

GREENBELT FOUNDATION

Response to ERO # 019-6141

Legislative and regulatory proposals affecting Conservation Authorities to support
the Housing Supply Action Plan 3.0
Ministry of Natural Resources and Forestry



Possibility grows here.

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www.greenbelt.ca

Response to ERO # 019-6141

Legislative and regulatory proposals affecting Conservation Authorities to support the Housing Supply Action Plan 3.0

Ministry of Natural Resources and Forestry

The Province of Ontario is proposing legislative and regulatory proposals affecting Conservation Authorities (CAs) that would profoundly impair their longstanding role in watershed management and environmental sustainability.

For 18 years, the Greenbelt Foundation has been a trusted and effective partner to the Province in unlocking the enormous economic, ecological, agricultural, and social benefits of Ontario's Greenbelt, which is vital to the prosperity and growth of southern Ontario. We appreciate this partnership and look forward to continuing our work together.

The Greenbelt Foundation appreciates the opportunity to provide the following feedback in response to ERO posting #019-6141. However, this feedback is offered with the caveat that more time would be required for a full impact analysis, particularly in the context of the range of other legislative proposals being made at the same time under the umbrella of Bill 23 and Bill 39, as well as amendments to the Greenbelt Plan, and other concurrent legislative matters.

Why the Greenbelt Foundation is commenting

The Greenbelt provides immense value to Ontario, but its agricultural, natural heritage and water resource systems are significantly impacted and dependent on effective watershed management and other oversight and regulation that the CA system in our province provides.

Because the Greenbelt Plan is a land-use plan that works with other provincial plans and legislation to ensure effective and efficient growth, the Greenbelt Foundation supports "smart growth" efforts that allow our province to build communities in the fast-growing Greater Golden Horseshoe (GGH) region in a manner that addresses land use and housing needs, leverages existing infrastructure, and ensures access to green spaces and other public amenities.

CAs are partners in delivering key aspects of the *Greenbelt Plan*. Weakening their capacity and effectiveness will hamper their ability to carry out this role. For instance, they may undertake the critical work of delineating key natural heritage features and key hydrologic features boundaries internal to the Greenbelt Plan when dealing with applications for development.¹ In absence of

¹ Ministry of Municipal Affairs. (2017). Greenbelt Plan, 2017. <https://www.ontario.ca/document/greenbelt-plan-2017>. p. 72

CAs providing this function, it is unclear who will ensure this important protection of our water systems.

In addition, the *Greenbelt Plan* provides that “Watersheds are the most meaningful scale for hydrological planning. Municipalities, partnering with CAs as appropriate, shall ensure that watershed planning is undertaken to support a comprehensive, integrated, and long-term approach to the protection, enhancement or restoration of the quality and quantity of water within a watershed.”² To realize the goals of the Greenbelt Plan we need robust watershed planning that only CAs can provide.

Finally, the Foundation is concerned that proposed CA changes would undermine our significant work and the Government of Ontario’s investment in the area of nature-based solutions to provide ecosystem services to communities such as water supply and storm water management, as well as the use of natural infrastructure to reduce risks to communities and households, especially in the context of more frequent extreme weather and climate change.

Key Insights

Conservation Authorities – A Critical Part of Strong Communities

Municipalities need discretion in their agreements with Conservation Authorities given the lack of viable alternatives:

It is not clear who will undertake the important work of CAs that would be proscribed by Bill 23. Ontario has a CA system that is the envy of other jurisdictions for its effectiveness in protecting people and property and providing various services and assets that the people of Ontario value. Particularly in conjunction with other changes in Bill 23 to reduce the role of regional governments, municipalities generally will not have the capacity or expertise to deliver current CA services. Placing new responsibilities on municipalities will lead to inefficiencies and delays, which ultimately will undermine the Province’s goal of building more homes faster. We would also caution that loosening protections on our province’s water systems in this way will undermine the network of watersheds that provide safe drinking water for millions of Ontarians.

Limiting Conservation Authorities will increase the risk of natural hazards to property and people:

We ask that the Province be cautious in limiting the role of CAs as they are chief delivery agents in climate change mitigation and adaptation. Natural disasters are growing in frequency and intensity resulting in significant impacts including economic losses, and fatalities. Effective watershed management by CAs is crucial for flood protection. In 2020, insurable losses within

² Ministry of Municipal Affairs. (2017). *Greenbelt Plan*, 2017. <https://www.ontario.ca/document/greenbelt-plan-2017>. p. 23

Canada related to floods reached \$2.5 billion.³ CAs save the provincial government and taxpayers money by reducing the financial impacts of severe flooding events.

Potential disposal of Conservation Authorities land threatens the long-term viability of iconic recreational trails such as the Bruce Trail and the Oak Ridges Moraine Trail:

The Greenbelt and other areas in southern Ontario contain important and beloved recreational areas including trail systems that depend in many instances on CA land and related services. With a growing population the demand for such recreational amenities only becomes more important. We should be retaining CA lands for the benefits that they provide today and to ensure we can meet the needs of a growing province in the future.

Significant existing urban development and settlement areas exist; we need to focus development on existing communities that do not encroach on lands protected for natural conservation and related purposes:

The true path to Ontario's success is investing in our communities. While the Foundation strongly supports efforts to increase housing affordability and attainability, the Greenbelt Plan is founded on principles of smart growth, meaning existing urban lands should be prioritized for future intensification. Especially in the current context where extensive land is available for urban development, the proposal to identify CA lands for disposal runs contrary to this principle.

Conservation Authorities are key partners in Greenbelt protection and enhancement:

The Greenbelt overlaps with watersheds managed by many CAs in the Greater Golden Horseshoe. CAs are key partners in the identification and protection of natural resources in the Greenbelt, including water systems, biodiversity, and land conservation, and have often been delivery agents for initiatives that help realize the benefits of Greenbelt landscapes and hydrology. CAs are also centres of knowledge and best practice that numerous organizations benefit from when carrying out initiatives such as trail planning, tree planting and restoration as well as natural infrastructure management and development. The benefits of our world-leading CA system should not be jeopardized.

Recommendations

We recommend that, notwithstanding the passage of Bill 23 prior to the conclusion of consultations, the Province of Ontario not proclaim sections that preclude the following:

1. Municipalities should continue to be able to enter into Memorandums of Understanding with CAs under Section 21.1.1(1) of the Conservation Authorities Act.

³ Feltmate, B. and Moudrak, M. (2021). Climate change and the preparedness of 16 major Canadian cities to limit flood risk. University of Waterloo. Intact Centre on Climate Adaptation. <https://www.intactcentreclimateadaptation.ca/wp-content/uploads/2021/02/16-Cities-Flood-Preparedness-1.pdf>

2. Priority for development should be given to lands that are not protected for conservation and ecological health, especially given the immense amount of land already designated for urban development across southern Ontario.
3. Similar to the Ontario Federation of Agriculture, the Greenbelt Foundation recommends that CA lands leased to farmers not be included in the lands being considered for future removal.⁴
4. Before lands are identified for disposal, consideration should first be given to their potential for green space and park land expansion or continued agricultural production (including high value crops) to serve the region's needs – not to mention contributing to critical near urban nature needs.
5. The amendment to section 28.0.1(17) of the Conservation Authorities Act removing the possible effects on the control of pollution and the conservation of land should be rescinded, and considerations of "pollution" and "conservation of land" should be maintained, when CAs are reviewing permit applications.
6. Natural hazards must be considered at both site specific and watershed levels to ensure safety.
7. CAs should continue to have the ability to appeal in their own right or as a party to appeal at the Ontario Land Tribunal.
8. CAs should continue to collect fees adequate to cover their service costs and we recommend caution regarding fee freezes in an era of increasing demand for CA services and inflationary pressures.
9. We encourage the Province to re-establish and work with the Multi-Stakeholder Conservation Authority Working Group to discuss the Bill 23 amendments. This working group could help to find solutions that would increase Ontario's housing supply without risking public safety or downloading additional responsibilities onto municipalities.

Summary Overview

Changes to Conservation Authorities

Bill 23 makes several amendments to the Conservation Authorities Act that will undermine the effectiveness of CAs, which are outlined below. These amendments come at a time when climate

⁴ Ontario Federation of Agriculture. (November 17, 2022). [OFA submission to the Ontario Ministry of Natural Resources and Forestry regarding proposed legislative and regulatory changes to the Conservation Authorities Act.](#)

change is causing more severe weather events and the role of CAs in mitigating flood risks and water pollution within watersheds have never been more critical.

The overall impact of these changes in Bill 23 would result in a significantly reduced role for CAs, which could lead to unintended consequences including higher costs due to property damage from flooding, increased responsibilities for municipalities, more development in environmentally sensitive areas, and a decline of a watershed approach to managing the region's natural heritage and water systems. The changes will therefore not contribute to the provincial goal of increasing affordable and attainable housing supply, and in increased risk to safety and property.

Greenbelt Impacts

CAs are significant partners in maintaining, enhancing, and restoring the Greenbelt's landscape and natural systems in critical ways that impact millions of Ontarians.

The Greenbelt Foundation collaborates directly with all CAs in the region to understand and prioritize restoration needs in the Greenbelt and implement landscape-scale restoration programming such as significant enhancement of near urban forests and riparian areas in river valleys. The Greenbelt is situated in the country's largest urban area resulting in heavy use of its lands. It is therefore especially important to continuously maintain the health of its natural and agricultural systems.

For example, the Grindstone Creek Watershed Natural Asset Management Project brings together Conservation Halton, the cities of Hamilton and Burlington and the Royal Botanical Gardens, to value the services provided by natural assets in the watershed and identify natural infrastructure projects such as flood mitigation. The watershed is currently experiencing downstream flooding and pollution impacts in the popular Cootes to Escarpment EcoPark System, and Hamilton Harbour, a Federal Area of Concern under the Great Lakes Water Quality Agreement. Conservation Halton contributed watershed-scale expertise, natural asset data and assessment methodologies to the project.

CAs are also at the forefront of creating and maintaining new and innovative park lands and greenspace in the Greenbelt and across Ontario. The GGH region has a looming deficit of large parks (20 acres and above), which will grow to 32,000 hectares by 2051 under current municipal plans.⁵ In recent years, with the support of the Greenbelt Foundation, CAs have led the creation of the following greenspaces:

- Cootes to Escarpment EcoSpark System, 3900 hectares (Conservation Halton and Hamilton Conservation)

⁵ Greenbelt Foundation and Green Infrastructure Ontario Coalition. (2022). [Improving Access to Large Parks in Ontario's Golden Horseshoe. Policy, Planning and Funding Strategies.](#)

- Credit Valley Trail, 100km (Credit Valley Conservation); and
- Niagara Peninsula GeoPark, just launched (Niagara Peninsula Conservation Authority)

CAs require ongoing capacity, expertise, and resources to maintain existing greenspaces that have ecological, social, and cultural importance to residents. For example, Ganaraska Conservation Authority is currently rehabilitating the region’s largest near urban forest after devastation from a recent storm and working hard to re-open hiking trails. The Greenbelt Foundation is working to renew a strategy and increase access to the iconic Oak Ridges Moraine Trail. Local CAs will be key partners in expanding, maintaining, and promoting the trail – among many other local trail and recreational amenity efforts.

Bill 23 Context and Financial Health

The Greenbelt Plan is a foundational component of planning for success that ensures efficiency and sustainability in the Greater Golden Horseshoe, including fiscal stability. We therefore urge caution as a picture is emerging of likely unintended consequences arising from the suite of changes in Bill 23.

For example:

- The Association of Municipalities of Ontario has determined that “the financial implication to Ontario’s municipalities could be as much as \$5.1 billion over the next nine years”.⁶ The City of London alone has estimated that “the overall impact to the City of London will be \$97 million+ over a five-year period.”⁷
- The Regional Planning Commissioners of Ontario has concluded that “The protection of such natural systems that extend beyond local boundaries does not appear to have been addressed in Bill 23” and “unintended consequences include increasing the financial burden for municipal taxpayers by making them pay more for growth, reducing the ability to create new parks and other open spaces, limiting citizen rights, making it impossible for some municipalities to build supporting infrastructure on time to support growth, and removing effective regional growth management, especially in ensuring the efficient use of infrastructure and protecting vital natural systems that cross municipal boundaries.”⁸

⁶ Association of Municipalities Ontario (AMO). (November 16, 2022). [AMO Submission on Bill 23, More Homes Built Faster Act, 2022](#). p. 3.

⁷ Newcombe, D. (November 21, 2022). [Province’s controversial housing plan would cost London \\$97 million over five years](#). CTV News London.

⁸ Regional Planning Commissioners of Ontario. (November 18, 2022). Making Room: Shaping Big Housing Growth and Affordability in Ontario.

Expanded Recommendations

Restrictions on Conservation Authorities entering into agreements with municipalities to review planning applications

Bill 23 would amend sections 21.1.1 and 21.1.2 of the Conservation Authorities Act so that CAs could not review or comment on certain matters under prescribed Acts including: the Aggregate Resources Act, the Condominium Act, the Drainage Act, the Endangered Species Act, the Environmental Assessment Act, the Environmental Protection Act, the Niagara Escarpment Planning and Development Act, the Ontario Heritage Act, the Ontario Water Resources Act, and the Planning Act.

We agree with the Regional Planning Commissioners of Ontario, who report that:

*"In the absence of any government level (including Conservation Authorities) being responsible for the planning-related protection of watershed-scale natural systems, there is a big gap. We need only remind ourselves of past catastrophic events like Hurricane Hazel to drive home the need for comprehensive planning and implementation measures."*⁹

Traditionally, CAs have been involved in the municipal planning process through reviewing and providing their expertise on official planning, zoning and subdivision application and other related planning matters. Through agreements with municipalities, CAs also provide comments and support to municipalities on issues such as natural heritage and natural hazards. Given their role as a science based, technical agency that works with municipalities, the Province and development industry, CAs have unique expertise that informs their work.

As distinct from municipalities, especially lower tier municipalities, CAs take a watershed approach through these plan review processes to make sure that connections are made between wetlands, flood control and other natural infrastructure, which helps to ensure safe development. The changes to the Conservation Authorities Act and the Planning Act under Bill 23 would significantly undermine the role of CAs to work with municipalities to mitigate environmental and natural heritage risks.

In addition, by removing the opportunity for these agreements, Bill 23 could result in increased financial and administrative burdens to municipalities. When downloading these types of responsibilities on municipalities, it is important to consider how development in one jurisdiction will impact other adjacent or downstream municipalities. Municipalities do not have the watershed perspective that spans political boundaries that CAs have. Municipalities do not

⁹ Regional Planning Commissioners of Ontario: MAKING ROOM: Shaping Big Housing Growth and Affordability in Ontario. November 18, 2022 - Final Report, pp.18

have the capacity and expertise in water resource engineering, regulatory compliance, and environmental planning and may need to hire additional staff or hire consultants for this work.

Placing new responsibilities on municipalities may lead to inefficiencies and delays in the development review process, which ultimately may not contribute to the Province's goal of building more homes faster. Municipalities anticipate that these higher costs and delays will be passed onto applicants and developers. This could particularly impact rural communities within the Greenbelt where the municipal staffing levels and tax bases are more limited.

Recommendation 1

Municipalities should continue to be able to enter into Memorandums of Understanding with CAs under Section 21.1.1(1) of the Conservation Authorities Act.

Converting Conservation Authorities owned lands for residential development

CAs own approximately 147,000 hectares of land.¹⁰ These lands were acquired for several reasons including for flood and erosion control and the long-term protection of environmentally sensitive areas. These lands provide important areas of recreational spaces for the region's residents, protect drinking water and biodiversity, and contribute to climate change adaptation measures. Removal of these lands from the CAs' protection could produce unintended consequences which could reduce ecosystem services, increase risk of flooding and erosion, and ultimately reduce climate change resiliency. Removal of these lands from CA protection could produce the exact public safety and environmental problems that that original acquisition of these lands was meant to avoid.

CA lands are important for near urban nature. A recent report by the Greenbelt Foundation and the Green Infrastructure Ontario Coalition found that access to large parks within the region is a concern, as over 2 million residents in the Greater Golden Horseshoe are living in neighborhoods with low accessibility to parks.¹¹ If residents had access to lands in CAs for recreational purposes, it could help to address that deficit of parkland. As above, before any identified lands are disposed of, their potential for parkland expansion should first be considered.

Because CAs operate on a watershed basis, they are often ideal partners for us in initiatives that provide access to nature and recreation across municipal boundaries, such as trails and discovery routes. Examples include iconic assets such as the Bruce Trail, the Credit Valley Trail,

¹⁰ Conservation Ontario. (October 27, 2022). Media Release. [Province Continues to Change Roles and Responsibilities of Conservation Authorities.](#)

¹¹ Greenbelt Foundation and Green Infrastructure Ontario Coalition. (2022). [Improving Access to Large Parks in Ontario's Golden Horseshoe. Policy, Planning and Funding Strategies.](#)

and our current initiative to renew the Oak Ridges Moraine Trail. Not only is the expertise held by CAs invaluable, but their ownership of tracts of conserved land is vital to the continuity of the trails, and to the provision of off-road recreation. These lands have value in addition to their potential for housing, and any directive to identify them for sale or reduce CA oversight and partnerships must take this additional value into account. It is not clear to us from the proposal that these uses will be protected and continued.

In addition, more than 3000 acres of lands owned by CAs are leased to farmers for agricultural purposes.¹² The increasing farmland loss in Ontario in recent years has implications on farmland tenure, as farmers are struggling to purchase land due to high land prices, causing the amount of farmland owned to decrease across the province. Within the GGH region, 64% of farmland was owned in 2021, compared to 36% of farmland being rented.¹³ Within the Greenbelt, 57% of farmland was owned in 2021, compared to 43% of land being rented.¹⁴ The long-term leases provided by CAs help provide certainty and motivation to farmers to invest in their operations.

Recommendation 2

Priority for development should be given to lands that are not protected for conservation and ecological health.

Recommendation 3

Similar to the Ontario Federation of Agriculture, the Greenbelt Foundation recommends that CA lands leased to farmers not be included in the lands being considered for future removal.¹⁵

Recommendation 4

Before lands are identified for disposal, consideration should first be given to their potential for green space and park land expansion or continued agricultural production (including high value crops) to serve the region's needs as well as importance as near urban nature areas.

Removal of established tests for consideration on Conservation Authorities permit decisions

Several factors must currently be considered when making decisions related to permission to carry out a development project or permit to engage in otherwise prohibited activities. These factors include the potential effects on the conservation of land and the control of pollution. Bill 23 would amend section 28.0.1(17) of the Conservation Authorities Act by removing the two

¹² Ontario Federation of Agriculture. (November 17, 2022). [OFA submission to the Ontario Ministry of Natural Resources and Forestry regarding proposed legislative and regulatory changes to the Conservation Authorities Act.](#)

¹³ Statistics Canada. (2021). [Census of Agriculture.](#)

¹⁴ Ibid.

¹⁵ Ontario Federation of Agriculture. (November 17, 2022). [OFA submission to the Ontario Ministry of Natural Resources and Forestry regarding proposed legislative and regulatory changes to the Conservation Authorities Act.](#)

factors (i.e., pollution and land conservation) and add a new factor, which is the consideration of the effects on the control of unstable soil and bedrock. This amendment will limit the role of CAs to address issues regarding pollution and the conservation of land in considering permissions and permits.

If the scope of the CA permits is narrowed to only address natural hazard issues, CAs would presumably not be able to require setbacks from water, require sediment control during construction, or protected naturalized shorelines. In addition, CAs would no longer be able to address water quality concerns, which are required under federal and provincially approved Remedial Action Plans for designated areas of concern. CAs use the “pollution” and “conservation of land” considerations and conditions to limit sediment run off into lakes and rivers that contributes to poor water quality. Municipalities would then become responsible to address these issues, and we risk creating a patchwork of inconsistent practices.

Recommendation 5

The amendment to section 28.0.1(17) of the Conservation Authorities Act removing the possible effects on the control of pollution and the conservation of land should be rescinded, and considerations of “pollution” and “conservation of land” should be maintained, when CAs are reviewing permit applications.

Development subject to the Planning Act authorizations should not be exempt from requiring Conservation Authorities permits. Conservation Authorities regulations should not be delegated to municipalities.

Currently, section 28 of the Conservation Authorities Act provides a blanket prohibition on specific activities without a permit (e.g., certain development activities and activities that would interfere with a river, creek, stream, watercourse, or wetland).¹⁶ Bill 23 updates section 28 of the Conservation Authorities Act to provide the ability to exempt development authorized under the Planning Act from requiring a permit under the CA Act. The exemption would apply in the municipalities that are set out in the regulation and would be subject to conditions that are also set out in the regulation.¹⁷ Therefore, under Bill 23, permits will not be required within regulated areas (including wetlands) for activity that is part of a development authorized under the Planning Act.

However, most CA regulations should not be delegated to municipalities. The planning process is not sufficient to ensure that natural hazard concerns can be addressed through design and

¹⁶ Government of Ontario. (November 28, 2022). [Conservation Authorities Act, R.S.O. 1990, C27](#).

¹⁷ Aird Berlis. (October 27, 2022). [More Homes Built Faster Act, 2022 Proposes Significant Changes to Legislation](#).

construction considerations on their own. This could place additional pressure, responsibility, and liability on municipalities. Working beyond municipal boundaries is essential for CAs in their role regarding permitting to consider impacts on both upstream and downstream communities.

CAs can save the provincial government and taxpayers money by reducing the financial impacts of severe flooding events, which is a leading cause of public emergencies in Ontario. These natural disasters are growing in frequency and intensity with climate change causing severe impacts in terms of insurance claims, economic losses, and in some cases fatalities.

CAs are the first line of defense in preventing and reducing the impacts of floods through working with municipalities and the provincial government to inform the planning and regulation of development to minimize flood risks in watersheds. The Province's own Special Advisor on Flooding (Doug McNeil) in his 2019 report found that Ontario's CA system remains a key reason why Ontario has not experienced the same catastrophic flood impacts that have devastated Alberta and British Columbia in recent years.¹⁸ This report recommended that the provincial government support municipalities and CAs during land use planning because of their critical role in protecting Ontario residents and reducing risk that occurred in other parts of the country where CAs are not present.¹⁹

Recommendation 6

Natural hazards must be considered at both site specific and watershed levels to ensure safety.

Limiting Conservation Authorities right to appeal under the Planning Act

Under Bill 23, CAs would be limited to appeal matters at the Ontario Land Tribunal (OLT) that affect land that they own, or where the CA is the applicant. In addition, a CA may only act as a public body in specific appeals listed in Bill 23, where the appeal is made under a provision related to natural hazard policies in the Provincial Policy Statement. As CAs have a key role to play in development related to natural hazards, they need to have the ability to appeal those relevant planning decisions.

Recommendation 7

CAs should continue to have the ability to appeal in their own right or as a party to appeal at the OLT.

Freezing Conservation Authorities Fees

Bill 23 authorizes the Minister to direct a CA to not change the fees that it charges for a specified period of time. CAs anticipate that freezing their cost recovery fee could produce a

¹⁸ Douglas McNeil. (2019). [Ontario's Special Advisor on Flooding Report to Government. An Independent Review of the 2019 Flood Events in Ontario.](#)

¹⁹ Ibid.

backlog that will need to eventually be addressed.²⁰ It is unclear who will pay for this shortfall in fees. Freezing fees could result in decreased service capacity, longer delays and potential long-term impacts such as increased pressure on CAs to divest their lands for development. In the end, taxpayers, not developers, would likely absorb the increasing costs for development review.

Recommendation 8

CAs continue to collect fees that are adequate to cover their services, and we recommend caution regarding fee freezes in an era of increasing demand for CA services and inflationary pressures.

Multi-Stakeholder Conservation Authorities Working Group

The Multi-Stakeholder Conservation Authority Working Group successfully provided guidance to the provincial government during the last review of changes to the Conservation Authorities Act. This working group included representatives from CAs, the provincial government, the Association of Municipalities of Ontario, as well as the agricultural and development sector. They were able to effectively review and move forward initiatives related to the Conservation Authorities Act. This working group should continue working with the Province to provide advice and solutions regarding the Bill 23 amendments.

Recommendation 9

Similar to Conservation Ontario and the Ontario Professional Planners Institute (OPPI), we encourage the Province to work with the Multi-Stakeholder Conservation Authority Working Group to discuss the changes under Bill 23.²¹ This working group could help to find solutions that would increase Ontario's housing supply without risking public safety or downloading additional responsibilities onto municipalities.

About The Greenbelt Foundation

The Greenbelt Foundation is a charitable organization dedicated to ensuring Ontario's Greenbelt remains permanent, protected, and prosperous. Our work centres on protecting and investing in near-urban nature, natural infrastructure, and climate resilience; supporting local Greenbelt farmers and the rural agricultural sector and economy; promoting the vast and varied tourism and recreation opportunities that the Greenbelt offers; and engaging Ontarians in enjoying and helping to keep the Greenbelt thriving.

²⁰ Conservation Ontario. (October 27, 2022). Media Release. [Province Continues to Change Roles and Responsibilities of Conservation Authorities.](#)

²¹ Conservation Ontario. (October 27, 2022). Media Release. [Province Continues to Change Roles and Responsibilities of Conservation Authorities;](#) Ontario Professional Planners Institute (OPPI). (November 24, 2022). OPPI Commentary on Bill 23 and Supplementary ERO Postings.

The Greenbelt

The 2.1 million acres of protected lands of the Greenbelt support \$9.6 billion in provincial GDP and nearly 180,000 full time jobs. The Greenbelt is home to 78 species at risk and 721,000 acres of wetlands, grasslands and forests that provide \$3.2 billion in annual ecosystem services --- which includes \$224 million of flood protection services and 71 million tonnes of carbon storage.

The Greenbelt's forests, lakes, rivers, and wetlands also provide essential recreational opportunities for the GGH's growing population. It is home to over half of the large parks in the region, has a network of biking and hiking trails including the 475 km Greenbelt cycle route and numerous cultural and historical sites that are all with easy access of our urban centres.

Farmland makes up 40% of the Greenbelt. With the high-quality soils, favourable climate conditions, and proximity to Canada's largest market, Greenbelt farms and agri-food businesses make a significant contribution to the regional economy. The agricultural sector is the second largest contributor to the province's GDP at \$39.5 billion/year, providing 822,000 jobs. We continue, however, to lose hundreds of acres of prime farmland outside of the Greenbelt. Permanent protection of our prime agricultural land is an economic imperative and essential to sustain a reliable source of local food.