



May 21, 2019

Ms. Carolyn O'Neill  
Ministry of Environment, Conservation and Parks  
40 St. Clair Avenue West, 10<sup>th</sup> Floor  
Toronto, ON M4V 1M2  
[glo@ontario.ca](mailto:glo@ontario.ca)

**RE: ERO 013-5018 Modernizing conservation authority operations – Conservation Authorities Act**

Dear Ms. O'Neill,

We are writing on behalf of the Ontario Fruit and Vegetable Growers' Association (OFVGA) to comment on the proposal to modernize conservation authority operations. The OFVGA represents the interests of over 3,500 fruit and vegetable farmers in Ontario. The organization's primary objective is to work with government to facilitate a business environment that is supportive of fruit and vegetable farmers and their competitiveness.

The OFVGA supports the Ontario government's plan to modernize the operations and authorities of conservation authorities by amending the *Conservation Authorities Act*. By clearly defining the core mandates of conservation authorities, the net effect will be an overall improvement on how these core functions are carried out and potentially lead to red tape reduction.

Conservation authorities' role in delivering programs and services regarding drinking water source protection, natural hazard protection and management (including flooding), conservation and management of authority lands are important to fruit and vegetable farmers that grow food on nearby lands. Their staff have the requisite skills, knowledge and historical perspective to fulfil this mandate.

To fulfil their core mandates effectively, conservation authorities require adequate funding to facilitate its ability to deliver these programs, including the provision of adequate funding to enable individual landowners to implement complimentary on-the-ground projects and actions.

The OFVGA supports the proposal to increase transparency and accountability of conservation authorities, including for the delivery of municipal programs and services that are not part of the authority's core mandate.



As significant areas of land in Ontario is dedicated to agricultural uses, including the production of fruits and vegetables, the governance of conservation authority boards could be strengthened by creating a seat dedicated to farmer representation. It is important that conservation authorities understand how the implementation of their core mandates influence farm businesses within the region. Additionally, board training should include agriculture's role in the watershed, including the broad suite of environmental and ecological services that agricultural lands provide, in addition to providing clean, safe and affordable food.

Any fees for programs, services or permits provided by conservation authorities should reflect the actual cost to deliver the program, service or permit and not be a source of revenue for the authority. In addition, conservation authorities should be following reasonable service standards so that projects and/or farm operations are not unnecessarily delayed. There is an opportunity for conservation authorities, the provincial government and stakeholders should be brought together to develop service standards for issuing permits and project approvals.

Thank you for the opportunity to comment on the Ontario proposal on modernizing conservation authority operations. The OFVGA applauds the province for taking on this important work and we are committed to working with government to ensure conservation authorities remain strong and focused on their core mandates.

Please feel free to contact the OFVGA should you wish to discuss our comments.

Sincerely,

A handwritten signature in black ink that reads "Bill George Jr." in a cursive style.

Bill George Jr.  
Chair, OFVGA Board

A handwritten signature in black ink that reads "Mike Chromczak" in a cursive style.

Mike Chromczak  
Chair, OFVGA Environment and  
Conservation Section

cc: Hon. Rod Phillips, Minister of Environment, Conservation and Parks  
Hon. Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs



**About the OFVGA:**

The OFVGA is the leading voice for Ontario's fruit and vegetable farmers. Our sector includes more than 3,500 family run farms that employ over 30,000 people directly on-farm. For every on-farm job, it is estimated there are 2.2 jobs created downstream, or approximately 96,000 jobs combined. Fruit and vegetable production drives Ontario's rural and urban economies by generating more than \$4.2 billion in economic activity annually, along with \$600 million in combined tax revenues for all levels of government. Ontario fruit and vegetable farmers compete with global producers for domestic and export markets that demand low cost quality produce. Fruit and vegetable exports from Ontario total over \$1.6 billion, almost half of which originates from the greenhouse vegetable sector.