



December 2, 2020

Hon. Jeff Yurek
Minister of Environment, Conservation and Parks
College Park
5th Floor 777 Bay Street
Toronto, ON M7A 2J3
Sent by e-mail: minister.mecp@ontario.ca

Dear Minister Yurek,

RE: Bill 229, Schedule 6: The Protect, Support and Recover from COVID-19 Act (Budget Measures) 2020

Ontario Pork represents the 1,180 farmers who market 5.5 million hogs in the province. The organization is engaged in many areas, including research, government representation, environmental issues, consumer education and food quality assurance. Ontario Pork is the first livestock commodity group in the province to set social responsibility benchmarks, demonstrating pork producers' commitment to sustainable farming. Ontario's pork industry "farm to fork" generates \$2.6 billion in economic output and 13,186 in full-time equivalent jobs.

Ontario's pork industry is proactive in the use of environmentally friendly farming practices, as proud stewards of the land on which they farm. This is extremely important to the communities in which they live and work, and to the business of farming. The protection of Ontario's prime agricultural areas for their long-term agricultural use is vital.

We are writing today to provide pork sector input on several of the proposed amendments to the Conservation Act, as found in Bill 229, Schedule 6. We appreciated the opportunity to participate in two webinars hosted by Ministry staff, and we also understand that further consultations will occur upon the release of regulatory changes later this month or in the new year.

Agriculture sector appointee to conservation boards

Section 14(4) authorizes the Minister to appoint a "representative of the agricultural sector" to the conservation authority board. While we support this important addition to conservation authority boards, we do have several questions including the role of the representative of the agricultural sector, how they will be chosen, accountability, and if will they be a voting member. Ontario Pork recommends that the agricultural representative role on the board be defined and be a full voting member of the conservation authority's board.

Program delivery consistency

Ontario Pork supports a clearer definition of the mandatory programs and services a conservation authority must deliver as well as those programs and services it provides for or on behalf of a municipality and other programs and services. We also ask that the government commit to ensuring that all 36

conservation authorities have the financial resources to fully deliver the provincially mandated programs and services.

Definitions

Ontario Pork requests that the government develop a regulation to define “development activity”, “hazardous land”, “watercourse”, “wetland” and “pollution” immediately after the Conservation Authorities Act amendments are passed, as recommended by the Ontario Federation of Agriculture (OFA). In terms of defining “wetlands”, the 2020 Provincial Policy Statement (PPS) contains a comprehensive definition that has remained consistent throughout multiple PPS reviews. Ontario Pork recommends that the “wetlands” definition be used, verbatim, in the Conservation Authorities Act’s definitions regulation. In addition, we support the OFA’s recommendation that the Conservation Authorities Act definition of a “watercourse” be rewritten to incorporate the following principles, to capture the elements of a natural watercourse:

- i. That there be reference to a “defined channel, with a bed and banks”,
- ii. That intermittent streams are natural watercourses, and
- iii. That any definition of a watercourse excludes man-made ditches, roadside ditches, agricultural swales as well as drains constructed under the Drainage Act.

Ontario Pork appreciates the opportunity to provide input on Schedule 6 of Bill 229 and we look forward to participating in ongoing consultations and discussions.

Sincerely,



Eric Schwindt
Board Chair