

December 4th, 2020

Honourable Jeff Yurek
Minister of the Environment, Conservation and Parks
777 Bay Street, 5th Floor
Toronto ON, M7A 2J3

RE: *Bill 229- Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020- Changes to the Conservation Authorities Act and Planning Act*

Dear Minister Yurek,

The Ontario Society of Professional Engineers (OSPE) is the advocacy body and voice of the engineering profession. Ontario currently has over 85,000 professional engineers, 250,000 engineering graduates, 6,600 engineering post-graduate students and 37,000 engineering undergraduate students.

The work that the Ministry of the Environment, Conservation and Parks (MECP) conducts overlaps with many of the duties that engineers perform daily. Changing climate and weather patterns that lead to increased environmental conditions such as flooding, can adversely affect the integrity of the design, operation, and management of engineered systems. Concurrently, many of these engineered systems placed upon the environment, such as pavement covering green space, interacts with the climate to generate more severe and destructive impacts of weather events.

OSPE is concerned with the proposed changes through Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020, especially those concerning the *Conservation Authorities Act* and the *Planning Act*.

Provincial changes to both the *Conservation Authorities Act* and the *Planning Act* risk watering down or losing the conservation authorities' science-based watershed approach which currently protects people and property from flooding and other natural hazards. This ensures a healthy environment, community, and province.

Conservation Authorities (CAs) are important agencies who help protect Ontario's environment. Their science-based watershed information helps to steer development to appropriate places where it will not harm the environment or create risks to people. CAs bring the watershed science and information to the various tables where development and growth are being reviewed and discussed.

These provincial changes limit the conservation authorities' ability to provide input to municipal planning applications and to permit decisions and appeals.

The Conservation Authority watershed model has served Ontario well and is relied upon by many levels of government, businesses and residents to reduce flooding and other natural hazards as well as to protect the environment from upstream to downstream.

Conservation authorities undertake a wide variety of watershed management programs and services including: monitoring, data collection management and modelling; watershed-scale studies, plans, assessments and strategies; and watershed-wide actions including stewardship, communication, outreach and education activities that protect our environment on a watershed basis.

Engineers rely on this data to make informed decisions. Bill 229 will limit the ability of engineers to perform their duty to protect the environment.

Any effort to reduce or constrain the mandate of Conservation Authorities is contradictory to the interests of the people of Ontario who are facing enormous risks and costs as a result of climate change and ongoing biodiversity loss. The roles and responsibilities of Conservation Authorities are critical in protecting the lands, waters and wildlife which benefit businesses and communities across Ontario, and upon which our health and well-being ultimately depend.

Provincial changes will also actually create more costs, delays and red tape around permit and applications and appeals. There are new appeal processes which will significantly slow down the permitting process creating delays and more red tape. If applicants are not satisfied with decisions made by the Hearing Boards (CA Board of Directors or Executive), then applicants can now appeal directly to the Minister who can make his or her own decision without a hearing and even issue a permit. Alternatively, or in addition, the applicant can appeal a decision of the conservation authority to the Local Planning Appeal Tribunal (LPAT). These changes could add as many as almost 200 days to the application process.

If you have any additional questions please contact Stuart Atkinson, OSPE Policy and Government Relations Lead at satkinson@ospe.on.ca or 416-223-9961 ext. 225.

Sincerely,



Réjeanne Aimey, P.Eng.
Chair and President
Ontario Society of Professional Engineers



Sandro Perruzza
Chief Executive Officer
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CC:

Hon. Doug Ford, Premier of Ontario
Hon. Rod Phillips, Minister of Finance
Jeremy Roberts, MPP Ottawa West—Nepean
Ian Arthur, MPP Kingston and the Islands
Stan Cho, MPP Willowdale
Mitzie Hunter, MPP Scarborough—Guildwood
Logan Kanapathi, MPP Markham—Thornhill
Sol Mamakwa, MPP Kiiwetinoong
David Piccini, MPP Northumberland—Peterborough South
Sandy Shaw, MPP Hamilton West—Ancaster—Dundas
Dave Smith, MPP Peterborough—Kawartha
Vijay Thanigasalam, MPP Scarborough—Rouge Park