

November 24, 2022

Public Input Coordinator
MNRF - PD - Resources Planning and Development Policy Branch
300 Water Street, 2nd Floor, South tower
Peterborough, ON K9J 3C7
Submitted online and sent via email to wetlands@ontario.ca

Re: ERO 019-6160 Proposed Updates to the Ontario Wetland Evaluation System

Dear MNRF Public Input Coordinator,

The National Farmers Union - Ontario (NFU-O) is responding to ERO 019-6160 to voice our opposition to the proposed changes to the Ontario Wetland Evaluation System (OWES). We believe that the revisions to the OWES threaten a healthy ecology across the province, endangering the thriving natural systems that make growing abundant and nutritious food possible.

The NFU-O recognizes that Ontario's wetlands are complex and interconnected systems that support ecological diversity and create important natural buffers during climate fluctuations. These wetlands connect to water systems on farms (spring-fed ponds, wells, rivers, creeks, and streams) and must remain reliable and non-contaminated for us to feed our growing population.

We question the rationale behind the OWES revisions: The NFU-O believes it is unnecessary to remove or undermine wetland designations in order to address the affordable housing crisis. The provisions that are removed under these proposed OWES updates are not "red-tape" in need of cutting; they are crucial to protecting our natural heritage and agricultural lands for future generations.

The NFU-O is an accredited farm organization representing thousands of sustainable farmers in Ontario and has advocated for farmers across Ontario since 1969. Members work together to achieve agricultural policies that ensure dignity and income security for farmers while protecting and enhancing rural environments for present and future generations. We have frequently shared our expertise as Ontario farmers to advocate for policies that will offer more, not less, protections to the province's [waterways and wetlands](#) and the [biological diversity](#) that resides there.

The NFU-O is particularly concerned about the following proposed changes to the OWES:

- **Power being stripped from Conservation Authorities (CAs)**

We are against the revocation of CAs power within the OWES to require permits and oversight of development projects regarding water-taking and their potential

interference with rivers, creeks, streams, watercourses, wetlands, flood or erosion control. We see this as part of the larger proposals in Bill 23 to disempower CAs ability to advise municipalities regarding watershed planning decisions. Municipalities do not have the in-house expertise or the financial resources of CAs to adjudicate the value of wetlands or complex ecosystems. We see the stripping of CA power as a way for the Ontario Government to shirk oversight and analysis of the environmental and agricultural impacts of paving over wetlands, and will move us away from green and sustainable urban planning. The checks and balances within the current OWES and the participation of CAs and the MNRF are crucial to responsible development and environmental protection.

- **The disallowing of the “complexing” of wetlands and the “re-evaluation” of currently-protected wetlands**

By disallowing the “complexing” of wetlands, the updates to the OWES ignore the [research](#) that proves that, while small wetlands might not be considered “provincially significant” on their own, taken together, wetlands play an incredibly important role in naturally sequestering carbon, mitigating floods, and creating rich habitats. We see the disallowance of “complexing” as a means to reduce the number of wetlands classified as “provincially significant” and therefore requiring protection from development.

That the changes also allow for single wetland units that were previously evaluated as part of a larger wetland complex to be re-evaluated, re-scored, and re-mapped without a complete re-evaluation of the entire wetland complex is a dangerous move away from legislative protections that take into account that wetlands, no matter their size, do not exist in isolation. Even the smallest wetlands are crucial to neighboring farmers and local communities.

- **The elimination of endangered species criterion**

The proposed elimination of endangered species criterion (4.1.2.1 and elsewhere) when assessing the need to protect any given wetland is alarming. We know that wetlands are crucial reproductive habitats and homes to many of Ontario’s endangered species. The loss of these endangered species will have ripple effects that have the potential to impact pollinators and other life necessary for the sustainable production of the food we eat.

In the face of a rapidly changing climate and uncertain seasonal weather patterns, relaxing protections for complex wetland and waterway systems will have massive impacts on above and below ground waterways and the production potential of nearby agricultural lands. The revisions to the OWES will undermine community resilience to flooding on both agricultural lands and built areas. Removing legislative protections of Ontario's natural areas like the ones proposed will have a decisively negative impact on Ontario's food security.

The NFU-O strongly opposes any changes that would result in the loss of any more wetlands in Ontario. Instead, we would support any Government legislation that offered proposals on how to expand existing policies designed to protect our finite wetlands and waterways.

Sincerely,



Max Hansgen,
President, National Farmers Union - Ontario

cc: The Honourable Graydon Smith, Minister of Natural Resources and Forestry
The Honourable Lisa Thompson, Minister of Agriculture, Food and Rural Affairs
The Honourable Steve Clark, Minister of Municipal Affairs and Housing