behalf of KCCA’s Board of Directors.

Sincerely,



Alison Warwick, Chair
cc: Conservation Ontario