

AN OPERA RESPONSE
TO EBR REGISTRY 010-8243

January 10, 2010

On behalf of its member organizations and their individual constituents the OPERA coalition is unable to properly respond to subject proposal on the following grounds:

1. Restricted Circulation:

Although some provincial officials privately concede that Internet communication as a public consultation tool provides often inadequate and sometimes highly unbalanced results, this EBR registry obviously presumes all interested or affected respondents are possessed of a computer, an Internet connection and enough foreknowledge, time, inclination and expertise to scroll through multiple Queen's Park web sites in search of material concerned with or related to a 31-page addition to the Conservation Act.

2. Insufficient Notice:

Introduced Nov. 25/09 with a expiry date for public comment of Jan.11/10 little more than 5 weeks (47 calendar days minus 10 traditionally pre-assigned to seasonal celebration) are allowed for the public at large to review, understand, research and address a particularly opaque government document of shadowy origin, excessive length and complex semantics.

3. Unpublished Authors

Apart from generic mention of government agencies, sub-agencies and special interest groups as invited members of the Conservation Authorities Liaison Committee, the group that allegedly produced or initiated the proposal in question, no information can be found on or off the Internet as to an official Ministerial appointment of that Committee, the number of its members and the name, qualifications and corporate connection of each such participant.

Based on these assessments we do not regard either this proposal or the illusion of public consultation this EBR posting attempts to validate to be worthy of detailed response at this time.

R.A. (Bob) Fowler, Secretary
Ontario Property and Environmental Rights Alliance

"to protect, and entrench in law, landowner rights and responsibilities"