



ONTARIO
RIVERS
ALLIANCE

379 Ronka Road
Worthington, ON P0M3H0
LindaH@OntarioRiversAlliance.ca
OntarioRiversAlliance.ca

9 September 2016

Alex McLeod, Policy Officer
Ministry of Natural Resources and Forestry
Policy Division, Natural Resources Conservation Policy Branch
Water Resources Section
300 Water Street
Peterborough, ON
K9J 8M5
By email: Alex.McLeod@Ontario.ca

Dear Sirs:

Re: EBR 012-7583 – Conservation Authorities Act Review
Conserving Our Future: Proposed Priorities Renewal

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for several stewardships, organizations, and private and First Nation citizens who have come together to protect, conserve and restore healthy river ecosystems.

In addition to our submission regarding the Conservation Authorities Act Review Discussion Paper, dated 19 October 2015, ORA is very pleased to provide our recommendations on what has been identified as the five priorities for updating the Conservation Authorities Act, as follows:

1. Stronger Oversight and Accountability

a. Priority Actions:

- Conservation Authorities (CAs) must maintain autonomy from provincial and municipal oversight in order to remain focused on watershed management; however, collaboration and a sharing of information and resources within all levels of government is essential.
- Providing the public, stakeholders, and indigenous communities greater opportunities to participate in decision-making.
- Processes, funding and requirements for establishing, amalgamating or enlargement of a conservation authority should be updated to provide more opportunity for smaller municipalities to create their own CA.
- There needs to be a purpose statement in the Act to clearly define the roles and responsibilities of a CA.
- Use of an Integrated Watershed Management approach to ensure water resources are protected and human activities and natural resources are managed on a watershed basis.



- b. Least Important Actions:
 - Enhancing provincial and municipal oversight.
 - Providing more authority to the Minister.
- 2. Clarity and Consistency**
- a. Priority Actions:
 - Increase clarity and consistency in roles and responsibilities, processes and requirements.
 - Policy and guidelines must be consistent with other regulators.
 - CAs must be open, transparent, and accessible to the public.
 - b. Least Important Actions:
 - Streamlining often eliminates important safeguards, and adds risks.
- 3. Collaboration and Engagement**
- a. Priority Actions:
 - All levels of government should establish a working relationship with CAs to more effectively manage impacts, share resources, capacity building, programs, expertise and initiatives.
 - Increase funding and resources, education and awareness, and create an inventory of resources and best practices.
 - Strengthen and share compliance tools.
 - Enhance opportunities for Indigenous, public and stakeholder participation in the decision making process.
 - b. Least Important Actions:
 - The one-window approach is a form of streamlining that can remove key safeguards.
- 4. Funding Mechanisms**
- a. Priority Actions:
 - CAs perform valuable services that require sufficient and reliable annual provincial funding to allow for their independence from municipal influence.
 - Must clarify the role of municipalities in oversight and funding.
 - CAs require the ability to levy to provide a self-sustaining source of income.
 - b. Least Important Actions:
 - All proposed actions are important.
- 5. Enhance Flexibility for the Province**
- a. Priority Actions:
 - As noted above, enhanced autonomy with sufficient and reliable provincial funding must be provided by the province.
 - All programs and services must be focused on carrying out the core values and principles of Integrated Watershed Management.
 - b. Least Important Actions:
 - ORA is not supportive of interference by the Minister/Ministry into the CA Act framework to develop, delegate or deliver existing or future management programs and services.



ORA supports the proposed purpose and preamble provided by Conservation Ontario (CA), with the exception of the word “development”, as follows:

The purpose of this Act is for the Government of Ontario to provide for the conservation, restoration, and management of natural resources by supporting participating municipalities to collaborate on a watershed basis through Conservation Authorities' programs and services, working with government bodies and interested individuals and communities.

It is important that CAs restrict their purposes to management of natural resources, as their development could unduly influence some watershed management decisions.

ORA is very supportive of the work the CAs in Ontario have been doing over the years. It is unfortunate that some CAs have access to more funding opportunities than others; therefore, it is very important that their excellent work is supported and enhanced through a fairer and more balanced funding formula.

Thank you for this opportunity to comment!

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance