

ONTARIO PROPERTY AND ENVIRONMENTAL RIGHTS ALLIANCE

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To: Ms. Sarah O'Keefe, Policy Advisor From: R.A. (Bob) Fowler, OPERA Secretary

Fax: (416) 314-2976 Pages: Seven (7)

Phone: (416) 212-4312 Date: February 19, 2006

Re: EBR Registry No. AA05E0001 – Bill 43 CC: Halton Federation of Agriculture

Urgent For Review Please Comment Please Reply Please Recycle

The Ontario Property and Environmental Rights Alliance (OPERA) is a provincial coalition of trade associations and volunteer citizen groups organized in 1994 under a common mandate "to protect, and entrench in law, the rights and responsibilities of landowners against arbitrary restrictions and decisions of government". As a network research and communication facility we monitor and, where indicated, formally protest provincial and federal legislation that unfairly inhibits use, title, mortgage worth and market value of private property by regulation without compensation.

A bewildering parade of Ontario statutes introduced in just the past 12 months clearly indicate that private owners of land, particularly rural land, in this province are being deliberately marginalized, their life style demeaned, their primary asset devalued and their legitimate concerns endlessly evaded or entirely ignored. Certainly legislation that unilaterally transfers more than a million acres of land, much of it privately owned, to state control under the Golden Horseshoe Greenbelt label and covert "adjustment" of the Conservation Authorities Act at the expense of municipal governments and their local constituents are, from a private landowner perspective, shining examples of fairness diminished and justice denied.

On behalf of its members and supporters, OPERA has publicly expressed serious reservations as to the process and implications, but not the claimed intent, of Greenbelt and Conservation Act legislation. With respect, we now confirm similar concerns regarding Bill 43 – Ontario's so-called Clean Water Act. To that end, we attach an insightful submission already presented for provincial government review by the Halton Region Federation of Agriculture.

OPERA unequivocally endorses the purpose, structure and language of the HRFA submission as well as the critical need for its wide circulation. We are particularly concerned about the uncommonly short period of time allowed for public consultation, apparent resurrection of unworkable nutrient management dictates in the Clean Water Act, massive increases in bureaucracy occasioned by implementation and enforcement of yet another exercise in state control and unrestrained right of government trespass on private property.

Please advise whether or not a more reasonable Bill 43 consultation schedule can be officially sanctioned in which event OPERA will be pleased to submit additional comment. Thank you.
