

Finding the Balance

Evolving Provincial and Municipal Governance of Nutrient Management



Year 1 Interim Report

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September 30, 2004

Funded by Ontario Pork

Preamble

This is the first of two annual interim reports that document municipal experience with Nutrient Management By-laws after provincial regulations under the Nutrient Management Act came into force. The second report shall provide a more detailed analysis of this issue.

1.0 Introduction

Since the Nutrient Management Act came into force in September of 2003, provincial regulations according to Section 61(1) supersede municipal by-law provisions for all new livestock operations or those expanding over 300 Nutrient Units (NU) (municipalities continue to enforce existing local by-laws to facilities that are not currently under provincial jurisdiction). During this transition municipalities have had significantly different views ranging from those who have readily amended by-laws to be consistent with the new regulation to those who are willing to challenge the regulation and provincial authority in court. The success of the new regulation and the ability of agriculture to function will depend on finding the right balance in this evolving area of governance.

The first interim report provides insight into the ongoing transition in governance that is occurring between the province and municipalities. Insight provided in this report reflects the input of a number of people. All municipalities undergoing this transition were requested to complete a survey, and 65% of municipalities responded¹. As well, a number of individuals representing the municipalities, including Chief Building Officials (CBO's), planners, administrators, and by-law officers were consulted. Discussions also occurred with representatives from OMAF and farm groups. Although it is recognized that we have not heard from a number of municipalities and the input of additional OMAF staff and farm leaders would be beneficial, this initial interim report provides a first glimpse at the issues and successes of the transition and as a result will help to ensure that the needs of agriculture and the environment are mutually respected.

1.1 Goal and Methodology

The goal of this first interim report is to provide insight into the transition of nutrient management between municipal and provincial governance since April of 2003 (prior to the Act coming into force). This insight will allow the agri-food industry to monitor and positively influence the ongoing transition.

To address the goal of this research several methods were used:

- A questionnaire was faxed to 84 municipalities in Ontario that indicated in the 2003 report by Caldwell that they had a nutrient management by-law.

¹ The researchers continue to seek 100% response from municipalities.

- Nutrient Management By-laws and Planning Act by-laws (zoning, site plan control, etc.) were monitored to identify the changes that occurred in response to the Nutrient Management Act (Bill 81).
- Thirteen Municipal Officials were interviewed to identify ongoing issues and successes (from a sample of those municipalities that both have and have not amended by-laws in response to the new regulations).
- Two farm leaders were consulted to identify their perspective on any issues related to the continued involvement of municipalities in the regulation of new or expanding livestock facilities.
- Two OMAF staff members were interviewed to identify their perspective on any issues associated with the transition between provincial and municipal interests.
- OMAF and municipal staff were consulted to identify the timing required to process files under the Nutrient Management Act Regulation (i.e. how long it takes for a farmer to obtain approvals to construct).

1.2 Organization

This report consists of four sections. Section 1 includes an Introduction and overview of the Goal and Methodology. Section 2 presents the results of the questionnaire and provides a discussion of the results based on insight from municipal staff. Further issues coming out of the discussion with municipal staff are addressed, as well as the perspectives of provincial staff and farm leaders. Section 3 focuses on the provincial approvals process for building permits and includes both provincial and municipal perspectives. Section 4 provides a series of recommendations.

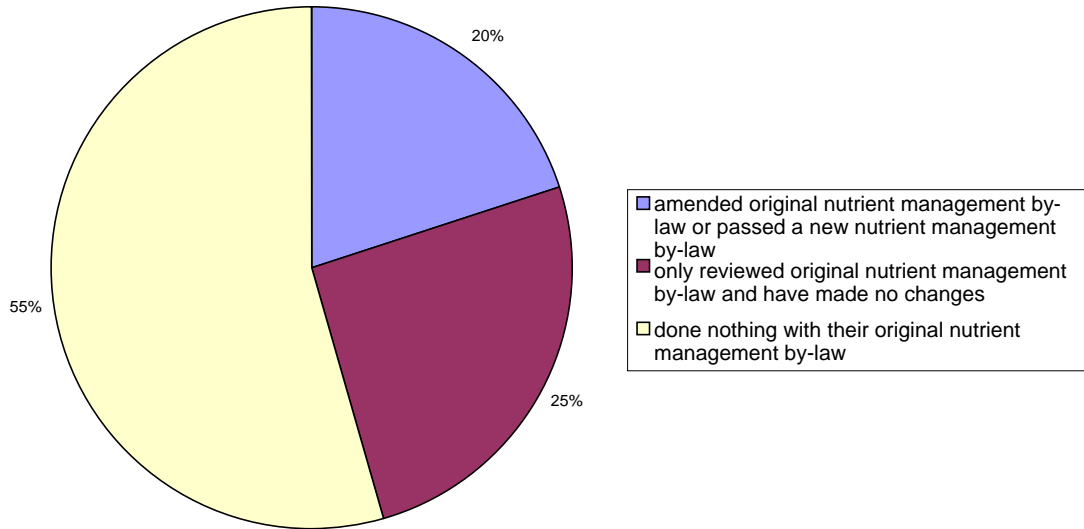
2.0 Questionnaire Results and Insight from Municipal Officials, OMAF Representatives and Farm Leaders

2.1 Questionnaire Results and Discussion with Municipal Officials

The results of the surveys sent to municipalities are presented below. Eighty-four questionnaires were sent and 55 were returned. The graphs below display the percentage of each out of the total that was returned. Therefore 100% equals 55 municipalities.

A discussion of each graph is also included. The discussion is based on interviews with Municipal Officials. Further issues and topics discussed with Municipal Officials (as well as those discussed with OMAF staff and Farm leaders) follow.

**Actions Taken by the Municipality Regarding the Nutrient Management By-law
(since the adoption of the Nutrient Management Act)**



Results

Out of the 55 responses received, only 20% of municipalities have either amended their original nutrient management by-law or passed a new nutrient management by-law since the adoption of the Nutrient Management Act. Of the remaining municipalities, 25% indicated that they have only reviewed their original nutrient management by-law but have not made changes as of yet, while 55% of municipalities indicated that since April of 2003, they have done nothing with their original nutrient management by-law.

Discussion

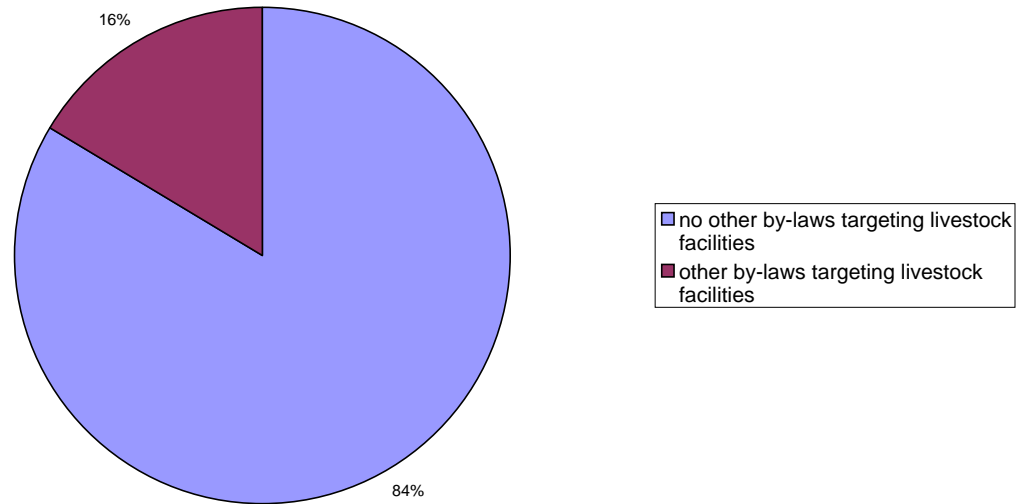
The results of the survey indicate that the majority of municipalities have done nothing with their by-law since April of 2003. This means that they have neither amended their existing nutrient management by-law nor passed a new by-law, nor have they even reviewed their existing by-law to determine where potential changes may need to occur to avoid conflict with the Regulation. After speaking with municipal staff, the main reason for this is that many municipalities have not had any applications that would fall under their local by-law or the NMA, either because construction of livestock facilities has been limited over the past year, or because the municipality does not have much livestock production. Some municipal staff indicated that making changes to their by-law has not been a priority because they have been too busy with other matters, but if an application were to arise, they would take the opportunity to go through both the Regulation and the local by-law and make the appropriate changes.

Similarly, those municipalities that are in the process of reviewing their by-law have done so slowly because they have not felt any pressure to make the required changes. Other matters have taken priority over the NMA.

For those municipalities that have made changes to their nutrient management by-laws, they have done so because they want to be in conformity with the NMA. The changes made to the nutrient management by-laws vary with each municipality, but generally involve the following aspects:

- days of manure storage required (either increase or reduction of days storage to 240 days)
- land ownership requirement (removal of a land ownership requirement)
- transportation of manure (removal of any restriction on the transportation of manure)
- change from Livestock Units to Nutrient Units
- earthen storage (removal of restrictions on earthen storage)

**Passing of Other By-laws that Target Livestock Facilities
(since the adoption of the Nutrient Management Act)**



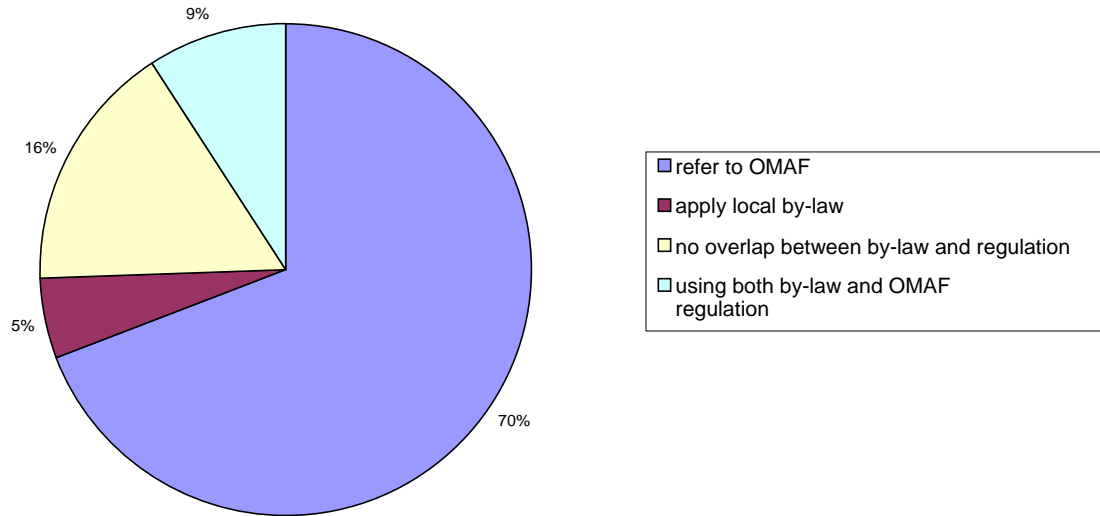
Results

Out of the 55 responses received, 84% of municipalities indicated that since April of 2003, they have not passed any other by-laws that specifically target livestock facilities or relate to nutrient management. Only 16% of municipalities indicated that they have passed other by-laws targeting livestock facilities or relating to nutrient management such as interim control by-laws and zoning by-laws.

Discussion

The majority of municipalities have not passed any other by-laws that target livestock facilities or relate to nutrient management since April 2003. Those municipalities that have passed other by-laws have done so for various reasons. A few municipalities have either amended existing zoning by-laws or have passed new ones so that the zoning by-laws are consistent with their amended or new nutrient management by-law. Some municipalities, out of concern over the perceived “less stringent” standards set out by the Regulation (as compared to their nutrient management by-laws) have passed interim-control by-laws to cap livestock development and have passed by-laws restricting development in wellhead protection areas.

Action Taken by Municipality if There is Overlap Between Local By-law and the Nutrient Management Act (NMA)



Results

Out of the 55 responses received, 70% of municipalities indicated that if an application clearly required provincial approval and the municipal by-law dealt with the same subject matter then they would refer the applicant to OMAF for approval. A small percentage (5%) indicated that they would continue to apply the municipal by-law despite the fact that it dealt with the same subject matter as the provincial regulation. Out of the remaining municipalities, 9% indicated that they would apply both the by-law and the regulation, while the remaining 16% indicated that the by-law had already been amended so there is no overlap between the two.

Discussion

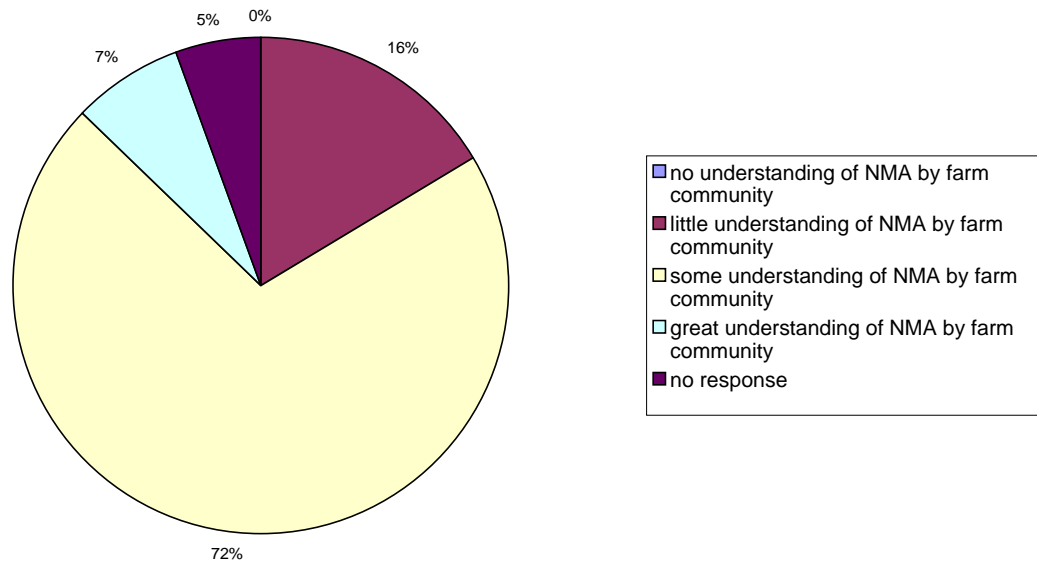
As shown by the results, the majority of municipalities indicated that if an application clearly required provincial approval and the municipal by-law dealt with the same subject matter then they would refer the applicant to OMAF. After speaking with municipal staff it was determined that this would occur for a variety of reasons. Many municipalities would refer the applicant to OMAF simply because they acknowledge the jurisdiction of OMAF in dealing with the specific subject matter. However, a few municipalities indicated that the applicant would be sent to OMAF due to the fact that municipal staff does not understand the requirements of the legislation nor would they feel comfortable interpreting the Regulation.

The municipalities that indicated that there is no overlap between the by-law and the Regulation have amended their existing nutrient management by-law or have passed a

new by-law to be consistent with the Regulation. Therefore if these municipalities received an application, they would apply their by-law where they have jurisdiction and would refer the applicant to OMAF when OMAF had jurisdiction (currently all new or expanding operations above 300 NU). Similarly, those municipalities that indicated they would apply both the local by-law and refer the applicant to OMAF may do so for the same reason. However, after speaking with municipalities, some indicated that if they received a by-law that required OMAF approval, they would still apply aspects of their by-law even after the application had received approval. For example, one municipality indicated that once an application was approved by OMAF it would still have to be submitted to the municipality's Peer Review Group for final approval (as stated in the by-law).

After speaking with municipal staff, it was determined that municipalities indicating that they would apply their local by-law to the application even if it required OMAF approval would do so for one of two reasons: either the municipality has simply not yet amended the by-law to be consistent with the Regulation and will continue to apply their by-law until they make the necessary changes, or the municipality is concerned about the implications of the legislation (i.e. they do not want large livestock operations in the municipality and have therefore put a cap on the size of operations).

Understanding of the Farm Community Within the Municipality of the Nutrient Management Act (NMA) and Regulation



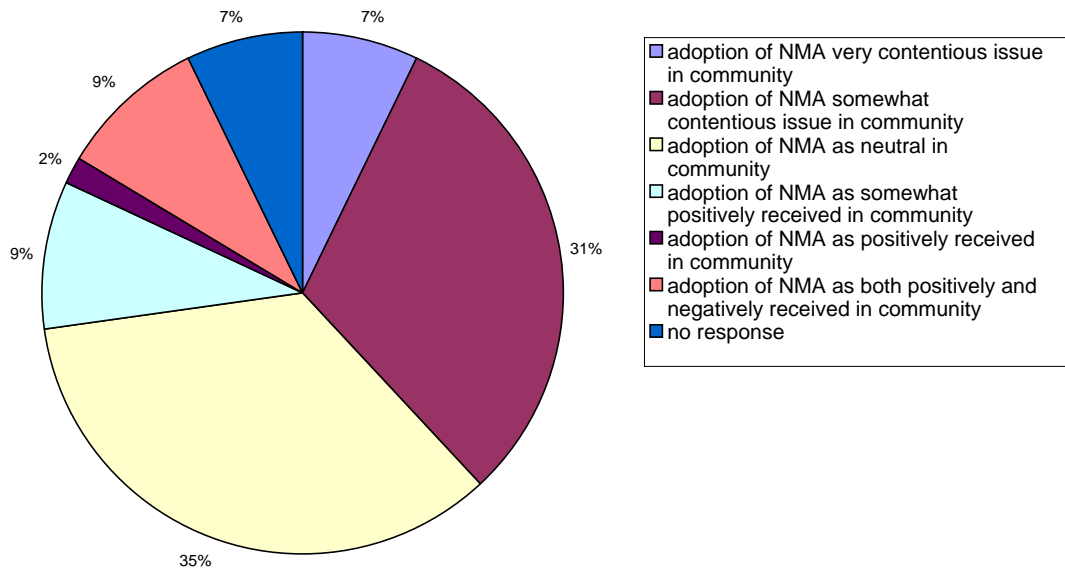
Results

Out of the 55 responses received, the majority of municipalities (72%) indicated that the farm community had some understanding of the Nutrient Management Act and its Regulation. Sixteen percent of the municipalities indicated that there was little understanding of the Act within the farm community, while 7% indicated great understanding. No municipalities indicated zero understanding, while 5% of municipalities did not respond to the question.

Discussion

All municipal staff interviewed indicated that the Province had held information sessions for the community prior to the passing of the Regulation. Most of those from the farming community that attended these sessions reported a range from little to some understanding of the requirements. It was indicated that where those farmers had a great understanding it was because they were the ones that actually had to go through the process of completing the Nutrient Management Strategy/Plan (as compared to municipal staff who could simply send along the application to OMAF).

Reception of the Nutrient Management Act (NMA) Within the Community



Results

Out of the 55 responses received, 7% of municipalities indicated that the Nutrient Management Act and Regulation was a very contentious issue within the community. A great percentage of municipalities (31%) indicated that the adoption of the Act was somewhat of a contentious issue in the community. The greatest number of municipalities (35%) indicated that the Act was a neutral issue in the community. Nine percent of municipalities indicated that the Act was somewhat positively received in the community, while only 2% suggested that the Act was positively received. Nine percent of municipalities saw the NMA as both positively and negatively received in the community, while 7% of municipalities did not respond to the question.

Discussion

In speaking with municipal staff it was determined that the response of the community to the Nutrient Management Act varies greatly between municipalities, and depends upon both the make-up of the community (i.e. percentage of the farm versus non-farm population) and the reliance of the municipality on the livestock industry. In some regions where the non-farm population has dominated the make-up of the community, the adoption of the Act had been welcomed as a high set of standards to regulate large livestock facilities. However, in other regions where non-farm population has perceived the Act as a set of standards that are less strict than the local nutrient management by-law, the NMA has been a contentious issue. In regions that have a high population of farmers, both sides can also be seen. Some farmers view the Act as legislation that will restrict the possibility of livestock expansion. Other farmers see the Act as a way to

become more competitive with farmers across Ontario (these issues will be discussed further in the following section). Therefore municipalities may have indicated that the NMA has been positively received, negatively received, or both, depending upon these factors.

Those that have indicated a neutral position may have done so because of the variety of reactions within the community. Another reason that some municipalities have indicated a neutral position regarding the Nutrient Management Act is due to the fact that livestock production is not occurring (or is occurring very little) within the community. For this reason, the community has not taken a position either way.

2.2 Further Discussion with Municipal Officials

The interviews with Municipal Officials have provided insight into many aspects of the transition of nutrient management from the municipalities to the province. Much of the discussion with municipal staff has already been presented in the results section. However a number of other issues were addressed including:

- The relationship between the Province and the municipality,
- The concerns of the municipality surrounding the NMA,
- The concerns of the community (both farming and non-farming) surrounding the NMA,
- The changes in workload of municipal staff due to the implementation of the NMA

2.21 Relationship between Municipalities and the Province

Regarding the relationship between the Province and the municipality since the implementation of the Nutrient Management Act and Regulation in September of 2003, municipal staff indicated a diverse set of relationships. Staff representing many municipalities indicates that since the initial information meetings and training sessions held by OMAF prior to the passing of the Act, not much contact has occurred between the two. Many have found the Province to be unresponsive to requests for help in interpretation and enforcement of the Regulation. On the other hand, some municipalities have indicated a good working relationship with the Province, with information and feedback passing easily between the two. However, these municipalities are typically those that have been involved in the process of developing the Act and Regulation right from the beginning.

2.22 Municipal Concerns

A number of concerns regarding the NMA and Regulation were indicated during the discussion with municipal staff including environmental and interpretation issues. A big concern amongst many municipalities is that the NMA and Regulation are not doing enough to address environmental issues and site specific concerns, and are targeting the wrong operations. These municipalities are typically those that have put very restrictive

standards in their by-laws such as caps on livestock production, or have put mechanisms in their by-laws to deal with site specific issues (i.e. requirements for a hydrogeological study due to concern with spreading manure on the shallow limestone overburden). The sections of the legislation causing the most environmental concern are those that deal with the storage requirement, the transfer of manure and the ownership of the land on which manure is spread. As well, most municipalities interviewed believe that the legislation is targeting the wrong facilities. Currently, only large operations (new or expanding over 300 NU) fall under the legislation. However, according to many interviewed, it is these large operations that, due to their size and scale, are already well organized and follow good management practices of nutrient production and spreading. It is the accumulation of small farms, those that do not fall under either the provincial Act or the local by-law, that cause most concern for the municipalities. These are the operations that are reportedly operating near watercourses and using liquid manure systems.

Other concerns held by many municipalities surround the understanding and interpretation of the Act and Regulation. Many of the municipal staff interviewed indicate confusion around specific terms used in the legislation, such as Nutrient Units, and are unclear as to why these terms are used when others, such as Livestock Units, are already in use in local by-laws. As well, a few mentioned that they still did not fully understand certain requirements of the Regulation such as the Short Form Nutrient Management Strategy. In fact a few municipalities indicated that they would not accept the Short Form Strategy in the municipality because of a lack of understanding.

Not only is understanding of specific terms an issue, but so is interpretation of the legislation. For example, one municipality was concerned that the legislation's definition of "intensive" was different from the definition in the local by-law, and this difference in interpretation would have significant implications.

Concerns relating to operational aspects of the legislation were also expressed. These include the need for a land registry displaying all of the manure application agreements, the need for follow-up to be done to ensure that farmers are complying with their Nutrient Management Strategy/Plan, and the need for a model by-law on which municipalities can base their nutrient management by-laws so that they are in compliance with the Act.

2.23 Community Concerns and Perceptions

The municipalities also commented on the reaction of the community, both farming and non-farming, to the NMA and Regulation. Like the municipal staff themselves, the community has had a mixed reaction to the legislation, indicating both concern and content. The biggest concerns surrounding the Act are shown by the farming community and involve costs and time delays. Farmers are concerned that eventually they will have to update their operations in order to comply with the legislation (i.e. will have to add liners to their manure storage), and this will require a large monetary investment. Farmers, of smaller operations especially, may not be able to cover the costs of this up-

date because of a lack of funding from the provincial government, and may be forced to retire or go out of business.

Farmers have also indicated concern over the increased amount of time that will be required when applying for a building permit. Both the development of Nutrient Management Plans and Strategies and the wait surrounding the approval of the application by OMAF will cause time delays in the building process.

The majority of those from the non-farming community that are aware of the NMA and Regulation, as well as some farmers, have reacted positively to the legislation. The non-farming community is pleased that steps are being taken by the province to deal with livestock operations (although concern still exists over the smaller operations that are not regulated), and the farmers are pleased to have a standard set of rules to follow regarding nutrient management.

2.24 Municipal Workload

The municipal staff interviewed was asked to comment on any changes in their workload due to the implementation of the NMA and Regulation. Although a few municipalities indicated that their workload is unchanged, many stated that since the legislation was implemented their workload has increased. Those in the municipality dealing with the regulation of nutrient management must not only read and try to understand the legislation, but must also do the same for a number of other pieces of provincial legislation such as the proposed legislation for Source Water Protection. As well, municipal staff must be available to answer questions regarding the legislation and its requirements, and address the concerns of the community surrounding the legislation, while at the same time, keep up with day-to-day responsibilities. Not only is the increased workload a concern, but so too is the lack of compensation for this increase.

One person interviewed indicated a drop in workload and believed that this was due to the decline in the ability of Canadian livestock farmers to compete on the global market because of the increasing amount of regulation for Canadian operations. One municipality, since last year, experienced a drop from approximately 30 building permit applications last spring to 3 permit applications this past spring.

2.3 OMAF Staff Perspectives

For this initial interim report, two members of OMAF staff were interviewed to identify their perspective on any issues associated with the transition between provincial and municipal interests (please note that the final report will include a more comprehensive survey of OMAF staff perspectives). The biggest issue expressed by staff was that of the gap in regulation created during the implementation of the legislation. Even after July of 2005, existing and expanding operations under 300 NU will still not be covered by the NMA. If municipalities continue to apply their existing by-laws to operations under 300 NU, then inequalities in standards and guidelines between the large and the small operations may be created within the municipality. However, it is also realized that

implementing legislation of this scope requires time and therefore gaps will have to exist until the Act is fully implemented.

Another issue discussed by OMAF staff was that of the need for information systems. It was concluded that a land tracking system would be helpful to monitor manure spreading. Municipalities and the province need to work co-operatively on this matter.

2.4 Farm Leaders' Perspectives

For this report, two leaders in the farming community were also consulted to identify their perspective on any issues related to the continued involvement of municipalities in the regulation of new or expanding livestock facilities (please note that the final report will include a more comprehensive survey of farm leaders' perspectives). Once again, the biggest issue was that of consistency. The leaders of the farming community would like municipalities to change their by-laws to be consistent with the Regulation so that all areas of Ontario would fall under the same rules and guidelines concerning livestock operations. It was noted that some municipalities, especially those that have been openly against large livestock facilities and have used their nutrient management by-laws as a way of restricting livestock production, are contesting the superseding of the legislation and are using other by-laws, such as zoning, to get around the requirements of the Act. It is the hopes of the farming leaders that municipalities will one day accept this legislation and rules for livestock production will be equal across the province.

3.0 Provincial Approvals Process for Building Permits Under the Nutrient Management Act and Regulation – Municipal and Provincial Perspectives

3.1 Municipal Perspectives

Municipal staff was consulted to identify the timing required to process files under the Regulation. Those municipalities that have had applications approved under the Regulation spoke of varying experiences with the OMAF approvals process. The majority of municipalities indicated a fairly slow turn over rate for applications undergoing provincial approval, in some cases up to two months. This is quite lengthy when compared to the two to four weeks required for municipal approval. However, other municipalities have had good experiences with the provincial approvals and have had plans approved within three weeks. Staff indicates that the amount of time required often depends upon the quality of the application. Incomplete applications would take a longer amount of time than complete applications.

3.2 Provincial Perspectives

OMAF staff was also consulted to identify the timing required to process files under the Regulation. The mean turn around time as indicated by the province is approximately 30 days, but the amount of time required is dependent upon the quality of the application. If, once reviewed by staff, the application needs further work, it is sent back to the

consultants involved in the initial writing. A complete application that does not require further work by the consultant would take less time to approve than one that does require further work.

OMAF staff was also asked about the success and challenges of the approvals process. It was indicated that the current process of reviewing and approving plans is working well, but the process is evolving. Decisions regarding the interpretation of the Act in different situations present an ongoing challenge. As well, the relationship between the province and the municipalities is also evolving, as the province has realized that the municipalities are not as informed of the approvals process as once thought. The responsibilities of OMAF and the Ministry of the Environment regarding the compliance of the Regulation needs to be effectively communicated to the farm community. Currently the two ministries have a working relationship, but communication remains a priority.

Changes that would be made to the approvals process, as indicated by OMAF staff, include changes in staffing and information systems. An increase in the amount of staff involved in the process is recommended as it is predicted that once financial assistance is provided to the farming community, increases in the number of application plans will be seen and hence an increase in the workload (and potentially an increase in the amount of time required to process applications). OMAF staff indicated the need for two additional improvements: 1) an improvement in the information sharing between ministries and, 2) ongoing improvement in information sharing (i.e. land tracking) with municipalities.

4.0 Recommendations

The following recommendations address the issues identified through the survey and interviews with municipal staff, OMAF staff, and farm leaders and presented in this interim report.

Recommendation 1: Clarification Related to Financial Compensation

The issue of funding is a concern for some municipalities (related to a perceived increased workload). It is recommended that the Province discuss the concern that municipalities are not being properly compensated for their work further with municipalities to determine if these concerns are warranted.

Recommendation 2: Promotion of Tools

It is recommended that the Province continues to promote the awareness of Nutrient Management Plan/Strategy tools available to the public on the OMAF website.

Recommendation 3: Working Relationship between Province and Municipality

It is recommended that the amount of interaction between the Province and the municipality be increased (i.e. perhaps have an OMAF staff member visit the

municipality regularly to answer questions of staff and the community, and to provide assistance to farmers using OMAF approvals process).

Recommendation 4: Collaboration between Province and Municipality

It is recommended that the Province seeks further assistance for dealing with the issues outlined in this report from those that are currently working through the issues (i.e. municipal staff and consultants).

Recommendation 5: Further Training for Municipal Staff

It is recommended that the Province provides further training specifically for those that must enforce the Regulation at the municipal level (i.e. building officials) on interpretation and understanding the requirements and responsibilities of the legislation.

Recommendation 6: Promotion of By-law amendment

It is recommended that the Province undertakes to work with and inform municipalities of the advantages of amending their by-laws to make them consistent with the provincial Regulation.

Recommendation 7: Provide Examples of By-law changes to Municipality

It is recommended that the Province identify the types of changes that municipalities have made to their by-laws to ensure consistency with the provincial Regulation (i.e. increase or reduce the days of manure storage to 240 days, remove any land ownership requirements for spreading manure, remove any restrictions on the transportation of manure, change from Livestock Units to Nutrient Units, or remove any restrictions on earthen storage). This information should be made available to the public and shared with other municipalities.

Recommendation 8: Clarification Regarding Legal Authority of Section 61(1)

It is recommended that the Province continue to seek legal clarification concerning municipal by-laws (Nutrient Management and others) that are inconsistent with the provincial Regulation.

Recommendation 9: Promotion of Regulation to Farm Community

Municipalities reported that 16% of farmers have little understanding of the Regulation and 72% have some understanding of the Regulation. This suggests that the province and municipalities should continue to ensure that information is made available to the farm community and existing information packages should be evaluated to ensure that they are meeting this need.

Recommendation 10:

It is recommended that the Province focus resources on working with the communities where there are contentious issues (i.e. those municipalities that have indicated that they will continue to apply their by-laws despite section 61(1) tend to be those municipalities that have contentious issues).

Appendix A

Municipalities that Received Survey

Municipality of Brockton	Township of Edwardsburgh/Cardinal
Municipality of Arran Elderslie	Village of Merrickville-Wolford
Municipality of Kincardine	Municipality of Thames Centre
Municipality of South Bruce	Municipality of North Middlesex
Town of Saugeen Shores	Municipality of Southwest Middlesex
Town of South Bruce Peninsula	Township of Middlesex Centre
Township of Huron-Kinloss	Township of Lucan Biddulph
County of Brant	Township of Adelaide Metcalfe
Chatham-Kent	Township of Strathroy-Cardoc
Town of Mono	Norfolk County
Township of East Garafraxa	Municipality of Trent Hills
Township of Melancthon	Township of Alnwick/Haldimand
Township of East Luther Grand Valley	Township of Hamilton
Township of Brock	Township of Cramahe
Township of Scugog	Municipality of Port Hope
Municipality of Uxbridge	City of Ottawa
Municipality of Bayham	Township of South-West Oxford
Municipality of West Elgin	Township of Norwich
Municipality of Dutton/Dunwich	Township of East Zorra-Tavistock
Township of Malahide	Township of Zorra
Township of Southgate	Township of Blandford Blenheim
Township of Chatsworth	County of Perth
Township of Grey Highlands	Township of Perth South
Municipality of West Grey	Municipality of West Perth
Meaford	Township of Cavan-Millbrook-North
Township of Stirling-Rawdon	Monaghan
Township of Tyendinaga	Township of Havelock-Belmont-
Municipality of Bluewater	Methuen
Municipality of Huron East	Township of Otonabee-South Monaghan
Municipality of South Huron	Township of Asphodel-Norwood
Municipality of Morris Turnberry	Township of North Kawartha
Township of Howick	Stormont, Dundas and Glengarry
Township of North Huron	Township of North Dundas
Township of Ashfield-Colborne-	Township of South Stormont
Wawanosh	Township of South Glengarry
Municipality of Central Huron	Township of East Hawkesbury
City of Kawartha Lakes	Prince Edward County
Lambton County	Township of Ramara
Town of Plympton-Wyoming	Township of Evanturel
Town of Greater Napaness	Township of Chamberlain
Township of Stone Mills	Town of Erin
Township of Loyalist	Township of Guelph-Eramosa
	Township of Puslinch
	Township of Minto
	Township of Centre Wellington

Appendix B

Municipalities that Returned Survey

Municipality of Brockton
Municipality of Arran Elderslie
Municipality of Kincardine
Town of Saugeen Shores
Municipality of South Bruce
Town of South Bruce Peninsula
Town of Mono
Township of Brock
Municipality of West Elgin
Township of Malahide
Township of Southgate
Municipality of West Grey
Township of Stirling-Rawdon
Township of Tyendinaga
Municipality of Bluewater
Municipality of Huron East
Municipality of South Huron
Township of Howick
Township of North Huron
Municipality of Morris Turnberry
Municipality of Central Huron
City of Kawartha Lakes
Lambton County
Township of Stone Mills
Township of Loyalist
Township of Edwardsburgh/Cardinal
Village of Merrickville-Wolford
Municipality of Thames Centre
Municipality of Southwest Middlesex
Township of Adelaide Metcalfe
Municipality of North Middlesex
Township of Middlesex Centre
Township of Strathroy-Cardoc
Norfolk County
Municipality of Trent Hills
Township of Alnwick/Haldimand
Township of Hamilton

Township of Cramahe
Township of South-west Oxford
Township of Norwich
Township of East Zorra-Tavistock
Township of Zorra
County of Perth
Township of Perth South
Municipality of West Perth
Township of Cavan-Millbrook-North
Monaghan
Township of Havelock-Belmont-Methuen
Township of North Kawartha
Township of North Dundas
Township of East Hawkesbury
Prince Edward County
Township of Ewanturel
Township of Puslinch
Township of Minto
Township of Centre Wellington