



25 Adelaide Street East, Suite 1100  
Toronto, Ontario M5C 3A1  
Tel: 416-203-2746  
Toll Free: 1-877-557-2746  
Fax: 416-203-6181  
Website: [www.apgo.net](http://www.apgo.net)  
E-mail: [info@apgo.net](mailto:info@apgo.net)

May 21, 2019

Ministry of the Environment, Conservation and Parks  
Carolyn O'Neill  
Great Lakes Office  
40 St Clair Avenue West, 10<sup>th</sup> Floor  
Toronto, ON  
M4V1M2

### **Conservation Authorities Act Review - EBR Registry # 013-5018**

The Association of Professional Geoscientists of Ontario (APGO) is mandated through the Professional Geoscientist Act, 2000 (PGA) to serve and protect the public by regulating the practice of geoscience in Ontario. Geoscience expertise provides quantitative evidence-based input to the characterization of soils, rocks, water, ecosystems, watersheds, and sites, as well as the identification of contamination or disturbances to ecosystems, and the proposal of mitigation strategies and remediation strategies.

Conservation Authorities are often called upon to make decisions based on such geoscientific principles. The mandate of the APGO and the PGA in regulating the geoscience profession, therefore, has a direct relevance to Conservation Authorities and the Conservation Authorities Act (CAA) and we appreciate this opportunity to comment on the above referenced EBR posting.

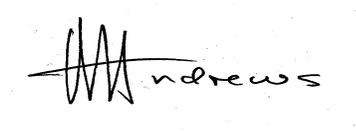
The APGO believes that science-based policy must be the cornerstone of any update to the Conservation Authorities Act to ensure both public confidence and public protection. To achieve that goal, APGO recommends that the updated Act include provisions to mandate the use of Qualified Persons (QPs) as defined in the PGA to fulfill requirements in the Act around application and permit approvals, reviews, or any other decisions that may impact the public.

The use of QPs in the CAA will result in economic growth and efficiency being achieved in a way that protects the public and natural environment. Experience has shown that Conservation Authorities who utilize QPs, either on staff or as consultants, increase efficiency and cost savings by reducing the need for costly and time-consuming Peer Reviews. In addition, the use of QPs ensure the public is always protected through permitting and application decisions being based on science-based principals by experts accountable to a self-regulatory organization.

APGO would appreciate the opportunity to meet to further discuss our proposal to protect the public through ensuring the inclusion of QPs in any update to the CAA. We look forward to the

opportunity to work collaboratively with government on this important issue as the update to the CAA evolves.

Sincerely,  
Tony Andrews  
CEO, Association of Professional Geoscientists of Ontario (APGO)

A handwritten signature in black ink, consisting of a stylized, scribbled initial followed by the name "Andrews" written in a cursive script.

Zen Keizars  
President, Association of Professional Geoscientists of Ontario (APGO)

A handwritten signature in black ink, featuring a highly stylized and abstract scribble that is difficult to decipher, followed by a horizontal line.