

June 9, 2017

By Email: finn.macdonald@ontario.ca

Finn MacDonald, Policy Officer
Ministry of Natural Resources and Forestry
Policy Division, Natural Resources Conservation Policy Branch
300 Water Street
Peterborough, ON
K9J 8M5

Re: Proposed amendments to the Conservation Authorities Act as part of Bill (139), the Building Better Communities and Conserving Watersheds Act, 2017 (EBR Registry Number: 013-0561)

Dear Mr MacDonald,

The undersigned organizations request that the deadline for comments relating to the above-noted proposal be extended to August 14, 2017.

The reasons for our request are outlined below.

First, we understand that the Ministry of Natural Resources and Forestry (MNRF) is working on a summary document to help the public understand the proposed amendments to the *Conservation Authorities Act* (CAA) contained in Bill 139. As of the date of this letter, this additional explanatory information is not publicly available and the current deadline for comments is June 30, 2017. The public will better informed about the implications of the proposed amendments with the explanatory document in hand. And, as the *Environmental Bill of Rights, 1993* (EBR) provides for “means by which residents of Ontario may participate in the making of environmentally significant decisions by the Government of Ontario” (s2(3)(a)), effective public participation is facilitated by ensuring there is adequate time to consider the potential impacts of the proposed amendments.

Second, as Bill 139 contains more than simply amendments to the CAA, consideration of the impacts has the potential to be complex and warrants more than 30-days for the public to be able to effectively provide feedback.

Third, there is currently another Environmental Registry notice relating to Bill 139: “Bill 139 - (Schedule 3) – the proposed Building Better Communities and Conserving Watersheds Act, 2017: Amendments to the Planning Act” (EBR Registry Number: 013-0590) posted by the Ministry of Municipal Affairs (MMA). The deadline in MMA’s notice is August 14, 2017. Given that comments are being sought by two ministries relating to the same legislative proposal, the deadlines for comments ought to be aligned. There is precedence for aligning Environmental Registry notice deadlines. As just one example: under the Coordinated Land Use Planning Review, MNRF’s proposed amendments to the Niagara Escarpment Plan (EBR Registry Number: 012-7228) had the same deadline (October 31, 2016) as MMA’s proposed amendments to the Greenbelt Plan (EBR Registry Number: 012-7195), the Oak Ridges Moraine Conservation Plan (EBR Registry Number: 012-7197), and the Growth Plan for the Greater Golden Horseshoe (EBR Registry Number: 012-7194).

In conclusion, the alignment of deadlines for comment on Bill 139 is in keeping with the purposes of the EBR and will provide for a more effective means of public engagement.

We thank you for your consideration of our request. Please advise as to your decision in timely manner.

Regards,

Theresa McClenaghan
Executive Director
Canadian Environmental Law Association



Dr Anne Bell
Director of Conservation and Education
Ontario Nature



Tim Gray
Executive Director
Environmental Defence



Dr. Gail Krantzberg
Engineering & Public Policy Program
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Jill Ryan
Executive Director
Freshwater Future Canada



Paul Newall
Chair
Credit River Alliance



Mark Mattson
Presidents and Waterkeeper
Lake Ontario Waterkeeper



Linda Heron
Chair
Ontario Rivers Alliance



Andrew McCammon
Executive Director
Ontario Headwaters Institute



Cc: Hon. Kathryn McGarry, Minister of Natural Resources and Forestry (minister.mnrf@ontario.ca)
Dianne Saxe, Environmental Commissioner of Ontario (dianne.saxe@eco.on.ca)