

MINISTRY OF THE ENVIRONMENT, CONSERVATION AND PARKS
“Regulatory and policy proposals (Phase 2) under the Conservation Authorities Act”
ERO posting closing February 25, 2022

Comments from the City of London:

Page #	Reference/Text Excerpt	Comment
6	<p>“Additionally, we propose that the Municipal Levies Regulation would include:</p> <ul style="list-style-type: none"> • The two existing voting methods (i.e., the ‘one member, one vote’ and ‘weighted vote’, as set out in current legislation and regulation). • The three current methods of apportioning expenses/costs (i.e., modified current property value assessment, agreement of the authority and participating municipalities, and as decided by the authority), while adapting the appropriate use of the apportionment and voting methods to the categories of programs and services where costs may be apportioned among all participating municipalities or to one or some.” 	<p>There are, and will continue to be, two methods used for voting on CA budgets and municipal levies – the one member/one vote method and the weighted voting method. It may be simpler to adopt one consistent voting methodology for these processes. The weighted majority (“pay for say”) voting method may be preferable as it provides a greater voice to those participating municipalities who are more significantly impacted by these decisions.</p>
8	<p>“An authority and participating municipalities coordinate and communicate with each other their fiscal and budgetary timelines and expectations for the municipal levy and for the budget.”</p>	<p>The City is supportive of the continued ability for CA’s and participating municipalities to coordinate and communicate with each other their fiscal and budgetary timelines and expectations. This maintained flexibility is critical to ensure effective relationships between CA’s and participating municipalities.</p>
8	<p>“The draft preliminary authority budget is circulated to participating municipalities and upon circulation, the authority would be required to publicly post the draft budget to its website a minimum of 30 days before a vote on the final budget by the municipally appointed members.”</p>	<p>The City is supportive of the requirement to post draft budgets on CA websites a minimum of 30 days prior to the approval of the municipal levy, as well as the requirement to make the final budget available on the CA website, which will improve transparency and accountability for CA’s.</p>
8	<p>“In addition, it is proposed that the conservation authority must provide a summary of how the authority considered opportunities for self-generated revenue as part of the consultation process with participating municipalities on the budget and the levy.”</p>	<p>The City is fully supportive of the proposed requirements for CA’s to provide a summary of how the authority considered opportunities for self-generated revenue as part of their budget consultation process. This will ensure visibility into all opportunities considered to minimize municipal levy</p>

MINISTRY OF THE ENVIRONMENT, CONSERVATION AND PARKS
“Regulatory and policy proposals (Phase 2) under the Conservation Authorities Act”
ERO posting closing February 25, 2022

Page #	Reference/Text Excerpt	Comment
		requirements and should be beneficial for Municipal Council’s review of the CA budgets.
9	“Apportionment Methods for Conservation Authority Program and Services Costs”	The cost apportionment methodologies for operating and capital costs as outlined appear to be reasonable. In particular, the need for flexibility in the approach for apportionment of Category 2 and 3 programs and services will be critical.
14	“We are proposing to proclaim s. 21.2 of the <i>Conservation Authorities Act</i> , which provides that the Minister may determine a list of ‘classes of programs and services’ that a conservation authority may charge a fee for, publish this list and distribute it to each conservation authority. An authority would be permitted to charge a fee for a program or service only if it is set out in the Minister’s list of classes of programs and services. Once a conservation authority is granted the power to charge a fee for a program and service, the authority may determine the fee amount to charge.”	By placing these restrictions on programs/services for which a fee can be charged, it may undermine the desire for CA’s to explore opportunities for other self-generated revenues, as is the intention in other sections of the proposal. The proposal indicates that user fees may be charged where the “user pay principle is appropriate”. It may be valuable to clearly articulate the definition of this, as it could be interpreted differently by each CA.
17	“We are proposing through a Minister’s regulation that conservation authorities be required to maintain a <i>Governance</i> section on their website in a conspicuous and easily accessible location for the public to access key information.”	The addition of a governance section on each CA website is a valuable requirement. This enhancement will improve transparency and accountability for CA’s.