



May 6, 2024

**Submitted to ERO online**

Conservation Authorities and Natural Hazards Section  
Ministry of Natural Resources and Forestry - RPDPB  
300 Water Street  
2nd Floor South Tower  
Peterborough, ON K9J 3C7

**RE: Regulation detailing new Minister's Permit and Review powers under the Conservation Authorities Act (ERO No. 019-8320)**

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To whom it may concern:

Thank you for the opportunity to comment on the "Regulation detailing new Minister's Permit and Review powers under the Conservation Authorities Act".

On April 1, 2024, proclaimed provisions in the *Conservation Authorities Act* (CA Act) and associated regulations came into effect. These provisions include new powers for the Minister of Natural Resources and Forestry to:

1. Issue an order to prevent a Conservation Authority (CA) from issuing a permit and to take over the permitting process in the place of a CA; and
2. Review a CA permit decision at the request of the applicant.

On April 5, 2024, the Province posted a proposal for a regulation on the Environmental Registry of Ontario (ERO Number [019-8320](#)) to specify the circumstances under which these Ministerial powers can be used.

Nottawasaga Valley Conservation Authority [NVCA] staff has reviewed the proposed regulation as identified in ERO Number [019-8320](#) and provides the following comments:

**Implications**

If the regulation is approved as proposed, some of the potential implications include:

1. Decision-making could become political rather than technical and could result in an increased risk to life and property.
2. Local decision-making could be circumvented.
3. More confusion and time delays could be introduced into the development approval process.

## Suggested Recommendations for the Province

To avoid the potential implications identified above, further details and clarification regarding the Minister's scope and process for considering development proposals is recommended in consultation with CAs. The details regarding these new Minister's powers must be carefully developed to ensure Minister's decision making on permits remains technical, apolitical and integrates a watershed perspective to natural hazard management to continue protecting the public, properties and infrastructure. Furthermore, alternative solutions that would support provincial goals and solve the challenges that CAs and municipalities face that can lead to delays in the development approval process and meeting housing goals should also be discussed and explored with the Province.

Thank you again for the opportunity to provide comments on the "Regulation detailing new Minister's Permit and Review powers under the Conservation Authorities Act". The NVCA would be pleased to meet with Ministry staff to further discuss the regulatory requirements and implementation details.

Sincerely,



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