



**Ontario**  
Home Builders'  
Association

## Conservation Authorities Review

Conserving Our Future: Proposed Priorities For Renewal

EBR – 012-7583

BILD  
Bluewater  
Brantford  
Chatham-Kent  
Cornwall  
Greater Dufferin  
Durham Region  
Grey-Bruce  
Guelph & District  
Haldimand-Norfolk  
Haliburton County  
Hamilton-Halton  
Kingston-Frontenac  
Lanark-Leeds  
London  
Niagara  
North Bay & District  
Greater Ottawa  
Oxford County  
Peterborough &  
The Kawarthas  
Quinte  
Renfrew  
Sarnia-Lambton  
Simcoe County  
St. Thomas-Elgin  
Stratford & Area  
Sudbury & District  
Thunder Bay  
Waterloo Region  
Windsor Essex



**Submitted to: Hon Kathryn McGarry**  
**Minister of Natural Resources and Forestry**  
**September 9, 2016**



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## About OHBA

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The Ontario Home Builders' Association (OHBA) is the voice of the land development, new housing and professional renovation industries in Ontario. OHBA represents over 4,000 member companies, organized through a network of 30 local associations across the Province. Our membership is made up of all disciplines involved in land development and residential construction, including: builders, professional renovators, trade contractors, manufacturers, consultants and suppliers. Our members have built over 700,000 homes in the last ten years in over 500 Ontario communities. The residential construction industry employed over 330,000 people and contributed over \$51 billion to the Province's economy in 2015.

OHBA is committed to improving housing affordability and choice for Ontario's new home purchasers and renovation consumers by positively impacting provincial legislation, regulation and policy that affect the industry. Our comprehensive examination of issues and recommendations are guided by the recognition that choice and affordability must be balanced with broader social, economic and environmental issues

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## Background

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The *Conservation Authorities Act*, administered by the Ministry of Natural Resources and Forestry (MNRF), enables two or more municipalities in a common watershed to establish a Conservation Authority (CA) in conjunction with the province. The purpose of a CA is to deliver a local resource management program at the watershed scale for both provincial, municipal and in some cases, federal interests. CAs have played a significant role in Ontario's natural resource management landscape for nearly 70 years.

In order to ensure that the *Conservation Authorities Act* is meeting the needs of Ontarians in a modern context, the MNRF is undertaking a review of the legislation by seeking feedback from municipalities, Indigenous communities, CAs, land development industry, stakeholders and the public regarding roles, responsibilities, funding and governance in resource management and watershed protection.

OHBA previously submitted recommendations in October 2015 to the Environmental Registry 012-4509 posting regarding the *Conservation Authorities Act* review. Throughout the legislative review, OHBA members from a number of our local home builders associations had the opportunity to participate directly in the consultation process at workshops, technical consultations and workshops hosted by OHBA to foster collaboration and engagement with MNRF. OHBA appreciates the extensive consultation and direct engagement between MNRF and our local associations and members.

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## *Executive Summary*

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OHBA is pleased to respond to the provincial review of the *Conservation Authorities Act* and the *Conserving our Future: Proposed Priorities for Renewal consultation paper*. Our members from across Ontario within 36 key watersheds have extensive experience working with Conservation Authorities (CAs) and navigating the plan review and permitting process. OHBA shares similar broad priorities for modernization and renewal with the Ministry and appreciates the opportunity to present our views and recommendations to the MNRF.

The ongoing review of the *Conservation Authorities Act* provides a critical opportunity to strengthen oversight and accountability mechanisms including formalizing the role of other Ministries in providing provincial direction and oversight to CAs. The review is also an opportunity to clarify the roles and responsibilities of CAs within the broader provincial legislative framework. While CAs have an important role in watershed management, OHBA has become increasingly concerned that a number of CAs have extended their reach beyond a core mandate related to natural hazards (i.e., PPS section 3.1) and watershed management, which is adversely impacting a number of broader provincial goals and objectives. The roles and responsibilities of CAs need to be appropriately balanced with the broader legislative framework that CAs operate in, which allows planning authorities and our members to build strong, healthy communities.

OHBA has been actively involved throughout the current legislative review and previous consultations that have aimed to improve efficiencies in the planning and permitting review process. Beginning in 2007 OHBA, the Building Industry and Land Development Association (BILD) and the Hamilton-Halton Home Builders' Association (HHHBA) participated as members of the Conservation Authority Liaison Committee (CALC) along with municipalities, the province and other stakeholders. The goal of CALC was to respond to a lack of clarity on CA roles and responsibilities in plan review and permitting. In 2010, MNRF and MMAH approved the *Policies and Procedures for Conservation Authority Plan Review and Permitting Activities* that would form part of MNRF's Policies and Procedures Manual. OHBA believed at the time that the new document would address a number of concerns with respect to accountability, transparency, efficiency and consistency CA plan review and permitting. While a number of positive improvements were made, we now have an opportunity for the MNRF to take a more assertive and direct role to modernize the *Conservation Authorities Act*, clarify roles and responsibilities and enhance accountability through an independent appeals process. The MNRF should take steps to ensure CAs are effectively delivering their core responsibilities and mandate while supporting the broader provincial policies established in the PPS, *Planning Act* and Growth Plan.

OHBA appreciates the opportunity to present our recommendations. We look forward to ongoing engagement with the province to modernize the CA legislative framework to more effectively and efficiently deliver their mandate. In the end, our collaborative effort will help to ensure that CAs are efficiently delivering on their core responsibilities.

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## Key Recommendations

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OHBA previously submitted 21 recommendations to the MNR in October 2015 in response to the Environmental Registry 012-4509 posting. OHBA continues to support those 21 recommendations (available at [www.ohba.ca](http://www.ohba.ca)). As part of OHBA's 2016 submission, we have scoped our proposed improvements down to 13 key recommendations:

1. A new purpose statement and preamble in the *Conservation Authorities Act* must clearly define the roles and responsibilities (i.e., “who does what”) of CAs, municipalities, the federal government and various Ministries. Specific roles and responsibilities should be entrenched in legislation. Modernized legislation should clearly define the CA core mandate to be prioritized around the achievement of the Natural Hazard policies of the PPS and watershed management.
2. CA roles and responsibilities should not extend beyond the scope of the *Conservation Authorities Act* and Ontario Regulation 97/04, unless an additional role is clearly defined in a publically posted MOU.
3. All MOUs should outline which agency is responsible for specific roles and responsibilities should be publically posted on CA websites and available as part of an annual report.
4. CA practices in areas outside of their mandate should be censored by the MNR so the Ministry may reallocate activities better delivered (or already being delivered) by qualified agencies.
5. CAs be mandated to establish fair and reasonable rules with respect to development application review fees for permits and that the appeal mechanism be the OMB to enhance accountability and fairness for fees. The *Conservation Authorities Act* review should contemplate implementing a process similar to the *Development Charges Act* for the preparation, review and public consultation of background studies that inform fee structure updates.

6. A consistent fee schedule structure should be applied across CAs that clearly define fee categories, and distinguish the characteristics of complex and less complex applications. Actual fees could be differentiated between conservation authorities, but the structure should be consistent.
7. The *Conservation Authorities Act* be included in the *Consolidated Hearings Act* Schedule to enhance accountability and transparency through independent third party appeals for planning and permitting roles as well as fee schedules.
8. Section 28(15) of the *Conservation Authorities Act* be amended to include the ability to appeal non-decisions on permit approvals. CA comments must be timely and be legislated as part of the planning application review process. Failure to provide comments on an application within 180 days shall be appealable.
9. CAs should be excluded from the site plan review application process where the site plan is within an approved plan of subdivision.
10. CA transparency and accountability should be improved by requiring publically posted annual reports and financial statements, which clearly link revenues and expenses related to areas of core mandate and other specific activities.
11. The provincial funding formulae should be modernized. Any provincial policies, programs or delegated authorities delivered by CAs should be funded by the province. These transfer payments should be clearly outlined in annual financial statements and in annual reports produced by CAs.
12. The review of the *Conservation Authorities Act* should consider assets owned, operated and managed by CAs through infrastructure asset management planning. This may include the ultimate disposition of assets where they do not represent or contribute to core mandates.
13. Following the *Conservation Authorities Act* review the Conservation Authority Liaison Committee (CALC) should be reconstituted.

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## ***Priority #1: Strengthening Oversight and Accountability***

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OHBA strongly supports modernizing the *Conservation Authorities Act* to enhance accountability mechanisms within the legislation, including increasing the transparency and oversight of CA decision making. OHBA notes that the provincial planning framework has evolved significantly since the last major review of the *Conservation Authorities Act* and that the current legislative review should reflect that.

### **Purpose Statement**

- OHBA is supportive of updating the Act to reflect modern legislative structures including adding a purpose statement to the Act and regulations defining the roles and responsibilities of all parties involved in overseeing and ensuring the accountability of CA operations, programs and services. The purpose statement should clearly outline core responsibilities and operational programs supported by municipalities through MOUs or through provincially delegated authority.

### **Appeals**

- OHBA is concerned by the lack of accountability associated with CA permit refusals and non-decisions. There is a lack of tension in the system that allows some CAs to operate under unreasonably long timelines and without an appropriate appeal mechanism. To enhance accountability OHBA recommends that Section 28(15) of the *Conservation Authorities Act* be amended to include the ability to appeal non-decisions on permit approvals. This section of the Act should include a subsection that states, “An application that has not received a decision within 180 days may be appealed to the Minister under section 15.” OHBA recognizes that many aspects of the CA mandate are outside the planning realm, but we respectfully submit that planning related applications be appealable to the OMB. To further increase accountability Section 28(15) should be further amended to include the ability of appeals to be referred to the Ontario Mining and Lands Commissioner or the OMB. To implement the ability of applicants to seek a joint hearing, the *Consolidated Hearings Act* Schedule should be amended to include “Referrals by the Minister of Natural Resources pursuant to section 28 (15) of the *Conservation Authorities Act*”. The *Conservation Authorities Act* should be added to that list of Acts as parties that could be heard at an OMB hearing.

### **Roles and Responsibilities**

- The processes, structures and frameworks that direct CA decision-making and operations should be refined to enhance transparency, accountability and enforcement mechanisms. Greater accountability can be achieved by entrenching clarity on guiding principles and the roles and responsibilities of various agencies directly in modernized legislation.

### **Direct Provincial Oversight and Monitoring**

- The MNRF has limited power to enforce compliance with the *Conservation Authorities Act*. Increasing direct oversight and monitoring by the Ministry would vastly enhance accountability, consistency and transparency in terms of governance as well as roles and responsibilities.
- The Provincial Government should provide direct oversight and monitoring of CA Boards to ensure their operations are transparent and Board members are held accountable for decision making. Provincial oversight should also include technical guidelines, best practices and other support for CA Boards and staff. OHBA regular training for Boards and staff on the contents of the *Policies and Procedures for Conservation Authority Plan Review and Permitting Activities*.
- Modernized legislation should ensure CAs be mandated to follow the intent of municipal Official Plans and provincial policy across Ontario. A provincial oversight mechanism, specifically through the MNRF must be established to pro-actively monitor and review all policies, guidelines, standards and activities for consistency with provincial policies and initiatives

### **Memorandums of Understanding (MOUs)**

- OHBA recommends that all MOUs outline which agency is responsible for specific items, and that MOUs be publically posted on CA websites and be outlined as part of annual reports. Additional accountability measures should be implemented in legislation for the MNRF to provide direct oversight regarding the coordination and implementation of those MOUs. OHBA strongly believes that a lack of oversight has resulted in mandate creep, unnecessary duplication, lack of consistency and eroding service standards. As such, municipal MOUs need to garner greater scrutiny from the Ministry.



### **Annual Reports**

- CAs should be required to produce annual reports and financial statements that detail: priorities, timelines and structures, MOUs and delegated authorities as well as revenues and expenses. Annual reports should make specific reference to the guidelines and performance monitoring policies set out in *Policies and Procedures for Conservation Authority Plan Review and Permitting Activities*.
- Transparent and consistent public reporting of revenues and expenditures in annual reports will enhance CA transparency and accountability
- Fees charged for planning and permitting reviews should be included in Annual reports and should do not exceed the cost of delivering the service, nor should they subsidize other operations/programs.

### **Standardized Legislative Timelines**

- The legislative review should look beyond guidelines in the *Policies and Procedures for Conservation Authority Plan Review and Permitting Activities* and consider standardizing timelines, fee structures and appeal mechanisms in legislation to improve accountability.
- An undesirable outcome of a broad CA mandate is the chronic backlog and shortage of staff to deal with core roles and responsibilities. CAs spend too much time reviewing and commenting, even on relatively straightforward applications. Furthermore, timelines are not guaranteed, and do not align themselves well with *Planning Act* application processes and timelines.

### **Asset Management Planning**

- OHBA is supportive of measures to establish mechanisms that encourage evidence-based and strategic long-term infrastructure planning. The *Infrastructure for Jobs and Prosperity Act, 2015* offers an important function to ensure that the government, and every broader public sector entity, must consider asset management planning principles when making decisions respecting infrastructure. OHBA therefore recommends that the legislative review consider assets owned, operated and managed by CAs to ensure that they are being managed in an efficient and economical manner. CAs should be required to conduct infrastructure asset management plans on a regular basis to ensure greater accountability and transparency for infrastructure related decisions. Asset management planning

could also provide insight into whether there should be some disposition of assets to third parties, such as recreational facilities and heritage sites to achieve more efficient management.

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## ***Priority #2: Increasing Clarity and Consistency***

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OHBA strongly supports clarifying and confirming the CA mandate, providing greater consistency in programs and services and offering some degree of standardization in program and policy design and implementation. MNRF must better align CA mandates with the current legislative and planning framework as well as broad provincial public policy objectives and local city building objectives.

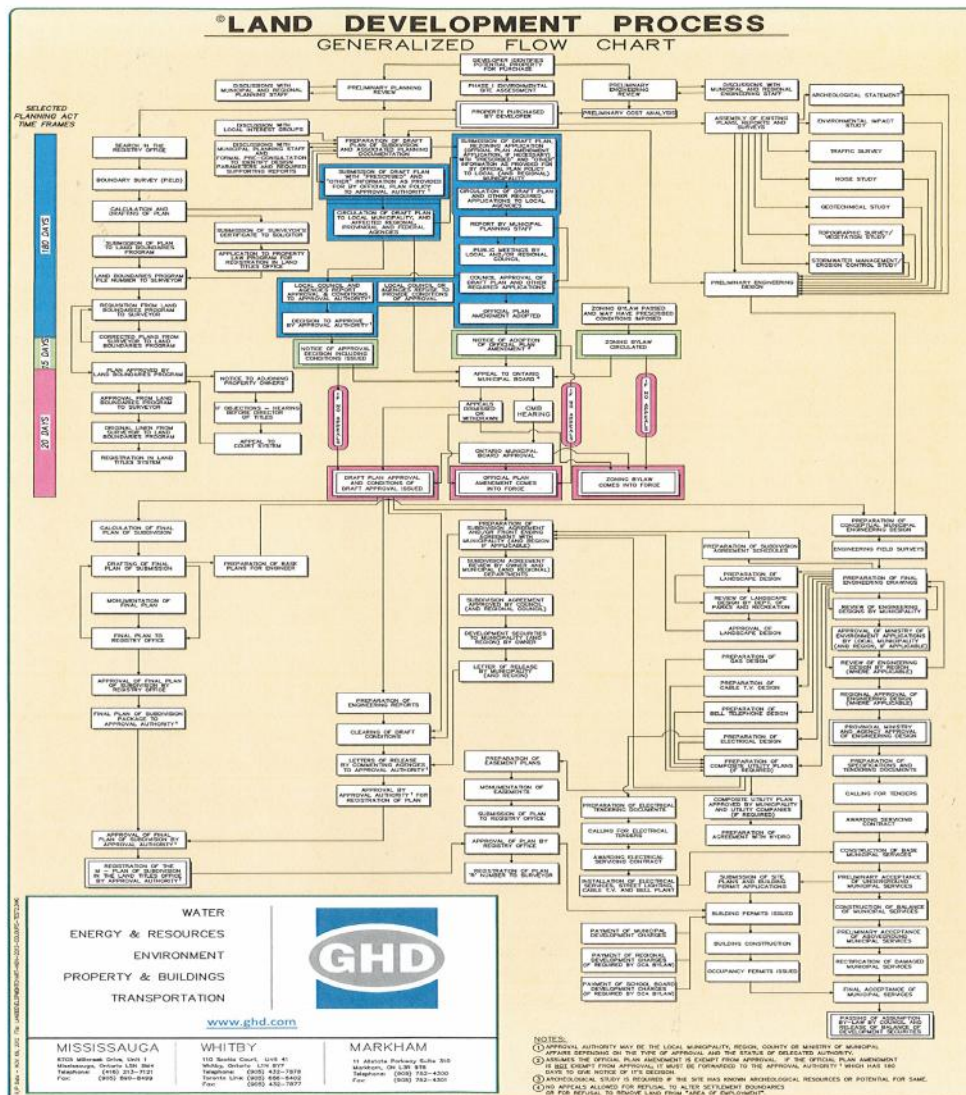
### **Clarity in Roles and Responsibilities**

- OHBA is supportive of the CA role related to natural hazards (PPS section 3.1) and related watershed management activities, as well as the technical expertise they provide in their planning/permitting functions within the scope of the *Conservation Authorities Act* and O.Reg 97/04. However, OHBA continues to express concern that some CAs have expanded their areas of activity beyond their jurisdiction by their own discretion (rather than through a municipal MOU or provincially delegated authority).
- A review of the mandate of CAs should allow for priorities to be reset and streamlined to ensure they are better positioned to effectively deliver on their core functions. In some cases, CAs are engaging in work that is redundant to municipalities, other ministries and institutions that are better positioned to undertake this work. As such, the *Conservation Authorities Act* review should define and clarify the mandate of CAs to fit the modern day legislative framework:

ONTARIO'S LAND USE PLANNING SYSTEM



Source: Ministry of Municipal Affairs and Housing



OHBA notes that over the past decade the Greenbelt, PPS (both 2005 & 2014), Growth Plan, *Planning Act*, *Endangered Species Act*, Source Water Protection Plans and other planning related legislation have been implemented and/or updated. A modernized *Conservation Authorities Act* should reflect the evolving provincial legislative framework and clearly define municipal and provincial roles and responsibilities.

Legislative Framework that Clarifies Roles and Responsibilities		
Municipal	Provincial	Conservation Authorities
<ul style="list-style-type: none"> <li>• Official Plans</li> <li>• Zoning By-Laws</li> <li>• Secondary Plans</li> <li>• Plans of Subdivision</li> <li>• Site Plans</li> <li>• Building Permits</li> </ul>	<ul style="list-style-type: none"> <li>• Planning Act</li> <li>• Provincial Policy Statement</li> <li>• Greenbelt Plan</li> <li>• Growth Plan</li> <li>• Oak Ridges Moraine Conservation Plan</li> <li>• Niagara Escarpment Plan</li> <li>• Ontario Building Code</li> <li>• Endangered Species Act</li> <li>• Source Water Protection Act</li> <li>• Clean Water Act</li> <li>• Climate Change Action Plan</li> <li>• Biodiversity</li> <li>• Wetlands</li> </ul>	<ul style="list-style-type: none"> <li>• O. Reg 97/04</li> <li>• Watershed Management</li> <li>• Natural Hazards</li> <li>• Flood Management</li> </ul>

- MNR should carefully consider CA roles and responsibilities that may be more efficiently handled elsewhere. For example, the question remains of whether CAs are the most appropriate agency to undertake research initiatives, operate recreational facilities and maintain infrastructure assets. Additional clarity of the CA mandate should clearly define what priorities should be and, where CAs should invest limited resources would strengthen the focus on delivering the core mandate more effectively.

**Clarifying Authority Under Regulation vs Advisory Comments**

- Many CAs are commenting on planning matters outside their scope of review. OHBA is concerned this extension of power stemming from a lack of clarity in roles and responsibilities, results in duplication, a slow approvals process, unnecessary costs and conflict.
- OHBA recommends that clarity and consistency be enhanced to ensure CA roles do not extend beyond the scope of the *Conservation Authorities Act* and Ontario Regulation 97/04, unless an additional role is clearly defined in a publically posted MOU or by delegated authority. Furthermore, clear delineation is needed between what their authority is under the regulation and what their commenting role is

under the *Planning Act*. To provide clarity in the delineation of responsibilities, OHBA recommends that when providing comments on a planning matter, CAs should be required to preface comments clearly indicating that the comments are “advisory” and not as an extension of their legislative authority and that municipalities should not hinder the progression of an application as a result of these comments.

### **MOUs and Delegated Authority**

- Many CAs have undertaken additional responsibilities through MOUs with municipalities and have delegated authorities with other provincial Ministries. There is currently a lack of clarity for evaluating if CAs are operating within the scope of those MOUs or if they are branching out into other areas on their own initiative. MOUs need to clearly and publically define the roles and responsibilities of CAs and municipalities to ensure that they can be held accountable for their specific roles and responsibilities.

### **Duplication of Service**

- OHBA is concerned that a lack of clear delineation of roles and responsibilities has resulted in both municipalities and CAs becoming involved in duplicative processes. The review of the *Conservation Authorities Act* should provide clarity and specify where different agencies become involved in the approvals process and strive to eliminate duplication in the review and approval process.
- In addition to duplication, mandate creep can also lead to slightly different or contradictory opinions and comments being provided on the same application that cannot be reconciled by the applicant. Greater clarity in legislative roles and responsibilities should assist with the issue of escalating approvals and contradictory opinions that simply paralyze the approvals process when multiple agencies are involved.
- OHBA is also concerned that the lack of clarity in roles and responsibilities has resulted in some municipalities choosing to circulate “everything” for comment thus resulting in some CAs becoming inundated with circulations for minor items they shouldn’t be reviewing. Higher quality screening maps could assist to reduce duplication and unnecessary reviews as CAs should not be circulated on applications outside of the O.Reg 97/04 area.

### **Site Plan Review**

- OHBA recommends that CAs be excluded from participating in the site plan review process. Site Plan Review should only be conducted by a municipality where the CA has not already had the opportunity to review and comment on the Plan of Subdivision. A second review through the site plan review process should be exempted as it is a duplicative process.

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### ***Priority #3: Improving Collaboration and Engagement***

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OHBA is strongly supportive of utilizing the current legislative review of the *Conservation Authorities Act* to improve collaboration and engagement involving CAs and a broad set of stakeholders, interest groups and members of the public.

### **Service Standards**

- The *Policies and Procedures for Conservation Authority Plan Review and Permitting Activities* has been a positive tool to clarify roles, responsibilities, pre-submission consultation procedures, timelines and how the principle of development is established through the planning process. Ultimately, there should be a certain degree of service standards across all CAs to improve accountability. To achieve this, OHBA would support greater collaboration through additional CA staff training and education with respect to policies and procedures.

### **Conservation Authorities Liaison Committee (CALC)**

- The MNRF should improve collaboration and engagement with stakeholders and revisit the *Policies and Procedures for Conservation Authority Plan Review and Permitting Activities* through a reconstituted Conservation Authorities Liaison Committee (CALC) to contemplate the addition of performance measures and monitoring. This would facilitate a consistent application of the policies and procedures in this document and create greater predictability in the review process.

### **Local Stakeholders Liaison Committees**

- To further improve collaboration and engagement, OHBA recommends establishing liaison committees between individual CAs and stakeholders, including the public and development industry.

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## ***Priority #4: Modernizing Funding Mechanisms***

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It is important that CAs are both fiscally sustainable and fiscally responsible in carrying out their services and when investing in capital projects.

### **Provincial Funding**

- The current legislative review should address the provincial funding formulae to support the basic operational capacity of CAs.
- CAs that provide services based on provincial policy objectives should receive provincial funding that reflects their provincial policy undertakings and delegated authorities. If CAs are undertaking provincial roles and responsibilities, financial arrangements must be transparently reported in financial statements and annual reports. Funding models should be reviewed for delegated responsibilities from other ministries to ensure that the funding of roles and responsibilities is directly correlated. This same sentiment applies to any federal roles and responsibilities CAs may undertake.
- Funding should be reflective of an appropriately scoped mandate that has been prioritized and rationalized based on the broader legislative and regulatory landscape.

### **Fees**

- OHBA continues to express concern regarding the transparency and consistency of how planning and permitting review costs are determined. OHBA is supportive of the principles set out in the MNRF's *Policies and Procedures for Charging Conservation Authority Fees*, specifically:
  - Parity with neighbouring CAs to promote consistency;
  - Prevention of duplicative fees charged by local municipalities, and other agencies and ministries for related services;
  - Consistency in fee schedules with local municipalities, and other agencies and ministries for related services; and

- Fees shall be reflective of the complexity of the application and level of effort required to administer the application.
- As such, CAs should conduct transparent fee reviews and be accountable for a level of service that is reflective of updates to fees and charges. CAs should be open about the financial inputs and calculations used to create fee schedules. This should include a background study process similar to the development charges by-law review process as legislated by the *Development Charges Act*. This will allow stakeholders to ensure that planning fees are appropriate and are not being duplicated by other agencies. Furthermore, opportunities to conduct peer reviews of fee structures should be explored.
- The *Conservation Authorities Act* should legislate a consistent fee schedule with clearly defined service categories that can be applied by all CAs (individual CA fees would be differentiated, but categories and definitions would be consistent).
- To ensure transparency, CA fee schedules should be clear on the definition of each fee category and the difference between “major” and “minor” applications.
- OHBA recommends that this review consider enhanced enforcement mechanisms to improve accountability and ensure the level of service provided is commensurate with the fee charged for review. CAs should be mandated to establish fair and reasonable rules with respect to development application review fees for permits and that the appeal mechanism for fees be the OMB to enhance accountability for fees. These fees should be linked to the anticipated costs to the conservation authorities in terms of processing each type of application provided for in the fee.

#### **Capital Infrastructure**

- Since the establishment of the *Conservation Authorities Act* a number of Acts affecting municipal infrastructure funding have been passed. The province should review the capital projects that are the responsibility of CAs to determine whether they are the appropriate delivery agency for these projects or whether the stewardship of these projects should be the responsibility of municipal governments.

#### **Municipal Levy**

- To enhance accountability and transparency for services, programs and operations to the public who contribute funding to CAs through property taxes and the municipal levy,



the municipal levy should be listed as a separate item on property taxes. Similar to some services and utilities delivered in some municipalities such as water and/or garbage that are separately itemized, the municipal levy on property taxes would increase public awareness and direct accountability for how tax dollars are being allocated.

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## ***Priority #5: Enhanced Flexibility for the Province***

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### **Delegation of Authority Requires New Funding**

- It is noted in the *Conserving Our Future: Proposed Priorities for Renewal* that the MNRF considers it necessary for a new Section in the Act be established so that the Province can formally delegate natural resource conservation and management programs and services to CAs. In order to avoid additional financial burdens to current municipal funders and stakeholders, any delegation of additional provincial programs and services to CAs must be accompanied with financial resources from the provincial government to fully fund any new delegated responsibilities.
- Any new delegation or future delegation of responsibilities must have an appeal mechanism in place if related to land-use planning.
- OHBA supports provincial consideration to potentially delegate responsibilities to other entities where CAs currently have roles and responsibilities if such other entities would be better positioned to deliver upon those roles and responsibilities in a more effective and efficient manner. Any such delegation would have to uphold the principals of consistency, clarity, accountability and transparency.

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## Conclusion

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OHBA looks forward to continuing to work with the Provincial Government and working towards modernizing the *Conservation Authority Act*. The review provides an opportunity to clearly outline the scope of CA roles and responsibilities which will help to reduce duplication and overlap of various agencies. The MNR must undertake a much stronger and more active role in the direct oversight of CAs to ensure consistency in programs and services, some degree of standardization in program policy design as well as the implementation of their mandate specific to their roles and responsibilities.

OHBA strongly believes that the legislative review should result in a clearly defined mandate for CAs that clearly delineates between provincial, municipal and CA roles and responsibilities. It is critical that the planning and permitting functions as well as the fee schedules be made appealable to independent third parties and greater direct Ministry oversight be established in legislation. Service delivery and fees levied on the industry for extensive, duplicative and uncertain service timelines must be resolved.

The *Conservation Authorities Act* should also be updated to include reasonable approval and review timelines that require CAs to be accountable for the services they deliver. Expenditure and revenue reporting requirements through annual reports must also be enhanced to strengthen oversight and accountability. Achieving consistency in fee structures across CAs should be a priority.

Thank you once again for the opportunity to provide our feedback. As the review process for the *Conservation Authorities Act* continues into the next stages, we trust the MNR will take OHBA's comments and recommendations with thoughtful consideration.