



ROMA's Response to Changes to the *Conservation Authorities Act* (ERO posting 019-2986)

Submission to the Ministry of the Environment, Conservation and Parks

June 25, 2021

Introduction

The Rural Ontario Municipal Association (ROMA) is pleased to reinforce the comments provided by the Association of Municipalities of Ontario (AMO) regarding the Regulatory Proposal Consultation Guide (Phase 1) (ERO 19-2986) under the *Conservation Authorities Act*.

ROMA takes pride in promoting, supporting, and enhancing strong and effective rural governments. About 270 of Ontario's 444 municipalities have populations of less than 10,000, while scores more are rural in character. As the rural municipal organization under AMO, ROMA advocates for policies and programs that will help build thriving rural communities in Ontario.

Feedback

Rural municipal governments believe that the Guideline(s) and upcoming regulations should recognize the varied financial and staff capacity that exists across Ontario. That is why the flexibility around non-mandatory activities is appreciated, as these tasks will vary based on local circumstances, which may include growth pressures, existing infrastructure, staff skill base at the municipality and Conservation Authority, council philosophy on green infrastructure, and asset management planning.

The transition period also ought to include standardized training to ensure the new regime is successful, as there does not seem to be a process to address the varied staff capacity limits and/or skill gaps across Conservation Authorities. Gaps need to be identified as part of the transition/inventory process, and the Province should provide guidance to encourage innovative solutions and information sharing.

The process should also include negotiations on what will be offered and to what standard. To assist municipalities and Conservation Authorities, the Ministry should consider offering "getting to yes" type training. In fact, the Ministry should undertake a significant education program on all aspects of these changes. This will ensure the public and interested parties have a shared understanding of the scope and intent of the regulations and guidance.

While this new regime will result in greater transparency on how budgets are being spent, ROMA feels strongly that there will still be challenges to contain costs associated with municipal levy. For example, the municipal levy will need to support expenditures for requirements under various pieces of legislation that will require Conservation Authority staff time and for which there is no means of recuperating costs.

ROMA urges the Ministry to move forward with the next phase of implementation and make the detailed language available as soon as possible. While legislative and regulatory changes may create greater transparency and fuller agreement on the scope of activities of Conservation Authorities, the fundamental concerns regarding strained staffing capacity at the Conservation Authorities, strained municipal levies and the need for an infusion of reliable long-term funding remain.

Conclusion

ROMA appreciates the opportunity to provide comments and we look forward to our continued work with AMO and your Ministry as this round of changes are implemented, and beyond.