Authority Annual Meeting Agenda

Thursday, January 15, 2026, 1:00 p.m.

1. **Land Acknowledgement**
   We begin our meeting today by respectfully acknowledging the Anishinaabeg Nation, the Haudensaunee, the Neutral, and the Petun peoples as the traditional keepers of this land. We are committed to moving forward in the spirit of reconciliation with First Nation, Métis, and Inuit peoples.

2. **Adoption of agenda**
   Recommendation: That the agenda of the Authority Meeting, January 15, 2026, be adopted as circulated.

3. **Declaration of pecuniary interest**

4. **Approval of minutes**
   That the minutes of the Authority Meeting, November 20, 2025, be adopted as circulated.

5. **Introductions of guests**

6. **Staff introductions**

7. **Chair's address – Tom Hutchinson**

8. **GM's address – Erik Downing**

9. **Election of officers**

   9.1 Appointment of Chair Pro Tem

   Recommendation: THAT _____be appointed as Chair Pro Tem for the purposes of conducting the election of officers for 2026.

   9.2 Appointment of Scrutineers

   Recommendation: THAT _____ and _____ be appointed as scrutineers for the election of officers as conducted on January 15, 2026.

   9.3 Election of Chair

   9.4 Election of Vice Chair

   9.5 Election of 2nd Vice Chair

   9.6 Election of Member-at-Large (if required)

10. Committee appointments

10.1 Appointments to Forestry Committee

10.2 Appointments to Property & Parks Committee

10.3 Appointments to Water Resources Committee

10.4 Appointments to Agricultural Advisory Committee

Recommendation: THAT the following Directors be appointed as members to the SVCA committees for 2026:

Forestry Committee: _____, _____, _____, and _____.

Property and Parks Committee: _____, _____, _____, and _____.

Water Resources Committee: _____, _____, _____, and _____.

Agricultural Advisory Committee: _____, _____, _____, and _____.

11. New business

Governance

11.1 GM-2026-01: Program Report

11.2 GM-2026-02: SVCA Workplan

11.3 GM-2026-03: Meeting Schedule

Corporate Services

11.4 COR-2026-01 -2026 Budget update – Erik Downing

Recommendation: THAT the apportionment amount of $2,829,657 for Category 1 operating expenses and capital costs be approved in accordance with Ontario Regulation 401/22, Section 27(4) of the Conservation Authorities Act;

THAT the Saugeen Valley Conservation Authority adopt the 2026 Budget in the amount of $6,493,483 as approved in principle, November 20, 2025; and

FURTHER THAT the General Manager/Secretary-Treasurer is hereby authorized to notify the member municipalities of the cost apportioning amounts owing; and

FURTHER THAT cost apportioning payments shall be due from member municipalities in two equal instalments on March 31 and June 30, 2026, and that late payments shall be subject to the Authority's standard late payment charge of 1.50% per month thereafter.

11.5 COR-2026-02: Statutory Administrative Approvals – Erik Downing

Recommendation: THAT the Saugeen Valley Conservation Authority Board of Directors re-affirm for 2026 the Health and Safety Policy; and

FURTHER THAT the Saugeen Valley Conservation Authority Board of Directors Re-Affirm for 2026 the Workplace Violence, Harassment, and Sexual Harassment Policy.

11.6 Appointment of Auditor

Recommendation: THAT Baker Tilly SGB LLP be confirmed as the auditor to the Authority for the year 2026.

11.7 Appointment of Solicitor

Recommendation: THAT Beard Winter LLP, Loucks and Loucks LLP, and Mathews, Dinsdale & Clark LLP be appointed solicitors to the Authority for the year 2026 for general operations, with the option to engage the services of other local solicitors, as necessary.

Environmental Planning and Regulations

11.8 EPR-2026-01: EPR Correspondence – Matt Armstrong

11.9 EPR-2026-02: Bruce County MOU – Brandi Walter

Recommendation: THAT Saugeen Valley Conservation Authority endorse the updated Memorandum of Understanding for Planning Review Services Between SVCA and the County of Bruce; and

THAT the updated Memorandum of Understanding be circulated to Bruce County Council for review and approval.

11.10 EPR-2026-03: Amendments to 2026 EPR Fee Schedule – Matt Armstrong

Recommendation: Recognizing the potential for 2026 Provincial direction relative to Environmental Planning and Regulations Fees;

THAT the Saugeen Valley Conservation Authority board of directors approve the proposed amendments to the 2026 EPR Fee Schedule; and

THAT should Conservation Authorities receive provincial direction to alter Fees, that SVCA staff implement those changes, as required.

Forestry and Lands

11.11 LAN-2026-01: SVCSV Agreement Review – Donna Lacey

12. Correspondence

13. Closed Session

Recommendation: THAT the Authority move to Closed Session, In Camera to discuss matters related to identifiable individuals; and

FURTHER THAT Erik Downing, Izabela Polowa, and Ashley Richards remain in the meeting.

14. Other business

15. Adjournment

THAT the January 15, 2026 meeting of the Authority be adjourned.

Public Notice:
Saugeen Valley Conservation Authority (SVCA) is committed to providing accessible information and communications in accordance with the Accessibility for Ontarians with Disabilities Act (AODA). If the format of this document interferes with your ability to access the information, please contact us at www.saugeenconservation.ca/access, email accessibility@svca.on.ca or call 519-364-1255. We will provide or arrange for the provision of an accessible format or communication support, at no additional cost, in a timely manner.

Saugeen Valley Conservation Authority

Minutes – Board of Directors Meeting

Date:	Thursday November 20, 2025, 10:00 a.m.
Location:	1078 Bruce Rd 12, Formosa, ON, N0G 1W0 and hybrid
Chair:	Tom Hutchinson
Members present:	Paul Allen, Larry Allison, Barbara Dobreen, Kevin Eccles, Bud Halpin, Steve McCabe (arrived at 10:30 a.m.), Gregory McLean (virtual, left meeting at 3:00 p.m.), Dave Myette, Mike Niesen, Sue Paterson, Moiken Penner, Jennifer Prenger (virtual), Bill Stewart, Peter Whitten (arrived at 1:00 p.m.)
	Staff present: Erik Downing, Adam Chalmers, Donna Lacey, Matt Armstrong, Katie Thomas, Ashley Richards, Emily Williamson, Darren Kenny, Izabela Polowa

The meeting was called to order at 10:00 a.m.

1. Land Acknowledgement – read by Bud Halpin

We begin our meeting today by respectfully acknowledging the Anishinaabeg Nation, the Haudenosaunee, the Neutral, and the Petun peoples as the traditional keepers of this land. We are committed to moving forward in the spirit of reconciliation with First Nations, Métis, and Inuit peoples.

2. Adoption of Agenda

Motion #G25-79

Moved by Moiken Penner

Seconded by Kevin Eccles

THAT the agenda for the Saugeen Valley Conservation Authority meeting, November 20, 2025, be adopted as amended, to add a staff introduction item and to defer the scheduled delegation to a later point in the agenda.

Carried

3. Staff Introduction

The Board of Directors were introduced to the new corporate services administrative assistant and accounts payable clerk.

4. Declaration of Pecuniary Interest

There were no declarations of pecuniary interest relative to any item on the agenda.

5. Adoption of Minutes

5.1 Authority meeting September 18, 2025

Motion #G25-80
Moved by Paull Allen
Seconded by Sue Paterson
THAT the minutes of the Saugeen Valley Conservation Authority meeting, October 16, 2025, be adopted as presented.

Carried

6. Delegation – HK Mapping, Michael Bayer

A delegation titled "Huron Kinloss Citizens Concerns – SVCA Flood Map Project" was received by the Board of Directors. Mr. Bayer provided some background and concerns with the project, informed the Board of Directors of a petition and letters of support to the Legislature Assembly of Ontario. The petition calls on the province to "Enact legislation to prevent municipalities using Conservation authorities to de facto seize and sell property owners' property to increase tax revenue", "Test new computer flood map models against historical data and local knowledge. The external review by another engineering company is not sufficient", and "Remove the arbitrary 15–37 metre hazard line setback as mandated by the Ontario Government from hazard lines and refine SVCA floodplain maps."

Mr. Bayer was thanked for his time.

7. Matters Arising from the Minutes – none

8. New Business

8.1 GM-2025-25: 2026 SVCA Budget Communications

The GM/S-T reported that the 2026 Budget Communications Toolkit has been completed and circulated to Directors. The toolkit outlines the MCVA apportionment model, provides comparison tables, and offers talking points to support consistent discussions with member municipalities. The initiative is intended to improve clarity and transparency during municipal budget processes and that finance staff of member municipalities were integral to this effort.

8.2 GM-2025-26: 2026 SVCA Budget

Motion #G25-81
Moved by Kevin Eccles
Seconded by Steve McCabe
THAT the SVCA Board of Directors approve the 2026 draft budget in principle;
THAT $84,000 be taken from Category 1 reserves, to be applied toward apportionment; and
FURTHER THAT staff be authorized to forward the draft budget to the Authority's watershed municipalities for a 30-day review and commenting period and include the offer of a delegation if requested.

Carried

The motion to approve the 2026 SVCA Draft Budget in principle was amended following discussion, to reflect the a 1.6% apportionment increase, made by allocating $84,000 from category 1 reserves to apportionment. Several Directors expressed hesitation about drawing from reserves given early discussions regarding potential regional conservation authority amalgamation, noting that reserves can be directed by the Board at any time.

Staff reviewed the distinction between Category 1, 2, and 3 programs and services. Category 1 activities are mandatory under O.Reg 686/21 and funded through cost apportionment. This includes natural hazard management and related activities, conservation and management of authority owned lands (including maintenance of facilities, trails, parking, and other capital assets related to public recreation), as well as general administration of the authority. Category 2 programs are delivered through municipal agreements. Category 3 activities are programs that further conservation but are funded either through self-generated revenue (ie. campgrounds) or through cost apportioning agreements (ie. the SVCA Water Quality Program).

The Board discussed the Modified Current Value Assessment process and weighted vote procedure used to approve apportionment and the final budget. Directors with a higher apportionment value carry a larger portion of the total vote and attendance is required to vote.

Clarification was provided on reserve categories. Category 1 reserves reflect overages from mandatory programs. Category 3 reserves reflect exceedances of self-generated revenue. Special Projects reserves relate to initiatives such as the Environmental Baseline Monitoring Program for the Nuclear Waste Management Organization.

The provincial fee freeze related to Environmental Planning and Regulations fees was touched on, with Director Halpin noting that this loss of revenue is downloaded to the ratepayer.

8.3 CS-2025-27: 2026 Fee Schedule

Motion #G25-82
Moved by Steve McCabe
Seconded by Bill Stewart
THAT the Board of Directors of Saugeen Valley Conservation Authority approve the amendments to the attached Fee Policy, and approve the following fee schedules to take effect on January 1, 2026 (Schedules A, C and D).

Carried

The GM/S-T reported that the Fee Policy has been updated to reflect the completion of the Environmental Planning and Regulations Fee Review. Manager Armstrong clarified that provincial communication regarding the fee freeze prevents any changes to EPR fees. Staff confirmed that while a suggestion was made to create a new fee for meeting the provincial 21 to 29 day review window, SVCA already issues permits within 3 to 5 days of receiving a complete application. A Director also noted that introducing such a fee, even if permitted, would create financial inequity.

8.4 CS-2025-28: 2026 Finance Report

Manager Chalmers presented financial statements through June 2025. Director Dobreen inquired whether additional statements would be brought forward, and staff confirmed that more reports will be provided. Director Allison inquired as to the expected frequency, the intention of presenting them at every meeting or every other meeting in 2026 was expressed. It was noted that Corporate Services has experienced a challenging year, with leaves of absence and subsequent vacancies affecting finance support for the majority of the year.

8.5 GM-2025-29: SVCA Operational Plan

The GM/S-T presented the SVCA Operational Plan to date. Director Dobreen requested an opportunity to review the signed Children's Safety Village agreement. Manager Lacey advised that she would provide a report to the Authority at a future meeting.

8.6 GM-2025-30: Program Report

The GM/S-T highlighted the inclusion of communications metrics within the SVCA program report as well as a summary table of EPR permits issued between September 25 and October 23, 2025.

8.7 GM-2025-31: 2026 Provincial Announcement on Conservation Authority Restructuring

Director McCabe remarked that the proposed Huron-Superior regional conservation authority was large and questioned where contributions were to come from. Director Myette inquired as to the source of these changes, and the GM/S-T explained these changes were issued through the Ministry of the Environment, Conservation and Parks. Chair Hutchinson shared the understanding that regional conservation authorities would be absorbing the assets of the local conservation authorities. Director Dobreen thanked SVCA staff for clear and quick communication regarding the proposed changes. The Authority was assured that additional information would be coming from staff to member municipalities as correspondence, aligned with Conservation Ontario's approach, to support municipal submission to the Environmental Registry of Ontario.

8.8 EPR-2025-12: Proposed Changes to Huron-Kinloss Regulation Mapping

Motion #G25-83
Moved by Larry Allison
Seconded by Kevin Eccles
THAT the Saugeen Valley Conservation Authority approves the proposed changes to the Huron-Kinloss Regulation Mapping.

Carried

Staff presented the proposed updates to the Huron-Kinloss regulation mapping, completed in accordance with Ontario Regulation 41/24 and supported by federal FHIMP funding. Updated flood hazard mapping for seven watercourses, based on new LiDAR data and peer-reviewed modelling, allows SVCA to shift from broad Screening Area mapping to more precise Regulated Area mapping. Extensive public engagement occurred from 2023 to 2025, including mailed notices, door-to-door outreach, media releases, digital communication and three public meetings, with strong attendance and constructive feedback.

The proposed updates result in a net reduction of approximately 25.37 hectares of land requiring SVCA review and replace 71 hectares of Screening Area with refined Regulated Area, which will improve review efficiency. Draft mapping for the Pine River is available only for the section west of Lake Range Drive, with the eastern section expected in 2026. If approved, staff will begin using the new mapping immediately and will update SVCA and Bruce County GIS platforms.

Director Stewart raised concern regarding changes to shoreline management beyond the 100-year flood event level. Manager Armstrong confirmed that the 100-year event remains the standard benchmark and explained that the increase relates to dynamic beaches which account for approximately 40 percent of shoreline within SVCA boundaries. It was noted that under O.Reg. 41/24, which established a single regulation for all conservation authorities, SVCA was required to add an additional fifteen metre allowance to dynamic beaches reflect provincial direction.

Director Allison observed that the recent Huron Kinloss delegation had conflated SVCA 2025 regulation mapping updates with the 2024 provincial changes to shoreline regulation and reiterated that the delegation remains focused on reducing the provincially mandated fifteen metre shoreline buffer.

It was noted that the delegation stated SVCA requires the use of SVCA approved or mandated contractors. Staff confirmed this is not the case and that applicants may use any qualified professional. Directors inquired about insurance implications, and staff explained that insurance companies set their own rates and rely on their own risk mapping and calculations, which can be significantly more stringent than SVCA standards. Staff reiterated that the fifteen metre shoreline change did not originate from SVCA but was required through provincial regulation changes.

8.9 EPR-2025-13: Status of Active Violations

Staff reported that as of November 3, 2025, there are 44 active violation files, compared with 54 in April 2025. Most files fall within categories involving activities unlikely or likely to cause significant damage, and no files are rated in the highest risk category. Two violation matters are before Provincial Offences Court; one has recently been resolved and the other is awaiting a trial date. Staff continue to resolve files through compliance approvals and site remediation where possible.

Director Prenger asked that future reports include plus and minus values to show changes by category, as the current report provides only net totals. It was also noted that the violations policy can be reviewed to incorporate considerations for repeat offenders if directed by the Board. Staff noted that SVCA aims for voluntary compliance wherever possible, as hearings and court proceedings are costly for both the Authority and the individuals involved. Chair noted an interest to revisit and receive a staff update on SVCA Violation Strategy's approach to repeat violators.

8.10 WR-2025-09: 2024 Water Quality Annual Report

Staff presented the 2024 Water Quality Annual Report and noted that certain exceedances, such as nitrogen, reflect a single sampling moment, which reinforces the importance of long-term trend data. Directors asked about the sources of exceedances. Manager Thomas explained that the Water Quality Program's role is to monitor and collect data, to examine trends at a watershed scale, and that staff could pursue point source evaluation if resources were made available.

8.11 Other Business – none

9. Adjournment

With no further business to discuss, the meeting was adjourned at 3:17 p.m. following a motion by Moiken Penner and seconded by Sue Paterson.

_____	_____
Tom Hutchinson	Ashley Richards
Chair	Recording Secretary

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2026 AGM Chairs Address

I want to start by acknowledging the people in this room and those we work with every day. Our member municipalities, our board, our staff, our neighbouring CAs, and the taxpayers across the watershed. The work of Saugeen Valley Conservation Authority only happens because of that collective effort.

Over the past few months, we have all been paying close attention to the Environmental Registry of Ontario and the Province's direction around Conservation Authorities, including the proposed amalgamation. I want to be clear. While I am disappointed by the provincial announcement and what it could mean for local governance and decision making, I am incredibly proud of the work that has been done here, collectively, over the past 75 years.

That work is real, it is measurable, and it is rooted in partnership. Every day, conservation authorities and municipalities work side by side for the benefit of our communities.

We see it in flood forecasting and warning and infrastructure management, where SVCA water resources staff work directly with municipal operations and emergency management teams to protect lives, homes, roads, and infrastructure.

We see it where where data, modeling, and local knowledge come together to support sound municipal decision-making, or agricultural practice adjustments.

We see it in forestry, where the SVCA forestry and lands team works with municipalities on tree planting and hazard tree projects that strengthen local landscapes and support rural economies.

We see it in planning and development, where SVCA staff provide Planning Act comments on applications across the watershed. That work helps municipalities make informed decisions, ensures development happens in appropriate locations, and reduces long-term risk to people and property.

We see it through our permitting program, which supports safe community growth by ensuring that development near watercourses, floodplains, and hazardous lands is done responsibly. These permits are not about stopping development. They are about guiding it safely, so communities can grow without creating future problems that taxpayers will be left to fix.

We see partnership in the day-to-day relationships between SVCA staff and municipal staff who know their communities and care deeply about them.

These partnerships deliver real economic benefit by reducing risk, protecting infrastructure, and supporting sustainable development. They also deliver social benefit by protecting public safety, preserving green space, supporting recreation, and maintaining the environmental quality that makes our watershed a good place to live, work, and raise families.

Through municipal support, generations of residents have invested in conservation programs, flood protection, watershed management, and the conservation lands the public knows and loves today. Those investments built trails, grew forests, protected valuable wetlands.

I also want to acknowledge the many landowners and families who entrusted land to this Authority through donation. That trust is something we take seriously. Our conservation lands are not just parcels on a map for inventory. They are places of memory and meaning. Memorial groves where families have planted trees in honour of loved ones. Trails walked by generations.

While there may be uncertainty ahead at the provincial level, what does not change is the value of the work done here, the strength of local partnerships, and the dedication of staff, board members, and municipalities who continue to work together in good faith.

Seventy-five years of conservation in the Saugeen watershed did not happen by accident. It happened because communities believed in local decision-making, shared responsibility, and long-term thinking. That legacy matters, and it is something we should all be proud of.

Thank you to our municipal partners, our staff, our board, and our taxpayers for your continued trust and support. It is an honour to serve as Chair of Saugeen Valley Conservation Authority, and I am proud of what we have accomplished together no matter what the future brings.

Thank you.

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2026 AGM GM Address

2025 was a full year. A busy one. A year where the work mattered, where it showed up in the field, in council chambers, and sometimes, quietly, behind the scenes where most of our best work tends to live.

Before I get into specifics, and I will, department by department, I want to say this clearly and right up front. The organization did not just get through the year. It moved forward. That doesn't happen by accident. It happens because staff show up, adapt, solve problems, help each other out, and keep doing the work even when conditions are not perfect, the weather isn't cooperating, or external forces seem to conspire against us at the most inopportune times.

Starting with Environmental Planning and Regulations, because this was a year where foundational work really came into its own. The new Content Management System, which is now fully in use, has already changed how information is managed, accessed, and shared, and while systems like that rarely get applause, they quietly make everything else work better. The updated Policies Manual, now live and in use, is another example of that same steady progress. It gives clarity, consistency, and confidence, both internally and externally.

Outreach was a major theme this year as well. The Amish and Mennonite outreach materials, including mapping and tailored information, were completed and delivered to two of these communities, with another eight communities identified across the watershed. That work will continue into 2026, and it's a good example of meeting people where they are, respectfully, practically, and with the right tools in hand. Outreach to real estate law offices is underway, an online webinar is planned, and we're continuing to modernize how planning information is shared and understood.

There was also strong progress on mapping and policy work. Draft regulation mapping for large areas of Huron-Kinloss was completed and brought forward for public presentation in October, with Board approval shortly thereafter. The Southampton two-zone floodplain modelling and mapping was completed as well. Draft updates to Planning Service Agreements with our member municipalities moved forward, reinforcing those long-standing working relationships that make the system function.

In Forestry and Lands, 2025 was very much a year you could see. SVCA planted over 26,000 seedling and 4,400 landscape stock trees for over 35 landowners. Managed Forest Tax Incentive plans were renewed or created for 20 landowners.

Videography at Saugeen Bluffs through RTO7 helped tell the story of that site in a new way. Water system improvements at Saugeen Bluffs were completed. The hydro expansion project at Durham Conservation Area moved ahead, improving both service and capacity.

Stoney Island Conservation Area saw significant improvements thanks to the FedDev grant, including bridge replacements, trail remediation, and a new vault privy, all of which improve safety, accessibility, and the overall visitor experience. Stoney Island and Sulphur Spring Conservation Areas saw the update and renewal of partnership agreements with local groups, leveraging SVCA properties to improve not only the watershed, but watershed residents' lives. Brucedale Conservation Area welcomed a new playground, Formosa Conservation Area officially opened to the public. That's a lot of ground covered, quite literally.

Flood Forecasting and Warning had a year that reminded us why this work is so critical. The stream gauge and weather station network was expanded and upgraded. Eleven flood messages were issued, each appropriately timed and effective, which is exactly what you want to be able to say in hindsight. The Collaborative Water Data Viewer was launched, the WATFLOOD forecasting model was implemented, and a Canada Summer Jobs grant supported additional capacity.

Frazil ice monitoring and response, done in collaboration with municipal partners, stood out again as an example of strong coordination under challenging conditions. This is work that often happens quickly, in bad weather, with no margin for error, and it was handled well.

In Water Resources, the list is long, and that's not a criticism. Risk evaluation planning advanced, a QA/QC data plan was developed, accountability plan research continued, and easement research moved forward. Major infrastructure work included Durham Upper Dam Phase 2 Class EA, gravel bar cleanout below the Durham Lower Dam, rock relocation at the Upper Dam, the Paisley Cleanout Project, new dam safety signage and fencing, and ongoing inspection and maintenance across multiple sites. This is steady, essential work.

For Category 2 programs, inspection and maintenance continued in line with agreements, a public safety plan for Hanover Dam was completed, a fencing and fall arrest system was installed at Mount Forest Dam, and CCTV inspection of the Paisley Dyke was carried out. Again, not flashy work, but critical work.

Category 3 programs continued to deliver value as well. Water Quality Annual Report delegations moved forward with watershed municipal councils, collaboration with Bruce Power continued, and annual programs were completed as planned. These partnerships matter, and they continue to be a strength for SVCA.

Finally, Corporate Services, which had a year that combined logistics, people, and a fair bit of problem-solving. Event planning and support for SVCA's 75th Anniversary Celebration was a major undertaking, and a successful one.

When you look at all of this together, and it's worth doing that once in a while, what stands out to me is not just the volume of work, but the balance. Field work and policy. Systems and relationships. Planning for the long term while responding to immediate needs. That balance doesn't happen automatically. It happens because people pay attention, communicate, and care about doing the job properly.

So, thank you. For the long days, the cold ones, the complicated files, the site visits, the meetings that ran over, and the steady professionalism that keeps this organization moving

forward. We're heading into another year with plenty ahead of us, but also with a strong foundation under our feet, which makes all the difference.

Let's keep going, more or less the same way we always do, thoughtfully, collaboratively, and with an eye on both the forecast and the long view.

Thanks everyone.



Summer student doing flow measurements for flood forecasting and warning.

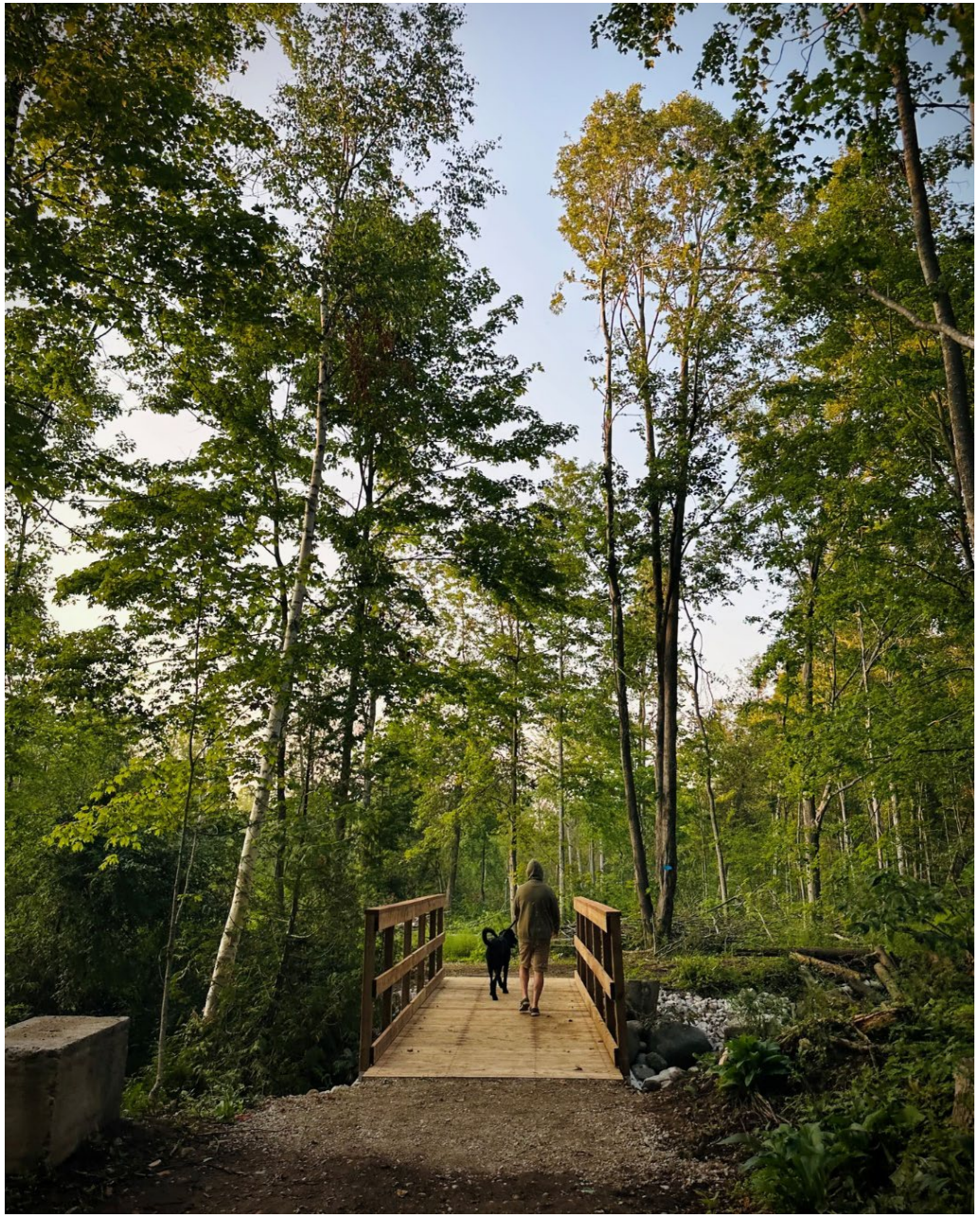
Mount Forest Dam with new fencing in the background.





Staff at Neustadt Dam performing inspections.

Bridge replacement at Stoney Island through FedDev.





Many upgrades were performed to the hydrological stations.



Winter camping at Durham Conservation Area.



Oct 1, 2025 HK Reg Mapping public meeting in Point Clark.

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Program Report GM-2026-01

General Manager/ Secretary-Treasurer's (GM/S-T) Report

November 18, 2025 – Ministry of Environment Conservation and Parks (MECP) hosted online information center on proposed amalgamation of Conservation Authorities (CA).

November 24, 2025 – Upper Thames Region CA hosted Southwestern General Managers (GM) meeting to discuss emergent issues and MECP CA amalgamation proposal.

November 25, 2025 – Maitland Valley CA hosted Lake Huron CA GMs and Chairs to discuss messaging around MECP proposed CA amalgamation.

November 26, 2025 – All CAs GM meeting (digital) to discuss MECP proposed CA amalgamation.

November 28, 2025 – Source Protection Committee Meeting (digital due to weather).

December 4, 2025 – Site Meeting. Development matter Hanover with Chair.

December 4, 2025 – Water Resources Committee Meeting (virtual, weather).

December 5, 2025 – SVCA Agricultural Advisory Committee Meeting.

December 8, 2025 – MECP Huron-Superior Regional CA meeting (GM and Past Chair attendance alongside other SVCA Directors invited via member municipalities) concurrent with Conservation Ontario Council Meeting. Vice Chair attended that meeting on behalf of SVCA.

December 8, 2025 – Bruce Power C Expansion Socio-Economic impact review call, WSP.

December 9-10, 2025 – Conservation Authorities University – CA Finances and Budgeting, In person, King City.

December 10, 2025 – Conservation Ontario ERO Posting GM discussion to MECP's proposed CA Amalgamation.

December 11, 2025 – Grey County Council attendance to support Grey County staff report in opposition of MECP proposal to amalgamate CAs as proposed.

December 11, 2025 – Conservation Ontario Council Meeting, digital. GM and Vice Chair participation.

December 12, 2025 – Meeting with MPP Thompson, Mayor Don Murray Huron-Kinloss, SVCA Director and Huron-Kinloss mapping petitioner.

December 12, 2025 – Lake Huron Coastal Centre Board Meeting.

December 15, 2025 – GM Completed two Administrative Reviews regarding two proposed permit applications.

December 16, 2025 – Flood Duty Training SVCA – All SVCA involved staff.

December 18, 2025 – CKNX radio interview regarding Conservation Authority amalgamation.

Corporate Services

During December and into January, Corporate Services remained focused on stabilization, onboarding, and completing several high priority operational deliverables. While the pace was fast, the work was substantive and foundational.

Both the Accounts Receivable and Accounts Payable positions have now been filled, with new staff successfully onboarded and actively working in their roles. Additional finance support has also been brought on to strengthen capacity, particularly as work continues getting financial systems current and accurate. New team members are already contributing and becoming familiar with SVCA systems, priorities, and processes.

December also marked a period of transition within the department, with a recent staff departure and Ashley Richards temporarily stepping into the Acting Manager role for Corporate Services. Several critical deliverables were immediately undertaken, including payroll reconciliation, updates to taxable benefits, critical invoicing, and payment adjustments.

To support workload management and ensure consistency in public communications, a communications contractor has been retained to manage social media activity. This support allows internal staff to remain focused on core operational and financial priorities while maintaining a steady public presence.

In December, Corporate Services staff participated in a guided outing across the watershed with Donna Lacey, Manager of Forestry and Lands. The tour included visits to several SVCA properties, including the headwaters of the Saugeen watershed, and provided valuable context and connection to the lands and programs the department supports. A photo from the outing is attached.

As the New Year begins, Corporate Services has clear, immediate goals related to reconciliation and system alignment, supported by a capable and engaged team.



Northern most headwaters of the Saugeen Conservation watershed.

Environmental Planning & Regulations (EPR)

Huron-Kinloss Regulation Mapping Updates

Mapping is live and in effect. Work continues on the Pine River upstream of Lake Range Drive.

Updated Planning Agreements

EPR staff are working to update Planning Services Agreements with our member counties and municipalities. A draft of the updated SVCA/MVCA/GSCA/Bruce County will be presented to the Board imminently.

Southampton Two-Zone Floodplain Project

Staff attended a PIC on November 19, 2025, in Southampton regarding the recently endorsed Two-Zone Floodplain Concept for areas of Southampton.

Amish/Mennonite Outreach

Staff are scheduling meetings with leaders of the Amish and Mennonite communities to raise awareness of environmental planning and regulations.

Permits Issued Pursuant to Section 28.1 (1) of the *Conservation Authorities Act*

The following 29 permits were issued between October 23, 2025 and December 31, 2025.

Permit	Municipality	Description of Works
25-244	Huron-Kinloss	Installation of an armour stone retaining wall and slope drainage system.
25-245	Brockton	To complete interior repairs to Structure 1510010 including filling abutment and footing voids with concrete, and installing steel braces.
25-246	Kincardine	To remove an existing retaining wall and regrade an approximately 4-foot by 8-foot portion of slope; install an Invisarail railing with concrete base and helical piles; remove and replace interlocking, stepping stone and flagstone walkways, and a flagstone patio; install a patio stone curb; place gravel for a shed pad; pour a concrete shed pad; and remove grass and place aggregate for parking, with related excavation, filling and grading.
25-247	West Grey	To construct a feed bunker and commodity bay, with related excavation, filling and grading.
25-248	Brockton	To construct a 1920 square foot pavilion, with attached and enclosed storage area, with related excavation, filling and grading.
25-249	Kincardine	To remove a former pedestrian bridge's east pier; regrade a portion of the slope, once the east pier is removed; extend an existing storm pipe; and place-rip-rap, with related excavation, filling and grading.
25-250	Hanover	To construct a duplex with covered porches and decks, with related excavation, filling and grading.

Permit	Municipality	Description of Works
25-251	Saugeen Shores	Removal of an existing wooden retaining wall and installation of a Redi-Rock retaining wall, granite boulder revetment, and the relocation of existing stairs and deck, with associated excavation and grading.
25-252	Minto	Construction of additions to the existing dwelling, removal of existing detached garage, installation of new sewage disposal system, and related excavation, filling, and grading.
25-253	Southgate	Construction of a new 1,792 sq. ft. farm storage shed, with related excavation, filling and grading.
25-254	Arran-Elderslie	To install fibre optic services by horizontal directional drill and plow in multiple locations (Project TARA-UG03, TARA-UG04, TARA-UG06, TARA-UG08, TARA-UG11, TARA-UG12) with related excavation, filling and grading.
25-255	Saugeen Shores	To install fibre optic services by horizontal directional drill and plow in multiple locations (Project BURG-UG01 to BURG-UG09, BURG-UG11 to BURG-UG27, BURG-UG31 to BURG-UG36, BURG-UG38) with related excavation, filling and grading,
25-256	West Grey	To construct a 4661 square foot two-storey dwelling with attached garage, covered porches, laneway, and parking area; and install a raised sewage disposal system, with related excavation, filling and grading.
25-257	South Bruce	Installation of fibre-optic services by horizontal directional drill and plow in multiple locations (Project Otter Creek OLT - WKTNON101-MC01, 02, 05, 06, 07, 10) with related excavation, filling and grading.
25-258	Minto	Replacement of an existing deck with covered porch and construction of a new 1,200 sq. ft. detached garage with related excavation, filling and grading.
25-259	Kincardine	For the alteration of watercourses by horizontal directional drill using water, and works within and adjacent to floodplain and adjacent to wetland by horizontal directional drill and open trench, consisting of the installation of fibre optic cable, with related excavation and grading.
25-260	West Grey	To construct a 1408 square foot storage building, with related excavation, filling and grading.
25-261	Saugeen Shores	The proposal is to construct two new storm infiltration galleys within the beach and boardwalk area west of Peel Street with associated excavation and filling. The first infiltration galley will measure approximately 20.0 metres in length, 4.0 metres in width, and 1.32 metres in depth, while the second galley will measure approximately 28.8 metres in length, 8.0 metres in width, and 1.32 metres in depth.
25-262	Kincardine	For the alteration of watercourses by horizontal directional drill using water, and works within and adjacent to floodplain and adjacent to wetland by horizontal

Permit	Municipality	Description of Works
		directional drill and plow trench, consisting of the installation of fibre optic cable, with related excavation and grading.
25-263	Huron County	Demolition of an existing 116 sq. m. cottage, garage, and shed and construction of a new 775 sq. m. single detached residence with related excavation, filling and grading.
25-264	Grey Highlands	To demolish the existing garage and construct a new 768 square-foot garage, with related excavation, filling and grading.
25-265	West Grey	To construct a 4140 square-foot shed attached to an existing barn as well as a new gravel barn yard, with related excavation, filling and grading.
25-266	Huron-Kinloss	Construction of a 3,832 sq. ft. two story single detached residence, install a new septic system and construct a retaining wall on a vacant lot with related excavation, filling and grading.
25-267	South Bruce	Interference with a watercourse consisting of the installation of fibre-optic cable (Project 367-1-SA06-W-A9B-30 SDRD N-IFA) by horizontal directional drill with water and within floodplain by horizontal directional drill and plow with related excavation and grading.
25-268	Arran-Elderslie	To construct a 9676 square-foot workshop, septic system with related excavation, filling and grading.
25-269	West Grey	Demolition of an existing residence and construction of a new 1731 sq. ft. partial two-story single family residence with associated excavation, filling, and grading.
25-270	Southgate	Demolition of an existing detached accessory building, and construction of a new detached accessory building, and related excavation, filling, and grading.
25-271	Brockton	For the alteration of a watercourse by horizontal directional drill using water, and works within and adjacent to floodplain and adjacent to wetland by horizontal directional drill and plow, consisting of the installation of fibre optic cable, with related excavation and grading.
25-272	West Grey	Install systematic tile drainage with six outlets, including one on the neighboring property to the west, with all outlets discharging to the intermittent watercourse on the subject property.
25-273	Southgate	Like-for-like replacement of existing road culvert crossings #342, 344, 348 and 349, with related excavation, filling and grading.
25-274	Southgate	Installation of systematic agricultural drainage tile with multiple outlets to watercourse, with related excavation, filling and grading.

Permit	Municipality	Description of Works
25-275	Kincardine	To construct a 2131 square foot single family, two-storey dwelling, with a basement, attached garage, covered porch, deck, and laneway; and install a raised sewage disposal system, with related excavation, filling and grading.
25-276	Arran-Elderslie	Installation of fibre-optic services by horizontal directional drill using water and plow (Project Chesley POP - BYDLON104-DP01-MC15-UG) with related excavation, filling and grading.
25-277	Brockton	To construct a 504 square foot shade structure with concrete pad, and a concrete patio and sidewalks, with related excavation, filling and grading.
25-278	West Grey	To regrade approximately 262 feet of a slope nearest the west property line to a 3:1 profile, with related excavation and grading.
25-279	Brockton	To construct a 248 square foot garage addition onto an existing attached garage, with related excavation, filling and grading.
25-280	South Bruce	Construction of a 48 foot (east-west) by 28 foot (north-south) detached accessory building, and related excavation, filling, and grading.
25-281	Brockton	To demolish an existing dwelling and detached garage, to construct a new dwelling with attached garage and a detached garage, and to install services from South Street via trenching, with related excavation, filling and grading.
25-282	West Grey	Remove the existing rear roof, extend the rear exterior walls to 8 feet in height, and convert the current upper level into a full second story to create additional habitable space.
25-283	Saugeen Shores	To construct a 2567 square-foot single detached dwelling and a 1876 square-foot detached garage.
25-284	Saugeen Shores	To replace a sewage disposal system, with related excavation, grading and filling.
25-285	Southgate	Demolition of an existing detached accessory building and construction of a new detached accessory building.
25-286	Huron-Kinloss	Demolition of an existing cottage and construction of a new single detached, two story 2,054 square foot residence and septic system with related excavation, filling and grading.
25-287	Arran-Elderslie	The proposal is to demolish the existing 24' x 24' building and construct a new 38' x 44' outbuilding in its place. The approved works include excavation and backfilling associated with the new structure, as well as the placement of approximately 30–35 cubic yards of fill.
25-288	South Bruce	Installation of fibre-optic cable by plow and directional drill (327-367 HWY 9 - IFA MC) and associated excavation and grading.

Permit	Municipality	Description of Works
25-289	Arran-Elderslie	To construct a 1600 square-foot house and a detached 336 square-foot garage, with related excavation, filling and grading.
25-290	Saugeen Shores	Construction of a new 34.4 square metre park washroom building on a concrete pad with related excavation, filling and grading.
25-291	Southgate	Widen an existing farm laneway entrance including culvert replacement with related excavation, filling and grading.
25-292	Huron-Kinloss	Interference with a watercourse consisting of the completion of maintenance works on the Kincardine-Kinloss Municipal Drain consisting of a bottom only cleanout and brushing of one bank slope and top of bank.
25-293	Grey Highlands	To install 110m of 6-inch plastic gas main, with related excavation, backfilling and grading.
25-294	Southgate	Complete renovations to an existing single-family residence including raising of the roof line.
25-295	Huron-Kinloss	Demolish an existing cottage and construct a new single detached 3571 sq. ft., two story residence with related excavation, filling and grading.

Forestry and Lands

Lands Report

Staff evicted two people from two different sites that were camping in areas that are not designated for camping, without incident. Cleanup of the sites was completed by staff in a timely fashion.

Forestry staff have been completing tree marking and site visits on private properties.

Hazard tree removal has been ongoing.

The gender-neutral vault privy has been opened at Stoney Island CA. This was one of the last upgrades being made through the grant opportunity. Work remaining is the installation of a new kiosk at the trailhead.

The hydro expansion project completion has been a little delayed due to the depth of snow received and subsequent removal. It is anticipated that the newly serviced sites will be available for winter camping in January.

Staff have spent a surprising amount of time clearing snow in November. This continued into December. The early snowfalls with multiple melts over the last two years have been time consuming.

Staff have been responding to a higher than usual request for SVCA owned property information.

Water Resources

Flood Forecast and Warning (FFW)

On December 28th, 2025, a Watershed Condition Statement – Water Safety was issued due to forecasts advising of daytime temperatures of 5-6°C and rainfall amounts of 15-30 mm. The message was in effect until December 31st, 2025.

Flood Watch Training

Annual Flood Watch training was completed with SVCA staff in December 2025. This training is completed internally each year and provides staff with an overview of SVCA's Flood Contingency Plan, and staff roles and responsibilities in the event a Flood Watch or Flood Warning message is issued.

Snow Surveys

Snow survey season officially started on November 15th. To date, all snow surveys have recorded above average snow depths and water content. While temperatures in December primarily remained below freezing, some short periods of above freezing temperatures combined with rain later in the month reduced snowpack depths throughout the watershed. Lake effect snow squalls are expected to remain prevalent for the region as Lake Huron has yet to develop substantial ice cover.

Ice Monitoring

Ice monitoring has officially commenced as of December 1st. Throughout the watershed, ice conditions are documented to inform the potential for ice breakup and jamming. Specific to Durham, frazil ice conditions are monitored daily to document the production and deposition of frazil ice which is used to inform flood potential.

Category 2 Agreements

The Category 2 agreement with Arran-Elderslie is now finalized and signed by SVCA and Arran-Elderslie. All Category 2 works are underway.

Capital Projects

Current WECI projects being worked on include the Paisley CCTV inspection which finished field work mid-December and are now being reviewed, final reports should be completed by March. Fall arrest equipment for the Mount Forest Dam has been received, Hanover Dam safety signs have been received, and both will be used or installed once the snow clears. The Mount Forest fencing project was also completed late November before the snow arrived for the South side of the Dam. Current WECI requirements are being met with reporting deadlines.

Additional projects completed include the public notification for the debris at the Durham Upper Dam, once direction is received from Transport Canada, we will proceed with installing the boom this summer. The field component of the tree remediation study at Sulphur Spring Dam, Allan Park Dam, and Glenelg Dam has been completed and a final report should be complete by the end of January. Staff have participated in easement information seminars, and a course on contract management and vendor performance evaluations. Staff are continuing to work on standardizing

operating procedures for infrastructure maintenance and works. Staff are continuing to follow inspection requirements for the various structures across the Saugeen Valley Watershed and Category 2 agreements responsibilities are underway.

Request for Proposals and Quotations (RFPs and RFQs)

SVCA staff have issued or working on the following RFPs:

Paisley Dyke CCTV Inspection – Field work has been complete, and report should be received by March.

Tree Remediation RFP – Field work has been complete, and report should be received by end of January.

DUD Class EA Phase 2 – Staff are working with municipal staff and engineering form to finalize the bid.

Water Quality (WQ)

Water quality staff are conducting delegations to municipalities to share the data summarized in the 20 Year Water Quality Report. Seasonal well maintenance for the Provincial Groundwater Monitoring Network has been completed. Surface water sampling for both internal and provincial programs has been completed. Staff will conduct limited winter surface water sampling in January, February, and March as part of the Provincial Water Quality Monitoring Network winter sampling program. In the following months, water quality staff will undertake QA/QC of data collected in 2025 and incorporate this into the 2025 Water Quality report and the Water Quality dashboard on the SVCA website.

GM-2026-02: SVCA Operational Plan January 15, 2026

Legend: Text in Red indicates new or updated item

All Departments

Significant Activity	Operational Task	Updated Target Completion Date	Target Completion Date
Administration	2025 Annual Report	March 2026	December 2025
Mapping Working Group	In Progress	March 2026	December 2025
October 6, 2024, Formosa Lightning Response	Office Restored, Insurance Finalization	March 2026	2025
General	Landowner Recognition Program Brainstorm	March 2026	November 2025

Department: Corporate Services

Significant Activity	Operational Task	Updated Target Completion Date	Target Completion Date
Administration	Continue to develop and / or renew health and safety policies		Waiting on Workplace Culture Assessment Plan
Human Resources	Modernize SVCA's Personnel Policy		Waiting on Workplace Culture Assessment Plan
Human Resources	Code of Conduct		Waiting on Workplace Culture Assessment Plan
Human Resources	Volatile Client Plan	March 2026	October 2025
Human Resources	Emergency Communication Plan	March 2026	October 2025
GIS/IT	Critical Failure Information Technology Plan	March 2026	October 2025

Significant Activity	Operational Task	Updated Target Completion Date	Target Completion Date
Administration	Public Consultation: *Accessibility for Ontarians with Disabilities Act*	March 2026	October 2025

Completed Items:

Significant Activity	Operational Task	Completion Date	Target Completion Date
Administration	Annual 2023 SVCA Report		Complete
Administration	Accessibility policy development		Complete
Finance	2023 Audit		Complete
Administration	Document Retention policy		Complete
Administration	Compensation policy		Complete
Administration	Revenue Generation Strategy		Complete
Human Resources	Job Descriptions for Market Compensation Review		Complete
Administration	Office Reopening – Lightning Strike	January 13, 2025	Complete
Administration	Submission of MFIPPA reporting for 2024	March 2025	Complete
Content Management System	Complete	April 2025	Officially in initial use
2023 Performance Evaluations	Complete	April 2025	April 2025
Administration	2024 Audit	May 2024	May 2025
2024 Performance Evaluations	Complete	September 2025	July 2025
Administration	Professional Development Strategy Planning		2025
Administration	Negotiate Category 2 Agreements with municipalities	November 2025	November 2025

Department: Environmental Planning and Regulations

Significant Activity	Operational Task	Updated Target Completion Date	Target Completion Date
Section 28 of *Conservation Authorities Act*	Continue implementation of the Violations Strategy to resolve outstanding violations	Ongoing	Ongoing
Environmental Planning	Update Planning Service Agreements to reflect Bill 23 changes	January 2026	2025
General	Amish and Mennonite Outreach Strategy Planning		Executing/Underway
Environmental Planning	Carbon Copying Directors Correspondence	January 2026	January 2026

Completed Items:

Significant Activity	Operational Task	Completion Date	Target Completion Date
General	Website updates		Complete
General	Revise complete application checklist and post online		Complete
Regulatory Mapping	Update regulation limits on online mapping		Complete
General	Landowner Recognition Program Brainstorming	May 2025	May 2025
General	Completion of Environmental Planning and Regulations Policy Manual Revisions	May 2025	May 2025
General	Board of Directors Hearing Training – Section 28	July 2025	

Department: Water Resources

Significant Activity	Operational Task	Updated Target Completion Date	Target Completion Date
Water and Erosion Control Infrastructure	Complete database of existing easements and identify additional easement requirements, if needed		Ongoing
Water and Erosion Control Infrastructure	Confirmation of infrastructure ownership		Ongoing
Water and Erosion Control Infrastructure	Apply for Water and Erosion Control Infrastructure (WECI) funding		Complete, prepare for next intake/administer projects
Ontario Low Water Response	Creation of Low Water Response Committee	TOR Being Drafted March 2026	WRC Meeting Fall 2025
Water Quality	Completion of SVCA Water Quality Report		Presentations to be booked
Flood Forecasting and Warning	Launch "Flood Watch" program for public involvement, complete with information sessions for municipal partners		TBD
General	Working In and Around Water Policy	March 2026	November 2025
General	Risk Evaluation Planning	February 2026	December 2025
Water and Erosion Control Infrastructure	Complete an operational plan for SVCA structures		Ongoing
Water and Erosion Control Infrastructure	Complete draft 10-year capital working plan for SVCA water and erosion control structures that were inspected in 2022, 2023	March 2026	December 2025

Completed Items:

Significant Activity	Operational Task	Completion Date	Target Completion Date
General	Watershed-based Resource Management Strategy		Complete

Significant Activity	Operational Task	Completion Date	Target Completion Date
Water and Erosion Control Infrastructure	Asset Management plan for SVCA structures		Complete
NWMO Special Project	NWMO Environmental Monitoring Baseline Program years 1 through 3 final reports		Complete
Water and Erosion Control Infrastructure	Ice management plan for SVCA watershed		Complete
Flood Forecasting and Warning	Flood watch training 2025	December 2025	December 2025/ January 2026

Department: Forestry and Lands

Significant Activity	Operational Task	Updated Target Completion Date	Target Completion Date
Lands Management	Varney Pond – Investigate Land Disposition Options		Ongoing
Forestry	Forest Inventory		2027
Forestry	20 Year Management Plan		December 2026

Completed Items

Significant Activity	Operational Task	Completion Date	Target Completion Date
Lands Management	Kincardine Cross Country Ski agreement	October 20, 2025	Complete
Lands Management	Land Acquisition and Disposition Policies		Complete
Lands Management	Ash hazard tree removal from Stoney Island properties		Complete
Lands Management	Conservation Areas Strategy for SVCA		Complete
Lands Management	Conservation Lands Inventory for SVCA		Complete
Lands Management	Durham CA Fence installation		Complete
Lands Management	Saugeen Valley Children's Safety Village Agreement	November 2, 2025	Complete

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GM-2025-03

Report To: Chair and Directors, Saugeen Valley Conservation Authority
From: Erik Downing, General Manager/Secretary-Treasurer
Date: January 15, 2026
Subject: 2026 Authority Meeting and Hearing Schedule

Recommendation

THAT the 2026 SVCA Authority meeting and Section 28 Hearing schedules be adopted as presented.

Background

Historically the Board of Directors for the Saugeen Valley Conservation Authority has held eight (8) regularly scheduled meetings per year on the third Thursday of the month as per the Administrative Bylaws, with Special meetings called as required.

Authority Meetings

The 2026 draft Authority Meeting Schedule is attached to this report. Meetings are scheduled for March, May, July, September, October, November, and December.

Section 28 Hearings

The Authority Bylaws indicate that Section 28 Hearings are the responsibility of the full Board (Sec. B1-xv). Due to the potential length of time required to convene a Hearing, staff recommend that they be scheduled independently of regular Authority meetings. To facilitate this, staff propose setting specific dates for Hearings at the start of the year.

Due to busy schedules, predetermined Hearing dates and times will benefit SVCA Directors, Staff, landowners, and legal councils. Staff recommend scheduling the 2026 Section 28 Hearing dates to coincide with Authority meetings, beginning at 10:00 a.m. It is anticipated that not all scheduled dates will be necessary; therefore, staff will release any unneeded dates two weeks in advance.

Prepared by:
[Original signed by:]
Erik Downing, General Manager / Secretary-Treasurer

2026 Authority Meeting Schedule

Date	Time
Thursday January 15, 2026	1:00 p.m.
Thursday March 12*, 2026	1:00 p.m.
Thursday May 21, 2026	1:00 p.m.
Thursday July 16, 2026	1:00 p.m.
Thursday September 17 – Budget Review, 2026	1:00 p.m.
Thursday October 15, 2026	1:00 p.m.
Thursday November 19, 2026	1:00 p.m.
Thursday December 17 , 2026	1:00 p.m.
Thursday January 21, 2027	1:00 p.m.

2026 Section 28 Hearing Schedule (if required)

Date	Time
Thursday March 12*, 2026	10:00 a.m.
Thursday May 21, 2026	10:00 a.m.
Thursday July 16, 2026	10:00 a.m.
Thursday September 17, 2026	10:00 a.m.
Thursday October 15, 2026	10:00 a.m.
Thursday November 19, 2026	10:00 a.m.
Thursday December 17, 2026	10:00 a.m.

*Note: second Thursday of the month.

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COR-2026-01

Report To: Chair and Directors, Saugeen Valley Conservation Authority
From: Erik Downing, General Manager/Secretary-Treasurer
Date: January 15, 2026
Subject: 2026 Saugeen Valley Conservation Authority Budget
Purpose: To seek Board approval of the 2026 draft budget

Recommendation

THAT the apportionment amount of $2,829,657 for Category 1 operating expenses and capital costs be approved in accordance with Ontario Regulation 401/22, Section 27(4) of the Conservation Authorities Act;
THAT the Saugeen Valley Conservation Authority adopt the 2026 Budget in the amount of $6,493,483 as approved in principle, November 20, 2025; and
FURTHER THAT the General Manager/Secretary-Treasurer is hereby authorized to notify the member municipalities of the cost apportioning amounts owing; and
FURTHER THAT cost apportioning payments shall be due from member municipalities in two equal instalments on March 31 and June 30, 2026, and that late payments shall be subject to the Authority's standard late payment charge of 1.50% per month thereafter.

Background

At the November 2025 meeting, the Board of Directors approved in principle a 1.6% increase for the 2026 apportionment budget. This represents the lowest budget increase approved in the past five years and reflects the Board's commitment to maintaining organizational stability while being mindful of municipal constraints. Corporate Services staff circulated this draft approved budget to receive municipal partner comments. No written comments have been received from member municipalities.

Analysis

Following direction from the Board in in September-November meetings in 2025 a target of up to 6 percent from the 2025 apportionment budget of $2,785,664, staff completed a comprehensive review of departmental budgets and capital allocations. Through continued internal collaboration, the overall apportionment increase had been reduced to 4.6%, at $2,913,657, while maintaining all current levels of service delivery. The Board then gave direction in November to utilize $84,000 of SVCA reserves to reduce the apportionment increase to 1.6%.

These reductions were achieved through careful cost containment and internal realignment rather than service cuts. No programs have been discontinued, and staffing levels remain stable across all departments. The finalized 2026 draft budget continues to support SVCA's four core program areas, Environmental Planning and Regulations, Water Resources, Forestry and Lands, and Corporate Services, along with governance and mandatory administrative functions under the *Conservation Authorities Act* and applicable Ontario Regulations.

Operational efficiency measures, including the consolidation of vehicle and equipment purchases and financing, deferral of select non-critical projects, and continued reliance on self-generated revenue, have helped offset inflationary pressures and maintain financial stability. Despite ongoing provincial fee freezes on planning and permitting services, SVCA remains positioned to deliver legislated and municipally supported services.

The 2026 budget reflects prudent fiscal management that balances affordability for municipalities with the Authority's responsibility to sustain core programming.

Financial Implications

The proposed 1.6% increase to apportionment will enable SVCA to maintain operational capacity, support staff workloads, and deliver mandatory programs and services under the Conservation Authorities Act. It reflects a balanced approach that maintains service levels while remaining well below the double-digit increases of recent years.

Strategic Plan Linkages

R1.0 – Resiliency; Development of a Robust, Stable Organization

Prepared by:
[Original Signed by:]
Erik Downing
General Manager / Secretary-Treasurer

Approved by:
[Original Signed by:]
Erik Downing
General Manager / Secretary-Treasurer

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Report COR-2026-02

Report To: Chair and Directors, Saugeen Valley Conservation Authority

From: Erik Downing, General Manager/Secretary-Treasurer

Date: January 15, 2026

Subject: Statutory Administrative Policy Approvals

Purpose: To seek re-affirmation of statutory administrative policy approvals related to SVCA's Health and Safety Policy and Workplace Violence and Harassment Policy as required under the Ministry of Labour's *Occupational Health and Safety Act.*

Recommendation

THAT the Saugeen Valley Conservation Authority Board of Directors re-affirm for 2026 the Health and Safety Policy; and further,

THAT the Saugeen Valley Conservation Authority Board of Directors re-affirm for 2026 the Workplace Violence, Harassment, and Sexual Harassment Policy.

Background

As part of conducting its business affairs, SVCA is required to comply with Sections 25 (2) (j) and Section 32.0.1 (1) (c) of the Ministry of Labour *Occupational Health and Safety Act*. Compliance under these two sections involves an annual review of the Authority's Health and Safety Policy (November 18, 2021) and Workplace Violence, Harassment, and Sexual Harassment Policy (November 18, 2021) to ensure a respectful, professional, trustworthy, and safe workplace is maintained for all staff, Board members, partners, and customers.

Analysis

Saugeen Valley Conservation Authority staff recommend that the Statutory Administrative Approvals as stated in this report be re-affirmed through Board resolution based on the following legislated requirements:

1. **Health and Safety Policy**

Sections 25 (2) (j) prepare and review at least annually a written occupational health and safety policy and develop and maintain a program to implement that policy.

In accordance with Section 25 (2) (j) of the *Occupational Health & Safety Act*, the re-affirmation of Saugeen Valley Conservation Authority's Health and Safety Policy (Attachment #1) is required.

2. Workplace Violence, Harassment, and Sexual Harassment Policy

Section 32.0.1 (1) (c) review the policies as often as is necessary, but at least annually.

In accordance with Section 32.0.1 (1) (c) of the Occupational Health & Safety Act the re-affirmation of Saugeen Valley Conservation Authority's Workplace Violence, Harassment, and Sexual Harassment Policy (Attachment #2) is required.

Prepared and Approved by:

[Original Signed By]
Erik Downing
General Manager/Secretary-Treasurer
Attachment 1: Health and Safety Policy (November 18, 2021)
Attachment 2: Workplace Violence, Harassment, and Sexual Harassment Policy (November 18, 2021)

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Health and Safety Policy

Intent

Saugeen Valley Conservation Authority acknowledges it has a statutory duty to take all reasonable precautions to protect employees, contractors, volunteers, visitors, and all other individuals onsite. Protecting employees from injury or occupational disease from accidents or incidents is a continuing objective. We will make every effort to provide a safe and healthy work environment for all staff. We believe all accidents are preventable and active participation at all levels will help ensure accidents are avoided. Supervisors and workers must refrain from any actions or activities that could jeopardize the health and safety of others and must work to reduce the risk of injury.

We are committed to promoting a safe and healthy workplace for all employees, contractors, volunteers, and visitors. In pursuit of our commitment, we will develop, implement, update, and enforce policies and procedures that promote and provide a healthier, safer work environment. We understand the importance of safety to the well-being and productivity of our employees and strive to safeguard the workplace from injury and malfeasance through negligence.

This policy outlines the responsibilities of all parties in maintaining a safe and healthy work environment. Saugeen Valley Conservation Authority will act in compliance with all applicable workplace health and safety legislation.

Guidelines

Communication

Saugeen Valley Conservation Authority encourages open communication on health and safety issues. Open communication is essential to providing an accident-free and productive work environment.

- Employees who voice or identify a health and safety concern will not be subject to reprisal or retaliation.
- Health and safety comments will be reviewed by the Joint Health and Safety Committee and Human Resources and will also initiate an investigation on each reported or potential hazard.
- Employees should inform their supervisor or human resources of anymatter they perceive to be an actual or potential workplace hazard.
- Communication can be written or verbal, and may be anonymous, if so desired.

Responsibilities

Employers will:

- Supply an effective strategy to manage the occupational health and safety concerns of the company.

- Allocate and govern resources properly to achieve the health and safety requirements of employees, and that policies comply with the company's legal obligations.
- Foster a workplace culture of safety with appropriate leadership.
- Review policies annually for compliance and efficiency, and revise where necessary.
- Provide all relevant parties with a copy of all orders or reports issued to the employer by a Ministry of Labour inspector and inform the committee of any work-related incidents involving injury, death, or occupational illness.

Managers and supervisors will:

- Help develop, implement, enforce, and update company policies and procedures.
- Continually promote health and safety awareness with instruction, information, training, and supervision to ensure the safe performance of employees.
- Use the process of hazard identification, risk management, and incident investigation.
- Perform occupational health and safety inspections of the workplace to identify and control all hazards to employees.
- Be accountable for the health and safety of employees under their supervision.
- Ensure that machinery and equipment are safe and that employees work in compliance with established safe work practices and procedures.
- Ensure that employees receive adequate training in their specific work tasks to protect their health and safety.
- Conduct health and safety meetings.

Human resources will:

- Liaise with government agencies to ensure workplace health and safety compliance.
- Advise management on safety and health policy issues.
- Coordinate health and safety inspections and follow up to ensure the completion of necessary corrective actions.
- Develop best practices that support a strong health and safety program.
- Design and develop accident and incident reports and investigation procedures.
- Maintain an up-to-date knowledge of applicable health and safety regulations as mandated locally, provincially, or federally.
- Design and develop company policies and procedures related to workplace safety and health issues.
- Review injury and illness trends and identify problem areas and solutions.

Employees will:

- Comply with occupational health and safety policies and procedures.
- Notify managers of any health and safety concerns, so they may be dealt with promptly.
- Protect their own health and safety by working in compliance with the law, safe work practices, and procedures established by the company.
- Use appropriate personal protective equipment as required.
- Report unsafe or potentially hazardous conditions, without fear of reprisal, to their manager or human resources.

All staff will:

- Complete required occupational health and safety training.
- Perform duties in a manner conducive to a safe workplace, following all safety practices and procedures.
- Report any incident, injury, or hazard as outlined in company procedures.
- Report any acts of violence or harassment in the workplace.
- Promote a hazard-free workplace.
- Learn the posted emergency plan detailing the facility's procedures pertaining to fire, weather, or medical emergency.

Joint health and safety committee members or health and safety representative will:

- Commit to improving health and safety conditions in the workplace.
- Stimulate and raise awareness of health and safety issues in the workplace.
- Recognize and identify workplace risks and hazards.
- Develop recommendations to address risks and hazards.
- Conduct regular workplace inspections and make written recommendations.
- Develop and implement accident prevention and health and safety programs.
- Listen to employee complaints, concerns, and suggestions.
- Participate in health and safety inquiries and investigations.
- Advise on health and safety matters, such as personal protective equipment.
- Maintain accurate and detailed records of near misses, accidents, and injuries.
- Promote and monitor compliance with health and safety regulations.
- Monitor the effectiveness of existing health and safety programs and policies and assist with the implementation of improvements.
- Attend regular committee meetings.

Reporting Structures

Any concerns or near misses should be reported to the health and safety committee or representative and the appropriate manager. Employees who voice or identify a health and safety concern will not be subject to reprisal or retaliation.

If an emergency occurs, employees must immediately report the incident to their supervisor. Appropriate responses will be dictated by the severity of the event and its effect on the health and safety of employees, visitors, and property.

An emergency is any number of unsafe conditions that pose a threat to people or property. This includes fire or smoke; natural disaster or severe weather; chemical, biological, or radiological incidents; and structural failures, etc.

Refer to the company's emergency response plan policy for additional details.

Health and Safety Policy

Acknowledgement and Agreement

I, _____, acknowledge that I have read and understand the Health and Safety Policy of Saugeen Valley Conservation Authority. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules/procedures outlined in this policy, I may face corrective action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

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SVCA Workplace Violence, Harassment, and Sexual Harassment Policies

Table of Contents

Workplace Violence, Harassment, and Sexual Harassment Policy Memo....4
Workplace Violence, Harassment, and Sexual Harassment Compliance Statement....5
Workplace Violence, Harassment, and Sexual Harassment Policy....6
Intent....6
Definitions....6
Guidelines....6
Violence Risk Assessment....7
Workplace Violence, Harassment, Sexual Harassment Program Control....8
Measures and Procedures....8
The Right to Refuse Unsafe Work....9
Fraudulent or Malicious Complaints....9
Record Keeping....10
Confidentiality....10
Policy Review....10
Workplace Violence, Harassment and Sexual Harassment Policy Acknowledgement and Agreement....11
Anti-bullying and Cyberbullying Policy....12
Intent....12
Definitions....12
Guidelines....12
Roles and Responsibilities....13
Disciplinary Actions....14
Anti-Bullying and Cyberbullying Policy Acknowledgement and Agreement....15
Dealing with Difficult Clients Policy....16
Intent....16
Guidelines....16
Dealing with Clients....16
Saugeen Valley Conservation Authority Standards....17
Dealing with Difficult Clients Policy Acknowledgement and Agreement....19
Weapons Policy....20
Intent....20
Definition....20
Guidelines....20
Weapons Policy Acknowledgement and Agreement....22
Domestic Violence Safety Plan....23

Intent 23
Setting-Up the Plan 23
Additional Safety 25
Additional Support 25
Privacy 25
Changes 25
Workplace Violence and Harassment Risk Assessment Form 26
Intent 26
Conducting Risk Assessment 26
Hazard Controls 28
Violence Assessment Form 29
Violence Incident Report Form 30
Harassment Complaint Form 32
Acknowledgement of Complaint Letter (Violence or Harassment) 34
Workplace Violence and Harassment Investigation Checklist 35
Sexual Harassment Investigation Checklist 39
Harassment Investigative Interview Questions 43
Intent 43
Interview Questions 44
Harassment Complaint Findings Report 46
Intent 46
Violence, Harassment, or Sexual Harassment Investigation Letter – Complainant – Complaint Validated 49
Violence, Harassment, or Sexual Harassment Investigation Letter – Complainant – Complaint Dismissed 50
Violence, Harassment, or Sexual Harassment Investigation Letter -Respondent – Complaint Validated 52
Violence, Harassment, or Sexual Harassment Investigation Letter – Respondent – Complaint Dismissed 53
Violence Investigation Follow–Up Form 55
Harassment Follow-Up Form 56

Workplace Violence, Harassment, and Sexual Harassment Policy Memo

To: SVCA Staff

From: Jennifer Stephens, General Manager/Secretary-Treasurer Date: March 15, 2022

Re: Workplace Violence, Harassment, and Sexual Harassment Policy

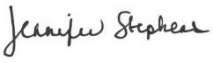
Saugeen Valley Conservation Authority is committed to building and preserving a safe work environment free from all forms of violence and harassment. Acts of violence or harassment against or by an employee will not be condoned or tolerated.

To demonstrate this commitment, the Authority has established a Workplace Violence, Harassment, and Sexual Harassment Policy developed in accordance with the requirements of the *Occupational Health and Safety Act* (OHSA). It is available for all employees to review and can be found digitally on SVCA's Corporate Platform (SharePoint) and on the Health and Safety bulletin boards at each SVCA workplace. In Formosa, the bulletin board is in the locker room beside the entrance door.

Saugeen Valley Conservation Authority will review the Workplace, Violence, Harassment, and Sexual Harassment Policy annually to ensure we are taking all reasonable precautions to protect the health and safety of our employees. If any changes are made to the violence and harassment provisions in the OHSA, the Authority will update this policy and communicate any changes to employees as soon as reasonably possible.

If you have any questions or concerns about violence and harassment in the workplace or our associated policies, please contact me or a member of the SVCA Joint Health and Safety Committee.

Sincerely,



Jennifer Stephens
General Manager / Secretary-Treasurer

Workplace Violence, Harassment, and Sexual Harassment Compliance Statement

Note: This compliance statement is written to comply with the changes to the Occupational Health and Safety Act introduced by Ontario Bill 132: Sexual Violence and Harassment Action Plan Act. These legislative changes came into force on September 8, 2016.

Saugeen Valley Conservation Authority is committed to building and preserving a safe working environment for its employees. In pursuit of this goal, Saugeen Valley Conservation Authority will work to prevent acts of violence, harassment, and sexual harassment on Saugeen Valley Conservation Authority premises, in compliance with the Occupational Health and Safety Act.

As such, Saugeen Valley Conservation Authority has adopted policies prohibiting physical or verbal threats (with or without the use of weapons); intimidation; inappropriate comments relating to sex, sexual orientation, gender identity, or gender expression; and violence in the workplace to minimize risk of injury or harm resulting from violence to Saugeen Valley Conservation Authority employees. These policies can be found digitally on SVCA's Corporate Platform (SharePoint) and on the Health and Safety bulletin boards at each SVCA workplace. In Formosa, the bulletin board is in the locker room beside the entrance door.

Saugeen Valley Conservation Authority will conduct an annual violence risk assessment and communicate all findings to our staff. In addition, Saugeen Valley Conservation Authority will provide appropriate training on violence, harassment, and sexual harassment in the workplace to all staff. Saugeen Valley Conservation Authority will fully investigate all incidents or complaints of violence, harassment, or sexual harassment in the workplace and will communicate the results of all investigations to the involved employees. All complaints will be handled with confidentiality, in compliance with the Act.

Saugeen Valley Conservation Authority does not condone domestic violence and will work to assist and protect any staff members who may be subject to domestic violence.

It is also a violation of the Workplace Violence, Harassment, and Sexual Harassment Policy of Saugeen Valley Conservation Authority for anyone to knowingly make a false complaint of harassment or violence, or to provide false information about a complaint. Individuals who violate the Workplace Anti-violence, Harassment, and Sexual Harassment Policy are subject to disciplinary and corrective action, up to and including termination of employment.

Workplace Violence, Harassment, and Sexual Harassment Policy

Note: This document complies with the Occupational Health and Safety Act, including changes made by Bills 168 and 132.

Intent

Saugeen Valley Conservation Authority is committed to building and preserving a safe, productive, and healthy working environment for its employees, free from violence and harassment. The Authority will take all reasonable measures to ensure job candidates, employees, managers, and clients are not subject to any form of violence or harassment. This commitment applies to all areas of business, including training, performance, assessment, promotions, transfers, layoffs, remuneration, and all other employment practices and working conditions.

Acts of violence or harassment against or by any employee will not be condoned or tolerated by the Authority. This policy outlines the Saugeen Valley Conservation Authority violence and harassment program, including how incidents of violence and harassment will be handled and investigated.

Definitions

Complainant:
A person who has made a complaint about another individual who they believe committed an act of violence or harassment against them.

Respondent:
A person whom another individual has accused of committing an act of violence or harassment.

Workplace harassment:
Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or workplace sexual harassment. This includes any form of offensive, abusive treatment or hostile behaviour that creates an intimidating, hostile, or abusive work environment and endangers the health and safety of the employee.

Workplace sexual harassment:
Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity, or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant, or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Workplace violence:
The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker; an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; or a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Guidelines

This policy has been developed in consultation with the SVCA Joint Health and Safety Committee. It will be reviewed annually, or more frequently if necessary to ensure that it

accurately represents the Saugeen Valley Conservation Authority prevention program.

Saugeen Valley Conservation Authority will provide all employees with appropriate training and information regarding the Authority's violence and harassment prevention practices and procedures. Employees are responsible for adhering to this policy and should report every incident of violence or harassment immediately to management. This includes any incidents that have been witnessed, experienced by, or reported to an employee.

For the purposes of this policy, workplace harassment or violence can occur:

- At the workplace;
- At employment-related social functions;
- In the course of work assignments outside the workplace;
- During work-related travel;
- Over the telephone, if the conversation is work-related; or
- Elsewhere, if the person is there as a result of work-related responsibilities or a work-related relationship.

Reasonable day-to-day actions by a manager that help manage, guide, or direct workers or the workplace and appropriate employee performance reviews, counselling, or discipline by a manager do **not** constitute harassment.

Violence Risk Assessment

Saugeen Valley Conservation Authority will conduct a risk assessment of the work environment to identify potential risks that could affect the organization and the health and safety of employees and will institute measures to eliminate or control any identified risks to employee safety.

The following factors will be considered during the assessment:

- Past incidents of violence;
- Violence that is known to occur in similar workplaces;
- The circumstances in which work takes place, including the type of work and conditions of work;
- The interactions that occur in the course of performing work; and
- The physical location and layout of the workplace.

The risk assessment may include reviews of records, security reports, employee incident reports, staff perception surveys, health and safety inspection reports, first aid records, or other related records. Areas that will be considered and may contribute to risk of violence include but are not limited to contact with the public, exchange of money, receiving doors, and working alone or at night.

The Authority will provide the Joint Health and Safety Committee with a written copy of the assessment and advise of the results.

The Authority will disclose information to workers who are likely to encounter a known person with a history of violence in the performance of their job duties, or if there is a potential risk of workplace violence because of interactions with the person with a history of violence.

However, the Authority will only disclose personal information that is deemed reasonably necessary to protect the worker from physical harm.

Workplace Violence, Harassment, Sexual Harassment Program Control

Measures and Procedures

This section of the policy will list the steps or procedures the organization has implemented to eliminate or reduce the risks of workplace violence identified during the violence risk assessment.

Reporting Incidents of Workplace Violence, Harassment and Sexual Harassment

An employee who believes they have been subject to violence, harassment or sexual harassment should submit a complaint to the SVCA Manager of Corporate Services. The complaint should be made as soon as possible following the incident and must include the following information:

- The date and time of the incident;
- The name of any persons involved in the incident;
- The name of any persons who witnessed the incident; and
- A thorough description of what occurred.

If the alleged harasser is the employee's manager, or in a position of power, the complainant is welcome to file a complaint with the General Manager / Secretary-Treasurer.

In the event the harasser is the General Manager/Secretary-Treasurer, the complaint shall be filed with the Authority Board Chair.

Immediate Assistance Procedures

The following measures and procedures should be followed when an incident of violence has occurred or is likely to occur and immediate assistance is required:

- Place an immediate call to emergency services by dialing 911.
- Any other actions as determined by the violence risk assessment.

Investigation Procedures

Once a complaint has been received, Saugeen Valley Conservation Authority will complete a thorough investigation. The organization will ensure that, where practicable, the investigation is completed within 90 days of the complaint being filed.

The investigation will include:

- Informing the respondent of the complaint;
- Interviewing the complainant and any persons involved in the incident;
- Identifying and interviewing any witnesses; and
- Obtaining statements from all parties involved.

All the above information will be documented and used to determine whether an incident of violence or harassment occurred. If necessary, Saugeen Valley Conservation Authority may employ outside assistance or request the use of legal counsel. The Joint Health and Safety Committee will not be involved in investigations and will not be provided with any identifying information of the parties involved.

A copy of the complaint, detailing the complainant's allegations will be provided to the respondent, who will be invited to reply in writing to the complainant's allegations. The reply will be made known to the complainant before the case proceeds.

The Authority will take all measures to prevent any disclosure of the incident and the

identities of the parties involved, unless the disclosure is necessary for the investigation, for taking corrective action or required by law.

Results of Investigation

Upon completion of an investigation, Saugeen Valley Conservation Authority will provide both the complainant and respondent a written summary of the findings of the investigation and any corrective action that has been or will be taken as a result of the investigation. This written notification will be provided within 30 days of the investigation being completed and will not include the investigation report unless required by law.

Control Measures

Where Saugeen Valley Conservation Authority determines that violence or harassment has occurred, control measures will be implemented to eliminate or control the risk of violence or harassment to a worker as a result of the investigation. These control measures will be determined on a case-by-case basis, depending on the situation investigated. Any control measure enacted will be communicated to the complainant and respondent, as well as any other applicable employees.

Disciplinary Measures

Any disciplinary action will be determined by the SVCA General Manager / Secretary-Treasurer and will be proportional to the seriousness of the behaviour or action involved in the incident.

In the event the harasser is the General Manager/Secretary-Treasurer, the Executive Committee shall determine disciplinary action. If the Authority determines that an employee has been involved in an incident of violence or harassment towards another employee, immediate disciplinary action will be taken, up to and including immediate dismissal.

Domestic Violence

If Saugeen Valley Conservation Authority becomes aware that domestic violence is likely to expose an employee to physical injury in the workplace, the Authority will take every precaution reasonable in the circumstances for the protection of the worker, including the completion of the enclosed Domestic Violence Safety Plan.

Recommendations to Victims

The Authority will provide appropriate assistance to any employee who is a victim of violence or harassment. Saugeen Valley Conservation Authority recommends that a worker who has been harmed as a result of an incident of violence at the workplace consult victim services, SVCA's Employment Assistance Program, and/or their health care provider for treatment or referral for post-incident counselling, if appropriate.

The Right to Refuse Unsafe Work

Employees have the right to refuse work if they have a reason to believe that workplace violence is likely to endanger them. Upon refusing to work, the employee must report the circumstance of the refusal to their manager. An investigation will follow in the presence of the Joint Health and Safety Committee.

Fraudulent or Malicious Complaints

It is a violation of this policy for anyone to knowingly make a false complaint, or to provide false information about a complaint. Unfounded or frivolous allegations may cause both the respondent and the Authority significant damage. Any employee who knowingly makes a false allegation related to violence or harassment will be subject to immediate disciplinary action, up to and including termination of employment.

Record Keeping

Saugeen Valley Conservation Authority will ensure that appropriate records of complaints and investigations relating to incidents of violence and workplace harassment are kept, including:

- A copy of the complaint or details about the incident;
- Any records related to the investigation, including notes;
- A copy of the investigation report (if applicable);
- A summary of the investigation results, including the reports provided to the complainant and respondent; and
- A copy of any corrective action taken to address the complaint or incident.

Confidentiality

Saugeen Valley Conservation Authority will not disclose the name of a complainant or a respondent or the circumstances related to the complaint to any person except where disclosure is necessary to investigate the complaint or take corrective action with respect to the complaint or required by law. The Authority will only disclose the minimum amount of personal information or details necessary for these purposes.

All records of harassment, and subsequent investigations, are considered confidential and will not be disclosed to anyone except to the extent required by law. The Authority will do everything reasonably possible to protect the privacy of any individuals involved and to ensure that complainants and respondents are treated fairly and respectfully.

Policy Review

In accordance with the *Occupational Health and Safety Act*, this policy will be posted in a conspicuous place in the workplace and reviewed annually.

Workplace Violence, Harassment and Sexual Harassment Policy Acknowledgement and Agreement

I, _____, acknowledge that I have read and understand the **Workplace Violence, Harassment, and Sexual Harassment Policy** of Saugeen Valley Conservation Authority. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules/procedures outlined in this policy, I may face corrective action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Anti-bullying and Cyberbullying Policy

Intent

Saugeen Valley Conservation Authority is committed to building and preserving a safe, productive, and healthy working environment for its employees based on mutual respect. Employees have the right to work free from harm and bullying in any form, and Saugeen Valley Conservation Authority is dedicated to ensuring employees can complete their duties without fear of bullying or harassment. All employees share in the responsibility to ensure that our workplace is a safe and welcoming place to work. In pursuit of this goal, acts of bullying against or by any employee will not be tolerated.

This policy is not meant to stop free speech or to interfere with everyday interactions. However, what one person finds offensive, others may not. Usually, bullying or harassment can be distinguished from normal, mutually acceptable socializing. It is important to remember it is the perception of the receiver of the potentially offensive message that determines whether something is acceptable or not, be it spoken, a gesture, a picture, or some other form of communication which may be deemed offensive or unwelcome.

Definitions

Bullying:

A repeated pattern of behaviour intended to intimidate, offend, degrade, or humiliate a particular group or person. It is also the assertion of power through aggression, targeting the competence level of the person being bullied. Although it can include physical abuse or the threat of abuse, bullying usually causes psychological rather than physical harm.

Cyberbullying:

A form of bullying or harassment intended to harm others using an electronic or online medium, such as social media websites, online chat rooms, e-mail, or text messages. Also referred to as online bullying or online harassment.

Harassment:

Behaviour that is hostile in nature and intends to degrade an individual or group based on personal attributes like prohibited grounds of discrimination under human rights legislation. It can include physical, verbal, written, graphic, or electronic means.

Workplace harassment:

Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or workplace sexual harassment. This includes any form of offensive, abusive treatment or hostile behaviour that creates an intimidating, hostile, or abusive work environment and endangers the health and safety of the employee.

Guidelines

Bullying and Harassment Prohibited

At Saugeen Valley Conservation Authority, employees have the right to work without fear of bullying. Bullying can possibly cause increased absenteeism and turnover, decreased productivity, and illness or injuries due to stress. Saugeen Valley Conservation Authority will not tolerate harassment or bullying in the workplace. Any employee who experiences or witnesses harassment or bullying should report the activity to SVCA's Manager of Corporate Services. All complaints will be taken seriously and investigated appropriately. Employees who submit a report or complaint of harassment or bullying will not be subject to any form of reprisal or retaliation because of the complaint.

Examples of bullying include, but are not limited to:

- Spreading malicious rumours or gossip;
- Using derogatory names towards an employee;
- Intentionally excluding or isolating someone socially;
- Verbal or physical aggression, intimidation, or threats;
- Stealing credit for someone else's work or ideas;
- Making offensive jokes, either verbally or in writing;
- Tampering with personal belongings, work, or workspace;
- Deliberately undermining, belittling, or criticizing a person or their work;
- Constantly changing or removing responsibilities or guidelines without cause;
- Intentionally setting someone up to fail;
- Unwarranted disciplinary action; and
- Purposefully excluding an employee from future promotions. Examples of cyberbullying include, but are not limited to:
- Sending threatening or damaging messages electronically;
- Spreading rumors through social media or e-mail;
- Electronic sabotage, such as sending viruses;
- Making slanderous remarks about the victim in public discussion areas;
- Impersonating the victim online by sending a controversial or inflammatory message which causes others to respond negatively to the victim;
- Sending offensive graphic material or pornography; or
- Creating a webpage or writing a blog entry that portrays the victim negatively.

Bullying or harassment do not include expressing differences of opinions or offering constructive feedback, guidance, or work-related advice about behaviour. Reasonable action taken by management in relation to the direction of employees, including managing performance, assigning work, and implementing disciplinary actions should not be considered bullying.

Roles and Responsibilities

Employees have a shared responsibility to ensure the workplace is free from harassment and bullying. Employees should report any instances of bullying, whether they were the target of the bullying or witness to the bullying. In all cases, where a complaint of bullying is made in good faith, the employee will not be disciplined or retaliated against in any way. As such, employees are expected to treat others with respect, and contribute to a respectful and safe work environment and report all acts of bullying to management.

Saugeen Valley Conservation Authority will apply appropriate disciplinary actions for all incidents of harassment or bullying.

Management will:

- Promote a respectful and safe working environment;
- Ensure employee adherence to this policy;
- Investigate complaints of bullying or harassment promptly;
- Maintain a confidential file for complaints of harassment or bullying, investigations completed, and actions taken;
- Report the incident to police where appropriate; and
- Apply disciplinary action where appropriate

Disciplinary Actions

If the findings of the investigation indicate that a violation of this policy has occurred, Saugeen Valley Conservation Authority will administer immediate and appropriate corrective or disciplinary action, up to and including dismissal. Corrective actions will be proportional to the seriousness or repetitiveness of the offence. Verbal or written warnings, training or counselling, monitoring the harasser, suspension, or dismissal may all be appropriate disciplinary actions.

Anti-Bullying and Cyberbullying Policy Acknowledgement and Agreement

I, _____, acknowledge that I have read and understand the **Anti- Bullying and Cyberbullying Policy** of Saugeen Valley Conservation Authority. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules/procedures outlined in this policy, I may face corrective action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Dealing with Difficult Clients Policy

Intent

Throughout the course of work, Saugeen Valley Conservation Authority employees may experience a variety of individuals facing a range of situations. Saugeen Valley Conservation Authority is dedicated to providing the utmost positive experience to all individuals when they are visiting any of our locations. From time to time, employees may encounter various situations in which individuals pose a threat of harm to themselves or others. This policy has been adopted by Saugeen Valley Conservation Authority to ensure that our employees are provided with a set of guidelines in the event they encounter a hostile or aggressive individual.

Guidelines

Saugeen Valley Conservation Authority has a zero-tolerance policy for violent or harassing behaviour of any kind. Violence can include physical and non-physical actions. What constitutes harassment is at the discretion of the employee who is working with the client, but should generally follow the guidelines in the *Violence and Harassment Policy* of Saugeen Valley Conservation Authority.

The following outlines guidelines which employees should enact at their discretion should they be faced with a situation in which their safety, or the safety of visitors, is threatened.

Dealing with Clients

The following should be utilized with all clients as by doing so it may help to prevent a client from becoming hostile in the first place, or may quickly defuse a situation where a client begins to get angry:

- Greet all clients in a friendly tone and let them know that they are welcome at Saugeen Valley Conservation Authority.
- Give clients your full attention and use active listening skills to ensure they know you are working with them.
- Paraphrase the questions/concerns of clients to show them that you are actively engaged in providing them with assistance.
- If a client's requests are unreasonable, try to reason with him/her and ensure that the client understands Authority policy, and why that policy is in place.

Dealing with Difficult Clients

In the event that a client's behaviour escalates and becomes hostile or violent, the following guidelines should be followed:

Avoid Engaging in Conflict

- Remember that a client may be hostile for a number of reasons so try not to take it personally. It is important to understand that sometimes there may be external factors that create anger or hostility in clients and regardless of the actions that are taken, employees may be unable to make a disgruntled client happy or satisfied.
- Maintain professionalism at all times and do not engage in conflict with clients as this will only make the situation worse and may put other people at risk.
- Use logic and kindness to attempt to get the situation under control.

Determine the Source of Anger

- Ask the client how you can help.
- Work to assist him/her in solving the problem, and let the client know that you are on his/her side.

Determine the Client's Needs

- Determine what the initial issue is/was, what was or can be done, and offer a solution.
- Try to determine what the client needs, and what it is that he/she wants to tell you.
- Be sure to acknowledge the client's anger and, where possible, attempt to alleviate the issue or solve the problem.
- Do not brush off anger or ignore the person as this may lead to increased anger or a client who becomes abusive.

Observe the Client on Approach

- Be observant and pay close attention to clients. In the event that a client is hostile, the client will generally display visible characteristics like clenched fists, a red face, agitated behaviour, etc.
- In the event that you notice a client exhibiting behaviours associated with hostility/anger, prepare yourself for a potential situation, and remain composed and professional.

Relate to the Client

Try to speak with the client in a way that shows him/her that you understand and can sympathize with the issue, while working with him/her to find an agreeable resolution. (An angry client will generally decrease hostility where he/she recognizes that you are trying to help.)

Some clients may have very quick mood changes that seem to escalate at extremely rapid rates. Employees are encouraged to be prepared for this possibility with most clients.

Saugeen Valley Conservation Authority Standards

Clients who are exhibiting the following behaviours will be asked to leave:

- Excessive shouting;
- Excessive swearing;
- Any verbally abusive remarks towards staff or other visitors; and/or
- The repeating of behaviours which they have been asked not to perform.

Clients who exhibit the following behaviours will be asked to leave and may be banned from use of Saugeen Valley Conservation Authority's services:

- Being asked to leave on multiple occasions for violating any of the client's
- behavioural standards outlined above.
- Any kind of physical violence towards anyone on Saugeen Valley Conservation Authority's premises or towards any employee or other clients at any time.
- Any kind of threat of physical violence.
- Willful damage or destruction to Saugeen Valley Conservation Authority property, or employee property.
- Possession of a weapon while on Saugeen Valley Conservation Authority premises.

- The use, possession, sale, manufacture, or dispensation of any illegal drug, alcohol, or paraphernalia associated with either while on Saugeen Valley Conservation Authority premises.

If staff are at a field site and they are subject to clients exhibiting the behaviours outlined above, they should promptly leave the site and advise their Manager or Supervisor of the situation.

General Safety Guidelines for all Employees

- Do not book clients who are known to become aggressive at the end of the day when staff coverage is minimal.
- Aim to meet with clients in proper meeting rooms or spaces that are visible to other staff.

Calling the Police

- If at any point an employee feels that his/her safety, the safety of the client or the safety of other clients is in jeopardy, the police must be called, regardless of the situation.
- The police should also be called if a prior client who has been banned re-enters the facility, or if a client will not leave after being asked.
- If you are not able to call the police with the client present, ask the client to leave the premises and at that point call the police immediately.
- If the client refuses to leave the premises, employees should remove themselves from the situation and use the nearest phone in a safe location to call police.

**Note: Staff working after hours programs are required to have a cell phone with them at all times in the event that an emergency situation occurs, and emergency personnel must be called.*

Dealing with Difficult Clients Policy Acknowledgement and Agreement

I, _____, acknowledge that I have read and understand the **Dealing with Difficult Clients Policy** of Saugeen Valley Conservation Authority. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules/procedures outlined in this policy, I may face corrective action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Weapons Policy

Intent

Saugeen Valley Conservation Authority is vitally interested in the ongoing health and safety of our employees, as well as that of our clients, visitors, and guests. Saugeen Valley Conservation Authority has adopted this policy to ensure that we minimize the threat of injuries associated with weapons on our premises. As such, possession of a weapon is prohibited while on Authority premises and anywhere else that Authority business is conducted.

Definition

Weapons:

Firearms, knives, blades, explosives, chemical hazards that cause bodily harm or any other item used with the intent of threatening or injuring another person.

Guidelines

Employee Responsibilities

- Saugeen Valley Conservation Authority employees are strictly prohibited from bringing weapons onto Saugeen Valley Conservation Authority premises.
- Saugeen Valley Conservation Authority employees will be responsible for communicating this policy to our guests, clients and/or visitors to ensure that they are aware of the policy, and the necessity for compliance.
- In the event that a Saugeen Valley Conservation Authority employee encounters a weapon of any sort, he/she is required to notify management immediately.
- In the event that a Saugeen Valley Conservation Authority employee witnesses the use of a weapon, or views a weapon being brandished in a threatening manner, he/she is required to contact management and/or the authorities immediately.

Management Employees

- SVCA Management employees are required to enforce this policy at all times and ensure the ongoing health and safety of our staff, guests, clients and/or visitors.
- SVCA Management employees who become aware of the presence of weapons as advised by any guest, client and/or visitor are required to ensure that the owner is made aware of the weapons policy of Saugeen Valley Conservation Authority. As such, they will be required to remove the weapon from the premises.
- SVCA Management employees will be responsible for communicating this policy to our staff, guests, clients and/or visitors to ensure that they are aware of the policy, and the necessity for compliance.
- SVCA Management employees will be responsible for taking the appropriate measures in the event of any failure to comply with this policy, including the removal of staff, clients, guests and/or visitors, or depending on the severity of the violation, contact the authorities, and potentially implement the Saugeen Valley Conservation Authority Lock Down Policy, and/or evacuation of staff, guests and/or visitors in compliance with the Saugeen Valley Conservation Authority Evacuation Plan.

Guests, Clients and/or Visitors

- Weapons of any sort are prohibited on SVCA premises by guests, clients and/or

visitors.

- Any and all weapons that have been brought to SVCA premises must be removed immediately.
- Guests, clients and visitors are strictly prohibited from brandishing, firing or displaying weapons on Saugeen Valley Conservation Authority premises.
- In the event that any guest, client or visitor is found to have been in violation of these terms and conditions, he/she will be asked to leave the premises, or depending on the severity of the violation, Saugeen Valley Conservation Authority may contact the appropriate authorities.

Weapons Policy Acknowledgement and Agreement

I, _____, acknowledge that I have read and understand the **Weapons** of Saugeen Valley Conservation Authority. Further, I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules/procedures outlined in this policy, I may face corrective action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Domestic Violence Safety Plan

Intent

Domestic violence can have serious and even lethal consequences. Behaviours such as emotional and psychological intimidation and harassment can be disruptive and harmful to the victim and can quickly turn into physical violence.

Stalking has been identified as one of the primary risk factors for attempted and actual murder of female partners in intimate relationships. Recent separation is also an important red flag as many deaths related to domestic violence in Ontario occurred when the relationship was ending or following separation.

Setting-Up the Plan

It is important to deal with each situation on a case-by-case basis, taking into account the needs of the individuals involved.

The plan outlines increased safety measures and should be created with the individual involved.

Name:	Date:
Location:	
Aggressor's full name:	
Address:	
Current relationship status:	
Description and photo:	
Aggressor's patterns of behaviour and high-risk times (e.g. free hours):	

Current Program(s) or working days and hours:	
(a)Would switching programs or changing your work schedule help? If yes, please indicate new program or schedule:	Yes No
(b)How do you normally arrive? (bus, walking, car, etc.) If you drive, where do you park and do you have a permit?	
(c)Would finding a new method to work help (including a new parking spot)? If yes, please indicate new method and/or parking spot:	Yes No
(d)Would having someone escort you to your car or public transportation help? If yes, please indicate plan:	Yes No
(e) If the aggressor shows up, how would you suggest handling the situation? ○ Call the police ○ Say that I am unavailable or not here ○ Ask him/her to leave the building ○ Other:	
(f)If it's possible, would you like to have his/her phone number and email blocked? If yes, please include information:	Yes No
(g)Do you believe that he/she would be violent to others or cause a scene in order to see you? If yes, please describe some of his/her behaviour and/or concerns you have :	Yes No
Would you like to attach any records to keep as evidence? (emails, voicemails) If yes, please indicate and attach:	Yes No

Additional Safety

Who can we contact in case of emergency? (name & phone number)

_____

If you are in danger, what code word can you use to ask for help?

_____

Additional Support

Safety plans look at the steps that can be taken at different points in time or in various situations (when at work, while living with the aggressor, getting ready to leave, leaving, afterwards, protecting children and family pets). Creating a safety plan requires experience in risk and threat assessments, so you may want to connect with services in your community to get additional expert help.

- **Local Shelters**
- **Assaulted Women's Helpline 1-866-863-0511** They offer anonymous and confidential crisis support for abused women in Ontario in 1554 languages.
- **Shelternet at** www.shelternet.ca **or 1-416-642-5463** They provide information for abused individuals, their family, friends and colleagues on a variety of topics, including finding shelter and safety planning.

Privacy

Saugeen Valley Conservation Authority has the duty to take every precaution reasonable to protect workers and that responsibility might outweigh the need for complete privacy.

We can ensure that all communication will happen on a "need to know" basis and that it will be done with the highest level of respect and confidentiality.

If it is determined that some information needs to be shared, we will make every effort to first discuss with you:

- **Who needs to be informed and why**
- **What information will be communicated**
- **The expectations for confidentiality**
- **Consequences if confidentiality is breeched**

Changes

If at any time you would like to update or change the safety plan please notify the Joint Health and Safety Committee.

Workplace Violence and Harassment Risk Assessment Form

Intent

The fundamental principle of a Health and Safety Program is to reduce the danger of injury, disease and violence to employees. To reduce the incidents of violence and harassment in the workplace, new legislation is being introduced across Canada. In order to conduct a thorough Risk Assessment, you should complete this Risk Assessment Form in the most comprehensive manner. Hazard identification is crucial in the workplace.

Once the Risk Assessment has been completed, the committee or a health and safety representative, if any, must be advised of the results of the assessment, and provided a copy if the assessment is in writing. Then the risks must be mitigated by developing policies and programs and facilitating worker and management training.

Conducting Risk Assessment

Step 1 – Documentation review

The first step in your Risk Assessment process will be a review of your organization's policies, procedures, worker training records and past incident reports. Reviewing this information will allow you to uncover potential risks, and valuable insight to be used when developing or adjusting your current policies and training.

Step 2 – Workplace audit

Determine the Risks Associated - Similar Workplaces

It is imperative that when conducting your Risk Assessment you consider similar workplaces. When thinking of comparable workplaces, you must think of similar duties, products, services, suppliers, environments and customers.

Determine the Risks Associated - Specific Workplace

Once you have been able to gather an exhaustive list of potential risks associated with similar workplaces, you can determine the risks that are specific to your workplace. Do remember to consider incidents that have almost escalated to violence, even if they are far between.

Determine any other prescribed elements that could be Risk factors

Take into consideration any other elements that could arise, such as special and annual events, special assignments, and cross training.

Step 3 – Employee survey and/or interviews

One powerful step in completing a thorough risk assessment is gathering information from your employees. They will be an excellent source of specific information, since they will have firsthand experiences and incidents to draw from. Use this information when completing the ranking, probability and consequences of the risks assessed.

Rank the Exposure

1 = Unlikely: A person is exposed to the hazard 1x per job or project

2 = Occasionally: A person is exposed to the hazard 2 x per job or project

3 = Often: A person is exposed to the hazard more than 3x to 5x per job or project

4 = Frequently: A person is exposed to the hazard 5 or more times per job or project

5 = Continuous: A person is exposed to the hazard continually

Determine the Probability of Occurrence

1 = Unlikely to occur

2 = Some chance

3 = Could occur 4 = Good chance

5 = Will occur if left unattended

Determine Potential Consequences

1 = Insignificant: a person receives a very minor injury, no damage to property

2 = First aid or minor property damage: a person administers first aid to self

3 = Injury results in lost time, seeking medical help or significant property damage

4 = Injury results in permanent disability, serious health effects or property damage

5 = Injury results in a fatality, or there is major property damage

Add the Numbers to Determine a Total Risk Rating

Serious (11 – 15) means the hazard must be attended to immediately, prior to the commencement of the job. Controls must be put into place. A safe job procedure must be in place prior to the commencement of the job.

Moderate (6 – 10) means the hazard requires attention. Controls should be put into place. A safe work procedure should be in place prior to the commencement of the job, but could be attended to once the job has commenced. Employees must be aware of the hazard. The safe work procedure must be in place prior to the completion of the job.

Low (3 – 5) means the hazard requires monitoring. Controls are recommended. A safe work procedure is recommended.

Hazard Controls

Depending on the risk rating, if the hazard cannot be eliminated, then controls must be implemented to reduce the risk.

There are three types of controls: Engineering, Administrative and Personal Protective Equipment (PPE). Some examples of the controls include:

Engineering Controls

- Design of a workplace
- Isolation/enclosure
- Implementation of Security Measures including surveillance and/or access cards

Administrative Controls

- Policies and procedures
- Training
- Organizing and planning work
- Rotation of workers
- Safety plan/procedure

Personal Protective Equipment (PPE)

- Access to alarms
- Communication devices

Violence Assessment Form

This Form must be completed in accordance with the established guidelines for hazard identification and assessment.

Description of work area:	Assessment performed by: Name: _____ Signature: _____	Date:

Description of Hazard (condition/circumstance)	Exposure (1 –5)	Probability (1 – 5)	Consequences (1 – 5)	Total	Rating	Controls (EC/AC/PPE)

Violence Incident Report Form

This form is to be completed in the event of any incident of violence that takes place on Saugeen Valley Conservation Authority premises, and may include threats of violence, bullying, and physical violence. The form should be submitted to the Manager, Corporate Services.

1. Name of complainant: _____
2. Address: _____
3. Location of Incident: _____
4. Person(s) accused of perpetrating a violent incident, or making threats of violence (respondent):_____
5. Nature of the allegations:

   _____

   _____

   _____

   _____

   _____

   _____
6. Date(s), time(s) and place(s) where the incident(s)

   _____

   _____

   _____

   _____
7. Did anyone witness the incident?

   ☐ yes

   ☐ no

   If yes:

   Name(s) of witness(es):

   Description of the respective role(s) played by witnesses in the incident:

   _____

   _____

   _____

   _____

8. What actions did you take in response to the incident?

_____

_____

_____

_____

9. If applicable, describe any incident that took place previously.

_____

_____

_____

_____

10. I am filing this complaint because I honestly believe that _____ has committed an act of violence.

I hereby certify that to the best of my knowledge the above-mentioned information is true, accurate and complete. Making false or frivolous allegations is in violation of the Saugeen Valley Conservation Authority Workplace Violence policy and is subject to disciplinary sanctions.

Furthermore, I realize that an inquiry will be initiated once this report has been filed.

_____ _____

Signature of the complainant Date

_____ _____

Form received By Date: Time:

Harassment Complaint Form

This form is to be completed in the event of any incident of harassment that takes place within the Saugeen Valley Conservation Authority workplace.

Workplace Harassment is defined as engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or workplace sexual harassment. This includes any form of offensive, abusive treatment or hostile behaviour that creates an intimidating, hostile, or abusive work environment and endangers the health and safety of the employee.

Name of Complainant:			
Person suspected of harassment (respondent):			
Nature of the allegations			
Incident	Date	Time	Place
Did anyone witness the incident?			YES / NO
If YES			

Description of their respective role in the incident:	
How did you (complainant) react to the harassment?	
If applicable, describe any incident that took place previously:	
Are you concerned for your safety while working with the respondent?	
What do you feel would be the most appropriate resolution?	

The information on this form will only be disclosed to those required to know for the purposes of an investigation. In order to maintain confidentiality and ensure a fair investigation is conducted, employees filing a complaint are asked to refrain from discussing their complaint with those not directly involved in the investigation.

Acknowledgement

I,_____, hereby certify that to the best of my knowledge the abovementioned information is true, accurate and complete. I understand that making false or frivolous allegations is in violation of Saugeen Valley Conservation Authority's (insert name of policy) policy and in doing so I understand I may be subject to disciplinary action up to and including termination of employment.

_____ _____

Signature of the Complainant Date

_____ _____

Form Received By: Date:

Acknowledgement of Complaint Letter (Violence or Harassment)

Note: The Ontario Occupational Health and Safety Act (OHSA) requires employers to complete workplace investigations in the event of a workplace harassment or workplace sexual harassment complaint within 90 days of the date the complaint was filed.

Depending on the complexity of the complaint, and the individuals involved, the Authority may wish to consider an external investigator, particularly if they are getting close to the 90-day timeline.

(Date)

(Recipient name) (Title) (Department)

(Phone number, e-mail address) Saugeen Valley Conservation Authority

Dear (Employee name),

This letter confirms that your complaint regarding a recent incident of (Insert appropriate violence or harassment) has been received by the Authority. Saugeen Valley Conservation Authority will be investigating the aforesaid allegations.

The Authority's investigation will adhere to the process detailed in the company's violence and harassment policy. Throughout the investigation, confidentiality will be of the utmost importance and must be maintained by all parties involved. Saugeen Valley Conservation Authority will do everything it can to protect the privacy of the individuals involved and to ensure that both complainant and respondent are treated fairly and respectfully.

Upon the completion of the Authority's investigation, a decision will be made, and the outcome will be communicated in writing to all applicable parties.

Note: There is no requirement under the Ontario OHSA or Human Rights Code to provide a full copy of an investigation report, or any investigation materials, to the parties involved in a complaint (complainant or respondent). While communication of the investigation outcome is required, the full report is Authority property and does not have to be provided.

For further information about the investigation process, please contact (Contact name) at (Insert phone number).

Sincerely,

(Signature) (Name)

(Position, title, and department)

Workplace Violence and Harassment Investigation Checklist

Note to client: This checklist has been designed to assist employers with investigating claims or acts of violence in the workplace. It is for planning purposes only. Following the steps below helps ensure you complete a thorough investigation and decide what course of action to take, if any.

Action	Steps to take	Complete
Obtain a description of the incident	• Obtain a written statement from the complainant and ask them to provide as much detail as they are comfortable providing, including the names of any witnesses and the respondent. • Listen to the employee and allow them time to provide a full account of the incident. • Treat the matter seriously. Maintain a professional attitude; avoid making any judgements or comments that deflect the seriousness of the accusation. • Provide a written acknowledgement of the complaint to the employee. • Ensure that the employee is free from retaliation as a result of their coming forward. • Ask the employee how they would like to see the problem resolved and whether there is a resolution that can be reached. • Inform the employee that they may file a complaint with the authorities if they choose.	
Investigating the incident	• Treat and investigate all claims seriously. • Contact the authorities or legal assistance if it appears that the situation may require legal action. • Choose an appropriate, unbiased investigator who has no personal relationship with any parties involved. • Conduct the investigation immediately after learning of the complaint. Ensure the investigation is completed by specific timelines required by legislation. • Remain impartial, focus on generalities, and never offer any personal opinions or say anything to compromise the investigation. • If conducting the investigation internally or personally: Prepare interview questions that elicit as much information as possible and interview the respondent and any witnesses identified. • Strictly adhere to the process detailed in the Authority's • violence and harassment policy. • Review any previous incidents, claims, or investigations of workplace violence involving the complainant or respondent.	

Action	Steps to take	Complete
	• If more than one allegation has been made, handle each one separately. • Document all information appropriately.	
Confidentiality	• Ensure that the complaint, investigation, and all information gathered remain confidential to the extent possible for the investigation. • Do not promise absolute confidentiality, as some information may need to be revealed to the complainant and respondent. • Information should be shared only where necessary, on a need-to-know basis, with appropriate parties. Limit who has access to information and inform them of the need to keep information confidential. • To avoid defamation liability, never use the situation or the results as an example to others or as a training tool.	
Interview the complainant	• Obtain a full written account of the incident, including a timeline of events and people involved or witnesses, and document all details provided. • Determine possible effects on the complainant, and assess the need for further support, medical care, psychological support, or accommodations while dealing with the incident. • Explain the seriousness of workplace violence accusations, and that a thorough investigation will be conducted before reaching any conclusion or corrective action. • Assure the complainant that they will not be retaliated against for making the complaint. • Determine whether it was an isolated incident or if a pattern of previous episodes exists. • Avoid making any statements about the respondent's • character, job performance, or personal life.	
Interview the respondent	• Inform the respondent of the complaint and allegation against them. • Allow the respondent to tell their side of the situation. • Remain neutral, professional, and do not use harsh interrogation tactics. • Obtain a detailed written statement from the respondent. • Document the areas of disagreement between the testimonies provided by both parties. • Identify any personal and reporting relationships, or hierarchy structures between the respondent and the complainant.	

Action	Steps to take	Complete
	• If the respondent is in a leadership role, indicate their job title, obtain a copy of their job description, and • determine their specific duties at the time of the alleged harassment.	
Interview witnesses	• Obtain from any witnesses written statements that either support or deny any of the allegations made. • Assure all witnesses that their cooperation is important, their testimony is confidential, and they will not be retaliated against for testifying. • Clarify any discrepancies among accounts from witnesses, the complainant, and the respondent.	
Resolve the complaint	• Review all documented accounts, interviews, and any information associated with the incident to prepare for a resolution. • Ensure the decision is strictly based on facts and not personal opinion or emotion. • Provide a written letter communicating the results of the investigation and actions taken to both the complainant and the respondent. Note that only the results and action taken should be communicated in a summary letter. The full investigation report is confidential Authority property. Ensure both parties understand the resolution. Even if they are not in agreement, they must acknowledge they are aware. • If the complainant requires or requests a transfer, obtain their consent, and ensure that it does not negatively affect their employment. • Where disciplinary action is required, determine the level of discipline based on the severity of the incident, previous action taken in similar circumstances, the employee's previous history, and the frequency. Any forms of discipline short of termination should follow Authority policy on discipline and be accompanied by a written warning stating that any reoccurrence of misconduct may result in immediate dismissal. If no discipline is imposed, document the rationale.	
After the resolution	• Review and revise workplace violence policies where needed. • Communicate the Authority workplace violence policy to all employees. • Provide counselling where appropriate. • Ensure all employees have received training on workplace violence. • Conduct a violence risk assessment to determine the	

Action	Steps to take	Complete
	likelihood of an incident occurring again and implement any necessary procedures or precautions to prevent similar incidents from occurring. • Carefully and fully document a final report that summarizes the investigation, parities involved, findings of the investigation, the discipline imposed, issues that were not resolved, and any remedial or preventive steps taken.	

Sexual Harassment Investigation Checklist

Note to client: This checklist is designed to help employers investigate claims of sexual harassment in the workplace. It is for planning purposes only. Following the steps below will help you complete a thorough investigation and determine what course of action to take, if any.

Action	Steps to take	Complete
Obtain a description of the incident	• Obtain a written statement from the complainant and ask them to provide as much detail as they are comfortable providing, including the names of any witnesses and the respondent. • Listen to the employee and allow them time to provide a full account of the incident. • Treat the matter seriously. Maintain a professional attitude, avoid making any judgements or comments that downplay the seriousness of the accusation. • Provide a written acknowledgement of the complaint to the employee. • Ask the employee how they would like to see the problem resolved and whether there is a resolution that can be reached. • Ensure that the employee is free from retaliation as a result of their coming forward. • Inform the employee that they may file a complaint with the authorities if they choose to.	☐
Confidentiality	• Ensure that the complaint, investigation, and all information gathered remain confidential to the extent possible for the investigation. • Do not promise absolute confidentiality, as some information may need to be revealed to the complainant and respondent. • Information should be shared only where necessary, on a need to know basis, with appropriate parties. Limit who has access to information and inform them of the need to keep information confidential. • To avoid defamation liability, never use the situation or the results as an example to others or as a training tool	☐

Action	Steps to take	Complete
Investigate the incident	• Treat and investigate all claims seriously. • Choose an appropriate, unbiased investigator who has no personal relationship with any parties involved. • Conduct the investigation immediately after learning of the complaint. Ensure investigation is completed within any specific timelines required by legislation. • Contact the authorities or legal assistance if it appears that the situation may require legal action. • Remain impartial, focus on generalities, and never offer any personal opinions or say anything to compromise the investigation. • If conducting the investigation • internally or personally: Prepare interview questions that elicit as much information as possible and interview the respondent and any witnesses identified. • Strictly adhere to the process detailed in the Authority's • sexual harassment policy. • Review any previous incidents, claims, or investigations of sexual harassment involving the complainant or respondent. • If more than one allegation has been made, handle each one separately. • Document all information appropriately.	☐
Interview the complainant	• Obtain a full written account of the incident and timeline of events, and document all details provided. • Determine possible effects on the complainant, and assess the need for further support, medical care, psychological support, or accommodations while dealing with the incident. • Explain the seriousness of a sexual harassment accusation, and that a thorough investigation will be conducted before reaching any conclusion or corrective action. • Assure the complainant that they will not be retaliated against for making the complaint. • Determine whether it was an isolated incident or if a pattern of previous episodes exists. • Avoid making any statements about the respondent's character, job performance, or personal life.	☐

Action	Steps to take	Complete
Interview the respondent	• Inform the respondent of the complaint and allegation against them. • Allow them to respond to the situation. • Remain neutral, professional, and do not use harsh interrogation tactics. • Obtain a detailed written statement from the respondent. • Document the areas of disagreement between the testimonies provided by both parties. • Identify any personal and reporting relationships, or hierarchy structures between the respondent and the complainant. • If the respondent is in a leadership role, indicate their job title, obtain a copy of their job description, and determine their specific duties at the time of the alleged harassment.	☐
Interview witnesses	• Obtain from any witnesses written statements that either support or deny any of the allegations made. • Assure all witnesses that their cooperation is important, their testimony is confidential, and they will not be retaliated against for testifying. • Clarify any discrepancies among the responses of witnesses, the complainant, and the respondent.	☐
Resolve the complaint	• Review all documented accounts, interviews, and any information associated with the incident to prepare for a final resolution. • Ensure the decision is strictly based on facts and not personal opinion or emotion. • Provide a written letter communicating the results of the investigation and actions taken to both the complainant and the respondent. Note that only the results and action taken should be communicated in a summary letter. The full investigation report is confidential Authority property. • Ensure both parties understand the resolution. Even if they are not in agreement, they must acknowledge they are aware. • If the complainant requires or requests a transfer, obtain their consent, and ensure that it does not negatively affect their employment. • Where disciplinary action is required, determine the level of discipline based on the severity of the incident, previous action taken in similar circumstances, the employee's previous history, and the frequency. • Any forms of discipline short of termination should	☐

Action	Steps to take	Complete
	follow Authority policy on discipline and be accompanied by a written warning stating that any reoccurrence of misconduct may result in immediate dismissal. • If no discipline is imposed, document the rationale	
After the resolution	• Review and revise any workplace sexual harassment policies as needed. • Communicate the Authority sexual harassment policy to employees. • Provide counseling where appropriate. • Provide employees with sexual harassment training. • Carefully and fully document a final report that summarizes the investigation, parities involved, findings of the investigation, the discipline imposed, issues that were not resolved, and any remedial or preventive steps taken.	☐

Harassment Investigative Interview Questions

Intent

Harassment can have serious consequences. Behaviours such as emotional and psychological intimidation and harassment can be disruptive and harmful to the victim and can quickly turn into physical violence. This document has been created to outline best practices and provide some helpful questions to ask while interviewing an employee about potential harassment. Employees who come forward with allegations of harassment must not face any form of reprisal if they have done so in good faith.

Best Practices

- The conversation with the employee should be held with SVCA's Manager of Corporate Services anda a manager or supervisor with whom the individual is comfortable.
- Be sure to hold the conversation in a private area to maintain confidentiality and be respectful of the employee's privacy.
- Take a supportive approach.
- Assure the individual that you are available to talk anytime, and that support is available.
- The Authority has an Employee Assistance Program; be sure to discuss the available benefits and provide the information to the employee so that they can contact your provider if they choose to do so.
- If the employee discloses that there has been an incident of harassment, be sure to fully investigate the claims.

Interview the Complainant

- Obtain a full account of the incident, and document all details provided.
- Determine any potential pattern involved, or if the incident was a singular occurrence.
- Determine if the incident was influenced by any contextual factors.
- Identify any reporting relationships or hierarchical structures that may have influenced the incident. Determine a timeline of events associated with the incident, what the job duties of each party were at the time of the incident, and what their expected locations were.
- Examine the potential of a charge made under false pretenses, and any motivating factors that may be involved. Work to rule out these potential elements.
- Inform the complainant that a thorough investigation will take place.
- Obtain a written, signed, and dated statement from the complainant.
- Ensure that the employee is free from retaliation as a result of their coming forward.

Interview the Respondent

- Describe the details of the accusation and ask for clarification on any discrepancies between the two stories.
- Identify any reporting relationships, or hierarchical structures that exist between the parties.
- Determine a timeline of events associated with the incident, what the job duties of each party were at the time of the incident, and what their expected locations were.

- Determine any potential for retaliation or reprisal and inform the accused that this would be unacceptable.
- Document all pertinent details of the interview, including observations of behaviour displayed and their account of the incident.

Interview Witnesses

- Obtain written, dated, and signed statements from any witnesses.
- Ensure that the employee is free from retaliation as a result of their coming forward.

Interview Questions

1. Where and when did the incident occur?

2. Who was involved in the incident?

3. What happened before the incident occurred?

4. What happened during the incident?

5. Did anyone else witness the incident? If so, please provide their names.

6. If the incident was witnessed by someone else, what was their role in the incident?

7. How did you react to the incident?

8. If applicable, describe any previous incidents.

9. Is there anyone else who may have relevant information regarding this?

10. Have you talked to anyone about the incident? If so, please provide their names. What did you tell them?

11. How would you like to see the situation resolved?

12. Is there anything else you want to tell me that I haven't asked you about?

Follow-Up

Harassment investigations are fluid and follow-up interviews may be required if additional clarification is necessary. Before concluding the initial interview with the interviewee, ensure that the individual is aware that they may be asked to provide additional information as necessary to support your investigation later in the process.

Harassment Complaint Findings Report

Intent

This report details the findings of a workplace harassment complaint. All findings are confidential, unless requested by any authorities as the subject of an investigation.

This report will not be publicized and is intended as an internal document. Saugeen Valley Conservation Authority will retain this information per statutory guidelines.

This report will not contain any personal opinions or judgments of the investigative team, but a summary of the facts as they were presented.

Background

Name(s) of Investigator(s):
Name(s) of Complainant(s):
Name(s) of Respondent(s):
Name(s) of Witness(es):
Date(s) of Occurrence:
Basic Summary of Complaint:

List of Statements (from all parties) to be included in the Report

1.
2.
3.

Additional Evidence Gathered

1.
2.

3.

Summary of Findings

Authorities Contacted (if Applicable)

Name of Authority:	Contact # of Authority:

Resolution of Complaint

Background

Name(s) of Investigator(s):
Name(s) of Complainant(s):
Name(s) of Respondent(s):
Name(s) of Witness(es):
Date(s) of Occurrence:
Basic Summary of Complaint:

List of Statements (from all parties) to be included in the Report

1.
2.
3.

Additional Evidence Gathered

1.
2.
3.

Summary of Findings

Authorities Contacted (if Applicable)

Name of Authority:	Contact # of Authority:

Resolution of Complaint

In this section, investigators are to detail what workplace actions (if any) were taken to resolve the issue. This may include any suspensions during the investigation; any employee transfers made as a result of the complaint; and whether or not the complaint resulted in a termination or resignation.

Violence, Harassment, or Sexual Harassment Investigation Letter – Complainant – Complaint Validated

(Date)

(Recipient Name) (Title) (Department)

(Phone Number, Email Address) Saugeen Valley Conservation Authority Dear (Recipient Name),

Upon review of the (violence/harassment/sexual harassment) complaint you filed on (Insert Date) with (Insert Name of Appropriate Authority), in which (Insert Name of Respondent) was the Respondent, Saugeen Valley Conservation Authority conducted a thorough investigation of the available information and determined that your complaint was well-founded. This letter is intended to provide you with the results of the investigation and to update you on corrective or disciplinary action that has or will be taken to remedy the situation.

All information collected during the investigation is strictly confidential. Saugeen Valley Conservation Authority takes all reasonable precautions to protect the personal information of all parties involved. Saugeen Valley Conservation Authority safeguards all information collected over the course of the investigation in accordance with our violence, harassment, and sexual harassment program. Additionally, it is your responsibility to limit disclosure or discussion of the investigation and the information collected during the investigation to those parties directly involved in the investigation.

Please find attached to this letter the following documents, which are provided strictly for the purposes of disclosing to you the outcome of the investigation and are not to be copied, distributed, or communicated to any parties not directly involved in the investigation (List Attached Documents):

- Complaint Investigation Form
- Harassment Complaint Findings Report
- Violence Investigation Follow-Up Form
- Violence Incident Report Form

As a result of the findings of the investigation, the following (disciplinary action/corrective action/action) has been or will be taken:

(Provide a Brief Summary of Action Taken)

If you have any concerns regarding the investigation, the action taken, or any further issues relating to the complaint, please do not hesitate to contact (Insert Appropriate Authority). Saugeen Valley Conservation Authority will take all reasonable action to ensure that your safety is protected.

Thank you for your cooperation in this matter and for helping us to ensure that we maintain a safe workplace environment. We will proactively work to ensure that a similar incident does not occur again.

Sincerely, (Signature) (Name)

(Position, Title, and Department)

Violence, Harassment, or Sexual Harassment Investigation Letter – Complainant – Complaint Dismissed

(Date)

(Recipient Name) (Title) (Department)

(Phone Number, Email Address) Saugeen Valley Conservation Authority Dear (Recipient Name),

Upon review of the (violence/harassment/sexual harassment) complaint you filed on (Insert Date) with (Insert Name of Appropriate Authority), in which (Insert Name of Respondent) was the Respondent, Saugeen Valley Conservation Authority conducted a thorough investigation of the available information and determined that the situation in question did not constitute (violence/harassment/sexual harassment). As a result, your complaint has been dismissed and will not be investigated further unless additional information is presented that has the potential to influence the conclusions drawn by the investigation. This letter is intended to provide you with the results of the investigation.

Your complaint was dismissed due to (State reason for dismissal of complaint, e.g., action was a legitimate exercise of management authority, Respondent could not reasonably have known that the action was unwanted, hurtful, or offensive). The decision to dismiss your complaint took into consideration the violence, harassment, and sexual harassment policies of Saugeen Valley Conservation Authority and all applicable legislation.

All information collected during the course of the investigation is strictly confidential. Saugeen Valley Conservation Authority takes all reasonable precautions to protect the personal information of all parties involved. Saugeen Valley Conservation Authority safeguards all information collected over the course of the investigation in accordance with our violence, harassment, and sexual harassment program. Additionally, it is your responsibility to limit disclosure or discussion of the investigation and the information collected during the investigation to those parties directly involved in the investigation.

Please find attached to this letter the following documents, which are provided strictly for the purposes of disclosing to you the outcome of the investigation and are not to be copied, distributed, or communicated to any parties not directly involved in the investigation (List Attached Documents):

Complaint Investigation Form

Harassment Complaint Findings Report

Violence Investigation Follow-Up Form

Violence Incident Report Form Choose:

As a result of the findings of the investigation, no (disciplinary action/corrective action) has or will be taken.

OR

Although the investigation did not reveal any contraventions of the *Occupational Health and Safety Act*, it has been determined that additional action is required. As such, the following (disciplinary action/corrective action) will be taken: (Describe disciplinary or corrective action).

If you have any additional information pertaining to your complaint that was not considered during the course of the investigation and which may affect the conclusions drawn by the investigation, please communicate it to (Insert Appropriate Authority) so that it may be assessed. Information that was already disclosed during the course of the investigation will not be re-evaluated.

If you have any concerns regarding the investigation or any further issues relating to the complaint, please do not hesitate to contact (Insert Appropriate Authority). Saugeen Valley Conservation Authority will take all reasonable action to ensure that your safety is protected.

Thank you for your cooperation in this matter and for helping us to ensure that we maintain a safe workplace environment.

Sincerely, (Signature) (Name)

(Position, Title, and Department)

Violence, Harassment, or Sexual Harassment Investigation Letter - Respondent – Complaint Validated

(Date)

(Recipient Name) (Title) (Department)

(Phone Number, Email Address) Saugeen Valley Conservation Authority Dear (Recipient Name),

Upon review of the (violence/harassment/sexual harassment) complaint that was filed by (Insert Name of Complainant) on (Insert Date) with (Insert Name of Appropriate Authority), in which you were the Respondent, Saugeen Valley Conservation Authority conducted a thorough investigation of the available information and determined that the complaint was well-founded. This letter is intended to provide you with the results of the investigation and to update you on corrective or disciplinary action that has or will be taken to remedy the situation.

The complaint made against you was determined to be well-founded due to (State reason for decision, e.g., the action should have reasonably known to be inappropriate). The decision in this case took into consideration the violence, harassment, and sexual harassment policies of Saugeen Valley Conservation Authority and all applicable legislation.

All information collected during the investigation is strictly confidential. Saugeen Valley Conservation Authority takes all reasonable precautions to protect the personal information of all parties involved. Saugeen Valley Conservation Authority safeguards all information collected over the course of the investigation in accordance with our violence, harassment, and sexual harassment program. Additionally, it is your responsibility to limit disclosure or discussion of the investigation and the information collected during the investigation to those parties directly involved in the investigation.

Please find attached to this letter the following documents, which are provided strictly for the purposes of disclosing to you the outcome of the investigation and are not to be copied, distributed, or communicated to any parties not directly involved in the investigation (List Attached Documents):

Complaint Investigation Form

Harassment Complaint Findings Report

Violence Investigation Follow-Up Form

Violence Incident Report Form

As a result of the findings of the investigation, the following (disciplinary action/corrective action/action) has been or will be taken:

(Provide a Brief Summary of Action Taken)

If you have any concerns regarding the investigation, the action taken, or any further issues relating to the complaint, please do not hesitate to contact (Insert Appropriate Authority).

Thank you for your cooperation in this matter. Sincerely,

(Signature) (Name)

(Position, Title, and Department)

Violence, Harassment, or Sexual Harassment Investigation Letter – Respondent – Complaint Dismissed

(Date)

(Recipient Name) (Title) (Department)

(Phone Number, Email Address) Saugeen Valley Conservation Authority Dear (Recipient Name),

Upon review of the (violence/harassment/sexual harassment) complaint filed by (Insert Complainant Name) on (Insert Date) with (Insert Name of Appropriate Authority), in which you were named as the Respondent, Saugeen Valley Conservation Authority conducted a thorough investigation of the available information and determined that the situation in question did not constitute (violence/harassment/sexual harassment). As a result, the complaint has been dismissed and will not be investigated further unless additional information is presented that has the potential to influence the conclusions drawn by the investigation. This letter is intended to provide you with the results of the investigation.

The complaint was dismissed due to (State reason for dismissal of complaint, e.g., action was a legitimate exercise of management authority, Respondent could not reasonably have known that the action was unwanted, hurtful, or offensive). The decision to dismiss the complaint against you took into consideration the violence, harassment, and sexual harassment policies of Saugeen Valley Conservation Authority and all applicable legislation.

All information collected during the investigation is strictly confidential. Saugeen Valley Conservation Authority takes all reasonable precautions to protect the personal information of all parties involved. Saugeen Valley Conservation Authority safeguards all information collected over the course of the investigation in accordance with our violence, harassment, and sexual harassment program. Additionally, it is your responsibility to limit disclosure or discussion of the investigation and the information collected during the investigation to those parties directly involved in the investigation.

Please find attached to this letter the following documents, which are provided strictly for the purposes of disclosing to you the outcome of the investigation and are not to be copied, distributed, or communicated to any parties not directly involved in the investigation (List Attached Documents):

Complaint Investigation Form

Harassment Complaint Findings Report

Violence Investigation Follow-Up Form

Violence Incident Report Form Choose:

As a result of the findings of the investigation, no (disciplinary action/corrective action) has or will be taken against you.

OR

Although the investigation did not reveal any contraventions of the *Occupational Health and Safety Act*, it has been determined that additional action is required. As such, the following (disciplinary action/corrective action) will be taken: (Describe disciplinary or corrective action).

If you have any concerns regarding the investigation or any further issues relating to the complaint, please do not hesitate to contact (Insert Appropriate Authority).

Thank you for your cooperation in this matter. Sincerely,

(Signature) (Name)

(Position, Title, and Department)

Violence Investigation Follow–Up Form

Complainant Employee's Name	Complainant Employee's Position
Alleged Perpetrator's Name	Alleged Perpetrator's Position
Date of the Incident(s)	Date of Formal Accusation
Accusation Received By: ☐ Supervisor ☐ JHSC	
Investigation Completed: ☐ Yes ☐ No	
Findings (Results) from Investigation:	
Action Taken:	
Date Form Completed:	
Form Completed By:	

Harassment Follow-Up Form

Complainant Employee's Name	Complainant Employee's Position
Alleged Harasser’s Name	Alleged Harasser’s Position
Date of the Incident(s)	Date of Formal Allegation
Accusation Received By: ☐ Supervisor ☐ JHSC	
Brief Description of allegations:	
Investigation completed: • ☐ Yes • ☐ No	
Was harassment found as defined in the Workplace Violence, Harassment, Sexual Harassment Policy? • ☐ Yes • ☐ No	

Was corrective action required?

- ☐ Yes
- ☐ No

Were the results of the investigation communicated to both complainant and respondent?

- ☐ Yes
- ☐ No

Date investigation completed:

Findings (results) from investigation:

**Note: If the results exceed the limits of this page, additional pages will be attached to this form.*

Actions taken:

**Note: If the actions taken exceed the limits of this page, additional pages will be attached to this form.*

Date Form Completed:

Form Completed By:

1078 Bruce Road 12 | P.O. Box 150 | Formosa ON
Canada | N0G 1W0 | 519-364-1255
www.saugeenconservation.ca
publicinfo@svca.on.ca

Report EPR-2026-01

Report to: Chair and Directors, Saugeen Valley Conservation Authority

From: Matt Armstrong, Manager, Environmental Planning and Regulations (EPR)

Date: January 15, 2026

Subject: Copying Authority Members on EPR Correspondence

Purpose: To inform the Board of neighbouring CA practices related to copying Authority Members on environmental planning and regulations correspondence.

Background

The SVCA Board of Directors received Section 28 Hearing training on July 17, 2025, delivered by John Olah of Beard Winter LLP. John recommended that SVCA change its practice of copying SVCA Directors on correspondence associated with planning and regulation files, as continuing to do so could result in a reasonable apprehension of bias for that Director should the matter reach a Hearing. It was the opinion of Beard Winter LLP that Directors should not have prior knowledge of the subject matter before a Hearing, or as is typical for our approach, before receiving Hearing reports from staff and the appellant, which are distributed at the same time.

The practice copying directors on associated correspondence ceased on September 19, 2025.

At the request of the Board, SVCA staff reached out to Conservation Ontario and neighbouring Conservation Authorities (CAs) to determine if other CAs have taken a similar approach.

Analysis

Conservation Ontario staff advised that copying Directors on correspondence is not a standard practice among conservation authorities and occurs infrequently.

Of the four neighbouring CAs contacted, one continues to copy Directors on permits and planning comment letters, while the remaining three do not.

Discussion

Directors are encouraged to direct landowners with questions on various environmental planning and regulation matters to EPR staff. Staff prefer this approach and welcome the opportunity to have these discussions with landowners.

Strategic Plan Linkages

A1.6 – Accessibility

E1.5 – Liability Assessment and Action

Prepared by:
[Original Signed by:]
Matt Armstrong
Manager, Environmental Planning and Regulations

Approved by:
[Original Signed by:]
Erik Downing
General Manager/Secretary-Treasurer

1078 Bruce Road 12 | P.O. Box 150 | Formosa ON
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www.saugeenconservation.ca
publicinfo@svca.on.ca

Report EPR-2026-02

Report To: Chair and Directors, Saugeen Valley Conservation Authority

From: Brandi Walter, Environmental Planning Coordinator, Environmental Planning and Regulations

Date: January 15, 2026

Subject: Memorandum of Understanding for Planning Review Services Between SVCA and the County of Bruce

Purpose: To endorse the updated Memorandum of Understanding for Planning Review Services between SVCA and the County of Bruce

Recommendation

THAT Saugeen Valley Conservation Authority endorse the updated Memorandum of Understanding for Planning Review Services Between SVCA and the County of Bruce; and
THAT the updated Memorandum of Understanding be circulated to Bruce County Council for review and approval.

Background

Counties and local municipalities have been delegated the planning authority function by the Province of Ontario; through the Planning Act (PA), Conservation Authorities (CAs) are considered public bodies in matters relating to natural hazard policies in the Provincial Planning Statement (PPS). Chapter 5 of the PPS contains land use planning policies related to natural hazards and requires that planning authorities collaborate with CAs to identify hazardous lands and hazardous sites and manage development in these areas.

Section 7 of O. Reg. 686/21 (Mandatory Programs and Services) delegates CA responsibilities under the PA relating to natural hazards. Through the regulation a CA shall provide programs and services, whether acting on behalf of the Ministry of Natural Resources and Forestry (MNRF) or in its capacity as a public body under the PA, to help ensure decisions under the PA are consistent with the natural hazards policies of the PPS; including, but not limited to, reviewing applications or other matters under the PA and providing comments, technical support or information to the responsible planning authority under that Act.

Bruce County and SVCA have a long-standing relationship related to land use planning; the updated Memorandum of Understanding (MOU) replaces the 2019 SVCA/County of Bruce MOU. SVCA staff have been working with the County, Grey Sauble Conservation Authority (GSCA), and Maitland Valley Conservation Authority (MVCA) on the draft MOU since September 2025. All agencies agreed to move forward with the updated MOU despite the Province's proposed CA amalgamation.

Analysis

SVCA and County plan review functions and responsibilities are defined in legislation. The purpose of the MOU is to provide a framework for effective and timely transfer of expert advice from the SVCA to the County of Bruce on land use planning matters related to natural hazards. The MOU pertains to the collection of SVCA fees, clarification of SVCA and County roles, and includes service delivery standards to streamline and improve the plan review process between Parties.

Since the previous agreement was signed, O. Reg 686/21 (Mandatory Programs and Services) was enacted and there have been significant changes to the *Conservation Authorities Act*. These changes dictate a notable departure of some services from the existing MOU, including:

1. Natural Heritage review has been removed. CAs can only comment to Natural Hazards (except for wildland fire) for Planning Act matters.
2. Review of the 'Water Sections' of the PPS has been removed. However, CAs will continue to screen for drinking water threats. As per O. Reg 686/21, CAs shall provide services to ensure they carry out its duties under the Clean Water Act.
3. For planning applications (zoning by-law amendments, consents, etc.), SVCA review of consistency to local natural hazard policies has been removed. Through legislation, CAs can only comment to consistency with the natural hazard policies of the PPS for Planning Act matters. For clarification, CAs are still required to review Official Plan and Zoning By-law updates for consistency with the natural hazard policies of the PPS.

In addition to the above changes, Bruce County has requested a separate MOU with each CA in its jurisdiction, which is a departure from previous agreements. A copy of the current MOU and a draft of the updated MOU are attached.

Next Steps

A copy of the updated and SVCA endorsed MOU will be presented to Bruce County Council for review and approval; after which, the MOU will be returned to SVCA for signing.

Strategic Plan Linkages

C1.0 - Cultivating strong relationships, increased collaboration
C1.6 - Customer Service Standards

Prepared by:
[Original Signed by:]
Brandi Walter
Environmental Planning Coordinator

Approved by:
[Original Signed by:]
Erik Downing
General Manager / Secretary-Treasurer

Corporation of the County of Bruce
30 Park Street, P.O. Box 70, Walkerton, ON, N0G 2V0
brucecounty.on.ca

45.0°N 81.3°W
BRUCE
county

October 28, 2019

SAUGEEN CONSERVATION
NOV 04 2019
RECEIVED

Saugeen Valley Conservation Authority
Attn: Mr. Wayne Brohman, General Manager
1078 Bruce Road 12
Formosa, ON
N0G 1W0

Dear Mr. Brohman,

Bruce County Council, at its session held the 5th day of September, 2019 adopted By-law 2019-048, a by-law to authorize the execution of a Memorandum of Agreement between the Corporation of the County of Bruce, the Saugeen Valley Conservation Authority, the Grey Sauble Conservation Authority and the Maitland Valley Conservation Authority to provide for the payment of fees for processing of applications made in respect of certain planning matters.

Attached is a fully executive agreement for your records.

Thank you.

Regards,

Darlene Batte

Darlene Batte
Deputy Clerk

Encl.

SAUGEEN CONSERVATION
NOV 04 2019
RECEIVED

MEMORANDUM OF AGREEMENT dated 5th day of September, 2019.

BETWEEN

THE CORPORATION OF THE COUNTY OF BRUCE

(Hereinafter referred to as the "**County**")

AND

THE SAUGEEN VALLEY CONSERVATION AUTHORITY

(Hereinafter referred to as the "**SVCA**")

AND

THE GREY SAUBLE CONSERVATION AUTHORITY

(Hereinafter referred to as the "**GSCA**")

AND

THE MAITLAND VALLEY CONSERVATION AUTHORITY

(Hereinafter referred to as the "**MVCA**")

Collectively referred to as "**the Conservation Authority (CA)**"

1. PURPOSE

The purpose of this Memorandum of Agreement (hereinafter referred to as "Agreement") is to provide a framework for effective and timely transfer of expert advice from the Conservation Authority(s) to the County of Bruce on land use planning matters.

The goal of the Agreement is to facilitate meaningful and timely expert advice from the Conservation Authority (CA) on Planning Act applications in the areas of environmental hazards and natural heritage as set out in the Bruce County Official Plan and locally adopted Official Plans as well as the Provincial Policy Statement (PPS). Parties will endeavor to provide open and timely sharing of information including mapping environmental hazards, natural heritage features, land-use designations and mapping of agricultural systems.

2. DEFINITIONS, in the context of this agreement:

The definitions below are general in nature. For the purposes of reviewing matters under this agreement, reference shall be made to the "Hazard Lands" and "Natural Heritage" policies found in the Bruce County Official Plan, Zoning By-law, or the local plan in effect and as defined in the Provincial Policy Statement, as amended

"Dispute Resolution" - It is expected that there will be differences of opinion, or priorities may differ between County staff and others in the planning process. It is the intent of all parties that they will use their best efforts to first resolve these disputes through meetings, email, telephone discussions between individuals so that most disputes or differences can be resolved promptly by the department(s) in charge of the service. If a dispute cannot be resolved in this manner then the issue in dispute will be raised to the level of the department head in charge of the service(s), and the department heads agree to follow the dispute resolution procedures as outline in Appendix 'D'.

"Hazardous lands" are generally defined as property or lands that could be unsafe for development due to naturally occurring processes. Along the shorelines of the Lake Huron and Georgian Bay, this means the land, including that covered by water, between the international boundaries, where applicable, and the furthest landward limit of the flooding hazard, erosion hazard or dynamic beach hazard limits.

Along the shorelines of large inland lakes, this means the land, including that covered by water, between a defined offshore distance or depth and the furthest landward limit of the flooding hazard, erosion hazard or dynamic beach hazard limits.

Along river, stream and small inland lake systems, this means the land, including that covered by water, to the furthest landward limit of the flooding hazard or erosion hazard limits.

"Natural heritage features and areas" are generally defined as features and areas, including significant wetlands, significant coastal wetlands, other coastal wetlands, fish habitat, significant woodlands and significant valley-lands, habitat of endangered species and threatened species, significant wildlife habitat, and significant areas of natural and scientific interest, which are important for their environmental and social values.

3. BACKGROUND

The County and local municipalities have been delegated the Plan Review function by the Province of Ontario.

Bruce County Council (or its delegate) is the approval body for development applications as provided for under the Planning Act R.S.O. 1990, CHAPTER P.13. Specifically, these applications include:

- Official Plan Amendments (exempt from Ministers approval for County amendments, delegated approval authority for local plan amendments)
- Severance applications, including easements and right of Ways
- Plan of subdivision and condominium applications
- Part Lot Control Exemption By-laws (approval body)

The Councils of the 8 local municipalities within the County of Bruce are the approval authority for a range of applications as provided for under the Planning Act R.S.O. 1990, CHAPTER P.13. Bruce County Planning and Development Department staff provide land use planning services to the 8 local municipalities within the County of Bruce. Department staff process certain development applications on their behalf. Specifically, these applications include:

- Rezoning applications
- Committee of Adjustment applications (minor variance/permissions)
- Part Lot Control Exemption By-law

The Conservation Authorities (CA) have been delegated to represent the 'Provincial Interest' for natural hazard management encompassed by the Provincial Policy Statement as amended. This delegated responsibility requires CAs to review and provide comments on municipal policy documents (Official Plans and comprehensive Zoning By-laws) and applications submitted pursuant to the Planning Act as part of the Provincial One-Window Plan Review Service. This responsibility is outlined in the Conservation Ontario/Ministry of Natural Resources (MNR, currently Ministry of Natural Resources and Forestry (MNRF))/ Ministry of Municipal Affairs and Housing (MMAH) Memorandum of Understanding on Conservation Authority delegated responsibilities.

4. RATIONALE FOR AGREEMENT

County and local Councils are granted the statutory authority for land use planning. These Councils rely upon Planning and Development Department staff to receive applications, review and analyze proposals, and to ultimately make a final recommendation to the respective council

on the applications. These decisions need to be based on the best information available to them at the time, within the statutory time frames as set out in the Act.

County Planning and Development staff are tasked with considering a wide range of variables that impact a land use application, evaluating the information at hand, and making final professional land use recommendations to the respective councils.

The County of Bruce Official Plan (and local plans in effect) direct new development to areas outside of hazardous lands that may pose a threat to life or property. Additionally, the County Plan (and local plans) aim to protect natural heritage features and areas. In some areas development is outright prohibited, and in other areas some level of development is permitted, provided it can show that the proposed development has no negative impact on features or functions.

The County does not always have in-house expertise that would provide for a fulsome review of such issues. The reason then for the Agreement, is to seek out expert advice from the Conservation Authority(s) in the area of natural heritage.

5. ROLES AND RESPONSIBILITIES

(a) The County and the Conservation Authorities mutually agree that:

i) This Memorandum of Agreement applies to the Conservation Authorities within the areas under its jurisdiction which are in the County of Bruce. This Agreement is not intended to nullify or alter any specific agreements already in place between partner organizations;

a. As there is no Conservation Authority in the Municipality of the Northern Bruce Peninsula (MNBP), and MNRF is not replicating the services provided by a CA, the related accountabilities fall to the municipalities. Under separate agreement the GSCA has agreed to review development applications with regard to natural hazards and natural heritage policies in the Municipality of Northern Bruce Peninsula.

b. The MVCA has not agreed to review applications, policy amendments or other documents with regard to natural heritage, in accordance with Appendix A.

c. The SVCA has agreed to review applications in the MVCA's jurisdiction within the County of Bruce with regard to natural heritage policies, in accordance with Appendix A.

ii) Nothing in this Memorandum of Agreement precludes the Conservation Authorities from commenting to the County from a Conservation Authority perspective, as it normally would on an application circulated by the County under the Planning Act, including appeals to the Local Planning Appeal Tribunal (LPAT);

iii) This Memorandum of Agreement may be amended by mutual agreement, in writing, from time to time to reflect changes in the programs of parties to this Memorandum of Agreement, or as a result of changes in provincial policies, or as a result of subsequent discussions between the parties hereto;

iv) Any party to this Memorandum of Agreement may terminate the agreement at any time, in writing to the other party(s) to the agreement, with a minimum of one- year notice;

v) The Dispute Resolution Procedures, as defined above and contained in Appendix 'D', shall be followed if/when disputes arise; and,

vi) Nothing in this Memorandum of Agreement precludes the CA from administering and enforcing its Regulation of Development, Interference with Wetlands and Alterations to Shorelines and Watercourses, made pursuant to the Conservation Authorities Act

(b) The County commits to:

i) Circulate to the CA under this Memorandum of Agreement all development/planning applications listed in Appendix A;

ii) Transfer appropriate policy statements, guidelines, manuals, maps, information, data and criteria from the County to the CA, as it is received from the Province of Ontario, or make arrangements to have said material transferred directly from the Province to the CA to reflect the terms of this Memorandum of Agreement;

iii) Make other arrangements to provide the application review and/or Technical Review services, when in the opinion of the County and/or the CA that the CA does not have the necessary resources or expertise to provide recommendations on the matter; and,

iv) Collect and remit fees as prescribed in the Conservation Authority fee schedule (Appendix C – 2019 Fee Schedule): or, as amended from time to time. The County acknowledges that the CA may charge to the applicant directly a Pre- consultation fee and/or Technical Review fee as prescribed in Appendix C.

(c) The Conservation Authority commits to:

i) Provide the County with those services listed in Appendix A and B;

ii) Provide planning support and mapping, where applicable when the County is undertaking specific policy or study work related to hazards and natural heritage, including Official Plan and comprehensive zoning by-law updates within the CA service area(s) as outlined in this Agreement;

iii) Provide its comments to the County prior to the public hearing, or public meeting, or due date for submitting comments as indicated on the circulated application or notice, or request an extension with reasons;

iv) Comment on whether the application or policy update complies with applicable Provincial Policies as set out Natural Hazards of the Provincial Policy Statement. Also, comment on whether the application or policy update complies with local policies;

v) Comment and provide an appropriate analysis of the proposed development including, whether the application complies with the Conservation Authorities Act;

vi) Comment on whether the application or policy update complies with Natural Heritage; and, Water Sections of the Provincial Policy Statement, and whether the application or policy update complies with local policies if applicable, within the CA service area(s) as outlined in this Agreement;

vii) Disseminate County data, maps, information or other documents when requested, only in accordance with County policies and procedures;

viii) Apply all relevant Provincial operational procedures and guidelines in the plan review and technical review services it provides the County; and,

ix) Make provision for staff to attend Appeal Board Hearings, upon the request of the County, with respect to the plan review and technical review services provided pursuant to this Memorandum of Agreement, at no extra cost to the County.

Details on the Objectives, expected results, timing and fees in relation to these tasks are outlined in the Appendices B and C, attached to this Agreement.

7. TIME FRAME FOR IMPLEMENTATION

This renewed Memorandum of Agreement replaces all previous Agreements including the agreement signed on April 6th, 2006. This Agreement will come into effect on September 5, 2019.

The parties have duly executed this Memorandum of Agreement under the hands of their authorized Officers.

This Agreement will be reviewed from time to time; and, no less frequently than every 5 years after it comes into effect.

Signed, Sealed and Delivered: **THE CORPORATION OF THE COUNTY OF BRUCE**

Mitch Twolan, Warden

Donna Van Wyck, Clerk

GREY SAUBLE CONSERVATION AUTHOIRTY

~~Sonya Skinner~~ Tim Lanthier
~~GAO~~ Interim General Manager

Cathy Little
Chair

SAUGEEN VALLEY CONSERVATION AUTHORITY

Wayne Brohman
General Manager

Dan Gieruszak
Chair

MAITLAND VALLEY CONSERVATION AUTHORITY

Phil Beard
General Manager

David Turton
Chair

APPENDIX A – SERVICES TO BE PROVIDED

WITHIN THE GEOGRAPHICAL AREAS SET OUT ELSEWHERE IN THE AGREEMENT, THE SERVICES TO BE PROVIDED BY THE CA TO THE COUNTY SHALL BE IN ACCORDANCE WITH THE FEE SCHEDULES (APPENDIX C). ***NOTE: X = PROVIDED***

DESCRIPTION of SERVICES	***DEVELOPMENT / PLANNING APPLICATION REVIEW***	***TECHNICAL CLEARANCE***
Identify need for and conduct technical review of reports on wetland areas impacts and mitigation measures	X	X
Review for site specific (off site) stormwater planning issues	X	X GSCA only
Identify need for and review stormwater management facilities and reports where outlet is to a watercourse or SVCA regulated area (river valley, wetland, shoreline)	X	X GSCA only
Review for sub-watershed planning/master drainage planning	X	X GSCA only
Comment on natural hazards (flooding, erosion, dynamic beaches, unstable soils and bedrock) including technical review of reports relating to hazard land limits and mitigation	X	X
Comment on development in CA-Regulated Areas	X	X
Review impact on natural heritage features (significant wildlife habitat, significant woodlands, significant valleylands, significant areas of natural and scientific interest, significant wetlands)	X	X
Identify fish habitat and conduct review of impacts and mitigation **(1)**	X	
Identify habitat of threatened and endangered species **(2)**	X	
Review impact on natural heritage systems.	X	X
Comment on shoreline processes impact	X	X
Comment on lakes and rivers impacts	X	X
Review and comment on natural resource related impacts on groundwater recharge/discharge areas where there is a fisheries, wetland, or other natural heritage impact.	X	X

Notes:

(1) Review of Fish Habitat is provided in consideration of the Provincial Policy Statement and does not provide clearance on the required statutes or legislation from either the Ministry of Natural Resources and Forestry or the Department of Fisheries and Oceans.

(2) Identification of potential habitat for Threatened and Endangered Species is provided in consideration of the Provincial Policy Statement. The Ministry of Environment, Conservation and Parks is responsible for implementation of the Endangered Species Act.

APPENDIX B: TASK REQUIREMENTS

Task	Objective	Expected Results	Timing	Fees
Pre-consultation with County Staff	The CA's shall assist County Planning staff in responding to landowner/development enquiries where the County staff or Conservation Authority staff determine that there may be a hazard/natural heritage and or regulatory limit issue associated with the proposal. This may require the production of a map by the Conservation Authority indicating the location of natural hazards and regulatory limits.	That County planning staff can provide advice to a landowner / perspective developer on barriers / opportunities (such as relocation of proposed building envelopes) that may be presented if a given proposal is formally pursued. In such cases, accurate details of the proposal shall be provided by County staff, and in turn the Conservation Authority shall provide a response indicating the presence of regulatory limits/hazard lines applicable to the proposal where available.	On a negotiated, reasonable basis Through regularly scheduled "consultation forum" meetings	None
Pre-consultation with prospective applicant	The Conservation Authority shall assist County Planning Staff and/or the applicant prior to formal application submission (pre-consultation) to determine the range and extent of hazard/natural heritage issues and or regulatory limit issues associated with the proposed development. Pre-consultation may include all or one of the following: on-site meetings, teleconference, and/or written correspondence as deemed appropriate by CA and County staff. The Conservation Authority shall assist by providing or reviewing alternative development scenarios that may avoid hazard/natural heritage, recommendations on the "scope" of studies if such studies are recommended as part of a complete application. Only properties which include a portion of the Conservation Authority 's Approximate Screening or Approximate Regulated Area, or any lands featuring natural heritage and/or adjacent lands would require the Conservation Authority 's involvement in the pre- consultation process.	That County planning staff, the Conservation Authority staff and the applicant have a fulsome understanding of any barriers/issues that may be present in the formal application process. An agreed upon approach to "complete application requirements", and the scoping on any proponent-based reports, if required.	On a negotiated/reasonable basis	No fee shall be charged to the County. In some cases, pre-consultation fees due to site visit, research and other costs may be warranted for complex applications. In such cases, pre-consultation fees shall be charged directly by the Conservation Authority to the landowner / proponent.

Formal Planning Act application submission	Upon formal submission of a Planning Act application, the Conservation Authority shall provide expert advice and assistance to the County Planner by identifying any hazard/natural heritage issues or other services outlined in this agreement including Schedule A associated with the application, and provide recommendations on remedial options if appropriate, the location of the regulatory line if the lands are regulated; and, subsequent impacts upon the proposed development where necessary	That County Planning staff can make a final recommendation to Council, with all questions having been addressed. Given the proposed location of the development, regulatory limits shall be determined, on a map, with certainty.	21 days for severance, zoning and minor variance applications. 30 days for all others	The County shall collect fees from the applicant and remit said fees as prescribed in Appendix B to the appropriate Conservation Authority.
Technical Review of documents	In cases where technical reports are submitted by the proponent with an application as part of the County's "complete application" requirements, the Conservation Authority shall provide a Technical Review of the studies, within their areas of expertise and/or experience as outlined in Schedule A The CA may in the review of technical reports and studies, determine that a third party consultant is required to provide a review or evaluation of the technical report or study and will include this information and a recommendation in their comments to the County.	The objective of the Technical Review is to have the following questions answered: a) Have the authors of the technical report chosen an acceptable scope and methodology for the situation at hand and was the methodology correctly applied? b) Given the chosen scope and methodology, and the type, volume and quality of the data collected, are the conclusions of technical reports relevant, valid and supportable? c) If mitigation/monitoring is being proposed by the technical reports, are the measures adequate?	Within 60 days from submission	Fee shall be paid by applicant/proponent directly to Conservation Authority in accordance with Schedule C
Judicial/Quasi-judicial Settings (i.e. Local Planning Appeals Tribunal (LPAT)	From time to time, the Conservation Authority staff may be called upon to provide evidence (as an expert witness) in support of a position taken on a given Planning Act application.	Defense of CA position in relation to an application	NA	None

APPENDIX C

FEE SCHEDULE – PLANNING ACT APPLICATIONS

The County advises the Conservation Authority that under this Agreement it will circulate the following types of development/planning applications to the CA, for comment in accordance with Appendix A.

i) Planning applications, as outlined in Section 3 of the Agreement; and,

ii) Site Plans, Subdivision Agreements, Subdivider's Agreements or other similar plans, agreements or documents where requested by the County or a local municipality.

OVERALL NOTES

- The fees shall be charged to all applicants except as outlined in this section.

  The Authorities reserve the right to waive a fee or reduce the fee on a case by case basis.

  No Application Review Fee shall be charged for municipally sponsored applications.

  Where a permit approval is required under Conservation Authorities Act in addition to the planning approval, the fee for the Conservation Authorities' permit may be discounted at the Authorities' discretion.

- On January 1st of every year, commencing January 1st of 2020, the fees as listed in 'Appendix C: Fee Schedule – Planning Act Applications' of this Agreement shall automatically increase on a percentage basis, rounded up or down to the nearest ten dollar increment, in a fashion consistent with the Statistics Canada "Consumer Price Index" for Ontario from October of the previous calendar year, if the consumer price index shows an increase. The un-rounded fees as calculated by the County shall be retained as the basis for the next year's CPI percentage calculations.

- For applications within MVCA's jurisdiction a 2/3 portion of the Application Review Fee will go to MVCA for Natural Hazard Review and the remaining 1/3 will go to SVCA. These parties agree that the fee proportions may be adjusted upon the agreement of these two parties, and the County will be notified of any mutually-agreed change. Fees paid directly to individual CAs (for example for technical reviews) will only be split if warranted by the type of review (i.e. Natural Hazard related vs. Natural Heritage related vs. both).

- The CA will invoice Bruce County individually for their respective portions of the application review fee.

- The Application Review Fee schedule is based on no pre-screening of applications by the County.

TABLE 1: APPLICATION REVIEW FEES, Natural Hazard and Natural Heritage Review	
Application Type	**Application Review Fee**
Official Plan Amendment	$360.00 per application
Zoning By-law Amendment	$360.00 per application
Consent (Severance)	$360.00 per each new lot created
Minor Variance	$270.00 per application
Draft Plan of Subdivision	$105.00 per each lot or block, with a minimum flat fee of $840.00 and maximum fee of $10,000.00. Note: 0.3 metre reserve blocks shall not be included in the calculation of the number of blocks.
Draft Plan of Condominium	The lesser of $105.00 per unit **or** $1200.00/ha with a minimum flat fee of $840. and maximum fee of $10,000.00
Site Plan Application	The lesser of $105.00 per unit **or** $2000.00/ha with a minimum flat fee of $840.00 and maximum fee of $10,000.00
Private Multi-Lot Residential Development (as an OPA and/or ZBA)	$105.00 per each unit (parcel) **or** block with a minimum flat fee of $840.00 and maximum fee of $10,000.00.
Other Types of Applications not noted above.	$270.00 per application
Municipality of Northern Bruce Peninsula applications	$100. Supplementary plan review fee for each application to facilitate GSCA review.

Table 1 Notes and Definitions:

1) Fees for multiple joint applications made at the same time for the same parcel and for the same development proposal, for Official Plan Amendments, Zoning By-law Amendments, Minor Variances and Consents will be discounted as follows:

First application	Full fee as per Application Review Fee above
Additional application(s)	50% of the full Application Review Fee per lot/application

Note: The First Application Review Fee shall always be the higher of the applicable fees.

2) The Application Review Fee shall be collected by the County on behalf of the Authority and remitted to the applicable Authority(ies) monthly.

TABLE 2 – FEE SCHEDULE FOR TECHNICAL REVIEW OF DOCUMENTS	
Technical Review Type	***Technical Review Fee***
1. Site Plans	*$650.00*
*2. **Scoped Site** Environmental Impact Studies for proposed mitigation measures related to any natural heritage features (refer to Appendix A)*	*$650.00*
*3. **Full Site** Environmental Impact Studies for proposed mitigation measures related to any natural heritage features (refer to Appendix A)*	*$1,440.00*
4. Subwatershed Study/Master Drainage Plan or Tributary Study	*$650.00*
5. Stormwater management studies and proposed facilities. This fee includes review of all Phases of SWM plans from preliminary or conceptual to final engineering design (Quality, Quantity and Sediment and Erosion Control)	*a) if primarily CA internal review - $1440.00 or $75.00/lot or block, whichever is greater* *b) if primarily external review with CA supervision - $40.00/lot or block*
*6. **Scoped Site** Impact studies and proposed mitigation measures for any proposal that is potentially impacted by natural hazards (flooding, slope stability, shorelines)*	*$650.00*
*7. **Full Site** Impact studies and proposed mitigation measures for any proposal that is potentially impacted by natural hazards (flooding, slope stability, shorelines)*	*$1,440.00*
*8. All technical clearance fees are subject to the **Supplementary Fee**, where applicable, in addition to the flat fee*	*See Note 4 below*

Table 2 Notes and Definitions:

1) It is anticipated that the determination of the type of studies required will be made by the County, following consultation with the applicable Conservation Authority. The fee for the technical clearance is to be paid by the proponent directly to the Authorities.

2) **Scoped Site** studies are generally recommended in situations where the nature of the natural feature or hazard is well documented, similar development has been previously proposed, modelled and analyzed, impacts are not expected due to the location or nature of a proposed development, and mitigation options have been developed.

3) **Full Site** studies are generally required in situations, which are more complex, where information is lacking, or where the risk or significance of the impact is high.

4) The **Supplementary Fee** applies when a Conservation Authority chooses to use specific technical assistance from another source to supplement their review of a technical document, and thereby direct costs are incurred by the Authority. This fee is in addition to the flat rate fee and is to be paid by the proponent directly to the Authority. The Supplementary Fee charged to the proponent is equal to the costs invoiced to the Authority by the other source for that specific review.

5) The Technical Review Fee shall be collected directly by the applicable Authority.

APPENDIX D – DISPUTE RESOLUTION PROCEDURE

In the case where the County's Planning staff and Conservation Authority staff disagree on a recommended action the first response should be that the individuals work to resolve the dispute as outlined:

1. Staff should first hold a meeting, email and/or connect by telephone to discuss issues in dispute, and use their best efforts to resolve the matter. Disputes shall be dealt with in a confidential manner.

2. If the dispute cannot be resolved between the individuals
   a. The party with the concern will raise the issue to the department heads in charge of the service(s) by way of a letter or memo.
   b. The department heads shall acknowledge receipt of the dispute within five (5) business days.
   c. The department heads shall review the issues identified by the individual raising the issue and in so doing may:
      - Review relevant municipal and provincial legislation;
      - Review other relevant policies and procedures;
      - Review any existing file documents;
      - Request information from the Staff, the individual in dispute or others involved in the dispute;
      - Identify actions that may be taken to address the dispute and/or improve services and operations; or
      - Take other actions the department head deems necessary to resolve the matter.

3. Decision
   Within ten (10) calendar days of receipt of a notice of dispute by the Department Heads, a joint discussion is encouraged, and unless the issue has been resolved, a response shall be provided in writing to the party with the concern's Department Head involved in the dispute (the "Decision").
   The Decision shall include:
   a) Whether the dispute was substantiated;
   b) If the dispute is not substantiated, the Department Head shall provide the reason(s) for their decision; and,
   c) Any actions the Corporation/CA has or will take because of the dispute and/or actions that should be considered by the CA.

4) From time to time, there may arise circumstances where the Department Head may not be in a position to guarantee response times. If the Department Head is unable to provide a Decision within ten (10) days of receipt, they shall notify the CAO/General Manager of the delay and provide an estimate of when a Decision will be provided.

5) Decisions made by the Department Head may be appealed, in writing, to the Chief Administrative Officer/General Manager within ten (`10) days, or when mutually agreed. The Chief Administrative Officer/General Manager shall review the appeal and may confirm, rescind or amend a Decision. In the event the Dispute cannot be resolved through this Dispute Resolution process, the Dispute may be submitted to the respective Council/Board, as the case may be.

6) There is no appeal process beyond what is defined in Section 5. This dispute resolution process is meant to apply to the services provided under this MOU, and does not limit the appeal or other options open to all parties under the powers granted to them in legislation and regulation, such as but not limited to asking for status at an LPAT hearing.

7) Responsibility
   All Staff should have a clear understanding of how Disputes are handled by the County/CA. All supervisors must comply with, explain this policy to their Staff, and conduct any necessary training.

MEMORANDUM OF UNDERSTANDING

FOR

PLANNING REVIEW SERVICES

BETWEEN

The CORPORATION OF THE COUNTY OF BRUCE

(the "County")

AND

The SAUGEEN VALLEY CONSERVATION AUTHORITY

(the SVCA)

1.0 Legislative Context

Planning Act

The County and local municipalities have been delegated the planning authority function by the Province of Ontario, through the *Planning Act* (PA.) Conservation Authorities (CAs), where they exist, are considered public bodies under the PA in matters relating to natural hazard policies in the Provincial Planning Statement (PPS).

Provincial Planning Statement

Chapter 5 of the PPS contains land use planning policies related to natural hazards. Section 5.2.1 requires that planning authorities shall, in collaboration with CA's where they exist, identify hazardous lands and hazardous sites and manage development in these areas, in accordance with provincial guidance.

Conservation Authorities Act

Section 7 of O. Reg. 686/21 (Mandatory Programs and Services) made under the *Conservation Authorities Act* (CA Act) delegates CA responsibilities under the PA relating to natural hazards. Through s. 7 ss. (1) of the regulation an authority shall provide programs and services to ensure the authority satisfies the functions and responsibilities set out in ss. (2), whether acting on behalf of the Ministry of Natural Resources and Forestry (MNRF) or in its capacity as a public body under the PA, for the purposes of helping to ensure that the decisions under that Act consistent with the natural hazards policies of the PPS, but not including those policies related to hazardous forest types for wildland fire. Section 7 ss. (2) sets the following functions and responsibilities mentioned in ss. (1), which included the following:

1. Reviewing applications or other matters under the PA and, where the authority considers it advisable, providing comments, technical support or information to the responsible planning authority under that Act for the purposes set out in subsection (1).
2. When requested to by the Ministry of Municipal Affairs and Housing (MMAH), providing comments directly to the Ministry within the timeframes requested by the Ministry on applications or other matters under the PA.
3. When requested to by a municipality or planning board, providing advice, technical support, training and any information the municipality or planning board requires for the purposes set out in subsection (1).
4. Apprising MMAH of any applications or matters under the PA where the authority is of the opinion that there is an application or other matter that should be brought to the attention of the Government of Ontario.
5. Providing technical input into and participating in provincial review of applications for approval of a "Special Policy Area" within the meaning of the Provincial Policy Statement, 2020 issued under s. 3 of the PA.
6. When requested to by MMAH, providing support to the Ministry in appeals on applications or other matters under the PA on behalf of the Province at the Ontario Land Tribunal (OLT) for the purposes set out in subsection (1).

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7. Undertaking an appeal to the OLT of a decision under the PA as a public body in accordance with that Act if,
   i. the appeal relates to a purpose described in subsection (1), and
   ii. the authority considers it advisable.

2.0 Background

Bruce County and the SVCA have a long-standing relationship related to land use planning. Bruce County Planning and Development staff provide land use planning services to the 8 local municipalities that comprise the County. Bruce County staff process certain development applications on their behalf and circulate those applications to the SVCA for review and comment.

3.0 Purpose

The purpose of this Memorandum of Understanding (hereinafter referred to as the "MOU") is to provide a framework for effective and timely transfer of expert advice from the SVCA to the County of Bruce on land use planning matters related to natural hazards.

Given SVCA and County plan review services are a legislated responsibility, this MOU pertains to the collection of SVCA fees, clarification of the SVCA and County roles, and includes service delivery standards to streamline and improve the plan review process between Parties.

This MOU is intended to work in tandem with the legislative and policy framework for planning in the Province of Ontario. It is not intended to conflict with responsibilities that have been assigned to any of the Parties, either by statute, regulation, policy or other instrument.

4.0 Definitions

“Conservation Authority Regulated Lands”

Means the area of jurisdiction of an authority as defined in s. 28 (1) of the *Conservation Authorities Act* and s. 1 and 2 of O. Reg. 41/24.

“Natural Hazards”

Means hazardous lands and hazardous sites as defined in the PPS.

“Wetlands”

Means wetland as defined in O. Reg. 41/24.

“Parties”
Means the County of Bruce and the SVCA.

5.0 Guiding Principles

This MOU is based on the following principles. The parties agree to work collaboratively to:

1. Ensure that each step of the PA application review process is complementary, adds value to the decision-making process, and does not result in service duplication,

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2. Make certain that the rigour of review is consistent with the scale and impacts of the project,
3. Safeguard the watershed, including people and property, from natural hazards,
4. Ensure that sharing of information assists and expedites decision-making,
5. Deliver timely, accurate, effective and customer-focused planning service,
6. Eliminate unnecessary duplication between parties to maximize the utilization of existing resources and technical expertise and, where possible, coordinate efforts,
7. Ensure the planning and regulatory systems are seamless, integrated, complementary and well understood through implementation of this MOU,
8. Share mapping resources / layers when needed,
9. Continuously improve working relationships and enhance service performance of all Parties; and,
10. Monitor the performance of this MOU and service delivery.

6.0 Data and Information Sharing

The Parties agree that data sharing, data modelling and GIS are important to service efficiencies and will establish an open data approach among the Parties, provided that the data sources are not restricted under third party licensing Data sharing agreements can be undertaken when the need arises, including provisions for cybersecurity, data hosting and storage considerations, and maintenance of agreements.

7.0 General

The County and the SVCA mutually agree that:

1. This MOU applies to the SVCA within the areas under its jurisdiction which are in the County of Bruce. This MOU is not intended to nullify or alter other agreements or MOUs already in place between partner organizations (i.e. CA Act Category 2 & 3 Agreements),
2. Nothing in this MOU precludes the CA from commenting to the County, and implementing their regulatory and/or landowner responsibilities, as they would normally exercise their rights under the PA, CA Act, Environmental Assessment Act, delegated responsibilities or other applicable legislation,
3. Nothing in this MOU precludes the County from exercising responsibility under the PA, the County Official Plan, or any other statutory requirement,
4. Nothing in this MOU precludes the parties from respectfully disagreeing with comments provided by the other party,
5. Where the SVCA is in conflict between legislated responsibilities and the responsibilities of this MOU, the County may seek third party opinions. This MOU would not prohibit the County from seeking third party opinions at any time or for any other matters,

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6. The SVCA will respond to general inquiries from the County and applicants, participate in pre-submission consultation meetings in accordance with s. 9.0 of this MOU, review technical reports, and provide expert witness support to the County and/or local municipalities as necessary and where requested, where the subject lands involve natural hazards, wetlands or SVCA regulated lands.
7. The SVCA will review applications and supporting technical reports circulated by the County and comment on whether the application or other planning matters are consistent with the natural hazard policies of the PPS. The SVCA shall apply all applicable Provincial guidelines and policies in the plan review and technical review functions it provides. For clarity, SVCA review functions are provincially mandated and listed in Appendix A to this MOU.

8.0 Service Delivery Standards

8.1 Application Circulation

The County agrees to circulate all planning applications and other matters to the SVCA as prescribed under the PA.

The SVCA, at its discretion, may advise the County where no fee and no comment is required. In these cases, the County will reimburse the applicant.

8.2 Review Timeframes

The County shall set timeframes for responding to planning document amendments and development applications in keeping with the requirements of legislated timelines. When setting timeframes, the County should consider SVCA staff review time, specifically where the SVCA was not included in pre-submission consultation.

The County will provide the SVCA with 21 days to review and comment on a planning application. In exceptional circumstances the County may request a condensed review period, or the CA may request an extended review period. The parties will work together to support an efficient workflow.

8.3 Dispute Resolution

In the case where the County's planning staff and SVCA staff disagree on a recommended action the first response should be that the individuals work to resolve the dispute as outlined in Appendix B.

9.0 Pre-submission Consultation

9.1 Applications

The County will include the SVCA on application pre-submission consultation where the subject lands are within or 30 metres adjacent to natural hazards lands. Pre-submission consultation may include on-site meetings, virtual meetings, and/or written correspondence.

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During pre-submission consultation, where applicable, the SVCA will recommend technical reports and plans to address natural hazards, including recommendations on the "scope" of studies for the purpose of complete application requirements.

9.2 Official Plan and Zoning By-law Updates

Prior to first draft of comprehensive official plan and zoning by-law updates the County will consult with the SVCA to review existing and/or proposed policies related to natural hazards. The SVCA will provide updated hazard mapping and make recommendations to manage development in these areas in accordance with provincial guidance and any other information the County and SVCA consider appropriate.

10.0 Conservation Authority Fees

Section 21.2 of the CA Act provides the legislative basis to allow CAs in Ontario to charge fees for services, including the collection of fees for planning and development related activities, such as permitting, plan review, and public and legal inquiries. CA Plan Review Fee Schedules are approved and endorsed by the SVCA's Board of Directors and will be circulated to the County prior to the start of the new calendar year.

No PA application review fees shall be charged for County or Municipally sponsored applications.

10.1 Fee Increases

SVCA plan review fees may be increased annually in accordance with SVCA fee policy, unless otherwise directed by the Minister of the Environment, Conservation and Parks. Where significant fee increases are proposed, prior notification to, and discussions with the County are encouraged.

10.2 Collection of Fees

The County will collect the appropriate fee on behalf of the SVCA at the time an application is submitted. Where the fee to be collected is unclear, County staff will consult with the SVCA.

The SVCA will invoice the County on a monthly basis for their respective portions of the application review fee.

10.3 Reconsideration of Fees Charged

Under the CA Act, any person who considers that the SVCA has charged a fee that is contrary to the fees set out in the SVCA's Plan Review Fee Schedule, or that the fee set out in the fee schedule is excessive in relation to the service or program for which it is charged, may apply to the SVCA and request that it reconsider the fee that was charged. This requirement will be administered by the SVCA in accordance with SVCA fee policy.

10.5 Expert Review Fees

The SVCA reserves the right to retain the services of an expert to review technical plans and reports submitted in support of a PA application. The SVCA will invoice any fees incurred for this service directly to the applicant.

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Where applicable, the County and the SVCA may jointly request expert review of technical plans and reports. In this circumstance, the County will be responsible for charging the fee back to the applicant.

11.0 Mandatory Review

This MOU is subject to a mandatory review that will regularly take place no more than five (5) years from the effective date of the MOU.

The mandatory review shall consider changes in programs of the parties and/or changes in Provincial legislation, policies, and written directives. The review shall be overseen by the Parties' General Managers/CAO's/Department Leads with any final recommended changes being subject to full agreement by all Parties

12.0 Terms of the MOU

This MOU shall come into effect on the date the last party signed the MOU and shall remain in effect until such time as an updated MOU may replace it.

This MOU may be reviewed at any time before the mandatory review if agreed to by the Parties, particularly when Provincial legislation or plans have been amended.

The County and SVCA will review this MOU at least six months prior to the expiry of each five (5) year term. The SVCA's Planning Department will monitor the MOU and its expiry.

Any party may terminate this MOU at any time upon delivering six (6) months written notice of termination to all parties.

Signed: **THE COUNTY OF BRUCE**

Warden,

_____

Clerk,

_____

Date

THE SAUGEEN VALLEY CONSERVATION AUTHORITY

Chair,

_____

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General Manager,

_____

Date

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APPENDIX A – SERVICES TO BE PROVIDED

Within the geographical areas set out in this MOU, and in accordance with O. Reg. 686/21 the services provided by the SVCA to the County is outlined in the table below.

DESCRIPTION OF SERVICE	DEVELOPMENT PLANNING / APPLICATION REVIEW	TECHNICAL CLEARANCE
Identify the need for and conduct technical review of the hydrologic/hydrogeologic impact to wetlands, watercourses, and inland lakes. (natural hazard related function/CA regulatory requirement).	X	X
Identify the need for and review stormwater management (SWM) facilities and reports where the outlet is to a watercourse or CA regulated area (river valley, wetlands, shoreline). Review of SWM facilities and reports is limited to natural hazard impacts and mitigation i.e. flood and erosion control. (natural hazard related functions/CA regulatory requirement).	X	X
Identify the need for and review lot grading and drainage, and erosion and sediment control plans. (natural hazard related functions/CA regulatory requirement)	X	X
Review for sub-watershed planning/master drainage planning as it relates to natural hazard mitigation.	X	
Comment on natural hazards (flooding, erosion, dynamic beaches, unstable soils, and bedrock) including the need for and review of technical reports relating to hazard land limits and mitigation. (natural hazard related functions/CA regulatory requirement)	X	X
Identify Drinking Water Source Protection Areas. Clients will be directed to the applicable Risk Management Official for more information.	X	
Identify the need for and review technical reports to reduce the risk associated with natural hazards to prepare for the impacts of a changing climate.	X	X

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APPENDIX B – DISPUTE RESOLUTION PROCEDURE

In the case where the County's Planning staff and SVCA staff disagree on a recommended action the first response should be that the individuals work to resolve the dispute as outlined:

1. **Staff should first hold a meeting, email and/or connect by telephone** to discuss issues in dispute and use their best efforts to resolve the matter. Disputes shall be dealt with in a confidential manner.
2. **If the dispute cannot be resolved between the individuals:**
   a) The party with the concern will raise the issue to the department heads in charge of the service(s) by way of a letter or memo.
   b) The department heads shall acknowledge receipt of the dispute within five (5) business days.
   c) The department heads shall review the issues identified by the individual raising the issue and in so doing may:
      i) Review relevant municipal and provincial legislation;
      ii) Review other relevant policies and procedures;
      iii) Review any existing file documents;
      iv) Request information from the Staff, the individual in dispute or others involved in the dispute;
      v) Identify actions that may be taken to address the dispute and/or improve services and operations; or
      vi) Take other actions the department head deems necessary to resolve the matter.
3. **Decision**: Within ten (10) calendar days of receipt of a notice of dispute by the Department Heads, a joint discussion is encouraged, and unless the issue has been resolved, a response shall be provided in writing to the party with the concern's Department Head involved in the dispute (the "Decision"). The Decision shall include:
   a) Whether the dispute was substantiated;
   b) If the dispute is not substantiated, the Department Head shall provide the reason(s) for their decision; and,
   c) Any actions the Corporation/CA has or will take because of the dispute and/or actions that should be considered by the CA.
4. **Where the Department Head may not be in a position to guarantee response times**: If the Department Head is unable to provide a Decision within ten (10) days of receipt, they shall notify the CAO/General Manager of the delay and provide an estimate of when a Decision will be provided.
5. **Decisions made by the Department Head may be appealed**, in writing, to the Chief Administrative Officer/General Manager within ten (`10) days, or when mutually agreed. The Chief Administrative Officer/General Manager shall review the appeal and may confirm, rescind or amend a Decision. In the event the Dispute cannot be resolved through this Dispute Resolution process, the Dispute may be submitted to the respective Council/Board, as the case may be.

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6. **This dispute resolution process is meant to apply to the services provided under this MOU** and does not limit the appeal or other options open to all parties under the powers granted to them in legislation and regulation, such as but not limited to asking for status at an OLT hearing.
7. **Responsibility**: All Staff should have a clear understanding of how Disputes are handled by the County/SVCA. All supervisors must comply with, explain this policy to their Staff, and conduct any necessary training.

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Report EPR-2026-03

Report to: Chair and Directors, Saugeen Valley Conservation Authority

From: Matt Armstrong, Manager, Environmental Planning and Regulations (EPR)

Date: January 15, 2026

Subject: Proposed amendments to 2026 EPR Fee Schedule

Purpose: To seek approval for proposed amendments to the 2026 Environmental Planning and Regulations Fee Schedule.

Recommendation

Recognizing the potential for 2026 Provincial direction relative to Environmental Planning and Regulations Fees; THAT the Saugeen Valley Conservation Authority board of directors approve the proposed amendments to the 2026 EPR Fee Schedule; and THAT should Conservation Authorities receive provincial direction to alter Fees, that SVCA staff implement those changes, as required.

Background

In late-2022, the Province announced that the fees charged by the Environmental Planning and Regulations (EPR) department would be frozen for the 2023 calendar year. The freeze came just as SVCA was preparing to implement a significant fee increase, based on recommendations from a comprehensive fee review completed by Watsons and Associates.

On November 23, 2023, through motion G23-115, the SVCA board of directors approved fee increases for the 2024 year that would have phased in approximately 50% of the proposed increases from the Watsons review. However, the Province announced again in late-December that fees would remain frozen for 2024.

In late-2024, staff prepared two fee schedules for 2025, one with fees frozen and another with what was approved but not used in 2024, plus 2024's cost of living adjustment (COLA). Fees were frozen again in late-December.

In late-2025, staff prepared a single fee schedule for 2026 based on another fee freeze, however 2026 arrived without an announcement from the Province that fees would be frozen. Staff are interested to amend EPR's 2026 Fee Schedule to include an increase to the fees that have remained static since 2023.

Discussion

The fee freezes in 2023, 2024, and 2025 have had a significant impact on EPR revenue and SVCA's budget. While the freeze was intended to support housing goals, it has prevented SVCA from moving closer to the cost recovery levels recommended through the Watsons external fee review. As a result, the department continues to rely on cost apportionment for over half of its budget and had planned to leave one review staff position vacant for 2026 due to an anticipated decrease in revenue.

The Tables below list the EPR fee schedule with 2025 fees in Column A and two 2026 fees for comparison in Columns B and C, rounded to the nearest $5. Conservation Ontario had been lobbying the Province to allow 2026 fees to increase by COLA (1.7%), so that option is presented for consideration in Column B. While this may be sufficient for CAs whose fees were already approaching cost-recovery, staff do not believe it would meet the needs of SVCA. Staff's preferred option is presented in Column C, which considers Watsons review, staff review time, and that too large an increase over 2025 could place an undue burden on clients.

EPR Fees in 2025, 2025 plus 1.7% COLA, and recommended for 2026

	SVCA Permit Application Review	**Column A 2025 Fees**	**Column B 2025 + 1.7% COLA**	**Column C 2026 Recommended**
1	Minor Works	$493	$500	$550
2	Standard Works	$850	$865	$1,000
3	Major Works	$2,000	$2,035	$2,500
4	Complex Works	$4,007	$4,075	$5,000
5	Other Works	$280	$285	$320
6	Permit extension and / or minor amendment	$130	$130	$150
7	Municipal/County Projects	Regular applicable fee	Regular applicable fee	Regular applicable fee
8	Commercial Renewable Energy Project	Double applicable fee	Double applicable fee	Double applicable fee
9	Conservation Project*	Half of applicable fee	Half of applicable fee	Half of applicable fee

*Project intended to protect or enhance the natural environment and is proposed by / in partnership with a recognized conservation or environmental agency as determined by SVCA

	Municipal Drains	**Column A 2025 Fees**	**Column B 2025 + 1.7% COLA**	**Column C 2026 Recommended**
10	New Municipal Drain review	$920	$935	$1,370
11	Municipal Drain maintenance review - without site inspection	$280	$285	$320
12	Municipal Drain maintenance review - with site inspection	$493	$500	$550

	Specific Property Inquiry	Column A 2025 Fees	Column B 2025 + 1.7% COLA	Column C 2026 Recommended
13	General verbal or email response	No fee	No fee	No fee
14	Initiate file and pre-consultation*	$116	$120	$100
15	Property specific letter response - without site inspection**	$280	$285	$320
16	Property specific letter response and site inspection**	$493	$500	$550
17	Property specific letter response and site inspection and proposal area greater than 1 hectare**	$920	$935	$1,120
18	Municipal or county project	Regular applicable fee	Regular applicable fee	Regular applicable fee
19	Property clearance letter (e.g. legal inquiry) - standard	$160	$165	$230
20	Property clearance letter - rush (5 business days)	$275	$280	$395

* Fee is reduced from subsequent property specific responses and permit application reviews.
** Fee is reduced from subsequent permit application reviews for same proposal

	Planning Fees	Column A 2025 Fees	Column B 2025 + 1.7% COLA	Column C 2026 Recommended
21	Zoning By-Law Amendment*	$390	$395	$600
22	Official Plan Amendment*	$390	$395	$600
23	Severances (Consents)*	$390	$395	$600
24	Minor Variance*	$290	$395	$400
25	Subdivision or Condominium	$120 per lot or block, ($900 min. fee, $10,740 max. fee)	$120 per lot or block, ($915 min. fee, $10,925 max. fee)	$180 per lot or block, ($1,350 min. fee, $12,350 max. fee)
26	Plan Review Fee per lot or large block (Multi Lot Development)	Not used - recommend removing	Not used - recommend removing	Not used - recommend removing
27	Pre-consultation	See Specific Property Inquiry fees above.	See Specific Property Inquiry fees above.	See Specific Property Inquiry fees above.

* Fees will be discounted for joint / multiple applications made at the same time, for the same parcel and proposal as follows: First application = full fee. Additional applications = 50% of the full fee per lot/application. The first application review fee shall be the higher of the applicable fees.

	Site Plans	Column A 2025 Fees	Column B 2025 + 1.7% COLA	Column C 2026 Recommended
28	Single Lot Residential / Minor Non-Residential	$650	$660	$700
29	Multi Lot Residential / Major Non-Residential	Lesser of $105/unit or $1,200/ha, with a max. fee of $10,000	Lesser of $105/unit or $1,220/ha, with a max. fee of $10,170	$1,805

	Technical Reviews	Column A 2025 Fees	Column B 2025 + 1.7% COLA	Column C 2026 Recommended
30	Scoped Site	$650	$660	$700
31	Full Site	$1,440	$1,465	$1,500

	Other Review Types	Column A 2025 Fees	Column B 2025 + 1.7% COLA	Column C 2026 Recommended
32	Compliance Approval (violation)	Double application fee	Double application fee	Double application fee
33	Stormwater management plan review per lot or large block, plus applicable surcharges	$135	$135	$145
34	Aggregate proposal review	$4,678	$4,760	$5,000
35	Environmental Assessment Review - Class A (Minor)	$440	$450	$750
36	Environmental Assessment Review - Class B (Major)	$795	$810	$1,515
37	Environmental Assessment Review - Class C	n/a	$810	$2,490
38	Engineering Report Review (per report)	$594	$605	$795
39	Professional service or expert witness service	Charge out rate plus disbursements	Charge out rate plus disbursements	Charge out rate plus disbursements

	Map and Air Photo Products	Column A 2025 Fees	Column B 2025 + 1.7% COLA	Column C 2026 Recommended
40	Photocopied maps, air photos	$18	$20	$35
41	Emailed air photos & other map products	$41	$40	$40
42	Bulk orders (over 9 items)	Fee reduced by 10%	Fee reduced by 10%	Fee reduced by 10%

Financial Implications

It is anticipated that the proposed 2026 fee increase and potential associated revenue will support returning the staff compliment within the Environmental Planning and Regulations Department to preferred operating levels.

Strategic Plan Linkages

R1.1 – Revenue Generation Planning and Action
R1.2 – Fee Policy review and development
R1.6 – Financial Processing Policy and Action

Prepared by:

[Original Signed by:]
Matt Armstrong
Manager, Environmental Planning and Regulations

Approved by:
[Original Signed by:]
Erik Downing
General Manager/Secretary-Treasurer

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Canada | N0G 1W0 | 519-364-1255
www.saugeenconservation.ca
publicinfo@svca.on.ca

LAN-2026-01

Report To: Chair and Members, SVCA
From: Donna Lacey, Manager of Forestry and Lands
Date: January 15, 2026
Subject: Children's Safety Village Lease Renewal
Purpose: To update the SVCA Board of Directors about the lease renewal with Children's Safety Village.

Background

On October 5th, 2015, Saugeen Valley Conservation Authority (SVCA) entered into a lease agreement between the Authority and the Saugeen Valley Children's Safety Village (SVCSV) (the Tenant). The term of this first lease agreement was 5 (five) years in duration. The Agreement was renewed in October 2020. Clause 3.1 of the Agreement under Article III (Term of Lease) specifies that the Tenant shall provide the Authority with written notice of its intention to exercise its right of renewal at least one (1) year prior to the end of each subsequent renewal period. The Tenant advised the Authority that it wishes to renew its lease, effective October 5, 2025, for another 5 years in May of 2024.

In the Agreement, the "*Facilities*" means the building to be renovated and operated by the Tenant on the Leased Premises, which comprises of an approximately 4,400 square foot administration building, a 1,600 square foot Resource Centre and an ancillary miniature village with a small-scale road and walkway system and approximately 20 miniature building shells. The Agreement lays out the Term of Rent, although SVCA has not charged rent for the past ten years.

During the term of the Lease, the Premises are not to be used for any other purpose than a Children's Safety Village without the express written consent of the Authority given in writing. The Tenant may rent all or part of the facility to private or community groups for fundraising purposes.

The 2025 Agreement needed to consider changes to SVCA programming and special events, SVCA security requirements, and site safety concerns.

Analysis

In July 2025, staff sent a revised Agreement to the Vice President of the SVCSV for their opportunity to provide feedback. Major updates to the Agreement were:

- SVCSV must book the use of the Resource Centre through SVCA; this allows SVCA to use the space when SVCSV does not have bookings (this process had been in place in 2025, but was not in the Agreement)
- The term of the Agreement was changed from five years to two years
- The SVCSV assumes responsibility for water testing at the tap
- The ability to rent the facilities to private or community groups was removed
- Increased SVCSV period of inactivity permitted from 120 days to 150 days
- Decreased the requirement of two months' notice for booking changes to one month's notice
- Added that SVCSV cannot make structure changes without SVCA staff approval
- Removed the provision of the agreement that precluded the charging of property access fees indefinitely

Many of the changes SVCA staff made to the document were a concern to the SVCSV. After significant discussion, the revised agreement was signed in early November.

The Saugeen Valley Children's Safety Village uses a portion of Sulphur Spring Conservation Area and associated facilities without providing any financial remuneration to Saugeen Valley Conservation Authority. Over the past decade, SVCA has not been consistently acknowledged as a sponsor or supporter, beyond the indirect association with SVCA-owned lands.

SVCA staff have requested that SVCSV formally recognize SVCA's support in future communications and through on-site acknowledgement. Representatives of SVCSV have agreed to implement this recognition moving forward.

Next Steps

Staff will continue to work with the SVCSV to ensure that the articles within the agreement are upheld.

Prepared by:
< [Original signed by:]>
Donna Lacey, Manager of Forestry and Lands

Approved By:
< [Original signed by:]>
Erik Downing, General Manager/Secretary-Treasurer

CORPORATION OF THE MUNICIPALITY OF SOUTH HURON
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December 18, 2025

Via email: todd.mccarthy@pc.ola.org

Minister of Environment, Conservation and Parks
5th Floor
777 Bay Street
Toronto, ON M7A 2J3

Dear Hon. Todd McCarthy,

Re: Response to Bill 68- Proposed New Ontario Provincial Conservation Agency

Please be advised that South Huron Council passed the following resolution at their December 15, 2025, Regular Council Meeting:

516-2025
Moved By: Ted Oke
Seconded by: Aaron Neeb

That South Huron Council endorses the Upper Thames Conservation Authority's draft Municipal Resolution regarding response to Bill 68 - Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities; and

That the draft resolution be updated to name the Municipality of South Huron, and circulated to the Ministry of Environment, Conservation and Parks, MPP Thompson, AMO, ROMA, area indigenous communities, all municipalities in Ontario, Conservation Ontario and all Conservation Authorities in Ontario as follows:

> **Whereas the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses; and**

Whereas the Municipality of South Huron established the Upper Thames River Conservation Authority (initially formed in 1947) and Ausable Bayfield Conservation Authority (initially formed in 1946); and

Whereas local municipalities currently provide approximately 35% of total conservation authority funding, while the Province of Ontario provides approximately 2% (2026 budget); and

Whereas municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers; and

Whereas conservation authorities collectively own and manage thousands of acres of land. Many of these properties were entrusted to the UTRCA for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities; and

Whereas Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined; and

Whereas the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks;

Now Therefore be it Resolved That the Council of the Municipality of South Huron calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; and

Further That while the Municipality of South Huron supports provincial goals tor consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; and

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Further That the Municipality of South Huron supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives; and

Further That a copy of this resolution be sent to:

- **the Ontario Minister of Environment, Conservation, and Parks,**
- **local MPPs,**
- **Association of Municipalities of Ontario,**
- **Rural Ontario Municipal Association,**
- **area Indigenous communities,**
- **all municipalities,**
- **Conservation Authorities, and**
- **Conservation Ontario.**

Result: Carried

Respectfully,

Kendra Webster, Legislative & Licensing Coordinator
Municipality of South Huron
kwebster@southhuron.ca
519-235-0310 x. 232

Encl.

cc: MPP, Hon. Lisa Thompson, lisa.thompson@pc.ola.org; AMO, resolutions@amo.on.ca; ROMA,roma@roma.on.ca; area indigenous communities; all municipalities in Ontario; Conservation Ontario, info@conservationontario.ca; all Conservation Authorities in Ontario

Township of Adjala-Tosorontio

7855 Sideroad 30
Alliston, ON L9R 1V1
P.: 705-434-5055
F.: 705-434-5051

December 12, 2025 Sent Via Email: minister.mecp@ontario.ca

The Honourable Todd J. McCarthy
Minister of the Environment, Conservation and Parks
College Park, 5th Floor
777 Bay Street
Toronto, ON M7A 2J3

Re: Support Resolution – Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

I am writing to advise that at the Regular Council Meeting held on December 10, 2025, the Council of the Township of Adjala-Tosorontio adopted a resolution to support the resolution and position of the Nottawasaga Valley Conservation Authority (NVCA) regarding the proposed boundaries for the regional consolidation of Ontario's Conservation Authorities.

The resolution reads as follows:

> *THAT Council of the Township of Adjala-Tosorontio supports the Nottawasaga Valley Conservation Authority's resolution and position regarding the Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities; and*
>
> *THAT a copy of this resolution be forwarded to the Environmental registry of Ontario consultations, the Minister of the Environment, Conservation and Parks, Brian Saunderson, MPP, Simcoe-Grey, the Association of Municipalities, Conservation Ontario, the Board of the Grey Sauble, Saugeen, Maitland Valley, Ausable Bayfield, Lake Simcoe Region and Lakehead Region Conservation Authorities.*

A copy of the NVCA Board's resolution is attached for your reference.

Should you have any questions, please do not hesitate to contact myself by email at clerk@adjtos.ca or phone at 705-434-5055 ext. 263.

Sincerely,

Robin Reid
Director of Corporate Services/Municipal Clerk

Encl. Nottawasaga Valley Conservation Authority Board resolution regarding Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

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Alliston, ON L9R 1V1
P.: 705-434-5055
F.: 705-434-5051

Cc. Brian Saunderson, MPP, Simcoe-Grey brain.saunderson@pc.ola.org
Association of Municipalities (AMO) resolutions@amo.on.ca
Conservation Ontario info@conservationontario.ca
Board of Grey Sauble Conservation explore@greysauble.on.ca
Board of Saugeen Conservation publicinfo@svca.on.ca
Board of Mailand Valley Conservation maitland@mvca.on.ca
Board of Ausable Bayfield info@abca.ca
Lake Simcoe Region Conservation Authority t.barnett@LSRCA.on.ca
Lakehead Region Conservation Authority info@lakeheadca.com

Discussion on NVCA Boards position on Provincial Conservation Authority changes

Recommendation:
RES: 83-25
Moved by: Cllr. Ralph Manktelow
Seconded by: Cllr. Joel Loughead
WHEREAS: the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities (CA), and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses; and
WHEREAS: local municipalities collectively currently provide between 25% and 50% of total conservation authority funding, while the Province of Ontario provides approximately 3%; and
WHEREAS: conservation authorities collectively own and manage thousands of hectares of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities; and
WHEREAS: the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create an Ontario Provincial Conservation Agency to provide centralized oversight and direction under the *Conservation Authorities Act*, with a municipal cost apportionment yet to be defined; and
WHEREAS: under this proposal, the Nottawasaga Valley Conservation Authority (NVCA) would be merged into a new "Huron–Superior Regional Conservation Authority" together with the:

1. Ausable Bayfield CA;
2. Maitland Valley CA;
3. Saugeen Valley CA;
4. Grey Sauble CA;
5. Lake Simcoe Region CA; and
6. Lakehead Region CA

forming a single organization stretching from Thunder Bay and Lake Superior through northern Lake Huron, Simcoe, Dufferin, Bruce, and Grey counties, York Region, Kawartha Lakes, and Durham regions; and

WHEREAS: the Board acknowledges and supports the Province's goals of improved efficiency, consistency and fiscal prudence in conservation delivery, but finds that the proposed "Huron–Superior" configuration would:

1. Create a geographically vast and administratively complex entity of 78+ different municipalities joining Northern, rural and fast-growing southern municipalities in the Greater Toronto Area with little shared watershed connection or economic alignment;
2. Dilute local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they affect;
3. Generate substantial transition costs — including human-resources integration, governance restructuring, IT migration and policy harmonization — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province's own business-planning principles of value for money, cost containment and service continuity; and
4. Risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it harder for applicants to obtain timely advice, resolve issues or expedite housing and infrastructure approvals that support the Province's "Get It Done" agenda; and

WHEREAS: the NVCA has already undertaken significant modernization work aligned with provincial objectives that demonstrates meaningful modernization can occur within the current watershed-based governance framework, including:

- implementation of a digital permitting and inspection system that has reduced turnaround times;
- adoption of shared-service arrangements in Corporate Services;
- independent service reviews identifying opportunities for cost recovery and efficiency; and
- measurable improvements in transparency and client communication; and

WHEREAS: the Board notes that the Lake Simcoe Region Conservation Authority operates under the *Lake Simcoe Protection Act* and Lake Simcoe Protection Plan, a unique legislative framework requiring distinct governance and reporting; and

WHEREAS: the Board further recognizes that the Lakehead Region Conservation Authority serves Northern Ontario communities facing vastly different climatic, hydrological and infrastructure realities, which would be ill-served by a single administrative structure extending to the Greater Toronto Area and physically based over 1,400 km away: and

WHEREAS: if the Province proceeds with reducing the number of conservation authorities, the Board believes a more geographically coherent and fiscally responsible alternative would be to consolidate only those conservation authorities with contiguous watersheds draining to Georgian Bay while maintaining the Lake Simcoe Region CA as distinct entity in recognition of its unique legislative framework and having Lakehead Region CA form the Northwestern Ontario Regional Conservation Authority reflecting its unique regional context;

THEREFORE BE IT RESOLVED THAT:

1. The Board of Directors does not believe that the amalgamation is required and does not support the proposed "Huron–Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257; and
2. The Board instead endorses further provincial evaluation of a more focused specific model that is a more geographically coherent, cost-effective, and locally accountable alternative to advance the government's priorities of efficiency, red-tape reduction and timely housing delivery; and
3. The Board requests that the Ministry engage directly with the 78+ affected municipalities and conservation authorities across Simcoe, York, Durham, Kawartha Lakes, Bruce, Huron, Dufferin, Grey, Lambton, and Northern Ontario before finalizing any consolidation boundaries or legislative amendments; and
4. That this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:
    - the Minister of the Environment, Conservation and Parks and his Opposition critics;
    - local Members of Provincial Parliament;
    - the Association of Municipalities of Ontario and Conservation Ontario; and
    - the Boards of the Grey Sauble, Saugeen Valley, Maitland Valley, Ausable Bayfield, Lake Simcoe Region and Lakehead Region Conservation Authorities.

5. Staff be directed to prepare NVCA's formal response to Environmental Registry Notice No. 025-1257.
    - The response shall reflect NVCA's position on maintaining effective watershed-based management, local accountability, and service continuity for member municipalities and stakeholders.
    - Staff shall submit the finalized response to the Environmental Registry of Ontario by the stated deadline and circulate a copy to the Board for information.

Carried;

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Tel: 613-394-4829 Fax: 613-394-5226 Website: www.ltc.on.ca Email: information@ltc.on.ca
Registered Charitable Organization No. 107646598RR0001

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON
K9J 3C7

December 17, 2025

RE: ERO number 025-1257

This letter is from the Board of Directors of the Lower Trent Region Conservation Authority (LTC) in response to ERO number 025-1257 “Proposed boundaries for the regional consolidation of Ontario’s conservation authorities”.

The Board of Directors is against the proposed consolidation of 36 conservation authorities into seven large regional conservation authorities. As outlined in the posting the purpose for the creation of the Ontario Provincial Conservation Agency (OPCA) and the proposed consolidation of conservation authorities is to modernize, streamline and standardize processes and applications for operations.

The Lower Trent Conservation Board of Directors are in favour of modernization, streamlining and standardization of processes and operations. We welcome the opportunity to be provided with e-permitting software, standardized financial and human resources management software and other applications that would create efficiencies across all 36 authorities. We do not believe that a consolidation is required to achieve these goals.

The development of Key Performance Indicators is also welcomed by Lower Trent Conservation. We are confident that staff can meet targets put forward by the OPCA. Last year alone, Lower Trent Conservation met mandated targets under O. Reg. 41/24 for issuing permits upon receipt of complete permit applications with an overall average of 7.32 days, which includes an average of 7.45 days for major permits and 6.88 days for minor permits.

To summarize, the process for consolidation is not necessary for improvements to be delivered by conservation authorities. The provision of common software applications would increase the operational efficiencies of conservation authorities and allow fair comparisons to be illustrated.

The haste at which the consolidation is being proposed appears rushed and does not provide a framework for the processes to occur by January 2027. We believe that more information is required and widely consulted upon before any consolidation is finalized.

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In addition, if the proposed consolidation, is completed prior to the delivery of standardized software will create a disruption in service delivery and regular operations whilst staff are learning the new operational processes. These processes are required to be implemented prior to any consolidation to allow for a smoother transition.

The Lower Trent Region Conservation Authority requests that the consolidation be paused until the current configuration of 36 conservation authorities be given the opportunity to establish operations utilizing the modernization tools and new standards as proposed.

And further, that a longer timeline be considered to address governance, financial, guidelines and directives before the proposed consolidation is considered. And the development of a clear transition plan be prepared collaboratively with a representative working group to outline expectations and timelines.

One of the primary concerns with the proposed consolidation is the loss of local representation at the Board of Director/municipal level. The area represented by the Eastern Lake Ontario Region Conservation Authority would amalgamate seven conservation authorities into one region and includes 48 municipalities. There is no model for governance outlined in the ERO posting. The request to provide feedback on a proposed regional governance model would necessitate a regional representational model based on existing county and/or regional governments. Having regional representation in our watershed area would have to include upper tier municipalities not participating in regional government. The voice of local municipalities will be lost under a proposed consolidation model including their ability to pay.

The representation of municipal board members leads directly into the question of how to maintain a transparent and consultative budgeting process across member municipalities. Municipalities fund more than 50% of local budgets and their input is invaluable in determining, maintaining and enhancing local programs to meet the needs of the local communities. The proposed consolidation will not be truly consultative nor conducive for transparency as there will be less exposure to budget planning and participation from the local level.

The proposed consolidation has been presented in a manner that will amalgamate financial and capital assets of each individual conservation authority into the regional conservation authority. Property assets are owned by the local conservation authorities and were either donated by local families and organizations or acquired through the assistance of local municipal governments. Other assets include buildings, equipment, vehicles, etc. Our municipal partners fund ongoing maintenance and replacement of these capital assets. The financial stability of each conservation authority varies across the region, and their priorities differ based on local input.

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Registered Charitable Organization No. 107646598RR0001

The Lower Trent Region Conservation Authority requests that all capital asset management plans, as approved by the Board of Directors, are considered as priority in any regional budgeting process for continuity of local operations.

And further, that all costs associated with the modernization and any transition to the proposed consolidation be paid for by the province and not downloaded to the municipalities.

Access to staff and programs at a local level is necessary to fulfill the mandate of conservation authorities. Local knowledge, experience and expertise are required to meet requirements of planning and regulations. Local expertise is also required to meet the conditions of local memorandums of understanding with our municipal partners. Under the proposed consolidation there exists the potential to lose local expertise and watershed knowledge with the loss of staff due to the uncertainties brought about by this proposed consolidation and the loss of local Boards of Directors.

The Lower Trent Region Conservation Authority requests that all local conservation authority offices remain open for access by municipal partners and the public to promote local delivery of all required services.

And further, that the province provides a letter to each conservation authority for distribution to staff reinforcing the importance of staff members to deliver programs and services which could assist with slumping staff morale, maintain service levels, and counteract the lack of direct messaging to date.

Conservation authorities have been present in local communities for decades and have built strong and binding relationships with municipalities, community groups, First Nations and residents. These relationships remain strong because of the presence of the local conservation authority in neighbourhoods and participation in local programs and activities. Maintenance of these relationships are imperative to the success of watershed programs and services. Comments received by municipal partners indicate that working under a regional model will likely slow down approvals and affect municipal timelines for planning and regulations.

The Lower Trent Region Conservation Authority recommends maintaining the current local offices as stated earlier and further that local naming and brand identity remain intact.

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The mapping as depicted for the proposed Eastern Lake Ontario Region Conservation Authority is incorrect. The northern limit of the Lower Trent Region Conservation Authority requires correction to reflect the legal and operational boundary.

Sincerely,

Gene Brahaney, Chair
Lower Trent Region
Conservation Authority

Sherry Hamilton, Vice-Chair
Lower Trent Region
Conservation Authority

Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO #025-1257)

Organization Name: Raisin Region Conservation Authority
Date: December 22, 2025

Address: 18045 County Road 2, Cornwall Ontario, K6H 5T2
Email Address: Alison.McDonald@rrca.on.ca
Phone Number: (613) 938-3611 ext. 222

We appreciate the opportunity to provide comments on ERO #025-1257 regarding the proposed boundaries for the regional consolidation of Ontario's conservation authorities. This feedback is the result of consultation with Raisin Region Conservation Authority (RRCA) staff, Board of Directors, municipalities, partners, and rightsholders.

While RRCA supports the province's objectives to modernize service delivery and strengthen hazard protection, we have significant concerns about the proposed consolidation model. Effective watershed management relies on strong connections to local needs, priorities, and expertise. The creation of a St. Lawrence Regional Conservation Authority spanning 46 municipalities and 18,500 km² risks undermining effective watershed management.

We are concerned that the proposed region will be too large to deliver effective governance, oversight, and accountability. We are worried about the loss of local decision-making authority, reduced municipal representation, service disruption, and impacts on local programs. We are also concerned this large Regional CA will not be able to maintain development review timelines and customer service standards.

RRCA recommends that the province:

1. **Reassess the consolidation model** to ensure geographic coherence, cost-effectiveness, and local accountability; consider source protection region alignments which reflect existing municipal partnerships and shared staffing.
2. **Consider alternative approaches** such as voluntary consolidation, smaller regional groupings, or shared corporate service agreements.
3. **Protect local municipalities and taxpayers** from any financial pressures related to the consolidation and the provincial agency.
4. **Ensure there is appropriate representation** of municipalities, including local governance bodies, to protect municipal representation, reserves, locally funded assets, and watershed priorities.
5. **Consider a longer implementation timeline** to address clear governance frameworks, timelines, and change management strategies to maintain service continuity and staff retention.

RRCA is committed to collaboration and encourages the province to take the necessary time to engage with Conservation Authorities and our partners in evaluating alternatives. These could include voluntary consolidation, smaller regional groupings, or shared corporate service agreements at a regional level.

If the province chooses to move forward with the current proposal, we respectfully request the opportunity for continued engagement to help achieving outcomes that serve both the province and local communities effectively.

ERO #025-1257 Questions:

1. **What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?**

If consolidation fails, the following could be lost:

- On-the-ground expertise,
- Understanding of local environmental conditions and records (e.g., localized infrastructure flooding),
- Strong relationships and funding support from: municipalities, Indigenous communities, donors, businesses, the agricultural community, watershed residents, and other partners,
- The ability to provide real-time response during storms and emergencies,
- High standards of customer service in development review,
- Support from the scientific community, and
- Effective oversight and buy-in from municipal funding partners.

The province should consider if the proposal is the best possible way to achieve the stated goals and objectives; many CA's have noted that modernization goals could be achieved through the current 36 CA corporations using legislative and regulatory amendments, technological solutions, and performance metrics/indicators. If the proposal moves forward, we suggest the following for consideration.

I. *Municipal and Partner Support*

The RRCA currently enjoys several partnerships, funding relationships, municipal agreements and a variety of self-generated revenue streams. These relationships are already being impacted by the proposed consolidation model. One of our long-term partners indicated they will not renew a significant agreement due to the change from 'local' to 'regional'. This has a large financial impact on our organization.

Should the province move forward with the proposal, the principle of "pay for say" must be maintained to retain the trust of municipal decision makers, funders, and taxpayers. The proposed St. Lawrence Regional Conservation Authority will change from five municipalities to 46, stretching oversight and "pay for say" to the point it may undermine confidence in CA governance. Municipal priorities must be maintained by defining local governance structures that include all participating municipalities. Each existing CA should maintain a distinct watershed-based operating division so that local knowledge, municipal relationships, and watershed-specific conditions remain central to decision-making.

Our local conservation areas form part of a limited public land portfolio in Eastern Ontario. To maintain municipal and partner support, long-standing conservation and land management priorities, along with the community benefits provided by these local areas, must remain stable. Additionally, strong guarantees are needed to ensure that reserves (built over decades through local municipal and partner investment) are not diverted to support unrelated regional priorities.

II. *Working Group and Communications/Transition Plan*

The province should collaborate with a working group (Conservation Ontario, CAs, municipalities, and other experts) to evaluate proposed solutions including forms of local governance (watershed committees, local councils, etc.).

The working group should help prepare a clear transition plan including:

- Designation of established leadership teams,
- Transition plans with clear milestones,
- Transition boards with representation from each existing CA, and
- Well thought out change management strategies for staff, partners, municipalities, and the public.

A clear and well-coordinated communication strategy will also be essential to support the transition. The province must ensure early and consistent provincial guidance on mandate, expectations, governance structure, and transition objectives. Where transitional staffing is established, regional leadership should be available to attend local offices to address issues as often as possible.

Personalized engagement, including council presentations, small-group stakeholder meetings, and one-on-one conversations with municipal representatives would provide opportunities for input on region-specific questions.

III. Protecting Local Service Delivery and Staff Retention

S*taff retention strategies should be prepared and communicated to manage the proposed consolidation. Engaging existing leadership should be a key priority.*

The uncertainty around consolidation presents a significant risk to workforce stability, recruitment, and retention. Effective watershed management depends on local integrated expertise in hydrology/hydraulics, natural hazards, ecology, and familiarity with the unique conditions of each watershed.

RRCA’s timely and personalized customer service is key to our strong relationships with residents and municipal partners. We are concerned that consolidation will cause service delays as new teams, processes, and expectations are established. RRCA currently delivers among

the fastest permit timelines in Ontario with routine permits often issued within 24 hours. Staff are directly integrated with partner municipal offices and regularly attend meetings with developers to expedite projects. Our staff are highly accessible through walk-ins, meetings, events, and site visits.

CAs also depend on well established partnerships with stewardship organizations, private landowners, farmers, Drainage Superintendents, and the development industry to deliver programs and services effectively. These partnerships are crucial for navigating complex regulatory frameworks, accessing funding programs, and advancing projects on the ground.

All stakeholders, including the development industry, benefit from certainty. The proposed consolidation will introduce unknowns and new processes at an already uncertain time in the market. Consolidation would require merging multiple IT systems, protocols, databases, HR and payroll systems, GIS platforms, and finance software. The potential for permit timeline delays is very high. The geographic size of the proposed region also creates uncertainty around the availability of in-person access and timeliness of field inspections.

Staff retention ensures continuity, preserves local watershed knowledge, protects decades of cultivated relationships, and maintains both service quality and community confidence. Ignorance of local concerns or issues will create distrust, lack of participation, conflict, and lack of partner or municipal support. The consolidation proposal has already introduced uncertainty and concern in staff. Clarity, consistency, and on-going support is essential throughout the proposed transition.

2. What opportunities or benefits may come from a regional conservation authority framework?

Most of the stated provincial objectives (shared digital tools, modernized systems, stronger technical capacity, and more consistent standards) can be achieved through existing provincial authority, recent legislative amendments, and the influence of the OPCA without the need for consolidation. If consolidation proceeds, RRCA recommends leveraging the following as opportunities.

I. Consistency

Right-sized consolidation could result in consistent permitting practices, technical standards, service levels, and fees which, in the long-term, contributes to a predictable development review environment. However, the RRCA already maintains low fees, quick turnaround times, and highly personalized service. Our municipalities do not want to go backwards with more complicated policies or increased fees. Harmonizing policies and fee structures must be done collaboratively to ensure they respect local delivery standards and do not drastically increase review fees.

Provincial approvals of policies, guidance, and standards have not kept pace with modern needs, and our core mandate has suffered from inadequate funding support. The creation of the OPCA should improve collaboration between CAs and the province resulting in alignment with provincial expectations including consistent permitting systems, GIS platforms, and public portals.

This alignment should result in additional funding and technical support to continue to modernize service delivery, improve technical capacity, and improve data access. Provincial guidance should be updated and stable, and multi-year funding should be directed to programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

II. Shared Staffing, Resources, and Partnerships

The regional model will provide for shared corporate services and staffing that may have been limited by availability, local budgets, or strategic priorities. A regional CA may also have greater ability to attract, retain, and coordinate senior leadership and technical expertise.

RRCA has investigated opportunities for shared corporate services; we would benefit from access to high-level finance, human resources, GIS, IT, legal as well as shared investments in technology and modernization (LIDAR, software licensing, records management, asset management, and flood warning). Consolidating shared services at the regional level would improve efficiency and consistency. Local offices could continue to focus on operations and local service delivery.

A regional CA may be better positioned to secure funding for broad, high-impact projects and support and enhance relationships with interest holders through regional groups for specific program areas (i.e., development approval best practices and consistent technical standards). Conversely, the region may lose connections with smaller, local funders and donors and may lose the trust of local interest holders.

3. Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up, and the municipal representative appointment process?

The governance structures must maintain strong connections to local priorities, local expertise, and municipal perspectives. Achieving the right balance between strategic and effective centralized oversight and fair and transparent local involvement is essential for successful, ongoing, watershed management.

The proposed consolidation requires careful consideration of governance and funding principles; specifically, ensuring large urban municipalities do not disproportionately control

regional priorities. Small, rural municipalities must be heard, supported, prioritized, and represented.

To mitigate this, a two-tier (or sub-regional or federated) governance model should be considered. By maintaining a local governance body with clear roles, the region can ensure decision-making is collaborative, transparent, and respectful of municipal autonomy. It will be important to ensure this does not create duplication while providing appropriate, delegated decision-making for local programs and services.

I. Regional Governance

Regional governance must balance representation, transparency, logistics, and efficiency. The regional board should include delegates from each CA (sub-regional/local office) to direct funding/budgets, policy, strategic priorities, and shared programs/services (GIS, IT, data management, legal, human resources, training, reporting). Upper and single tier appointments may be the simplest approach.

The size of the regional board must be reasonable for efficient decision making; however, municipal representation must be fair and provide meaningful engagement. For example, the Chair and Vice-Chair should be held by different local watersheds to ensure equal opportunities for these positions. Also, term lengths should similarly be limited.

The relationship between the regional CA Board and the OPCA should be clarified to ensure the regional boards can be independent and that board members understand the scope of meaningful decision-making and local accountability. The OPCA board should consider including members from each regional board to ensure direct connection back to each watershed.

II. Local Governance

Local councils (or watershed committees, advisory committees, etc.) would support pay-for-say representation and local decision making. The regional CA could appoint representatives from member municipalities to the local council. This ensures that municipalities who do not have an appointee on the regional CA have a clear ability to communicate with the region.

Local councils can provide advice and local context on program policy, advise on watershed-level programs and services, update watershed plans, prioritize category 2 and 3 services, and offer input on budget priorities. The regional CA could delegate additional responsibilities and functions to the local committee, as needed.

Additional regional, or watershed scale committees can be established based on local needs (agricultural advisory groups, St. Lawrence River Area of Concern, home-builder liaison committees). The Eastern Ontario First Nations Working Group (hosted by South Nation Conservation) should be supported to ensure that Indigenous perspectives are incorporated respectfully and consistently into decision-making.

4. **Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?**

Local watershed input in budget processes is essential if the province moves forward with the proposed consolidation. Our municipalities currently fund 24% of the RRCA's operating budget due to substantial external investments and user fees. We have also carefully tailored our programs and services to meet the needs of local taxpayers while keeping costs low. We are concerned that our municipal apportionment will increase in the large regional budget model. Locally funded reserves, land assets, and long-term capital programs must also be preserved for their local and intended use.

Local councils could follow a similar budgeting process as they do today. The proposed local budgets and apportionments could then be proposed to the regional CA for final approval. Alternatively, a Budget Advisory Committee could be established with membership from the local watershed council. There must be clear communication, expectations, and guidelines for developing budgets and agreements for Category 2 and 3 programs to assist in transparency, consistency, and accountability.

Budget documents should be publicly available, written in clear language, and shared early enough to align with municipal budget cycles. The regional board should consider a multi-year budget framework to improve predictability for municipal budgets.

RRCA regularly meets with municipal CAOs and senior staff to review workplans and presents the budget to municipal councils; these types of engagement opportunities should be preserved and prioritized. Regular regional financial reporting must be provided to municipalities including budget documents with local watershed focus.

5. **How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?**

We have serious concerns that the proposed St. Lawrence Region is too large to function effectively and risks undermining the principles of watershed-based management. Municipalities are concerned they will be under-represented, and that our local watershed needs (agricultural issues, drinking water management, localized flooding, conservation

lands) will be diluted. Source Protection Regions should be considered as a consolidation model, recognizing that these communities and staff are already working together.

Our local municipalities depend on our office for responsive access to staff and clear pathways for conflict resolution. Maintaining local offices, programming, municipal service agreements, local knowledge, on the ground presence, consistent access to staff, and brand identity is essential. Permitting decisions should also continue to be made at the local level.

A clear, well-coordinated communication strategy must provide timely and accessible information on the new regional boundaries, updated points of contact, any changes to permitting or operational processes, and how municipal relationships and responsibilities will function throughout the transition period. Regional CAs will depend on local watershed councils to ensure local concerns are addressed. An early announcement of these local councils would help maintain stability and function during the transition.

Proactive outreach to municipalities, Indigenous communities, landowners, agricultural groups, developers, and other key interest holders will set expectations and reduce uncertainty. It will be critical for regional leaders to build trust and respect. Regional staff should be available to attend local offices to address issues as often as possible. Personalized engagement, including council presentations, small-group meetings, and one-on-one conversations with municipal representatives, provide opportunities to address region-specific questions and reinforce local connections.

Additional Comments:

Ontario Provincial Conservation Authority

CAs and Municipalities have expressed concern about the proposed governance structure of the OPCA. As currently designed, the agency will report to a provincial ministry and be governed entirely by provincially appointed board members. CAs, and therefore municipalities, will be required to fund a portion of the agency's operations through existing levy/apportionment processes. This means that municipalities may contribute a significant share of the OPCA's budget without having any meaningful role in shaping its governance, its priorities, or its strategic direction.

Not only would this be a precedent-setting method for funding a provincial agency, it establishes a system in which municipalities help fund a provincial agency but have no formal avenue to participate in its oversight. This raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs.

The OPCA should be fully funded by the province with no cost recovery from CAs and should work collaboratively with municipalities, CAs and other key stakeholders to ensure changes are constructive, achieve desired outcomes, and do not erode local municipal governance of CAs.

If municipalities will fund the new regional authorities and OPCA, municipalities expect a meaningful governance model to ensure strong municipal input on watershed-specific issues. The OPCA should ensure its Board of Directors includes municipal, CA, and Conservation Ontario representation from urban and rural communities as well as from different geographical areas of the province.

Thank you for the opportunity to review and provide comments on the *Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO#025-1257).* If you have any questions about these comments, please feel free to contact the undersigned.



Alison McDonald,
General Manager, Secretary-Treasurer
Raisin Region Conservation Authority
alison.mcdonald@rrca.on.ca

Submitted on behalf of the Raisin Region Board of Directors

The Municipality of West Elgin

22413 Hoskins Line, Rodney, Ontario N0L 2C0
www.westelgin.net

December 22, 2025

Hon. Todd McCarthy
Ontario Minister of Environment, Conservation and Parks
5th Floor
777 Bay St.
Toronto, ON M7A 2J3

Via Email: todd.mccarthy@pc.ola.org

Re: Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

At its Regular Meeting on December 18, 2025, West Elgin Council adopted the following motion regarding proposed boundaries for the regional consolidation of Ontario's Conservation Authorities:

Resolution Number 2025-327

That West Elgin Council hereby receives the report Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities from Robin Greenall, CAO, And

That West Elgin Council resolves that the Municipal of West Elgin calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; AND

FURTHER THAT while the Municipality of West Elgin supports provincial goals for consistent permit approval processes, shared services, digital modernization, and imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; AND

FURTHER THAT the Municipality of West Elgin supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives, AND

FURTHER THAT a copy of this resolution be sent to the Ontario Minister of Environment, Conservation, and Parks, to the local MP and MPPs, the Association of Municipalities of

Ontario, the Rural Ontario Municipal Association, and municipalities and Conservation Authorities in Ontario.

Carried.

Sincerely,



Terri Towstiuc
Manager of Community Services/Clerk

Cc: Andrew Lawton, MP, Elgin-St. Thomas-London South
Hon. Rob Flack, MPP, Elgin-Middlesex-London
Association of Municipalities of Ontario
Rural Ontario Municipal Association
All Municipalities of Ontario
All Conservation Authorities of Ontario

Rideau Valley Conservation Authority

3889 Rideau Valley Drive
PO Box 599, Manotick ON K4M 1A5
T 613-692-3571 | 1-800-267-3504
F 613-692-0831 | www.rvca.ca

December 19, 2025

The Honourable Todd J. McCarthy
Minister of the Environment, Conservation and Parks
Ministry of Environment, Conservation and Parks
5th Floor, 777 Bay St.
Toronto, ON M7A 2J3

Re: Comments Regarding Proposed Consolidation of Conservation Authorities and Creation of Ontario Provincial Conservation Agency (ERO Posting 025-1257)

Dear Minister McCarthy,

At their meeting on November 27, 2025, the Board of Directors of the Rideau Valley Conservation Authority reviewed and discussed the proposed consolidation of Ontario's conservation authorities and the creation of the Ontario Provincial Conservation Agency. Following their discussion, the Board unanimously passed a resolution endorsing RVCA Staff Report 01-251127 and directing the Chair to submit a letter to the province reflecting the comments, concerns and directions outlined in the report.

General Comments

The RVCA concurs that the challenges facing Ontario continue to increase in complexity from climate change, population growth and the pace of development, and we welcome changes that are intended to strengthen the capacity, influence and impact of CAs in providing vital watershed management, in safeguarding people and property from flooding, and in being transparent and accountable in the delivery of permitting, programs, and services to Ontario's communities. And while we also agree that with better tools and resources, and central enablement and support, CAs could operate with greater consistency and transparency, and deliver improved services to municipalities and permit applicants, we differ on the most effective way to achieve this outcome.

The RVCA recommends that the province achieve its desired outcomes without amalgamating CAs. Clear provincial directives, consolidation of administrative services and shared staffing can all achieve consistency, modernized systems, better performance and standardized customer service, without the cost, disruption and potential drawbacks of amalgamation. These arrangements can also continue to be refined to ensure constant improvement, whereas amalgamation cannot be undone if unintended consequences arise.

Below are two tables that summarize areas of concern and comment as well as recommended direction to the province on how to proceed regarding the creation of the Ontario Provincial Conservation Agency (Table 1) and the proposed consolidation of CAs (Table 2).

Table 1: Creation of Ontario Provincial Conservation Agency
Funding of Agency • The creation of a new provincial agency would be an added financial cost for the province, and if the Agency recovers costs from CAs as proposed, it will put additional pressure on the municipal levy which local municipalities cannot afford.
Role of Agency • While CA Boards of Directors will retain governance over CAs, the scope and meaningfulness of their role may be diminished by the role and authority of the Agency. CA Boards must retain full governance responsibilities over CAs, including program oversight, budgeting and staffing. • The scope of the Agency should be limited to Category 1 programs which are those mandated by the province and include natural hazard and source protection programs. The Agency should not oversee Category 2 programs which are delivered on behalf of municipalities or Category 3 programs which are created by individual Boards to address local watershed issues and needs. The delivery of local programs and services should continue to be led by CAs.
Need for Agency • The province can already direct any aspect of CA operations and programs through the MECP and MNRF using legislation, regulations, technical rules, guidance, policies and other tools. • Between 2020 and 2023, the Minister of Environment, Conservation and Parks also convened a multi-stakeholder working group to work collaboratively with MECP and MNRF to develop regulatory amendments that addressed provincial priorities. The working group had representation from municipalities, CAs, Conservation Ontario, agriculture and developers.
Recommended Direction • The province should continue to oversee CAs through the MECP with support from a multi-stakeholder working group to help implement provincial priorities • If the province creates a new Agency to oversee conservation authorities o It should be fully funded by the province with no cost recovery from CAs o It should work collaboratively with municipalities, CAs and other key stakeholders to ensure changes are constructive, achieve desired outcomes and do not erode local municipal governance of CAs o It should also ensure its Board of Directors includes municipal and CA/CO representation from urban and rural communities as well as from different geographical areas of the province

Table 2: Regional Consolidation of Conservation Authorities

Watershed Services

- CAs are organized along watershed boundaries and not municipal boundaries to enable them to address natural hazards and resource issues within the drainage basin that is being impacted or causing it. Each watershed is unique in its hydrology, geology, topography and land use, meaning the issues and challenges it faces are also unique. Managing five watersheds together as one region would therefore be complex because the watersheds are distinct in their characteristics and needs.
- Staff also develop specialized knowledge and understanding of their watershed which guides their work whether its flood forecasting and warning, hazard mapping, operating flood control infrastructure, monitoring watershed conditions, or designing restoration and stewardship projects. This critical local knowledge and understanding would need to be preserved if CAs are consolidated to ensure effective program delivery. The consolidation of CAs would also not result in the complete harmonization of programs and services within regions because needs and priorities will continue to vary from one watershed to the next.

Customer Service

- CAs are very responsive and accessible to partners, clients and the public providing a high level of personalized customer service. People can call, email or meet with staff and staff are highly visible in the watershed, meeting people onsite, attending events, presenting to groups and councils or interacting with visitors at our conservation areas. Since most staff deliver conservation programs and frontline service, they develop relationships with local partners and a deep understanding of local communities, groups and people. Partners and clients, including municipalities, developers, farmers and lake associations, are also used to having direct access to senior staff, including the General Manager.
- Concerns have been raised that if CAs are consolidated, this level of customer service, access to staff and relationship building would not be feasible or sustainable given the geographic size of the proposed region and the number of clients the regional CA would have to serve

Municipal Boards

- The RVCA has 18 member municipalities, all of whom have a seat on its Board of Directors (with Ottawa having 5 seats). The Board functions efficiently and effectively with just eight to nine meetings a year.
- The proposed St. Lawrence Regional Conservation Authority would have 46 municipalities, so not all municipalities would be represented on the new Board. Under the current model, seats are allocated based on population which would favour larger urban centres like Ottawa, Kingston and Cornwall while marginalizing the significant number of smaller rural municipalities in Eastern Ontario. However, despite size or how seats are allocated, each municipality's voice and influence would be diluted within a regional CA
- Regional Boards would also not be as attune and responsive to local watershed issues and community concerns.

Finances

- If consolidation proceeds, it would be important that regional CAs remain independent corporations to ensure that all CA assets remain under CA control and ownership including land holdings, buildings and financial reserves. It is important that the province has stipulated that no CA assets would be transferred to the Agency or province as part of the proposed changes.
- Questions have also been raised about how budgets would be developed within regional CAs as the levy capacity of municipalities varies from watershed to watershed and programs are different between CAs based on the needs and tax base of each local watershed. Larger municipalities may not support levy dollars being spent on programs or capital projects outside the watershed they benefit from or are impacted by. For example, Ottawa pays 91% of RVCA's municipal levy, but it benefits from all programs and services as it is the downstream receiver in the watershed.

Cost

- The province stated that one reason it is proposing consolidation of CAs is to reduce duplicative corporate functions and costs. Many CAs, especially in Eastern Ontario, have very lean corporate services, sometimes relying on the services of member municipalities or neighbouring CAs. This means consolidation may not result in duplication or savings, and a larger organization may even result in higher administrative needs. Most CAs are also very flat organizations with little middle management and working senior managers. This allows the maximum amount of resources to go to frontline service. In a larger organization with numerous office locations, there could be a need for more management or full-time managers who are not also delivering frontline service. Operating a larger regional CA could also result in additional costs as staff would be serving the needs of a larger area and the Board would likely require committees to serve the needs of five watersheds and 46 municipalities.
- CAs already save on procurement costs by acquiring insurance, benefits, GIS software and some training through Conservation Ontario which results in significant savings each year. Eastern CAs also partner on procurement when possible, to save money on data, training, equipment and other services. The RVCA also jointly delivers programs with, or on behalf of, neighbouring CAs to save on staffing resources, including tree planting, rural clean water grants, septic permitting and septic reinspection.

Permitting

- The province stated that another reason it is proposing to consolidate CAs is permitting, indicating that CAs have different policies, customer service standards, fees, processes and staffing and technical capacity leading to unpredictable and inconsistent turnaround times for approvals.
- In 2019, CAs voluntarily adopted permit timelines developed by CO and publicly report on their performance annually. In 2024, the province legislated a permit decision deadline of 90 days, but CAs retained their service standard of 30 days for minor works. Last year the RVCA approved 99% of complete applications and issued 97% of permits within service standard timelines.
- The RVCA, MVCA and SNC have also had a consistent fee schedule for planning and permitting for well over a decade to ensure equity across municipalities. However, consistent fees across the province would result in higher fees outside the GTA as their fees are higher than other regions.
- In 2024, RVCA also updated its development review policies to be more consistent with SNC and MVCA and we have longstanding reciprocal staff sharing arrangements with MVCA and SNC that are used as needed to ensure no interruption in service for development review files and no permit delays.

Recommended Direction

- The challenges the province is trying to address through the regional consolidation of CAs can be achieved with 36 CAs:
    - The province could implement a standardized policy, service standards and centralized system to ensure reliable and consistent permitting across all CAs.
    - The province could require staff sharing amongst CAs where it is needed to balance and enhance technical expertise and capacity, improving service and program delivery and ensuring service continuity.
    - The province could lead or support centralized procurement, training, digital strategies, shared services and strategic investments across CAs to reduce administrative duplication and discrepancies in tools, technology and data management.

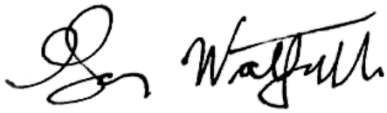
- If there are still CAs who cannot achieve provincial standards and desired outcomes, then strategic and targeted consolidation of those CAs could be considered.

- If the province decides to proceed with the regional consolidation of all CAs:
    - A cost-benefit analysis should be completed to ensure it will result in sufficient cost savings and to determine the optimal size and boundaries of regional CAs to maximize benefits while minimizing impacts.
    - Transition funding would be required from the province to ensure the cost of consolidation is not born by member municipalities.
    - One region should be consolidated first where the need is greatest, to ensure the model is successful before it is rolled out province wide.

Thank you for the opportunity to comment and for your consideration of RVCA's remarks, concerns and recommended directions. We also appreciated the opportunity to participate in a Regional Engagement Session and thank you for hosting one in Ottawa. As conservation authorities only exist where local municipalities have chosen to form, govern and fund them, we also ask that any transformative changes to CAs, including consolidation, only be undertaken following extensive consultation with our member municipalities.

Should you require any further information please do not hesitate to contact me at gwaterfield@perth.ca or 613-485-9169.

Sincerely,



Gary Waterfield, Chair

cc:

- Members of Provincial Parliament in the Rideau Watershed
- Hassaan Basit, Chief Conservation Executive
- Association of Municipalities of Ontario (AMO)
- Rural Ontario Municipal Association (ROMA)
- Watershed Municipalities
- Neighbouring Conservation Authorities

Hamilton Conservation Authority

A Healthy Watershed for Everyone

VIA EMAIL

December 11, 2025

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON
K9J 3C7
Canada

Re: Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities (ERO 025-1257)

Thank you for the opportunity to comment on the proposed boundaries for regionalizing Ontario's conservation authorities. The Hamilton Region Conservation Authority (HCA) has reviewed Environmental Registry Posting 025-1257 and the proposal to consolidate Ontario's 36 conservation authorities into seven regional entities, including the creation of a "Western Lake Ontario Regional Conservation Authority" that would incorporate HCA along with Niagara Peninsula CA, Halton Region CA, and Credit Valley CA.
HCA does not support the proposed regional consolidation and believes it is not required to achieve the Province's stated objectives, which can be fully met within the existing conservation authority framework through strengthened provincial standards, clear expectations, and targeted modernization. The proposal does not recognize what makes conservation authorities unique:

- We are built on local watershed boundaries, not administrative regions.
- Our services rely on local relationships, local knowledge, and locally responsive governance.

Conservation authorities work because they are local, and responsive. Large-scale consolidation would diminish that strength. Additionally:

- Conservation authorities are established on watershed boundaries so frontline programs reflect local conditions.
- The HCA has a track record of positive working relationships with our member municipalities, the development industry, watershed businesses and residents.
- Conservation Ontario working with conservation authorities have already developed standards and guidelines that promote consistency while respecting local watershed needs.

- The Government has already modernized the Conservation Authorities Act to streamline operations, focus on core mandate, and improve permit review performance — including prescribed timelines in legislation related to permit reviews, which the HCA and, conservation authorities more broadly have met.
- The proposed centralized permitting system can be implemented without amalgamation.
- The Province already holds the legislative authority needed to implement the consistency, transparency, and modernization that it seeks.

Amalgamation would create unnecessary bureaucracy, impose transition costs, and fragment established relationships with local municipalities, landowners, and partners. It would also risk undermining specialized local operations such as HCA's marina or Halton's ski hill—services that require specialized equipment and trained staff and cannot simply be absorbed and redistributed. HCA's work is supported by a strong brand, a well-performing Foundation, and a successful annual membership pass program, all of which rely on local trust and identity. For these reasons, the HCA Board has passed a formal motion stating its opposition to the proposed "Western Lake Ontario Regional Conservation Authority". A copy of the Board motion has been attached to this response. Notwithstanding our strong opposition, we offer comments to the five ERO questions below.

ERO Questions and Responses

1. What do you see as Key Factors to support a successful transition and outcome of the regional conservation authorities consolidation?

HCA does not believe regional consolidation is the appropriate solution to the challenges identified by the Province. The Environmental Registry posting highlights issues such as inconsistent service delivery, outdated or fragmented systems, administrative duplication, and uneven accountability; none of these require amalgamation to resolve, as Ontario already has the legislative tools, regulatory framework, provincial standards, and the Ontario Provincial Conservation Agency to address them within the existing conservation authority structure.

For example:

- Inconsistent service delivery can be addressed through clear provincial standards, directives, and Conservation Ontario guidelines; HCA is already meeting provincial permit timelines and has modernized its planning and permitting processes.
- Outdated and fragmented systems can be resolved by implementing a centralized provincial permitting platform and shared technical systems without merging conservation authorities, as anticipated through the Province's proposed online permitting portal.
- Administrative duplication can be reduced through shared services, provincial coordination, and standardized directives, again without restructuring.
- Accountability can be strengthened through transparent performance reporting requirements and OPCA oversight.

If the Province proceeds with consolidation regardless, the following factors are essential to

minimize disruption and protect public interest:

- Maintain uninterrupted delivery of core watershed services such as flood forecasting, emergency response, enforcement, and permitting, with explicit safeguards so that transition work does not compromise public safety performance.
- Preserve each conservation authority as a distinct watershed-based operating division so that local knowledge, municipal relationships, and watershed-specific conditions remain central to decision-making.
- Protect trusted local brands, programs, and revenue sources, including HCA's membership pass program and HCA Foundation fundraising, which depend on local identity and community trust.
- Ensure staff retention and continuity of expertise so that institutional knowledge and technical capacity are not lost in a large regional structure.
- Provide early, clear, and ongoing communication with municipalities, Indigenous partners, landowners, and the public, with mechanisms for meaningful local input into any transition plans.

Given the proposed Western Lake Ontario Regional Conservation Authority would encompass multiple conservation authorities, dozens of municipalities, and a large and diverse population along the Greater Toronto–Hamilton- Niagara corridor, the risk of diluted local voice and complex, multi-layered governance is significant. To manage this, the Province would need to:

- Establish right-sized governance and management structures that keep watershed divisions visible and operating.
- Provide a realistic, phased transition timeline.
- Fully fund transition costs, including IT and data integration, HR harmonization, communications, legal work, and asset and liability assessment, so that municipalities are not asked to underwrite restructuring they did not request.

If regionalization is pursued, Source Protection Regions— which already reflect hydrologic realities and long-standing municipal partnerships —offer a more logical, functional, and right-sized regional framework than the proposed Western Lake Ontario configuration. Source Protection boundaries were developed under the *Clean Water Act, 2006* and align with natural hydrological systems and these boundaries directly reflect water management and protection functions already core to conservation authorities and builds on existing partnerships. They also maintain more familiar boundaries for municipalities and the public.

2. What opportunities or benefits may come from a regional conservation authority framework?

HCA does not believe regional consolidation is required to achieve the opportunities described in the ERO posting. The potential benefits often attributed to amalgamation — such as better digital tools, modernized systems, stronger technical capacity, and more consistent standards — can all be achieved through existing provincial authority, recent legislative amendments, and coordinated support through the Ontario Provincial Conservation Agency.

As noted, realizing these opportunities does not require regional consolidation of conservation authorities. They depend instead on:

- Provincial investment in shared technology, hazard mapping, and data systems.
- Clear and consistent provincial standards.
- Leveraging high-performing conservation authorities as models and partners to support others.

Regional consolidation would introduce administrative complexity, substantial transition costs, and loss of local focus, without evidence that it would deliver better outcomes than targeted modernization within the existing framework. The Province's modernization goals can be fully met through strengthened standards, shared tools, and enhanced coordination, not amalgamation.

3. Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?

HCA does not support regional consolidation and emphasizes that the proposed Western Lake Ontario configuration will create governance challenges rather than solving them. With the large number of participating municipalities (approaching 30) and watershed communities, it will be extremely difficult to design a board that is both manageable in size and genuinely reflective of local needs.

If the Province proceeds regardless, governance at any regional conservation authority level must protect local voice, municipal accountability, and watershed identity by:

- Consider using existing Source Protection Regions as the basis for any regional boundaries, as these are scientifically grounded, hydrologically coherent, and aligned with municipal networks that already collaborate on drinking water protection.
- Establishing a board that is functional in size (for example, under approximately 20 members) and structured to provide a clear and fair representation across the area
- Ensuring strong, meaningful municipal representation by retaining municipal appointment authority.
- Preserving local authority for municipally funded or donor-funded programs so that decisions tied to local investments remain with the watershed division and its municipal partners.
- Establishing watershed-level advisory committees with clear roles in advising on local priorities and, where appropriate, delegated decision-making for local programs and services.

The governance framework must also clearly define the scope and limits of the Ontario Provincial Conservation Agency's directive powers, including which decisions are reserved for a regional CA board, what direction the OPCA may issue, and how appeals or dispute resolution mechanisms will operate. Without these safeguards, there is a real risk of centralizing authority at the provincial level in ways that diminish municipal accountability,

reduce transparency, and undermine local confidence in watershed management.

4. Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

HCA does not believe consolidation is required to enhance budget transparency or municipal involvement. Transparent, consultative budgeting can be fully achieved today through regulation, standardized reporting, provincial guidelines, and OPCA oversight, all within the existing conservation authority framework.

If a regional model is imposed, a transparent and consultative budgeting process would require:

- Maintaining meaningful local representation directly in the budget process so that each watershed division has clear input and influence, and local priorities drive levy discussions.
- Respecting local special levies/funding and municipal service agreements so that locally funded initiatives—such as land acquisition, land management, trail maintenance, restoration projects, or capital works—remain under local control and cannot be redirected without municipal consent.
- Using a clear, standardized regional budget framework in which each watershed division develops its own budget in alignment with local municipalities, and these are then consolidated at the regional level for transparency and oversight.
- Ensuring full disclosure and due diligence on assets, liabilities, capital obligations/asset management for all participating conservation authorities before any apportionment or levy model is adopted.

In a regional model, it is important to protect the perspectives of rural, agricultural, and small municipalities within expanded regional boundaries, ensure that local program priorities such as stewardship, monitoring, and rural water quality programs continue to be addressed, and deliver consistent, predictable, and accountable decision-making across the whole jurisdiction.

HCA also notes concerns regarding conservation authority funding (and thereby, municipal funding) of the Ontario Provincial Conservation Agency without corresponding municipal representation or oversight, underscoring the need for strong local input and transparent budgeting at both the regional CA level and the provincial agency level.
Finally, the full costs of transition—including IT and data integration, HR and labour relations, capital rationalization, branding, and legal work—must be funded by the Province, not downloaded to municipalities or supported at the expense of ongoing watershed programs.

5. How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

Strong community relationships do not require amalgamation, and in many cases consolidation would weaken them. The Province’s goals around stronger communication and engagement

can be advanced immediately through consistent provincial guidance, modernized standards, and local conservation authority practices.

If a regional model is imposed, maintaining and strengthening relationships with local communities and stakeholders would require:

- Maintaining each watershed as a distinct operating division, with local offices, field staff, and leadership that understand local conditions and remain accessible to residents, municipalities, and local First Nations.
- Preserving existing local brands and community-based fundraising, including HCA's brand, membership pass program, stewardship volunteers, and HCA Foundation, all of which are rooted in local identity and trust and cannot simply be replicated at a regional scale.
- Using Source Protection Areas and existing municipal-watershed partnerships as the foundation for local engagement, recognizing that these boundaries reflect communities that are already working together.
- Providing consistent, accessible points of contact for residents, businesses, and partners so that local clients know who to call and where to go for permitting, stewardship support, and day-to-day service.
- Supporting local fundraising and stewardship initiatives, which depend on visible local projects and recognizable local organizations rather than broad regional concepts.

In addition, any regional framework must safeguard continuity and performance of emergency and hazard services—such as flood and erosion forecasting, warning, and response—so that restructuring does not introduce gaps or delays that could put people and property at risk. Conservation authority-owned lands and greenspaces, including the 11,744 acres entrusted to HCA, are also central to local recreation, health, and quality of life; decisions on their use must remain grounded in local priorities rather than distant regional or provincial considerations.

Additionally, the HCA Board of Directors passed the following motion at the December 4, 2025 Board meeting:

BD12, 3565 **MOVED BY: Susan Fielding**
SECONDED BY: Elise Copps

THAT the Board of Directors approve the Motion regarding Bill 68/ERO

WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency whose objects include overseeing conservation authorities and the transition to a regional watershed-based framework for conservation authorities in Ontario with municipal cost contribution yet to be defined; and

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"),

proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring; and

WHEREAS under this proposal, the Hamilton Region Conservation Authority (HCA) would be consolidated into a new "Western Lake Ontario Regional Conservation Authority" together with the Niagara Peninsula CA, Halton Region CA and Credit Valley CA, forming a single organization extending along the western Lake Ontario shoreline from Niagara through Halton and Peel, encompassing urban and rural watershed that support the Greater Toronto-Hamilton corridor; and

WHEREAS the Province already has the authority to establish overarching legislation, regulations and standards through the Conservation Authorities Act and the Ministry of Environment, Conservation and Parks; and

WHEREAS Conservation Authorities in partnership with their member municipalities have for decades tailored programs and services to local watershed and community needs; and

WHEREAS HCA's municipalities currently provide 35% of total HCA budget funding, while the province of Ontario provides less than 1%; and

WHEREAS the HCA has already undertaken significant modernization work aligned with provincial objectives, including Information Technology / Information Management, and leveraging technology to streamline planning and permit review processes processing 94% of major permits within the provincial time period in 2024; and

WHEREAS conservation authorities collectively own and manage thousands of acres of lands - including 11,744 acres within HCA - entrusted to them as a legacy for long-term protection, stewardship and public benefit, with the expectation that such lands would be cared for by locally governed conservation authorities.

THEREFORE BE IT RESOLVED:

THAT the Board of Directors does not support the proposed "Western Lake Ontario Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257 as the proposal lacks sufficient justification, would significantly diminish local governance, and fails to recognize the effectiveness and efficiencies already achieved within existing watershed-based models; and

THAT the Board affirms that large-scale regional consolidation is unnecessary, would introduce substantial transition costs, and would divert resources away from frontline watershed programs. The Board further asserts that restructuring at this scale would erode local decision-making,

weaken municipal accountability, and disrupt long-standing community partnerships that are central to delivering responsive watershed management; and

THAT the Board urges the Province to strengthen centralized standards, resources, and communication rather than undertaking broad structural amalgamation and to provide **sustainable, predictable provincial funding** across conservation authorities—particularly where gaps exist—to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years; and

THAT the Board requests that the Ministry engage meaningfully and collaboratively with affected municipalities, conservation authorities, and local First Nations before advancing any consolidation, to ensure that any changes reflect both local needs and the practical realities of implementation; and

THAT the Board believes that the Province's proposed new online permitting portal can be implemented within the existing conservation authority framework without requiring structural amalgamation; and

THAT this resolution be included as part of the HCA submission to the Environmental Registry of Ontario and forwarded to the City of Hamilton, the Township of Puslinch, and all Conservation Authorities in Ontario.

CARRIED

Sincerely,



Brad Clark, Chair
Hamilton Conservation Authority



Lisa Burnside, CAO
Hamilton Conservation Authority

Cc:

Honourable Doug Ford, Premier of Ontario –	doug.fordco@pc.ola.org
Honourable Todd McCarthy, Minister MECP –	todd.mccarthy@pc.ola.org
Honourable Neil Lumsden –	neil.lumsden@pc.ola.org
Honourable Donna Skelly –	donna.skelly@pc.ola.org
MPP Sandy Shaw –	sshaw-qp@ndp.on.ca
MPP Monica Ciriello –	monica.ciriello@pc.ola.org
MPP Robin Lennox –	rlennox-qp@ndp.on.ca
MPP Joseph Racinsky –	joseph.racinsky@pc.ola.org

December 19, 2025 AA-031-25

Via E-mail: ca.office@ontario.ca

Ministry of the Environment, Conservation and Parks
Conservation and Source Protection Branch
300 Water St, North Tower, 5th Floor
Peterborough ON K9J 3C7

Re: Cataraqui Region Conservation Authority Submission to ERO 025-1257 Consultation (proposed Regional Consolidation of Conservation Authorities)

I am writing in response to the Environmental Registry posting ERO 025-1257, Proposed boundaries for the regional consolidation of Ontario's conservation authorities. Cataraqui Region Conservation Authority (Cataraqui Conservation) offers the following responses to the list of question within the posting, as well as some additional comments about the proposed changes to the Conservation Authority business model.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Paul Proderick
Chair
Cataraqui Conservation

David Ellingwood
General Manager
dellingwood@crca.ca
613-546-4228 ext. 248

cc: Hon Todd McCarthy, Minister of Environment, Conservation and Parks
Hon. Steve Clark, MPP, Government House Leader
MPP Ric Bresee
MPP Ted Hsu
MPP John Jordan
Hassaan Basit, Chief Conservation Executive
Board Members, Cataraqui Conservation
Gary Oosterhof, Vice Chair, Cataraqui Conservation
Conservation Ontario
all Conservation Authorities

Encl.: Cataraqui Conservation Submission to ERO 025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Cataraqui Region Conservation Authority
(Cataraqui Conservation)

Response to

ERO#025-1257

Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Submission:	Written Submission
Organization Name:	Cataraqui Region Conservation Authority
Date:	December 18, 2025
Address:	2069 Battersea Rd Glenburnie, ON, K0H 1S0
Email Address:	dellingwood@crca.ca
Phone Number:	613-546-4228

Overview of Cataraqui Conservation Comments

On November 7, 2025, the Ontario government posted ERO #025-1257 seeking feedback on proposed boundaries for consolidation of Ontario's 36 conservation authorities into regional conservation authorities, and the criteria applied to inform proposed boundaries.

Cataraqui Region Conservation Authority (Cataraqui Conservation) has and will continue to work closely with the Province, municipalities and colleagues at other conservation authorities to improve transparency, efficiency, fiscal responsibility, and partnerships. Over the last several years, Cataraqui Conservation has been adaptable and innovative to ensure compliance with other legislative amendments to the Conservation Authorities Act and Regulations.

However, Cataraqui Conservation **does not support the proposed consolidation into the St Lawrence Regional Conservation Authority**. We believe there are better approaches such as shared services, collaboration, harmonization and modernization, which can realize the stated objectives without risk of significant disruption to continued program delivery and value for money.

Cataraqui Conservation proposes that:

- Consolidation be paused
- A workplan be developed by OPCA to translate goals for consistency, modernization and efficiency into actionable steps for CAs; consideration of cost-benefit and reasonable implementation timelines should be undertaken
- Existing conservation authorities remain in place with the current governance model that allows oversight by elected municipal representatives of programs and services tailored to the geography and communities of the local watershed
- OPCA works with CAs to update technical guidelines and prepare province-wide standards and policies for permitting, as well as a digital permitting platform
- Key performance indicators be set to ensure that Provincial objectives are being met
- Hazard mapping projects and technology improvements be supported with a sustainable provincial funding share
- Clusters of CAs work jointly to establish shared services agreements for administrative and corporate functions to achieve efficiency through common platforms, policies, procurement, and methodology

Some key matters of interest to Cataraqui Conservation should consolidation proceed include: the role of municipalities in governance and representation in the new larger regions; transition of financial and land holdings; budget process and municipal apportionment; and program and services continuation.

ERO Questions and Responses

1. Key factors for a successful transition and outcome of regional consolidation:

Cataraqui Conservation does not support the proposed regional consolidation of conservation authorities. Consolidation would entail complex and expensive legal, operational and human resource processes. Transition costs could far outstrip any savings from efficiencies or modernization.

In recent years, the Province has used legislation, regulations, technical rules, guidance, and policies to effect changes to CA focus, natural hazard review, and other aspects of CA business. It would be possible for the Province's desired outcomes to be achieved through specific provincial directives and collaborative work among existing conservation authorities in contrast to consolidation into new regional bodies.

CA Staff have developed a detailed understanding of local watersheds which guides their work, whether flood forecasting and warning, hazard mapping, operating flood control infrastructure, monitoring watershed conditions, or designing restoration and stewardship programs. This critical local knowledge and understanding will need to be valued and preserved to ensure effective program delivery if CAs are consolidated.

If consolidation proceeds, then success depends on:

- Development of a business plan, including timelines, cost-benefit analysis, steps and milestones, KPIs and service standards, points of contact, permitting continuity measures, board and staff communications, and staff retention measures
- Phased implementation that does not negatively impact service delivery and also respects available financial and staff resources
- Revisiting the groupings of CAs within the proposed regional conservation authorities to better align with stated watershed selection principles; consider groupings with smaller geographic areas than current proposal and are similar in character
- On-going consultation and collaboration with municipalities and conservation authority Boards and staff
- Governance framework that allows each municipality to be represented and fulfill fiduciary responsibility to their constituency
- Retention of local knowledge and staff expertise
- Continuation of programs and services tailored to local priorities and needs

- Retention of local offices and staff, including management, for front-line service and fostering of relationships with local organizations, volunteers and municipal staff
- Continued emphasis on protecting life and reducing property damage from flooding and erosion throughout watershed management, development review, plan input, and other CA activities
- Support for municipal partners, the development community, and landowners with timely, reliable services;
- Focus on enhancing the economic, environmental and community health of the watershed;
- Provision of meaningful opportunities for people to connect at the local level

2. Opportunities or benefits of a regional conservation authority framework

In our opinion the Province's objectives can be achieved through shared systems, collaboration and voluntary service agreements between CAs. Service agreements could have the benefits of:

- Using modern tools across multiple watersheds with shared resources and technical expertise
- Joint procurement and shared staffing positions
- Simple governance using existing CA Boards to approve budgets, policies and projects under agreements and joint operational management by CA staff
- Programs that are currently offered on a local scale could be expanded to a regional scope
- Technical expertise could be shared to enhance development review, watershed monitoring, flood forecasting, and operation of water and erosion mitigation infrastructure

If consolidation proceeds, then opportunities or benefits may include:

- OPCA in collaboration with CAs, AMO and Conservation Ontario could update Provincial policies and standards, leading to reduced inconsistencies and consistent implementation outcomes
- Technical expertise could be shared toward floodplain mapping and development review

3. Suggestions for governance structure at the regional level:

The proposed consolidation would see each regional CA with a substantially larger number of municipalities in nearly all cases. For example, under the current representation formula in s.2(2) of the CA Act, the Board of the new St Lawrence Regional Conservation Authority would have over 70 municipal representatives from more than 40 member municipalities. A Board with so many members would clearly not function effectively.

An effective governance model would:

- Maintain the current local CA Board structure
- Continue current representation formula to ensure a direct line of communication, and a degree of accountability, for all municipalities
- Local CA Boards would then each be entitled to appoint a set number of representatives to a regional management board

Category 2 and Category 3 programs and services function by mutual agreement between CAs and municipalities. These services address watershed issues and local needs, are governed by Board representatives from our member municipalities and are funded by a combination of municipal apportionment, fees and grants. Given that these services are by agreement and are not funded with Provincial transfers, the oversight role of the OPCA should not be extended to this portion of CA business.

4. Maintaining a transparent and consultative budgeting process:

The proposed creation and operation of a new provincial Agency could be expected to have considerable costs. Given that the proposed Agency would have the power to recover costs from the Regional CAs, municipalities are very concerned that funding of the OPCA will be apportioned to regional CAs, and hence member municipalities, without municipal input.

Levy capacity and the tax base of municipalities varies from watershed to watershed, which has been considered pragmatically in the local decisions of each CA Board about service levels, fees and budgets over the years. Sudden changes in the allocated amount of apportionment to municipalities based on new CVA percentages within the consolidated regions or services not previously accessed may create financial hardship; a phased transition would assist in this shift.

During consolidation, it would be necessary to transfer the assets, land holdings, liabilities, contracts, agreements, etc. from the existing CAs to the new entity. protecting watershed reserves, infrastructure, and land assets. Many municipalities are concerned how locally funded reserves, land assets and long-term capital

programs will be treated within a consolidated structure. The costs (legal, labour), effort to determine financial position of each CA and time required to accomplish these tasks could be significant and highly contentious. Support will be needed to facilitate discussions, calculations and fair valuation for the municipal partners.

Utilizing service agreements as contrasted to consolidation could have the benefits of:

- Avoiding unnecessary transition costs
- Tailoring programs and services to portions of the watershed where needed and allocating the costs to the benefitting CA
- Joint procurement and shared staffing positions that can be billed back out to the benefitting CA

If consolidation proceeds, then budgeting should be done on a subregional level:

- Local offices would prepare portion of budget with review by local committee following a modified version of the budgeting process under O. Reg. 402/22
- Proposed subregional budgets and apportionments could then be proposed to the regional CA for final approval
- This would allow for the continuation of a familiar budgeting process within a new structure

5. Maintaining and strengthening relationships with local communities and stakeholders:

CAs are very responsive and accessible to partners, clients and the public while providing a high level of personalized customer service. There are concerns that if CAs are consolidated, then service levels, access to staff and relationship building would not be feasible or sustainable over the large geographic extent and number of clients within the proposed regional CAs. Currently staff are highly visible in the watershed, meet people on-site, attend events, present to groups and interact with visitors at our conservation areas. Strong relationships have been established with municipal colleagues and community groups.

Sustaining relationships with local stakeholders could be supported by the following actions:

- Maintain local presence in governance through continuation of Boards that approximate current CA watershed extents
- Maintain local offices and delivery to ensure CAs remain responsive to local needs
- Continue with local brand identity, infrastructure, programming, and staffing
- Decision makers within the proposed centralized permitting system should be based within the watershed area served to have efficient travel for site visits, access for clients and familiar with the local community and knowledge of local conditions
- Facilitate continued business relationship between CAs and the Foundations and Friends groups that volunteer and provide funding on a local basis

Thank you for the opportunity to review and provide comments on the Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO#025-1257).

ABCA Program Report

To: **Board of Directors – Business out of the Minutes**
Date: **November 20, 2025**
From: **Davin Heinbuck, General Manager/Secretary-Treasurer**
Subject: **Draft Resolution: A Response to Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities**

Recommendation:

WHEREAS the Ausable Bayfield Conservation Authority (ABCA) Board of Directors acknowledges and supports the Province's goals of improved efficiency of watershed management, through the implementation of a digital applications and permitting system, consistent policies, flood standards, fees, and technology; and

WHEREAS consistent policies, and resources across the existing conservation authorities boundaries could be achieved through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks; or Conservation Ontario; and

WHEREAS conservation authorities are locally based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks to lives and property. In the case of ABCA, this vision has proved a successful model for 80 years; and

WHEREAS the ABCA, with the guidance and support of our 12 member municipalities, demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. ABCA has successfully leveraged funding to support programs and services that are locally important and are driven by community engagement through ABCA's Conservation Strategy and the Watershed Based Resource Management Strategy; and

WHEREAS conservation authorities across the Province operate efficiently by working in close partnership with approximately eight member municipalities for every one conservation authority. This structure enables resources to be directed toward on-the-ground initiatives that advance our mandate while addressing local community needs, achieving an effective balance in scale, management and service delivery; and

WHEREAS plans to regionalize conservation authorities through consolidation would dilute local accountability and municipal partnership and is contrary to the basic principle that decisions are best made closest to the communities they affect. Effective representation by municipal partners remains core to the success of conservation authorities. The ABCA, while not unique among conservation authorities in this respect, is effective in working with our community to support sustainable development, and keeping communities safe; and

WHEREAS being front-line means being responsive and accountable to the community by delivering the services that are essential and valued to the best interest of the community. The front line of provincial priorities on housing, the economy, infrastructure, and climate resilience are in the decisions between municipalities working together to address issues around floodplain (and hazard) protection and resilient upland and landscape management. Further, our staff and Board are responsive and accountable to the needs of the watershed community., while meeting or exceeding provincial service standards. Our staff and Board are reachable through publicly available contact information. Local governance and direction combined with local service provision allows ABCA to continue to be responsive to our community; and

WHEREAS consolidation will result in substantial transition costs, not the least of which is time. In all facets, that would divert resources from front-line service delivery and delay desired outcomes. Further, the loss of local watershed knowledge and community relationships will add greater uncertainty, loss of trust, and delay for our watershed residents. This includes the agricultural community, businesses, builders, developers, and our municipal partners that seek timely and effective local advice, which is provided through local pre-consultation; and

WHEREAS a proposed regional watershed would create a geographically vast and administratively complex organization when joining northern municipalities with those that are rural, such as ABCA, where agriculture is the main economic driver. The differences are distinguishable between the Lake Superior and Georgian Bay watersheds to those in Southwestern Ontario on the shores of Lake Huron. The ABCA serves Southwestern Ontario agricultural communities facing vastly different geographies, climate, and infrastructure realities which would be ill-served by a broad regional administrative structure. This would be considerably worse if local offices do not remain available and accountable to its membership, partners and the communities they serve.

THEREFORE BE IT RESOLVED:

THAT the Ausable Bayfield Conservation Authority Board of Directors does not support the proposed “Huron-Superior Regional Conservation Authority” boundary configuration as outlined in Environmental Registry Notice 025-1257; and

THAT meaningful modernization can occur within the current watershed-based governance framework; and

THAT the ABCA Board endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government’s priorities of efficiency, red-tape reduction and timely home construction; and

THAT the Board asks that the Ministry of the Environment, Conservation and Parks engage directly with affected municipalities and conservation authorities across Southwestern Ontario through a working group before finalizing any consolidation boundaries or legislative amendments; and

THAT a forthcoming ERO response at the approval of the ABCA Board be forwarded to the Environmental Registry of Ontario consultations; and

THAT a letter from the Chair containing this resolution, and ERO response, be forwarded to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics; and

- the Ministry of the Environment, Conservation and Parks (CA Office); and

- Ontario’s Chief Conservation Executive, Hassaan Basit; and

- local Members of Provincial Parliament; Matthew Rae (Perth-Wellington), Hon. Lisa Thompson (Huron-Bruce, Minister of Rural Affairs), and Steve Pinsonneault (Lambton-Kent-Middlesex); and

- local MPs; and

- All local watershed municipalities, all municipalities in Ontario, and Counties within ABCA ‘s watershed; and

- the Association of Municipalities of Ontario, the Rural Ontario Municipal Association; and

- Ausable Bayfield Conservation Foundation; and

- Conservation Ontario and all Conservation Authorities in Ontario.

Background:

As shared with the ABCA Board at their special meeting held November 6, 2025, the Ministry of the Environment, Conservation and Parks has proposed to reduce Ontario's 36 conservation authorities to 7 regional authorities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency (OPCA) to provide centralized oversight and direction under the Conservation Authorities Act.

Under this proposal, the ABCA would be merged into a new proposed "Huron-Superior Regional Conservation Authority" together with the Maitland Valley CA, Saugeen Valley CA, Grey Sauble CA, Nottawasaga Valley CA, Lake Simcoe Region CA and the Lakehead Region CA (Thunder Bay), which will include approximately 78 municipalities across the range.

On Friday, November 7th, the Ministry of the Environment, Conservation and Parks posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), The ERO posting remains open for public comment for a total of 45 days until December 22, 2025 at 11:59 p.m.

Concurrently, Bill 68 was introduced on Thursday, November 6th, indicating that through changes to the Conservation Authorities Act, the OPCA will be established. The OPCA has control of the governance framework of the new regional conservation authorities, has authority over regional conservation authorities, and can charge fees to regional conservation authorities for cost recovery. The OPCA will assess, report and provide direction of regional authorities as it relates to finances, strategic plans, standards, central permitting, and general progress. The proposed plan will see the OPCA have a Board of 5-12 members, appointed by the government, but will not include members of parliament. The board will appoint a CEO, who will establish staffing of the agency. The current status of Bill 68 is that it is in First Reading, and is ordered for Second Reading, and expected to pass shortly.

December 4, 2025

Ministry of the Environment, Conservation and Parks
Conservation and Source Protection Branch
300 Water Street North Tower, 5th Floor
Peterborough, ON
K9J 3C7

Adelaide Metcalfe

Bluewater

Central Huron

Huron East

Lambton Shores

Lucan Biddulph

Middlesex Centre

North Middlesex

Perth South

South Huron

Warwick

West Perth

Ausable Bayfield Conservation Authority Submission to ERO 025-1257 Consultation on Proposed boundaries for the regional consolidation of Ontario's conservation authorities

The Ausable Bayfield Conservation Authority (ABCA) is one of Ontario's 36 conservation authorities delivering programs and services that further the conservation, restoration, and management of natural resources to fulfil a vital role in watershed management and protect communities from natural hazards. As leaders in watershed management, conservation authorities collaborate with the public, municipalities, Indigenous communities, the agricultural sector, and other partners to fulfil our mandate while meeting both local needs and provincial priorities. We have reviewed ERO 025-1257: consultation on *Proposed boundaries for the regional consolidation of Ontario's conservation authorities* and offer the following comments for consideration.

Watershed management is complex – challenges such as flooding, erosion and declining water quality are typically the result of upstream activities on the landscape and can impact communities unevenly as the results of these decisions, and activities cumulate through the watershed. This often results in a disproportionate burden of management challenges, and costs on downstream communities; however, maintaining local governance helps ensure that the costs and responsibilities of preventative measures and management are shared across the watershed. This local governance, and current framework of conservation authorities promotes an effective scale for delivering front-line resources in partnership with our local communities, alongside provincial priorities, to apply science-based decisions that protect communities from

natural hazards. While ABCA acknowledges and supports the province's goals of improved efficiency, through the implementation of a digital applications and permitting system, consistent policies, flood standards, fees and technology, it does not support the proposed "Huron-Superior Regional Conservation Authority" boundary and encourages the province to consider meaningful modernization within the current watershed-based governance framework.

It is therefore recommended that a feasibility study should be completed that will guide and risk-manage the creation of regional watershed boundaries based on strategic alignment, governance and leadership, financial efficiency and partner/community relations.

LOCAL

References to local throughout this ERO submission go well beyond the ABCA watershed in a geographic context. Local means so much more:

> *It is established relationships with the community in which we work and live. Decades of partnerships and service with our watershed residents and neighbours has developed trust and brand recognition. Being associated with the very rivers for which we are named establishes a relationship between the community and the landscape. Local is being responsive and accountable to the needs of our watershed residents and working collaboratively with them to balance environmental needs, community interests and provincial priorities.*

Posting Discussion Questions

What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?

Locally relevant geographic boundaries:

A priority for the Ontario Provincial Conservation Agency (OPCA) is maintaining watershed-based jurisdictions – aligning with natural hydrological boundaries to support effective flood and water management, consistent with drinking water Source Protection Areas and Regions. We do not support the proposed "Huron – Superior Regional Conservation Authority" boundary, as we do not believe it adequately meets this criterion. A key factor to support a successful transition and outcome is considering the landscape, land uses, and economy throughout the boundary of each regional conservation authority. For example, the County of Huron, within the proposed boundary of the "Huron – Superior Regional Conservation Authority" contributes more than $1 billion annually in agriculture revenue to

the Canadian economy. The landscape that supports this economy, and influences local, effective watershed management considerations, cannot be compared to fast-growing municipalities throughout the province, such as the urbanizing shoreline of Lake Simcoe, or the landscape, and the needs of the residents of Thunder Bay. Although agriculture is noted as a consideration of other proposed regional conservation authorities, we are concerned that agriculture, despite its significant contribution to the national economy, is not appropriately recognized in the proposed "Huron – Superior" boundary. This suggests that local land uses may not be adequately considered at the proposed scale.

Strong governance with local representation:

The ABCA affirms that strong, local municipal governance and oversight is fundamental to effectively deliver the vital watershed management programs and services that protect communities from natural hazards. Locally relevant watershed boundaries, supported by strong local governance, create a cohesive framework that overcomes jurisdictional barriers by enabling collaboration to meet both community and environmental needs. This collaboration between the community, industry and other employment sectors; municipalities, and the province, to address complex watershed management challenges, helps realize tangible outcomes by supporting the local community to build a more resilient Ontario.

Watershed-based management, which is the founding principal of conservation authority boundaries, is recognized internationally as the most effective means of addressing complex watershed management challenges. However, the true success of conservation authorities lies in the governance under which they were established and operate in, the structure that balances local environmental, economic and societal needs across a landscape and watershed scale that is meaningful to the people who live and work within it.

Regional support with local delivery:

The province has identified that its proposed amalgamation would improve conservation authorities by providing better tools and more resources; provide greater consistency and transparency; and deliver faster services to municipalities and permit applications, while ensuring decisions continue to be based on sound science.

Permitting administered by conservation authorities helps to ensure that development does not happen in unsafe areas and that it does not worsen the impacts in flooding or erosion in surrounding areas. ABCA understands that the OPCA will be tasked with streamlining and standardizing more consistent service delivery by setting provincewide service delivery standards. However, ABCA emphasizes that local delivery allows applicants to work with responsive staff through effective pre-consultation that may result in an outcome that

directs development away from regulated areas affected by the risk of natural hazards. Through this pro-active and effective working relationship, staff work with applicants to establish more resilient infrastructure and often eliminates the need for a permit altogether. Effective local delivery, enabled by knowledgeable and responsive staff, is fundamental to this success; however, this strength of the current conservation authority framework is not adequately captured within existing service delivery standards.

Therefore, the ABCA encourages the province to provide better tools and more resources that enhance consistency and transparency; and help deliver faster services to municipalities; within the existing conservation authority framework, enabling knowledgeable and responsive staff to deliver consistent services that continue to be based on sound science, supported by modern tools and resources, and backed by the region.

What opportunities or benefits may come from a regional conservation authority framework?

The ABCA recognizes that a more regional jurisdiction may improve our access to tools and resources to enhance consistency and transparency; and help delivery faster services; as conservation authorities collaborate to share resources, tools, knowledge and skills. However, ABCA reiterates that local delivery, by responsive staff is critical to successfully deliver watershed management programs and services, while fostering and maintaining strong relationships, as we work together, to build a more resilient Ontario.

The Healthy Lake Huron Initiative (HLH) is an example of how a regional conservation authority may operate to support a resilient landscape and provide opportunities and benefits to the conservation authority within its region. As a lead organization delivering the HLH, ABCA recognizes how separate, local entities, working together within a regional framework may generate opportunities that improve our individual program and service delivery. Through HLH, ABCA and its partners demonstrate that effective collaboration enhances access to improved resources and tools, and leverages shared technical skills and knowledge to strengthen the local delivery of programs and services across the HLH region.

The ABCA welcomes the opportunity to work with the province, to share our experience and build upon the success of the HLH framework. The HLH Initiative demonstrates that collaboration on a regional scale enhances opportunities, while still delivering local, efficient, and effective watershed management programs and services through our respective conservation authorities.

Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?

The ABCA reiterates that strong, local municipal governance and oversight is fundamental to effectively deliver vital watershed management programs and services that protect communities from natural hazards.

Watershed management is complex – it involves balancing the cumulative effects of previous land use decisions; local priorities and economic drivers; and provincial priorities including housing, the economy and infrastructure; while making sound, science-based decisions to protect communities from natural hazards. Strong, local governance, that recognizes watershed boundaries, as opposed to political boundaries is fundamental towards achieving this balance.

The ABCA welcomes the opportunity to work with the province to ensure that local governance is integrated into a regional framework. Through the successful HLH Initiative that ABCA described, governance at the regional conservation authority level could be structured with a tiered system. The tiered system would allow for:

- The retention of the local Board structure, creating a local Watershed Advisory Committee (Ausable Bayfield Watershed Advisory Committee) that includes representation from each member municipality.
- The local conservation authority Board or Advisory Committee to appoint member(s) to the Regional Conservation Authority Board of Directors
- The Regional Conservation Authority Board of Directors to appoint member(s) to the OPCA Board of Directors

The tiered system enables centralized leadership, efficient governance, strategic direction and transparent oversight to the decisions that are consistent across the region, or province, while enabling strong, local governance that facilitates effective and efficient watershed management.

Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

The ABCA is concerned about the financial implications for Ontarians associated with transitioning to regional conservation authorities. To ensure full transparency and informed decision making, a comprehensive cost-benefit analysis must be completed prior to

undertaking any transition. Further, any modernization of conservation authorities must be supported by provincial funding so that it does not affect service delivery.

With the guidance and support of our twelve member municipalities, ABCA demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. Through strong partnerships, the ABCA successfully leverages funding to support programs and services that are locally important, based on sound science, and driven by community engagement. The ABCA affirms that a transparent and consultative budgeting process across member municipalities within a regional conservation authority must retain municipal representation and authority. Please refer to the reference in the previous answer as it relates to the need for a local watershed Board or advisory committee. Retaining the involvement of member municipalities ensures transparency, effective consultation, and balances local, regional, and provincial priorities.

The ABCA acknowledges and supports the province's goal to improve efficiency of watershed management by implementing digital applications and permitting system, consistent policies, flood standards, fees and technology. The ABCA affirms that achieving this goal involves centralizing information, tools, and resources, rather than assets. To maintain strong, local relationships and community trust, assets must remain at the local level.

How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

For nearly eighty-years, conservation authorities have worked with local communities and stakeholders to address complex watershed management challenges, building strong relationships. These strong relationships are built on trust and are reinforced by the community's recognition of our local identity. This trust and brand recognition has been established through the frontline of conservation authorities – local councillors, management, and staff – working collaboratively to balance environmental needs, community interests and provincial priorities.

The current watershed boundaries of the 36 conservation authorities enable effective and efficient administration at a scale that the community relates to. This local scale fosters meaningful connections that help people to understand that they are apart of the natural world and live within a watershed. The existing watershed boundaries:

- Connect the name of the river to people where they live, work and play, to the local organization that delivers watershed management programs and services (e.g., stewardship, lands, education, outreach, etc.)
- Connect the programs and services to local governance (i.e., municipal councillors)

Local offices serve as the community's primary point of contact for conservation, supporting environmental progress through front-line service delivery and direct access to knowledgeable staff who connect individuals with the resources they need. The ABCA emphasizes the importance of not only maintaining our local offices, but also preserving conservation authorities' individual, distinct local identity and brand. A successful transition and outcome of regional conservation authorities must preserve the local identity, while considering opportunities to centralize information, tools, and resources, rather than assets, to build upon strong working relations, backed by the tools and resources of the region.

Any regionalization of conservation authority boundaries must continue to respect the local watershed agreements that are in place, honour donations made to the local conservation authority, the wishes of those donors, and maintain our commitment to partnerships with community organizations.

Conclusion

The Ausable Bayfield Conservation Authority affirms that strong, local municipal governance and oversight is fundamental to effectively deliver the vital watershed management programs and services that protect communities from natural hazards. As currently proposed, the "Huron – Superior" boundary is untenable. The ABCA does not support the proposed boundary configuration as outline in ERO 025-1257 and encourages the province to modernize and support conservation authorities within current watershed-based boundaries and governance. To maintain, and strengthen local relations and community trust, conservation authority boundaries must reflect local landscapes and economic drivers. With our many years of experience, collaborating with Healthy Lake Huron, we welcome the opportunity to work with the province to ensure that strong local governance is effectively integrated into a more regional watershed-based organization. The ABCA volunteers to be on a working group to help inform this transition.

November 26, 2025

Re: Bill 68 - Proposed New Ontario Provincial Conservation Agency and ERO #025-1257

Adelaide Metcalfe

Bluewater

Central Huron

Huron East

Lambton Shores

Lucan Biddulph

Middlesex Centre

North Middlesex

Perth South

South Huron

Warwick

West Perth

On October 31, 2025, the Ministry of the Environment, Conservation and Parks (MECP) circulated a media release "Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities".

On November 6, 2025, Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2) introduced changes to the Conservation Authorities Act enabling the creation of the Ontario Provincial Conservation Agency (OPCA). As proposed, the OPCA will be tasked with the streamlining and standardization of more consistent service delivery by setting provincewide standards and supporting those standards through improved tools, platforms and resources. The OPCA would be further tasked with overseeing the consolidation of the 36 Conservation Authorities (CAs), into 7 Regional Conservation Authorities.

On Friday, November 7th, the MECP posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), the ERO posting remains open for public comment for a total of 45 days until December 22, 2025 at 11:59 p.m.

Under this proposal, the Ausable Bayfield Conservation Authority (ABCA) would be merged into a new proposed "Huron-Superior Regional Conservation Authority" together with the Maitland Valley CA, Saugeen Valley CA, Grey Sauble CA, Nottawasaga Valley CA, Lake Simcoe Region CA and the Lakehead Region CA (Thunder Bay), which will include 80 municipalities across the proposed region.

The ABCA (formerly the Ausable River Conservation Authority) was the first CA created almost 80 years ago by local municipalities, to provide local management of water, soils and natural environments within its rural watershed.

Watershed-based management, which is the founding principal of CA boundaries, is recognized internationally as the most effective means of balancing environmental, economic, and societal needs across the landscape. The watershed model is most

effective when implemented at a scale that is reflective of the local landscape and economic drivers. Watershed management, supported by strong local governance, breaks down boundaries, and provides a framework to work collaboratively to meet the needs of the community, and the environment. This framework, and strong local governance and support has led to 80 years of effective, and efficient watershed management.

The ABCA recognizes and supports the province's desired outcome of improved consistency and modernized digital permitting processes, aligned with its goals and objectives for cutting red tape and getting more homes built faster, and safely. However, as an alternative to the proposed large-scale regional consolidation, the ABCA encourages the Province to achieve their goals and objectives by building on the proven strengths and relationships of local CAs and its umbrella organization, Conservation Ontario.

The current framework provides the opportunity to share resources, improve consistency and modernization across the province, without the potential costs associated with amalgamating the 36 CAs into 7 regions. The ABCA encourages a more geographically coherent, cost-effective and locally accountable alternative through engagement with directly affected municipalities and CAs across Southwestern Ontario before finalizing any consolidation boundaries.

Further, any modernization of CAs through tools and consolidation should be supported with Provincial funding. In recent years, the average annual funding from the Province to ABCA's annual operations amounts to1% of our total budget. Member municipalities fund approximately 30% of ABCA's budget. The remainder of our budget is funded primarily through partnerships and self generated revenue.

The ABCA Board of Directors, consisting of 9 Members who represent 12 municipalities, have unanimously expressed concern regarding effective local representation if CAs are amalgamated into larger regions. Under the current framework, our member municipalities have direct input into our local programs and services. The programs are delivered efficiently and effectively by knowledgeable staff in partnership with the community to meet our local environmental, economical and societal needs.

There is a significant amount of uncertainty with this proposal. To date, very few details regarding planned governance structure, local input, representation, budgeting, and CA assets have been shared. The ABCA is one of many CAs that has a supporting, charitable foundation, and clarity is needed around the future relationships with their partner CAs.

The ABCA Board of Directors encourages the MECP undertake a fulsome consultation process with both CAs, as well as municipalities before any decisions and changes are made as a result of the Province's proposal.

Attached is a resolution passed by the ABCA Board of Directors at their meeting held on November 20, 2025. The ABCA also encourages all partners to review the posting ERO #025-1257 Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities, and submit comments well in advance of the closing date of December 22, 2025.

For further information, please contact me by email through our office at info@abca.ca.

Sincerely,
AUSABLE BAYFIELD CONSERVATION AUTHORITY



Ray Chartrand
Chair

Encl.: ABCA Board Resolution #BD 80/25, November 20, 2025

Cc: The Honourable Todd McCarthy, Minister of the Environment, Conservation and Parks
The Conservation Authorities Office, Ministry of the Environment, Conservation and Parks
Hassan Bassit, Ontario's Chief Conservation Executive
Local Members of Provincial Parliament: The Honourable Lisa Thompson, Huron-Bruce, Minister of Rural Affairs; Steve Pinsonneault, Lambton-Kent-Middlesex; Matthew Rae, Perth-Wellington
Local Members of Parliament: Ben Lobb, Huron-Bruce; Lianne Rood, Middlesex-London; John Nater, Perth-Wellington
Local Municipalities and Counties
The Association of Municipalities of Ontario, and the Rural Ontario Municipal Association
The Ausable Bayfield Conservation Foundation
Conservation Ontario and All Conservation Authorities in Ontario

AUSABLE BAYFIELD CONSERVATION AUTHORITY
RESOLUTION #BD 80/25, November 20, 2025 **Moved by Wayne Shipley**
Seconded by David Jewitt

WHEREAS the Ausable Bayfield Conservation Authority (ABCA) Board of Directors acknowledges and supports the Province's goals of improved efficiency of watershed management, through the implementation of digital applications and permitting system, consistent policies, flood standards, fees, and technology; and

WHEREAS consistent policies, and resources across the existing Conservation Authorities boundaries could be achieved through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks; or Conservation Ontario; and

WHEREAS Conservation Authorities are locally based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks to lives and property. In the case of ABCA, this vision has proved a successful model for 80 years; and

WHEREAS the ABCA, with the guidance and support of our 12 Member Municipalities, demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. ABCA has successfully leveraged funding to support programs and services that are locally important and are driven by community engagement through ABCA's Conservation Strategy and the Watershed Based Resource Management Strategy; and

WHEREAS Conservation Authorities across the Province operate efficiently by working in close partnership with approximately eight Member Municipalities for every one conservation authority. This structure enables resources to be directed toward on-the-ground initiatives that advance our mandate while addressing local community needs, achieving an effective balance in scale, management and service delivery; and

WHEREAS plans to regionalize conservation authorities through consolidation would dilute local accountability and municipal partnership and is contrary to the basic principle that decisions are best made closest to the communities they affect. Effective representation by municipal partners remains core to the success of conservation authorities. The ABCA, while not unique among conservation authorities in this respect, is effective in working with our community to support sustainable development, and keeping communities safe; and

WHEREAS being front-line means being responsive and accountable to the community by delivering the services that are essential and valued to the best interest of the community. The

front line of provincial priorities on housing, the economy, infrastructure, and climate resilience are in the decisions between municipalities working together to address issues around floodplain (and hazard) protection and resilient upland and landscape management. Further, ABCA staff and Board Members are responsive and accountable to the needs of the watershed community, while meeting or exceeding provincial service standards, and are reachable through publicly available contact information. Local governance and direction combined with local service provision allows ABCA to continue to be responsive to our community; and

WHEREAS consolidation will result in substantial transition costs, not the least of which is time. In all facets, that would divert resources from front-line service delivery and delay desired outcomes. Further, the loss of local watershed knowledge and community relationships will add greater uncertainty, loss of trust, and delay for our watershed residents. This includes the agricultural community, businesses, builders, developers, and our municipal partners that seek timely and effective local advice, which is provided through local pre-consultation; and

WHEREAS a proposed regional watershed would create a geographically vast and administratively complex organization when joining northern municipalities with those that are rural, such as ABCA, where agriculture is the main economic driver. The differences are distinguishable between the Lake Superior and Georgian Bay watersheds to those in Southwestern Ontario on the shores of Lake Huron. The ABCA serves Southwestern Ontario agricultural communities facing vastly different geographies, climate, and infrastructure realities which would be ill-served by a broad regional administrative structure. This would be considerably worse if local offices do not remain available and accountable to its membership, partners and the communities they serve.

THEREFORE, BE IT RESOLVED:

THAT the Ausable Bayfield Conservation Authority Board of Directors does not support the proposed “Huron-Superior Regional Conservation Authority” boundary configuration as outlined in Environmental Registry Notice 025-1257; and

FURTHER THAT meaningful modernization can occur within the current watershed-based governance framework; and

FURTHER THAT the ABCA Board endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government’s priorities of efficiency, red-tape reduction and timely home construction; and

FURTHER THAT the Board asks that the Ministry of the Environment, Conservation and Parks engage directly with affected municipalities and conservation authorities across Southwestern Ontario through a working group before finalizing any consolidation boundaries or legislative amendments; and

FURTHER THAT a forthcoming ERO response at the approval of the ABCA Board be forwarded to the Environmental Registry of Ontario consultations; and

FURTHER THAT a letter from the Chair containing this resolution, and ERO response, be forwarded to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics,
- the Ministry of the Environment, Conservation and Parks (CA Office),
- Ontario's Chief Conservation Executive,
- local Members of Provincial Parliament,
- local Members of Parliament,
- Local Municipalities and Counties,
- The Association of Municipalities of Ontario, and the Rural Ontario Municipal Association,
- Ausable Bayfield Conservation Foundation, and
- Conservation Ontario and all Conservation Authorities in Ontario.

Carried.

Agenda Number: 11.3.3.
Resolution No. 319-21-2025
Date: Monday, December 8, 2025

MUNICIPALITY OF ARRAN-ELDERSLIE

Moved by: Deputy Mayor Jennifer Shaw
Seconded by: Councillor Moiken Penner

WHEREAS the Conservation Authorities Act enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses; and

WHEREAS the Municipality of Arran-Elderslie is unique in that it contains two watershed jurisdictions within its boundaries, being served by both the Saugeen Valley Conservation Authority (SVCA) and the Grey Sauble Conservation Authority (GSCA); and

WHEREAS the municipalities within Grey and Bruce Counties established the North Grey Region Conservation Authority in 1957 and the Sauble Valley Conservation Authority in 1958, which amalgamated into the Grey Sauble Conservation Authority (GSCA) in 1985; and

WHEREAS the municipalities within Bruce, Grey, Huron, and Wellington Counties established the Saugeen Valley Conservation Authority in 1950, which has since grown through collaboration and amalgamation with neighbouring conservation entities to form the present-day SVCA; and

WHEREAS local municipalities currently provide approximately 44% of total GSCA and SVCA funding, while the Province of Ontario provides approximately 7%; and 1% respectively

WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers; and

WHEREAS conservation authorities collectively own and manage thousands of hectares of land, much of which was donated or sold by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be
cared for by locally governed conservation authorities; and

WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency whose objects include overseeing conservation authorities and the transition to a regional watershed-based framework for conservation authorities in Ontario with municipal cost contribution yet to be defined; and

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring; and

WHEREAS under this proposal, both the SVCA and GSCA would be consolidated into a new "Huron Superior Regional Conservation Authority" that is over 23,000 square kilometres in size and consists of 80 municipalities, and

WHEREAS the Province already has the authority to establish overarching legislation, regulations and standards through the Conservation Authorities Act and the Ministry of Environment, Conservation and Parks to address issues related to permitting, by establishing guidance, online permitting platforms and technical standards through legislation that could help build homes; and

WHEREAS the SVCA and GSCA have already undertaken significant modernization work aligned with provincial objectives, including Information Technology / Information Management, and leveraging technology to streamline planning and permit review processes,

NOW THEREFORE BE IT RESOLVED THAT the Municipality of Arran-Elderslie calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; and

THAT the Municipality of Arran-Elderslie does not support the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257 as the proposal lacks sufficient justification, would significantly diminish local governance, and fails to recognize the effectiveness and efficiencies already achieved within existing watershed-based models; and

THAT the Municipality of Arran-Elderslie affirms that large-scale regional consolidation is unnecessary, would introduce substantial transition costs, and would divert resources away from frontline watershed programs. The Council further asserts that restructuring at this scale would erode local decision-making, weaken municipal accountability, and disrupt long-standing community partnerships that are central to delivering responsive watershed management; and

THAT while the Municipality of Arran-Elderslie supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down approach structure without strong local accountability and governance risks creating unnecessary cost, red-tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; and

THAT the Municipality of Arran-Elderslie urges the Province to strengthen centralized standards, resources, and tools rather than undertaking broad structural amalgamation and to provide sustainable, predictable provincial funding across conservation authorities to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years; and

THAT the Municipality of Arran-Elderslie believes that the Province's proposed new online permitting portal can be implemented within the existing conservation authority framework without requiring structural amalgamation; and

THAT the Municipality of Arran-Elderslie requests that the Ministry engage meaningfully and collaboratively with affected municipalities, conservation authorities, and local First Nations before advancing any consolidation, to ensure that any changes reflect both local needs and the practical realities of implementation; and

THAT this resolution be included in the Municipality's ERO response and forwarded to the Premier of Ontario, the Minister of the Environment, Conservation and Parks, all of Ontario's municipalities, MPPs, conservation authorities, AMO, and Conservation Ontario.

Carried

TOWNSHIP OF AMARANTH

374028 6TH LINE • AMARANTH ON • L9W 0M6

December 19, 2025

Hon. Todd McCarthy
Minister of the Environment, Conservation and Parks

Hassaan Basit
Chief Conservation Officer

Sent by email to: todd.mccarthy@pc.ola.org, Hassaan.Basit@ontario.ca

Re: Amalgamation of Conservation Authorities – Bill 68

At its special meeting of Council held on December 19, 2025, the Township of Amaranth Council discussed the proposed amalgamation of the Conservation Authorities and passed the following motion.

Background

Located in the aptly named Headwaters Region of Southern Ontario, the Township of Amaranth in the County of Dufferin is currently very under the jurisdiction of three Conservation Authorities: Grand River, Nottawasaga Valley and Credit Valley.
The Township of Amaranth has been under the jurisdiction of these three Conservation Authorities since they were established. Amaranth is currently well served by all three Conservation Authorities.
Under the proposal put forward by the provincial government as part of Bill 68 referenced above, the Township of Amaranth would remain split between three much larger Regional Conservation Authorities: Lake Erie, Huron-Superior and Central Lake. This proposal severely dilutes local accountability, potentially eliminating the voice of this municipality and the taxpayers who support the work of the Conservation Authorities with levies paid as part of property taxes. Meanwhile the provincial contribution to CAs continues at a level that funds less than 3% of the Conservation Authorities' respective budgets.
The Township of Amaranth values the significant watershed specific infrastructure investment as contributed by its three unique Authorities and the science-based knowledge that guides the decision making in each of the specific geographical areas of each Authority.
Conservation Authorities have been working hard to streamline permitting processes, improve delivery timelines and focus on fiscal prudence and consistency within their mandated roles. Through shared services, the improvement to modernization and

system evolution can continue with less system-wide disruption and without additional transition expense.

Resolution #: 2

Moved by: G. Little
Seconded by: V. Paan

BE IT RESOLVED THAT:

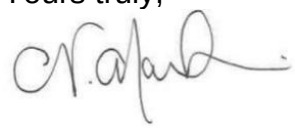
Council of the Township of Amaranth opposes the amalgamation process as defined in Bill 68.

Further, the Township of Amaranth proposes a three-year hiatus of any transition changes while evaluation is completed with proper, appropriate consultation of all partners in Conservation Authorities to review any proposed boundary realignments, additional governance oversight, potential service adjustments and other Conservation Authority model proposals.

For (5): C. Gerrits, G. Little, S. Graham, B. Metzger, and V. Paan
CARRIED (5 to 0)

Please do not hesitate to contact the office if you require any further information on this matter.

Yours truly,



Nicole Martin, Dipl. M.A.
CAO/Clerk

Cc: Dufferin MP and MPP
Association of Municipalities of Ontario
Rural Ontario Municipal Association
Ontario Municipalities
Conservation Authorities in Ontario
Ministry of Natural Resources

Attachment 1 of 2: NVCA Board Resolution

Discussion on NVCA Boards position on Provincial Conservation Authority changes

Recommendation:
RES: 83-25
Moved by: Cllr. Ralph Manktelow
Seconded by: Cllr. Joel Loughead
WHEREAS: the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities (CA), and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses; and
WHEREAS: local municipalities collectively currently provide between 25% and 50% of total conservation authority funding, while the Province of Ontario provides approximately 3%; and
WHEREAS: conservation authorities collectively own and manage thousands of hectares of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities; and
WHEREAS: the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create an Ontario Provincial Conservation Agency to provide centralized oversight and direction under the *Conservation Authorities Act*, with a municipal cost apportionment yet to be defined; and
WHEREAS: under this proposal, the Nottawasaga Valley Conservation Authority (NVCA) would be merged into a new "Huron–Superior Regional Conservation Authority" together with the:

1. Ausable Bayfield CA;
2. Maitland Valley CA;
3. Saugeen Valley CA;
4. Grey Sauble CA;
5. Lake Simcoe Region CA; and
6. Lakehead Region CA

forming a single organization stretching from Thunder Bay and Lake Superior through northern Lake Huron, Simcoe, Dufferin, Bruce, and Grey counties, York Region, Kawartha Lakes, and Durham regions; and

WHEREAS: the Board acknowledges and supports the Province's goals of improved efficiency, consistency and fiscal prudence in conservation delivery, but finds that the proposed "Huron–Superior" configuration would:

1. Create a geographically vast and administratively complex entity of 78+ different municipalities joining Northern, rural and fast-growing southern municipalities in the Greater Toronto Area with little shared watershed connection or economic alignment;
2. Dilute local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they affect;
3. Generate substantial transition costs — including human-resources integration, governance restructuring, IT migration and policy harmonization — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province's own business-planning principles of value for money, cost containment and service continuity; and
4. Risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it harder for applicants to obtain timely advice, resolve issues or expedite housing and infrastructure approvals that support the Province's "Get It Done" agenda; and

WHEREAS: the NVCA has already undertaken significant modernization work aligned with provincial objectives that demonstrates meaningful modernization can occur within the current watershed-based governance framework, including:

- implementation of a digital permitting and inspection system that has reduced turnaround times;
- adoption of shared-service arrangements in Corporate Services;
- independent service reviews identifying opportunities for cost recovery and efficiency; and
- measurable improvements in transparency and client communication; and

WHEREAS: the Board notes that the Lake Simcoe Region Conservation Authority operates under the *Lake Simcoe Protection Act* and Lake Simcoe Protection Plan, a unique legislative framework requiring distinct governance and reporting; and

WHEREAS: the Board further recognizes that the Lakehead Region Conservation Authority serves Northern Ontario communities facing vastly different climatic, hydrological and infrastructure realities, which would be ill-served by a single administrative structure extending to the Greater Toronto Area and physically based over 1,400 km away: and

WHEREAS: if the Province proceeds with reducing the number of conservation authorities, the Board believes a more geographically coherent and fiscally responsible alternative would be to consolidate only those conservation authorities with contiguous watersheds draining to Georgian Bay while maintaining the Lake Simcoe Region CA as distinct entity in recognition of its unique legislative

framework and having Lakehead Region CA form the Northwestern Ontario Regional Conservation Authority reflecting its unique regional context;

THEREFORE BE IT RESOLVED THAT:

1. The Board of Directors does not believe that the amalgamation is required and does not support the proposed "Huron–Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257; and
2. The Board instead endorses further provincial evaluation of a more focused specific model that is a more geographically coherent, cost-effective, and locally accountable alternative to advance the government's priorities of efficiency, red-tape reduction and timely housing delivery; and
3. The Board requests that the Ministry engage directly with the 78+ affected municipalities and conservation authorities across Simcoe, York, Durham, Kawartha Lakes, Bruce, Huron, Dufferin, Grey, Lambton, and Northern Ontario before finalizing any consolidation boundaries or legislative amendments; and
4. That this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:
    - the Minister of the Environment, Conservation and Parks and his Opposition critics;
    - local Members of Provincial Parliament;
    - the Association of Municipalities of Ontario and Conservation Ontario; and
    - the Boards of the Grey Sauble, Saugeen Valley, Maitland Valley, Ausable Bayfield, Lake Simcoe Region and Lakehead Region Conservation Authorities.

5. Staff be directed to prepare NVCA's formal response to Environmental Registry Notice No. 025-1257.
    - The response shall reflect NVCA's position on maintaining effective watershed-based management, local accountability, and service continuity for member municipalities and stakeholders.
    - Staff shall submit the finalized response to the Environmental Registry of Ontario by the stated deadline and circulate a copy to the Board for information.

Carried;

Nottawasaga Valley
Conservation Authority

Attachment 2 of 2: Letter - NVCA's progress in modernisation, efficiency and accountability

29 October 2025

By EMAIL

Mr. Hassaan Basit
Chief Conservation Executive
2nd Floor, 200-6733 Mississauga Rd
Mississauga, ON L5N 6J5

RE: NVCA's progress in modernisation, efficiency and accountability

Dear Mr. Basit:

On behalf of the Nottawasaga Valley Conservation Authority (NVCA), we extend our congratulations on your appointment as Ontario's first Chief Conservation Executive. Your leadership comes at a pivotal moment as conservation authorities work to deliver faster, more transparent and more consistent service while supporting the province's goals for housing, infrastructure and climate resilience.

Over the past several months, the NVCA has undergone a deliberate, comprehensive transformation. Guided by our Board and new Chief Administrative Officer, we have modernised our systems, streamlined operations and instilled a culture of continuous improvement.

Key achievements include:

- Faster, more predictable permitting. We have cleared a backlog of more than 100 files, introduced e-permitting and digital workflows that save staff an average of 45 minutes per application, and as of September 2025 have achieved 95 per cent compliance with provincial review timelines, with a new average permit delivery timeframe of just 16 days.
- A new triage system allows straightforward applications to move quickly so staff can focus on complex, higher-risk files.

- A 90 per cent customer-satisfaction rating, up from 68 per cent in 2022, reflects our stronger focus on service, communication and problem-solving.
- A leaner, more transparent budget. Following a line-by-line review, 21 of 27 expense categories were reduced or held flat with our operating budget declining by some $9000 with no service reductions. Category 3 charges were reduced by 31 per cent through proper reclassification of core hazard-mitigation work.
- Partnership with industry and municipalities. Our working group with the Building Industry and Land Development Association (BILD) fosters earlier collaboration and shared solutions, while regular municipal briefings enhance transparency and trust.

These reforms reflect a clear shift in culture. Our role is to apply science and local insight to help communities grow safely and sustainably. We are proving that conservation authorities can deliver both protection and progress.

We would welcome the opportunity to meet with you to discuss how our modernisation work aligns with your mandate to create a more effective, consistent and outcomes-driven conservation-authority sector.

Thank you for your attention and for your leadership in this important portfolio.

Yours sincerely,



Jonathan Scott

Chair, Nottawasaga Valley Conservation Authority

cc:

All MPPs representing the Nottawasaga Watershed; Dufferin County Council; Simcoe County Council; Grey County Council.

Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025

and

Proposed boundaries for the regional consolidation of Ontario's conservation authorities, Environmental Registry of Ontario posting #025-1257
Catfish Creek Conservation Authority Response

1) **What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?**

A successful transition and outcome in regional conservation authority consolidation hinges on several interconnected factors that must be managed with strategic attention and realism. At the core is the establishment of a clear purpose and shared vision among all participating organizations. When goals are well-defined and collectively endorsed, consolidation efforts tend to be focused and cohesive. However, if early vision-setting is rushed or dominated by only a subset of partners, the result can be misaligned priorities, stakeholder resistance, and decision-making gridlock.

Strong governance and leadership are equally critical. Effective boards and executive teams can maintain momentum, provide clarity during uncertainty, and reinforce accountability. Conversely, weak governance structures, those with unclear mandates, unbalanced representation, or inconsistent oversight can exacerbate inter-organizational tensions and leave staff without clear direction. Poor leadership during consolidation risks eroding morale, slowing integration, and undermining public confidence.

A well-structured change-management approach underpins the entire process. It ensures that operational alignment, policy harmonization, and technical-system integration unfold in an orderly and predictable manner. Without such an approach, consolidations often suffer from duplicated efforts, inconsistent procedures, and costly delays. Transparent, ongoing communication with staff, municipalities, Indigenous communities, and local stakeholders is essential to prevent misinformation and maintain trust. Failure to engage these groups early and consistently can lead to confusion, perceived loss of local control, and diminished community support.

Cultural integration often underestimated, is another major determinant of success. Conservation authorities may differ significantly in their organizational norms, decision-making styles, and service philosophies. A thoughtful approach to blending these cultures promotes collaboration and reduces friction. If ignored, cultural mismatches can create internal conflict, resistance to new processes, and the loss of key personnel who feel their values or identity are being sidelined.

Human-resources planning must be clear, fair, and transparent. Staff need certainty around job roles, reporting structures, and opportunities for growth. Without careful planning, consolidation can generate anxiety, disrupt workflows, and contribute to turnover, which threatens continuity of services and the retention of institutional knowledge. Financial transparency is equally important; a consolidated organization must develop a budgeting approach that covers both ongoing operations and transition

costs. Hidden or underestimated financial pressures can result in service cuts, strained municipal relationships, or reduced investment in core environmental programs.

Respecting local watershed identity and community relationships is fundamental to preventing service disruption and maintaining public trust. Conservation authorities are often closely tied to local environmental issues, historical partnerships, and community-based programming. Consolidation risks diluting this local presence or creating perceptions of centralization and detachment, especially if decision-making becomes more distant from watershed-level realities.

Robust data-management standards, consistent performance metrics, and harmonized regulatory processes support fairness and operational efficiency. They enable consistent service delivery across the newly formed jurisdiction. Without them, staff may rely on differing data sets, incompatible methods, or contradictory interpretations of regulations, leading to inconsistent decisions, stakeholder frustration, and potential legal challenges.

Strong risk-management practices, including contingency planning and scenario analysis, help an organization anticipate challenges such as budget overruns, system failures, or climate-related emergencies during the transition period. Weak risk planning, however, can leave the organization vulnerable to disruptions that jeopardize its credibility and ability to meet statutory responsibilities.

Building capacity for staff training, professional development, and knowledge transfer is crucial to maintaining operational resilience. Consolidation often brings new technologies and workflows that staff must quickly adapt to. Neglecting training can result in knowledge gaps, reduced service quality, and inefficiencies during the transition.

Leveraging modern technology, shared GIS platforms, digital permitting systems, and centralized information portals can streamline operations and improve collaboration. Yet technological integration is frequently one of the most complex and costly aspects of consolidation. Incompatible legacy systems, cybersecurity concerns, and insufficient IT support can impede progress and frustrate users.

Clear decision-making protocols and dispute-resolution mechanisms provide internal stability when multiple perspectives and priorities converge. Without them, disagreements may escalate, slowing progress and eroding trust among staff, partners, and board members.

Finally, consolidation must include an ongoing process of monitoring, evaluation, and adaptive management. This allows the organization to refine policies, respond to community feedback, and adjust to changing environmental conditions. However, if

monitoring is neglected or treated as a formality, the organization risks repeating early missteps, failing to meet service expectations, and losing accountability to the public and its municipal partners.

2) **What opportunities or benefits may come from a regional conservation authority framework?**

A regional conservation authority (RCA) framework offers a wide range of opportunities and benefits by enabling truly coordinated watershed management across multiple municipalities and jurisdictions. At its strongest, this model supports environmental protection at the natural scale of ecological processes rather than political boundaries. By aligning planning, monitoring, and restoration activities across entire watersheds, RCAs can address interconnected issues such as water quality, habitat fragmentation, and hydrologic changes more effectively than individual municipalities acting independently. However, achieving this level of integration requires complex coordination, and if inter-municipal priorities conflict or data standards differ, early planning efforts may be slowed or diluted.

One of the most significant advantages of a regional framework is improved flood and stormwater management. Managing infrastructure, floodplain mapping, natural assets, and hydrologic systems holistically reduces downstream impacts and helps prevent piecemeal solutions that merely shift risk rather than reduce it. Yet, this also introduces challenges: differing municipal expectations, local political pressures, and uneven levels of pre-existing infrastructure investment can make it difficult to establish equitable cost-sharing models. Some communities may feel they are paying more than they gain, potentially leading to tensions over funding and capital priorities.

Economically, consolidation can generate efficiencies by reducing duplication of environmental services, centralizing administrative functions, standardizing procurement, and sharing specialized resources such as technical staff or monitoring equipment. These efficiencies can free funds for frontline environmental work. However, potential cost savings are not guaranteed. Transition periods often bring temporary cost increases, such as integrating IT systems, harmonizing staff compensation, or aligning policies which may strain budgets if not anticipated. Additionally, larger regional structures sometimes risk becoming less nimble, with slower decision-making or administrative overhead that offsets anticipated efficiencies.

A regional RCA framework can also strengthen policy consistency and regulatory enforcement. Uniform standards for development review, permitting, and conservation planning reduce confusion for landowners, developers, and municipalities while helping ensure environmental protection is consistent across the watershed. Yet, establishing

uniform standards may require reducing local flexibility, which can be contentious in communities with unique landscapes, development pressures, or political priorities. The process of harmonizing formerly distinct regulatory systems can also be time-consuming, potentially delaying development approvals or generating frustration among stakeholders.

Scientific and technical capacity is another key benefit. Consolidation pools specialized expertise, hydrologists, ecologists, climate modelers, planners, GIS analysts creating a more robust and interdisciplinary technical foundation. This leads to better-informed decisions and more sophisticated watershed modeling. However, attracting and retaining highly skilled staff can be challenging if consolidation creates uncertainty about roles or if the regional authority's compensation structure cannot compete with larger municipalities or private-sector employers.

Unified structures also enhance data sharing and analysis. Standardized monitoring protocols and centralized databases strengthen evidence-based policies, improve trend detection, and support cohesive watershed-reporting systems. The downside is that integrating legacy data systems, formats, and software platforms can be complex and costly. Inconsistent historical datasets may limit comparability across regions, requiring significant effort to reconcile before meaningful analysis is possible.

The RCA model naturally encourages stronger partnerships with municipalities, Indigenous communities, NGOs, conservation groups, academic institutions, and local stakeholders. Collaboration becomes easier when engagement is coordinated at a regional scale, allowing for larger research initiatives, broader stewardship programming, and more coherent public education strategies. Nevertheless, regionalization may create concerns about loss of local identity, reduced community-level input, or less accessible staff. Indigenous partners may question whether regional systems adequately respect treaty rights, local governance structures, or place-based knowledge unless engagement is proactive and meaningful.

From a governance perspective, a regional authority can reinforce transparent decision-making through coordinated strategic planning and unified long-term capital investment strategies. This improves accountability and helps ensure that investments are prioritized based on watershed-level needs rather than political boundaries alone. Still, governance structures that become too centralized, or that do not adequately balance representation across municipalities risk creating perceptions of inequity or "dominance" by larger urban areas. If governance reforms are poorly designed, they may weaken local advocacy or reduce responsiveness to community-specific concerns.

A regional framework also expands potential funding opportunities. Larger organizations can access broader grant programs, attract multi-partner investments, and leverage

economies of scale in fundraising. However, there is a risk that smaller or rural municipalities may feel overshadowed in funding allocation, or that grant-driven priorities could divert attention from essential but less “visible” watershed work.

Finally, an RCA enhances long-term resilience to climate change by coordinating risk assessment, emergency planning, natural asset management, and resource allocation across the watershed. This integrated approach supports biodiversity, protects vulnerable ecosystems, and increases community resilience to extreme weather and flooding. Nevertheless, the success of such initiatives depends heavily on political stability, consistent funding, and the organization's ability to adapt quickly. Large regional entities may face bureaucratic delays or competing internal priorities that hinder rapid response, posing challenges in a context where climate impacts are becoming more frequent and severe.

Ultimately, a RCA framework provides a more cohesive, efficient, and future-ready model for managing natural resources at the watershed scale, but it also introduces structural, financial, and cultural challenges that must be thoughtfully addressed. When designed with clear goals, inclusive governance, strong local engagement, and careful implementation planning, the benefits can far outweigh the risks. When these elements are neglected, consolidation can generate tension, reduce service quality, or weaken the very environmental protections it aims to strengthen.

3) **Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?**

A well-structured governance framework for a regional conservation authority (RCA) must balance local representation, technical expertise, Indigenous involvement, and operational efficiency. It should be designed to reflect watershed realities while also ensuring that municipal, community, and ecological priorities are addressed in an equitable and accountable manner. Representation formulas can be based on watershed population, geographic distribution, watershed characteristics, municipal funding contribution, or a hybrid of these factors. This helps ensure that both densely populated urban areas and smaller rural or upper-watershed communities have an appropriate voice. Careful design is essential, as disproportionate representation either overweighting large municipalities or overprotecting small ones can undermine trust, strain decision-making, and weaken the integrity of watershed-scale planning.

To strengthen scientific, policy, and regulatory quality, optional seats may be reserved for provincial liaisons or independent environmental experts. Such roles can offer non-partisan guidance on environmental science, provincial legislation, climate projections, watershed modeling, and ecosystem restoration. While these positions are valuable,

they must be carefully positioned to avoid perceptions of undue provincial influence or conflicts with municipal autonomy.

Incorporating advisory or voting seats for Indigenous representatives, watershed stakeholders, local agricultural organizations, landowner groups, or community members can further enhance transparency and legitimacy. Indigenous participation is particularly important, as it embeds traditional knowledge, land stewardship principles, treaty considerations, and rights-based governance into the RCA's decisions. These seats should be supported with proper engagement protocols, honoraria, and culturally appropriate governance practices to avoid tokenism and ensure meaningful involvement.

Municipal representatives should be formally nominated by their councils and serve staggered terms of two to four years, balancing continuity with periodic renewal of perspectives. A structured board orientation program is essential, covering the RCA's statutory mandate, fiduciary responsibilities, conflict-of-interest rules, environmental planning authority, long-term capital obligations, and overall governance expectations. Without this orientation, municipal delegates may struggle to separate local political pressures from their fiduciary obligation to the entire watershed. Ongoing professional development refreshers on conservation legislation, natural hazards, climate resilience, equity frameworks, and financial governance helps board members maintain informed oversight as the environmental and regulatory landscape evolves.

Leadership positions, including chair and vice-chair, should rotate on a fixed schedule (e.g., every two years) to prevent concentration of influence and ensure diverse leadership perspectives. These roles should be reinforced by clear bylaws, a robust code of conduct, transparent meeting procedures, and an independent mechanism for conduct investigations or dispute resolution. This reduces the risk of political interference, undocumented decision-making, or governance breakdowns during periods of conflict.

A system of standing committees finance and audit, planning and permitting, conservation and restoration, governance and human resources, and Indigenous engagement provides deeper oversight and allows board members to specialize in strategic areas. Committees should have written terms of reference, annual work plans, and publicly accessible minutes. Regular internal reviews of committee performance and workload ensure they remain effective, balanced, and aligned with strategic priorities.

To strengthen internal accountability and operational clarity, the governance framework should include:

- Conflict-of-interest safeguards, including mandatory disclosure, recusal rules, and annual declarations.
- Transparent appointment and recruitment processes, especially for expert or community seats.

- Annual board self-evaluations and peer assessments, measuring effectiveness, ethics, and strategic focus.
- Annual performance reviews of the CAO, aligned with key performance indicators and strategic-plan progress.
- Clearly defined delegations of authority, distinguishing board-level strategic decisions from operational decisions reserved for senior management, helping prevent micromanagement and governance creep.

External accountability is equally important. RCAs should provide regular reporting to municipalities, Indigenous partners, the public, and the province, including:

- Annual watershed condition reports
- Audited financial statements
- Climate risk assessments and natural hazard updates
- Strategic plan progress reports
- Capital project dashboards and budget forecasts
- Publicly accessible board and committee minutes

Such transparency promotes public trust, demonstrates responsible stewardship of funding, and ensures that stakeholders understand how decisions support long-term watershed resilience and service delivery.

A strong governance framework must also incorporate adaptive management principles. As the watershed, community expectations, climate risks, and regulatory environment evolve, the structure must remain flexible enough to adjust representation formulas, committee mandates, or decision-making protocols. Periodic third-party governance reviews can provide objective assessments and recommendations for improvement.

Taken together, this comprehensive governance model cultivates transparent, accountable, inclusive, and expertise-driven decision-making. It positions the regional conservation authority to manage complex watershed-scale priorities while maintaining a strong and respectful relationship with municipalities, Indigenous governments, local communities, and key environmental stakeholders. Ultimately, such a structure ensures that the RCA remains resilient, credible, and effective in fulfilling its environmental protection and public service mandate.

4) **Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?**

Maintaining a transparent and consultative budgeting process within a RCA requires proactive communication, structured multilevel engagement, standardized financial practices, and a culture of openness. A well-functioning budgeting cycle not only strengthens relationships with member municipalities but also reinforces public trust,

demonstrates fiscal responsibility, and ensures that watershed priorities are aligned with available resources.

The process should begin with early, collaborative pre-budget consultations involving all member municipalities. This stage includes providing detailed projections of operational requirements, capital expenditures, anticipated growth pressures, inflationary impacts, regulatory changes, and emerging watershed risks. Sharing this information months before formal budget approval allows municipalities to incorporate anticipated levies into their own fiscal planning cycles. Early engagement also enables the RCA to flag emerging issues such as new provincial mandates, updated floodplain mapping standards, invasive species pressures, or climate-adaptation priorities that may significantly affect future resource needs.

Structured engagement mechanisms are essential. Regular joint meetings, financial workshops, or technical working groups provide municipal representatives with opportunities to ask questions, identify local priorities, and explore options for shared service delivery. These sessions must be inclusive, data-driven, and supported with clear explanations of cost drivers. They are also valuable for communicating why certain investments such as asset rehabilitation, hydrologic modeling, digital permitting systems, or natural infrastructure restoration are required and how they contribute to long-term community and environmental resilience. Presenting multiple scenarios or funding pathways allows municipalities to understand trade-offs and evaluate different levels of investment.

Transparency is reinforced by publishing draft budgets, detailed supporting documents, levy formulas, and clear rationales for significant changes. Making these materials publicly accessible helps reduce political uncertainty, dispel misconceptions, and provide councils, Indigenous communities, stakeholders, and residents with the information needed to assess how public funds are being used. Public consultations or open houses may further strengthen trust by allowing community members to ask questions and better understand watershed-wide challenges.

A consistent framework for cost-sharing, reserve management, asset management planning, and expenditure reporting is essential to ensure fairness and predictability. This includes:

- Clear rules for apportioning operating and capital levies
- Documentation of how reserves are built, used, and replenished
- Standardized asset lifecycle forecasting for infrastructure, equipment, and natural assets
- Comparisons of municipal contributions relative to service levels, watershed conditions, and local benefit
- Explanations of how inflation, population growth, and climate impacts influence long-term financial requirements

Standardized financial models such as multi-year operating budgets, 10–20-year capital forecasts, and scenario-based planning create stability and allow municipalities to anticipate future commitments. These models help identify potential funding gaps early, reducing the likelihood of unexpected levy spikes or emergency capital requests.

To further strengthen transparency and performance accountability, the budget process should be tied to clear, measurable indicators. Linking financial investments to environmental outcomes, service-delivery improvements, regulatory performance, and risk-reduction metrics helps demonstrate the value of public investment. Examples include metrics related to flood-risk reduction, water-quality improvement, restoration acreage, permitting service times, or climate-resilience upgrades. When these indicators are publicly reported, they provide a concrete demonstration of how funds translate into meaningful watershed improvements.

Accessibility is equally important. Developing plain-language budget summaries, infographic-style explanations, and public-facing financial dashboards ensures that key information is comprehensible to non-specialists. This approach helps residents, Indigenous communities, community groups, and local stakeholders understand how their contributions support watershed health, natural hazard management, and conservation programming.

Finally, transparency does not end with budget approval. Maintaining confidence in the RCA's financial integrity requires ongoing, predictable communication throughout the fiscal year, including:

- Quarterly financial updates
- Mid-year budget adjustments or reallocations, with explanations
- Risk assessments identifying emerging financial pressures
- Updates on capital project progress and cost variances
- Post-year evaluations comparing planned vs. actual results
- Performance reports linking spending to outcomes

This continuous cycle of monitoring, reporting, and adjustment ensures that the budgeting process remains adaptive, accountable, and aligned with evolving watershed conditions and municipal expectations. By integrating early consultation, structured collaboration, standardized reporting, accessible communication tools, and robust performance tracking, the RCA can maintain strong fiscal stewardship and reinforce long-term confidence in its governance, financial practices, and environmental mandate.

5) **How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?**

RCA can maintain and strengthen relationships with local communities and stakeholders by fostering authentic engagement, transparent communication, and collaborative partnerships all grounded in local identity, cultural context, and place-based ecological knowledge. As RCAs grow in scale or transition to regional models, it

becomes even more important to ensure that communities do not feel distanced from decision-making or disconnected from their local watershed issues.

A foundational element is regular, proactive communication that responds to the unique character of each sub-watershed or municipality. Outreach must be multi-channel and locally tailored. Newsletters, social media updates, local radio interviews, community newspapers, town-hall meetings, and watershed-specific events help keep residents informed about projects, monitoring results, policy updates, and environmental trends. Tailoring communication to local conditions for example, focusing on shoreline erosion in lakefront communities or agricultural runoff concerns in rural areas ensures that messages remain relevant and grounded in lived experience. Without this customization, communication risks becoming generic or overly regional, weakening community engagement and reducing trust.

Strong relationships also depend on structured opportunities for shared decision-making. Establishing advisory committees or working groups with municipal representatives, Indigenous governments, environmental organizations, agricultural groups, developers, recreational users, and local stewardship networks ensures that governance reflects diverse and locally informed perspectives. These groups can be further localized through sub-watershed advisory panels, which allow community members to identify issues, priorities, and practices specific to their region. This structure prevents smaller communities from feeling overshadowed by larger municipalities and ensures that watershed-wide strategies incorporate local nuance.

Meaningful engagement also requires creating hands-on participation opportunities. Volunteer planting days, stream cleanups, shoreline restorations, invasive-species removals, and habitat enhancement projects help residents develop a sense of ownership and connection to their natural environment. Citizen science programs such as water-quality sampling, species monitoring, and community mapping empower residents to contribute data and deepen ecological understanding. These participatory initiatives cultivate stewardship, enhance ecological literacy, and help bridge the gap between technical watershed planning and community experience. Without such opportunities, public engagement may remain theoretical rather than tangible.

Education is another critical pillar. Place-based learning initiatives, including school partnerships, youth leadership programs, community workshops, field demonstrations, and guided watershed tours, help residents understand the local landscape and its vulnerabilities. They also highlight the distinct hydrologic, ecological, and cultural conditions within each community. This approach strengthens public awareness about flood risks, natural hazards, biodiversity, climate adaptation, and the role of conservation authorities in local protection. When done well, education fosters long-term stewardship and counters misinformation. When neglected, communities may misunderstand conservation authority responsibilities or underestimate environmental threats.

Transparency is essential for sustaining trust. Making operational information, budgets, permitting decisions, monitoring results, restoration progress, and watershed report cards, openly available demonstrates accountability. Localized reporting, such as municipality-specific dashboards or sub-watershed summaries, helps residents see how conservation actions translate into local improvements. Transparent communication about challenges such as funding limitations, regulatory changes, or climate impacts also builds credibility and prevents assumptions that decisions are made without community input.

Strong relationships also rely on responsive, two-way communication. RCAs must acknowledge community concerns quickly, follow up with clear information, and adjust programs based on feedback when appropriate. Whether responding to landowner inquiries, resolving conflicts about property impacts, or addressing local environmental issues, responsiveness sends a clear message that the authority values community knowledge and lived experience. Conversely, delayed or opaque communication can erode trust and fuel perceptions that decisions are made “from the center” without regard for local realities.

Celebrating shared successes further strengthens relationships. Publicly recognizing community champions, Indigenous leadership, youth contributions, volunteer groups, and multi-partner achievements reinforces the collaborative nature of watershed stewardship. These celebrations build momentum, inspire ongoing participation, and highlight the tangible benefits of partnership-based conservation.

Maintaining place-based identity is especially important in a regional framework. Even within a consolidated RCA, each watershed community has distinct environmental challenges, cultural histories, governance preferences, and expectations for service delivery. Respecting these differences through local service hubs, community liaisons, region-specific programming, and adaptive communication approaches—helps ensure that consolidation does not dilute local voice or identity

By prioritizing authentic engagement, grounding communication in local identity, and offering accessible avenues for direct involvement, regional conservation authorities can cultivate strong, enduring, community-based partnerships. These relationships not only enhance public trust but also strengthen resilience, improve environmental outcomes, and ensure that watershed stewardship remains rooted in the people and places it serves.

6) **What absolutely cannot be lost through the consolidation to Regional Conservation Authorities?**

Through consolidation into Regional Conservation Authorities (RCAs), it is essential that certain core elements be preserved to ensure both ecological effectiveness and enduring community trust. Above all, local watershed autonomy and identity must remain central. Autonomy expressed through community voice, place-based decision-making, and localized operational presence is not a secondary consideration; it is the

foundation on which conservation authorities were built. Even within a larger regional structure, each watershed carries its own history, ecological patterns, stewardship culture, and social fabric. These distinct identities must remain visible, respected, and empowered within governance systems, day-to-day operations, and public-facing programming.

Local watershed knowledge is equally critical. The ability of staff to draw on site-specific understanding of wetlands, groundwater recharge zones, flood-prone corridors, erosion hotspots, fish and wildlife habitats, agricultural drainage patterns, and culturally significant lands is what enables effective, credible, place-based management. This knowledge is rooted not only in technical training but also in decades of experience held by local staff, Indigenous communities, landowners, stewardship groups, and volunteers. Consolidation must not flatten or homogenize this expertise. Instead, the RCA must embed institutional structures such as sub-watershed teams, local offices, or community liaisons that safeguard the autonomy and integrity of local ecological knowledge.

Strong relationships with municipalities, landowners, Indigenous nations, stewardship organizations, and volunteers form the backbone of conservation success. These relationships were built over many years through trust, collaboration, conflict resolution, and consistent presence on the ground. A regional model should reinforce these relationships, not dilute them, by ensuring staff remain physically and relationally connected to local communities. Municipal partners must continue to receive tailored support that reflects their unique priorities, risks, infrastructure needs, and political environments. Without these relationships and the autonomy to nurture them, community engagement, project delivery, and environmental stewardship would be severely weakened.

Regulatory and service continuity is another cornerstone of autonomy and public confidence. Development permitting, plan review, conservation enforcement, hazard identification, watershed monitoring, and flood forecasting must remain predictable, responsive, and grounded in local conditions. Any disruption in these services risks environmental harm, development delays, and erosion of municipal trust. Preserving institutional memory, watershed-specific datasets, and decades of monitoring results ensures that the new regional structure can make decisions that are historically informed, scientifically robust, and locally accountable. This continuity supports climate resilience and protects communities from natural hazards work that cannot be done effectively without local authority and expertise.

Local identity, branding, and stewardship programming must also be preserved so that communities continue to feel ownership over their watershed and its care. This includes maintaining sub-watershed advisory groups, volunteer networks, heritage initiatives, education programs, and youth engagement activities tied to specific rivers, forests, conservation areas, and cultural sites. These programs are not peripheral; they are essential expressions of community autonomy and stewardship. When residents see

their watershed reflected in decisions, programs, and communications, they remain invested partners in conservation.

Financial accountability and transparent reporting to member municipalities remain essential components of autonomy. Clear budgeting processes, levy explanations, and spending rationales must reflect local needs, contribution patterns, and project priorities. Municipal partners need assurance that consolidation will not centralize resources at the expense of smaller or rural communities. Autonomy in financial transparency helps protect the integrity of local investments and ensures that every community sees tangible, watershed-specific outcomes from its contributions.

In essence, consolidation should be designed to enhance coordination, improve efficiency, and expand technical capacity without sacrificing the local autonomy, knowledge, relationships, and identity that define the conservation authority model. Autonomy is not an obstacle to regional coordination; it is the mechanism that ensures regional systems remain grounded in the realities of each watershed. A well-designed RCA must therefore function as a network of empowered local units operating within a cohesive regional framework.

The goal is a stronger, more capable regional system that still feels local, familiar, accessible, and responsive, where each watershed retains the authority, presence, and identity necessary to serve its communities and ecosystems effectively. Autonomy is everything: it is the anchor that keeps conservation work meaningful, trusted, and deeply rooted in the landscapes and people it exists to protect.

7) Local concerns

Local communities and stakeholders often express significant concerns during consolidation discussions concerns that go far deeper than simple administrative adjustments. At the heart of these concerns is a strongly held belief that “bigger isn’t better,” especially when it comes to watershed management, environmental protection, and community relationships. Many communities value the existing conservation authority model precisely because it is local, nimble, place-based, and deeply informed by on-the-ground expertise. Consolidation threatens to disrupt this core strength.

One of the most pervasive fears is that representation will be diluted within a larger regional board. Municipalities worry their voice will become one among many, weakening their ability to influence decisions that directly affect their neighbourhoods, infrastructure, and locally significant natural areas. Smaller municipalities are especially concerned that their distinct challenges such as rural flood risks, agricultural drainage needs, shoreline erosion control, or wildlife corridor protection could be overshadowed by the priorities of larger urban centres. Under a regional lens, local nuance risks being lost, and with it, the ability to tailor responses to unique watershed conditions.

Communities also express legitimate concerns about service continuity and responsiveness. In the current system, local conservation authorities provide permitting,

hazard monitoring, enforcement, flood forecasting, and conservation area maintenance with an understanding that is highly contextual and site-specific. Residents and municipalities alike worry that consolidation could centralize or standardize these services in ways that reduce responsiveness. They fear slower permitting decisions, delayed hazard assessments, or reduced field presence just when climate change is increasing the urgency of quick, informed action.

A major risk of consolidation is the potential loss of embedded local expertise. Existing conservation authorities rely on staff who know the watershed intimately: historical flooding patterns, aging culverts and berms, localized erosion hotspots, cumulative effects of development, long-standing landowner relationships, and ecological trends shaped over decades. This kind of place-based knowledge cannot be replicated quickly, nor can it be effectively centralized. During consolidation, staff may be reassigned, spread thin over a larger region, or even lost altogether. This creates real knowledge gaps that jeopardize environmental outcomes, risk management, and long-term watershed resilience.

Local stewardship programs and volunteer-based initiatives are also at risk. Many communities fear that the unique character of their local programs could be diluted or replaced by generic, region-wide offerings. Neighbourhood tree plantings, creek cleanups, school field trips, Indigenous land-based learning, and citizen science projects often succeed because they are tailored to the specific natural and cultural landscape. A larger regional authority may struggle to maintain program frequency, diversity, or relevance at the local scale. When local engagement weakens, so does the sense of ownership and stewardship that communities feel toward their waterways and natural areas.

Financial transparency is another major concern. Municipalities want clear, accountable budgeting processes, and they worry that consolidation may obscure how levies are allocated or redistribute resources away from smaller watersheds. Many fear that efficiencies promised through “economies of scale” will not materialize, and that instead they could end up paying more for fewer localized services. The argument that “bigger saves money” is not supported by experiences in other sectors, where consolidation often increases overhead costs, administrative layers, and complexity while reducing accessibility and responsiveness.

Perhaps the deepest concern is that consolidation may shift decision-making toward top-down regional priorities, replacing long-standing local relationships, local branding, and locally relevant environmental initiatives with a centralized identity that feels disconnected from the community. Conservation authorities have spent decades building trust with residents, farmers, businesses, Indigenous communities, and municipalities. That trust is rooted in local presence, local identity, and local autonomy. Consolidation risks weakening these relationships by creating greater distance between decision-makers and the communities they serve.

All of this points toward a central truth that communities understand clearly:

Local conservation authorities are effective precisely because they are local.

Individual watershed authorities offer intimate knowledge, agility, accountability, and direct relationships that cannot simply be scaled up or recreated regionally. Bigger systems often become more bureaucratic, less transparent, and more distant—while smaller, community-rooted authorities remain responsive, adaptive, and trusted.

Therefore, the argument is not simply about resisting change; it is about protecting what works. The existing framework composed of individual, place-based conservation authorities has proven effective for decades because it integrates scientific expertise with local wisdom, governance, and stewardship. Rather than consolidating, many communities argue for strengthening existing authorities, improving collaboration where beneficial, and investing in local capacity.

In watershed management, as in many community-centered services, bigger is rarely better if it comes at the cost of local identity, local expertise, and local voice. The goal should be to enhance coordination without erasing the deeply rooted, community-based strengths that define conservation authorities.

A stronger future for watershed protection means building on what already works, not replacing it with a larger, less personal system that risks losing the very qualities that made conservation authorities successful in the first place.

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Re: Resolution (Bill 68 and ERO Posting 025-1257)

On October 31, 2025, the Ministry of Environment, Conservation and Parks (MECP) released a media statement titled "Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities," announcing the Province's intention to establish a new, board-governed Ontario Provincial Conservation Agency "Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities | Ontario Newsroom". This new agency is expected to provide leadership, governance, and strategic oversight to all Conservation Authorities (CAs) across Ontario. The announcement was made without prior consultation with Conservation Authorities—including the Catfish Creek Conservation Authority (CCCA)—or with the watershed experts, municipal partners, and staff who possess decades of local, on-the-ground knowledge. For a watershed the size of Catfish Creek, which relies heavily on close local partnerships, this absence of engagement raises significant concerns about transparency and informed decision-making.

Shortly after this announcement, on November 6, 2025, the government introduced Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2) "Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2) - Legislative Assembly of Ontario" . The bill passed First Reading and is expected to move quickly through the Legislature, with enactment anticipated in early December 2025. Schedule 3 of Bill 68 proposes amendments to the Conservation Authorities Act to formally create the Ontario Provincial Conservation Agency, outlining its objects, governance structure, and funding model. For a smaller watershed authority like CCCA, these proposed changes represent substantial structural and operational shifts, the impacts of which have not yet been fully articulated by the Province.

On November 7, 2025, the MECP posted Environmental Registry of Ontario (ERO) posting #025-1257, Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities, with a public commenting period running to December 22, 2025 "Proposed boundaries for the regional consolidation of Ontario's conservation authorities | Environmental Registry of Ontario" . This proposal reduces Ontario's 36 Conservation Authorities to seven large regional entities. As a watershed-based agency, CCCA's jurisdiction is defined by ecological and hydrological boundaries rather than municipal borders. The proposed regional map places Catfish Creek into an extremely large regional authority where watershed conditions, community needs, development pressures, and local priorities differ substantially from those of neighbouring watersheds. The geographic scale of this proposed region surpasses what is practical for meaningful representation of Catfish Creek's specific watershed characteristics.

The consolidation proposal carries potentially significant implications for municipalities, residents, and partner organizations within the Catfish Creek watershed. No evidence-based analysis has been provided by the Province to justify the transition to such large regional entities, nor has a detailed rationale been offered for establishing a separate provincial oversight agency to replace functions historically carried out by a Ministry. The dissolution of 36 Conservation Authorities—including Catfish Creek—and the creation of shared provincial systems for finance, HR, IT, and administration would create substantial costs and added layers of complexity. Instead of streamlining service delivery, this approach may fragment existing networks and delay local decision-making.

The absence of meaningful consultation is especially concerning. If the Province intends to proceed transparently, then all existing Conservation Authorities, including Catfish Creek—should be fully engaged before legislation advances to Second and Third readings. At present, consultation is limited to the boundary-setting ERO posting. This leaves numerous critical questions unanswered. These include the funding model for the proposed Ontario Provincial Conservation Agency; the governance model for the new regional CAs and whether Catfish Creek's municipalities will have adequate local representation; the feasibility of merging diverse watershed policies into a "one-size-fits-all" framework; and the risks associated with centralizing programs that are currently tailored to local watershed conditions, needs, and funding capacities.

Significant human-resource and organizational concerns also remain unresolved, including how staff redeployment will occur across large geographic distances; how charitable foundations that support individual conservation authorities will be affected; how dissolution may impact foundations' status under the Income Tax Act; and how locally owned assets—such as conservation areas, infrastructure, and other capital holdings—will be transferred or managed under a regional model. For Catfish Creek, which manages a unique suite of natural areas and infrastructure on behalf of its partner municipalities, these uncertainties pose real operational risks.

Under the proposed regional structure, Catfish Creek would join an amalgamated entity encompassing numerous municipalities—far too many for any one watershed to maintain meaningful influence. This stands in contrast to CCCA's current governance model, which ensures strong local representation and accountability to its participating municipalities. The proposed system risks creating an unwieldy regional board disconnected from the day-to-day realities of the Catfish Creek watershed, and it may dilute the ability of local municipal councils and residents to shape watershed priorities.

As the Province advances its consolidation plan, Catfish Creek Conservation Authority encourages the government to commit to full and meaningful consultation with municipalities regarding both the funding of the new Agency and the establishment of new regional conservation authorities. CCCA emphasizes the need to preserve a strong local voice accountable to watershed residents; maintain local expertise capable of delivering programming rooted in local conditions; retain accessible local offices;

provide clarity regarding the future of charitable foundations; and transparently disclose the anticipated costs of amalgamation. These measures are essential to safeguarding the long-standing, community-based watershed management model that has served the Catfish Creek region effectively for decades.

Attached to this correspondence is a resolution passed by the CCCA Board of Directors at a meeting held November 27, 2025.

Sincerely,



Morgaine Griffin
Chairperson
Catfish Creek Conservation Authority



Dusty Underhill
General Manager/ Secretary Treasurer
Catfish Creek Conservation Authority

Attached: CCCA Recommendation Resolution

CC: The Honourable Todd McCarthy, Minister of the Environment, Conservation and Parks
Rob Flack, MPP (Elgin, Middlesex, London); Ernie Hardeman MPP (Oxford);
Local Municipal Councils
Chief Todd Cornelius, Oneida Nation
Association of Municipalities of Ontario
Conservation Ontario
Conservation Authorities in Ontario
Local environmental groups and other stakeholders

Moved By: Paul Buchner

Seconded By: Arthur Oslach

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the *Conservation Authorities Act*; and

WHEREAS under this proposal, the Catfish Creek Conservation Authority (CCCA) would be merged into a new "Lake Erie Regional Conservation Authority" together with the:

- Lower Thames Valley CA
- St. Clair Region CA
- Upper Thames River CA
- Kettle Creek CA
- Essex Region CA
- Long Point Region CA
- Grand River CA

forming a single organization stretching from Windsor, Essex County and Pelee Island, through north of Waterloo region; and

WHEREAS the Board acknowledges and supports the Province's goals of improved efficiency, consistency and fiscal prudence in conservation delivery, but finds that the proposed "Lake Erie Region" configuration would:

1. Create a geographically vast and administratively complex entity, joining northern, rural and fast-growing southern municipalities throughout the province with little shared watershed connection or economic alignment;

2. Dilute local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they affect;

3. Generate substantial transition costs, including human-resources integration, governance restructuring, IT migration and policy harmonization, that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province's own business-planning principles of value for money, cost containment and service continuity; and,

4. Risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it harder for applicants to obtain timely local advice, resolve issues or expedite housing and infrastructure approvals that support the Province's "Get It Done" agenda; and

WHEREAS the CCCA has already undertaken significant modernization work aligned with provincial objectives, including:

- implementation of a digital permitting and inspection system that has reduced turnaround times;

- improvements in transparency and client communication;

- data and network systems, including security and redundancy

- numerous internal reviews to identify opportunities for cost savings and efficiencies

- conversion of redundant support and non-mandatory positions to front-line mandatory service positions

- demonstrating that meaningful modernization can occur within the current watershed-based governance framework; and

WHEREAS the Board further recognizes that the Catfish Creek Conservation Authority serves Southwestern Ontario communities facing vastly different climatic, hydrological and infrastructure realities, which would be ill-served by a larger overarching administrative structure extending over 300 kilometers to townships north of the Kitchener-Waterloo Guelph area;

THEREFORE BE IT RESOLVED THAT:

The Board of Directors does not support the proposed "Lake Erie Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257; and

The Board instead endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative

that advances the government's priorities of efficiency, red-tape reduction and timely housing delivery; and

The Board requests that the Ministry engage directly with affected municipalities and conservation authorities across Southwestern Ontario most specifically, the municipalities within the Catfish Creek administrative area before finalizing any consolidation boundaries or legislative amendments; and

That this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:

the Minister of the Environment, Conservation and Parks and his Opposition critics;

- local Members of Provincial Parliament;
- local Municipal Councils
- the Association of Municipalities of Ontario and Conservation Ontario;
- local First Nations
- local environmental groups and other stakeholders, and
- all Conservation Authorities in Ontario

CARRIED

Municipality of Chatham-Kent
Municipal Governance
315 King Street West, P.O. Box 640
Chatham ON N7M 5KB

December 16, 2025

Hon. Todd McCarthy
Minister of the Environment, Conservation and Parks
Via Email todd.mccarthy@pc.ola.org

Re: Amalgamation of Conservation Authorities - Bill 68

Please be advised the Council of the Municipality of Chatham-Kent, at its regular meeting held on December 15, 2025, supported the following resolution regarding the above noted matter.

WHEREAS the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses;

AND WHEREAS the Municipality of Chatham-Kent (through its original municipalities) established the Lower Thames Valley Conservation Authority and St Clair Region Conservation Authority (both initially formed in 1961);

AND WHEREAS local municipalities currently provide over 50% of total conservation authority funding, while the Province of Ontario provides approximately 5%;

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of acres of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities;

AND WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks;

NOW THEREFORE BE IT RESOLVED THAT the Council of the Municipality of Chatham-Kent calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND FURTHER THAT while the Municipality of Chatham-Kent supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND FURTHER THAT the Municipality of Chatham-Kent supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives.

AND FURTHER THAT a copy of this resolution be sent to the Ontario Minister of Environment, Conservation, and Parks, to the local MP and MPPs, the Association of Municipalities of Ontario, the Rural Ontario Municipal Association, and all municipalities and Conservation Authorities in Ontario.

Sincerely,

Judy Shantz, CMO
Director Municipal Governance/Clerk

C
Local MP and MPPs
Association of Municipalities of Ontario
Rural Ontario Municipal Association
Ontario Municipalites
Conservation Authorities in Ontario

TOWNSHIP OF CHATSWORTH
316837 Highway 6, RR 1
Chatsworth, Ontario N0H 1G0
Telephone 519-794-3232 – Fax 519-794-4499

December 18, 2025

Re: Township of Chatsworth Resolution:
Proposed Changes to Conservation Authorities in Ontario

Please be advised at Township of Chatsworth Council held on December 17, 2025 the following resolution was carried:

THAT CAO Clerk's Report 2025-29 be hereby received for information; and

WHEREAS the Conservation Authorities Act enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses; and

WHEREAS the municipalities within Grey and Bruce Counties established the North Grey Region Conservation Authority in 1957 and the Sauble Valley Conservation Authority in 1958 which amalgamated into the Grey Sauble Conservation Authority (GSCA) in 1985; and

WHEREAS local municipalities currently provide approximately 44% of total GSCA funding, while the Province of Ontario provides approximately 7%; and

WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers; and

WHEREAS conservation authorities collectively own and manage thousands of hectares of land, much of which was donated or sold by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities; and

WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency whose objects include overseeing conservation authorities and the transition to a regional watershed-based framework for conservation authorities in Ontario with municipal cost contribution yet to be defined; and

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring; and

TOWNSHIP OF CHATSWORTH
316837 Highway 6, RR 1
Chatsworth, Ontario N0H 1G0
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WHEREAS under this proposal, the Grey Sauble Conservation Authority (GSCA) would be consolidated into a new “Huron-Superior Regional Conservation Authority” that is over 23,000 square kilometres in size and consists of 80 municipalities; and

WHEREAS the Province already has the authority to establish overarching legislation, regulations and standards through the Conservation Authorities Act and the Ministry of Environment, Conservation and Parks to address issues related to permitting, by establishing guidance, online permitting platforms and technical standards through legislation that could help build homes; and

WHEREAS the GSCA has already undertaken significant modernization work aligned with provincial objectives, including Information Technology / Information Management, and leveraging technology to streamline planning and permit review processes processing 100% of major permits within the provincial timelines in 2024.

NOW THEREFORE BE IT RESOLVED:

THAT the Township of Chatsworth calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; and

THAT the Township of Chatsworth does not support the proposed “Huron-Superior Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257 as the proposal lacks sufficient justification, would significantly diminish local governance, and fails to recognize the effectiveness and efficiencies already achieved within existing watershed-based models; and

THAT the Township of Chatsworth affirms that large-scale regional consolidation is unnecessary, would introduce substantial transition costs, and would divert resources away from frontline watershed programs. The Council further asserts that restructuring at this scale would erode local decision-making, weaken municipal accountability, and disrupt long-standing community partnerships that are central to delivering responsive watershed management; and

THAT while the Township of Chatsworth supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down approach structure without strong local accountability and governance risks creating unnecessary cost, red-tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; and

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THAT the Township of Chatsworth requests a funding framework to be provided to member municipalities on what the financial model will look like for Ontario Provincial Conservation Agency (OPCA) moving forward. Chatsworth further calls on the Province to clarify what commitments they will make in terms of funding the current costs of CA's along with any unexpected costs that could come with this significant of a transition and change; and

THAT the Township of Chatsworth urges the Province to strengthen centralized standards, resources, and tools rather than undertaking broad structural amalgamation and to provide sustainable, predictable provincial funding across conservation authorities to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years; and

THAT the Township of Chatsworth believes that the Province's proposed new online permitting portal can be implemented within the existing conservation authority framework without requiring structural amalgamation; and

THAT the Township of Chatsworth requests that the Ministry engage meaningfully and collaboratively with affected municipalities, conservation authorities, and local First Nations before advancing any consolidation, to ensure that any changes reflect both local needs and the practical realities of implementation; and

THAT this resolution be included in the Municipality's ERO response and forwarded to the Premier of Ontario, the Minister of the Environment, Conservation and Parks, all of Ontario's municipalities, MPPs, conservation authorities, AMO, and Conservation Ontario.

Should you require additional information please contact the undersigned at 519-794-3232 ex. 134 or tyler.zamostny@chatsworth.ca.

Sincerely,

Tyler Zamostny
Deputy Clerk

Proposed boundaries for the regional consolidation of Ontario's conservation authorities

ERO#025-1257

Discussion Questions ++

Submitted by: Quinte Conservation Board of Directors and staff
Date: December 19, 2025
Address: 2061 Old Highway # 2, Belleville, ON, K8N 4Z2
Email address: bmcnevin@quintecoservation.ca
Phone Number: 613-968-3434 ext. 103

Introduction

Quinte Conservation is one of 36 conservation authorities across the province of Ontario. Formed in 1947, we have spent over seven decades working with local municipalities, local watershed residents and local stakeholder groups (agriculture, environmental, special interest, etc.) to ensure that the Quinte region is protected from natural hazards, has systems in place to provide accurate and timely information and data in the event of emergencies (i.e. a flood), provide programs and services to enhance our shared goals for the watershed region and ensure responsible development to protect life and property.

Quinte Conservation's boundaries are the same as the Quinte Source Protection Area. This area includes the watersheds of the Moria, Napanee and Salmon Rivers and all of Prince Edward County. Staff provide valuable services to all municipalities in the Quinte Source Protection Area, including risk management services and consultation for local development in vulnerable areas.

The province can achieve its objectives by providing performance metrics, policy alignment, and technological support without restructuring boundaries. Effective oversight does not require dismantling watershed-based governance, which is essential for maintaining local expertise and responsiveness. Quinte Conservation consistently exceeds provincial expectations through transparent service standards, online permit dashboards, and performance reporting.

Quinte Conservation adheres to Conservation Ontario's Client Service Standards for permit reviews and planning applications. All conservation authorities operate under the same regulations, including pre-consultation requirements, application protocols, and timelines mandated by O. Reg. 686/21, which also requires annual reporting.

Over the past three years (2022–2024), Quinte Conservation issued 1,109 permits with an average turnaround of 14 days. This

timing is well within provincial guidelines of 30 days for routine permits and 90 days for major permits. Delays typically stem from external parties such as landowners, developers, and other agencies, not conservation authorities. Provincial claims of delays in reviews by conservation authorities overlook regional differences between rural areas and the GTA.

To ensure efficiency and transparency, Quinte Conservation maintains a client service standard and offers tools such as online booking for pre-consultations, digital permit portals, interactive regulated area maps, technical checklists, and published fee schedules. Fees are locally calibrated and reflect regional economic conditions.

A uniform provincial model of consolidating conservation authorities into regions risks undermining locally informed decision-making essential for effective watershed management. Quinte Conservation's unique geology and watershed-specific risks require tailored studies and approaches. The authority actively participates in provincial working groups, shared service agreements, and initiatives to streamline processes. Our position is that issues largely stem from chronic underfunding, not organizational inefficiencies.

A successful transition and outcome of regional conservation authority consolidation must include meaningful and legally required consultation with Indigenous communities. Our watershed includes an Indigenous community, Mohawks of the Bay of Quinte, and we manage creeks and rivers that flow through their territory. To date, they have not been consulted regarding these changes. Proper engagement and fulfillment of the duty to consult are critical to respecting Indigenous rights, building trust, and ensuring that decisions reflect the interests of all communities impacted by watershed management. Without this, the transition risks overlooking important cultural, environmental, and legal considerations.

Specific to shared services, Quinte Conservation has provided engineering support to neighboring authorities, administers the WISKI Hub for 11 authorities, and collaborates directly with builders and landowners to mitigate flooding, erosion, and infrastructure risks. Our standards meet development needs while maintaining flexibility for local conditions. The regulations team is well-organized, engaging technical staff early to ensure timely reviews. Quinte Conservation follows provincially approved hearing guidelines for regulatory matters and aligns with Conservation Ontario's policies for plan review and permitting. Pre-consultation meetings and site visits further reduce uncertainty and delays.

Quinte Conservation employs advanced technology for data management and flood risk mitigation, including the WISKI database, a widely used system across Ontario, also utilized by provincial ministries. Our leadership in flood forecasting is supported by strategic watershed positioning, which provides critical lead time for warnings. Planned enhancements include installing flow gauges on urban creeks through capital asset funding.

Significant investments have been made in GIS platforms and Open Data Hubs, offering public access to LiDAR, aerial imagery, and geospatial datasets. In collaboration with municipalities, we have completed extensive floodplain mapping projects using state-of-the-art hydrologic and hydraulic modeling. Our Open Data Hub provides real-time access to watershed data, floodplain maps, water levels, and source protection information.

The primary barrier to consistent technological capacity across conservation authorities is chronic provincial underfunding. Standardization can be achieved through targeted provincial investment in shared platforms rather than administrative reorganization. Quinte Conservation and its partners already operate sophisticated modeling tools that often exceed provincial capabilities. These tools rely on local technical expertise to ensure timely, accurate decisions. Centralization would compromise data quality, slow reviews, and weaken emergency responses during extreme weather events.

Our permitting and planning process is fully automated and streamlined, with electronic delivery to applicants and municipalities for expedited service. Staff expertise and collaboration through provincial committees ensure best practices are consistently applied. While technology is critical, effective risk management ultimately depends on experienced professionals, a strength that smaller authorities maintain through deep institutional knowledge and cooperative networks such as the WISKI Hub and regional flood forecasting groups.

Quinte Conservation underwent amalgamation in the mid-1990s, consolidating three authorities into one. Today, we deliver integrated services for 18 municipalities, including flood forecasting, planning and regulations, communication, stewardship, Bay of Quinte Remedial Action Plan monitoring, water monitoring for provincial programs, education, source water protection and enabling services supported by our municipal partners. Quinte Conservation's jurisdiction is straightforward as a result of this amalgamation provides cost efficient administrative services over a large geographical region.

Our operations already minimize duplication through centralized platforms such as OnBase, GIS, and WISKI, which streamline

workflows and reduce redundancies. Detailed budgets and capital asset management plans are prepared annually, reviewed by municipal partners, and approved by our board of directors to ensure transparency, accountability, and efficient resource allocation.

Shared services provided by Quinte Conservation further enhance efficiency such as providing engineering support to neighboring authorities, sharing software licenses, and leveraging bulk purchasing for benefits and insurance. Eliminating local administrative functions would not guarantee savings; in fact, it could increase municipal costs if responsibilities shift to municipalities or require costly provincial services.

Local governance ensures municipal priorities are represented and aligned with watershed needs.

Centralizing administration would create a larger, costlier bureaucracy, undermining the lean, scaled model that smaller authorities rely on. Our current structure is highly efficient, with staff often performing multiple roles to maximize value for taxpayers.

Quinte Conservation operates under rigorous accountability measures. Annual reports, strategic plans, audited financial statements, and multi-year asset management plans are publicly available on our website.

Client feedback and performance reviews are integral to our service commitments, complemented by regular public engagement through open houses and consultations. Mandatory reporting under the Conservation Authorities Act, provincially mandated transition plans, and board meetings open to the public are essential to ensure transparency and compliance.

Local governance is a cornerstone of accountability. Our board of directors, comprised 100% from elected municipal officials, provides strong democratic oversight. Reducing local governance would diminish accountability and increase costs for taxpayers. With the proposed changes, local governance decisions will be lost. This proposals would remove the local voice for many of our smaller communities. For example, it would be unrealistic that all 18 of Quinte Conservation municipalities would have a seat at a new regional board. Therefore smaller muiniciapalities such as Tweed, Centre Hastings, Tyendinaga, Central Frontenac, Deseronto, Addington Highlands, Tudor and Cashel, etc. will lose their ability to make local decisions for

their communities.

Quinte Conservation Board of Directors passed a resolution that:

- Oppose the changes outlined in the ERO regarding consolidation; and
- Oppose the formation of the Eastern Lake Ontario Regional Conservation Authority; and
- Support the broad goals of the province in achieving better outcomes.

CA Name: Quinte Conservation	
What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?	Consolidation of conservation authority boundaries will not lead to a successful transition. The province can achieve service standards through the current 36 CA organizations by using legislative and regulatory amendments, technological solutions, and compliance checks. Local offices are the key to supporting local needs, knowledge, and expertise. This will ensure travel costs remain efficient, for both fleet and employees. Consolidation would require merging multiple IT systems, security protocols, asset databases, HR and payroll systems, GIS platforms, and finance software. The scale of integration risk is very high and could have long lasting impacts on service delivery. Conservation Authorities recognize that there is a need for standardized administrative processes, but this can be accomplished without creating instability that will certainly ensue with consolidating boundaries. It is important to recognize that there is significant risk when combining GIS data, land holding information, stewardship records, historic compliance information, permitting databases as we have experienced during the provinces transfer of property data to an

	electronic system. The loss of data and inaccuracies in transfer of information can cause significant financial liabilities. Quinte Conservation has partnerships, funding relationships, municipal agreements and a variety of self-generated revenue streams which will be negatively impacted by forcing a consolidation model that takes away the local watershed-based approach. Aligning all budgets and reporting frameworks would be extremely challenging and could reduce local accountability. Staff uncertainty, potential job changes, and time spent on reassigning roles could disrupt operations and limit our ability to provide core mandated work in a timely fashion. Local communication initiatives are imperative to the success of messaging. Consolidated messaging will lose local relevance and make it unclear for watershed residents and impacted communities. Communities need to know where and who they can contact for watershed services, development permits, and local watershed programs. Specialized local ecological knowledge cannot easily be transferred or preserved through large-scale mergers, which could have long-term impacts on flood forecasting and warning, stewardship, development reviews, dam operations, and all operational responsibilities of Quinte Conservation. A successful transition must prioritize watershed based management and continuity of existing commitments under the Canada Ontario Agreement (COA). The Bay of Quinte is an Area of Concern (AOC) under the Great Lakes Water Quality Agreement due to historical water quality issues, including excessive phosphorus loading, degraded fish and wildlife habitat and other impairments. The proposed consolidation map did not take the Bay of Quinte watershed into consideration and splits the Bay between two regions near Napanee, which may have implications for integrated management depending on how consolidation occurs. Quinte Conservation supports the Bay of Quinte Remedial Action Plan through its long-standing monitoring program, which is essential for tracking

	progress toward delisting the Area of Concern and meeting COA objectives. To maintain the integrity of monitoring and reporting, Quinte Conservation will need to continue monitoring outside the proposed regional boundaries. Even though the Bay of Quinte is undergoing redesignation, the Phosphorus Management Plan is designed to outlive the AOC designation and will need to continue. Proper land management will ensure the Bay of Quinte remains healthy, and Quinte Conservation's programs and regulations provide this critical support. The Provincial and Federal governments have already invested significant resources into restoring the Bay of Quinte, and poor land management practices, such as inadequate oversight of regulations and weak integration with municipal planning, could reverse decades of progress. Maintaining local "boots on the ground" is essential to protecting water quality, and sustaining the benefits of our governments' investment. Quinte Conservation is recommending that the province take a pause on consolidation and use the objects and powers of the OPCA to implement standards across the network. This can be achieved without unnecessary consolidation. Provide the tools, policies and directives to the 36 conservation authorities and let us show the province that we can meet their new standards. This may also lead to voluntary mergers/amalgamations of conservation authorities that see value in the proposition. Forcing consolidation will lead to undesirable relationships between the province and the impacted parties (conservation authorities and municipalities).
What opportunities or benefits may come from a regional conservation authority framework?	Quinte Conservation sees very limited value in consolidating our watershed into a region that will have 48 municipalities, 16,000 square kilometers area (about the size of Lake Ontario) and an unknown governance structure. It is our position that consistent standards, improved investment by the province, and collaboration of resources and services can be accomplished without consolidation. With appropriate funding into conservation authorities instead of investing millions of taxpayer dollars into

	consolidation, the province can significantly improve the funding relationship between CA's, municipalities and the province. From a corporate services perspective, one potential benefit might be the ability to share purchasing strength on few high-cost items, such as enterprise software licenses. This can be accomplished through the OPCA without consolidation. CAs already share technical expertise but can formalize these agreements to ensure transparency. Forced consolidation will increase administrative burden and reduce the capacity for on-the-ground impact. Having shared service agreements among conservation authorities could benefit regions without formal consolidation and could include: • Capacity for leveraging funding through government cost shared/grant programs; • Standardization of Commercial Forest operations, by adopting global Forest certification standards (i.e. Ontario Woodlot Association - Forest Certification Program and/or Sustainable Forest Licenses on Crown Land). • Forest Certification opens opportunities for carbon offset revenue. • Standardized parking gate system at Conservation Areas to generate revenue specifically for reinvestment into Conservation areas. • Sharing strengths amongst the collective Conservation Authorities existing professional expertise; • Greater public outreach through communications. • Streamlined legal expertise and/or resources. • Standardization of policies, procedures, compliance, HR processes, and systems.
Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the	Effective and transparent governance works best with smaller, focused bodies. For these reasons, the only appropriate governance model is the one we have now, local conservation authorities with direct municipal representation. Quinte Conservation represents 18 municipalities with a board of elected officials. Municipal representation from each of our 18 municipalities ensures that each member has input and a voice at every meeting. The current model of budget distribution and weighted vote for approval

municipal representative appointment process?	ensures that this local pay for local say model is transparent and works to the benefit all our local municipalities and watershed residents. Currently municipalities support greater than 50% of the revenue for Quinte Conservation; they pay the most and should have the most say. Proportional representation based on population has been successful in the current system, but removing smaller municipalities entirely would be problematic. A new board structure should not introduce bias by favoring larger municipalities or appointments made primarily by the province. Doing so risks silencing democratic voices from smaller communities, which play a critical role in land-use planning and environmental stewardship. Their input is essential to balanced governance, protecting Ontario's resources, and maintaining watershed integrity. Local priorities could easily be overshadowed by population-dense municipalities, leading to inequitable decision-making. Appointment processes would likely become disconnected from local concerns and funding commitments, making it harder to ensure accountability. From a corporate services perspective, a regional CA framework would create serious governance challenges. Representation would need to include all municipalities, resulting in an extremely large and unwieldy board.
Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?	From a finance and budget perspective, a regional framework would create serious challenges. Budgeting would need to account for very different levy models, asset portfolios, risks, and municipal financial capacities. A consolidated budget would quickly become complex, less transparent, and less meaningful for local councils. Consultation would likely become superficial for smaller municipalities, since they would no longer have direct input into local priorities. Preparing multiple regional budget scenarios would require significant administrative resources, reducing efficiency rather than improving it.

	A transparent budgeting process is only possible when local conservation authorities remain intact. Maintaining local staff will need to be a priority to maintain transparency and prevent loss of accountability.
How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?	From planning and regulation, source water protection, water resources, monitoring and corporated services, strong local relationships depend on staff being visibly present in communities, municipalities, and regional projects. Large regional entities make it difficult to maintain the personal connections that encourage volunteerism, donations, stewardship partnerships, and municipal trust. Communication also needs to be tailored to local ecology, risks, and concerns, which is not possible at a regional scale. Consolidation could undermine relationships with landowners, Indigenous partners, and municipalities. Maintaining a local presence will be the most important part of any change. Watershed residents, local municipal partners, stakeholder groups rely heavily on the branding of Quinte Conservation. Any change to naming and/or branding may have an impact on the success of the OPCA and provincial government. Quinte Conservation has a strong partnership and relationship with the Mohawks of the Bay of Quinte. We work together on a variety of initiatives including wetland health assessments, fish habitat projects, monitoring and stewardship initiatives that provide for a positive working relationship through the Bay of Quinte Remedial Action Plan and continue to build trust through meaningful consultation and collaboration.
What absolutely cannot be lost through the consolidation to Regional Conservation Authorities?	Responsiveness to local municipalities is critical, as is the ability to support local programming, education, and land protection initiatives. Losing any of these would significantly weaken our capacity to deliver on our mandate. Local source water

	protection programming, water resources (dam operations, flood forecasting and warning) and planning and regulations are essential to keeping our communities safe. Local decision-making must remain intact, along with the local ecological knowledge that staff bring. Control over local levies and accountability to municipalities is essential. Staff expertise tied to specific geographies and watersheds cannot be replaced. Equally important are the networks that support our work, including local volunteers, stewardship partnerships, and relationships with Indigenous communities. The integrity of GIS, forest carbon, and land management data must be preserved. The forest carbon offset program may be affected as some private companies do not want to invest in the government agencies. Ontario's current watershed-based management system has been in place for over 75 years, and it has consistently proven successful in protecting and managing the province's natural resources. Moving away from this approach risks losing the deep local knowledge and relationships that have been critical to its success. This foundation of local knowledge and community trust absolutely cannot be lost. Any restructuring must preserve the principles that have made Ontario's conservation authorities a model for integrated resource management, such as local presence, local expertise, and strong community relationships. Without these, the effectiveness of watershed management and the protection of Ontario's natural resources are at risk.
Local concerns	Geographic and economic differences within our newly consolidated area. The newly proposed area is vast. Belleville is being grouped with Oshawa, and there are local concerns that costs could rise to match those in the Greater Toronto Area. This would place an undue burden on local municipalities and residents who operate under very different economic conditions.

	Loss of local governance. Grouping Quinte Conservation with regions like Oshawa does not reflect the significant differences in geography, geology and watershed characteristics. Management strategies that work for urbanized areas may not be appropriate for rural mixed landscapes. Administrative capacity would be absorbed by restructuring instead of watershed protection. The Bay of Quinte is designated Area of Concern under the Great Lakes Water Quality Agreement and it will require specialized management approaches to ensure that it does not degrade to historical conditions. Its ecological, cultural, and economic significance requires tailored strategies that differ from those used in other watersheds. Increased costs for IT integration, severances, harmonization of pay bands, software unification, and legal/HR processes. The Quinte region includes significant karst landscapes, which present unique local challenges for water management, groundwater protection and development planning. These characteristics differ from the proposed consolidated area and geographical areas like Oshawa, requiring specialized strategies that can not be standardized across the proposed larger grouping. Risk of losing local talent due to uncertainty, burnout, or reorganization. Loss of local expertise. Reduction in streamlined and effective customer service for planning, permitting, risk management services, stewardship, and public inquiries. Loss of trust with local municipalities who rely on efficient, personalized service. Fragmented or incomplete data during amalgamation undermines informed decision making.

Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities (ERO#25-1257)

Comment period: November 7- December 22, 2025 through the ERO posting or by email to ca.office@ontario.ca

This response is provided on behalf of the Board of Directors of the Lower Thames Valley Conservation Authority (LTVCA), board members represent 10 member municipalities within the lower Thames valley watershed.

In the Province's proposal, the LTVCA watershed would be consolidated with seven other Conservation Authorities representing 81 member municipalities to form the Lake Erie Regional Conservation Authority.

ERO Proposal #025-1257 would result in Regional Conservation Authorities that would be incapable of delivering effective programming and be accountable to local municipalities. Although, the LTVCA does support streamlining and standardizing certain areas such as planning and regulations it opposes the plan to consolidate.

If the Province's continues with the plan to consolidate and proceeds with the ERO Proposal, the following are recommendations to create a plan that keeps local accountability and local programming.

Question 1: What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?

- Slowing down of the current rushed process to get it right. It took 80 years to create the present conservation authorities – less than 2 months of meaningful consultation in no way will create a workable result.
- Consultation at the watershed level ahead of legislative action ensuring that user pay input into changes.
- Full and transparent cost-benefit analysis of the proposed consolidation and the anticipated additional costs to municipalities and ratepayers for maintaining an overarching Agency, as well as amalgamation costs.
- Identification of an actual problems and concerns that are attempted to be addressed by the significant modifications being put forward (with specific cases/numbers).
- The proposed timeline for implementation of a yet-to-be-determined regional entity of early 2027 is both unrealistic and unnecessarily hurried. A phased approach spanning a period of three-to-four years, coinciding with municipal election cycles allows for a

phased implementation period that would comprehensively address the issues (and potential issues) resulting from amalgamation/consolidation

- A user-interface to a robust and shared permitting system, which is intuitive and facilitates natural hazard assessments, for authority staff and for the commercial/residential development sector, to file applications for clearances and approvals.
- Establishment of smaller sub-region hubs, with a small management team complement to oversee program staff, develop budgets, manage procurement for the sub-region and to secure and manage physical assets.
- Suggest implementing changes through the Ontario Provincial Conservation Agency (OPCA) without changing watershed boundaries for the first 3 year mandate of the OPCA. Determine if provincial concerns can be resolved, and if not, then proceed with amalgamation of CAs.
- Existing Boards should be maintained after October 2026, becoming transition boards of each CA.

Question 2: What opportunities or benefits may come from a regional conservation authority framework?

- Standardized natural hazard mapping products and digital resources to better support local development and flood monitoring as long as provincial funding becomes available as it once was to create this mapping.
- Shared operational technology, resources, best practices, standard operating procedures, policies and protocols.
- The reorganization allows the Province to fully consult with First Nation to develop governance approaches to any new Conservation Authorities that consider First Nations input and their role as rights holders in those watershed organizations.
- Note: All this can be achieved without amalgamation of Conservation Authorities

Question 3: Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?

- An equitable governance model will be very difficult to establish in a regional watershed that is as big as those that are proposed.
- The LTVCA continues to recommend a smaller regional model – perhaps a version of the Source Protection Regions to be able to develop better governance moving forward.
- The existing Conservation Authority model determines representation based on inclusion of each municipality within a watershed area. This is critical and accepted

by rate-payers. This model must move forward to ensure a user say for user pay principal is met.

- A significantly enlarged geographical reach does not provide for a manageable number of people or watershed area, if programs are going to be continued to be offered on a local basis. Direct relationships of residents to board members and staff are critical for local program delivery.
- Municipalities will be unwilling to contribute funding significantly distant of their geographical location. The governance model must ensure local funds are spent locally. The largest budget decision making area (for local programs) should be the existing CA boundaries regardless of the future boundaries of the regional CA.
- A two tiered model should be considered. The model where the current boards are still in place and appointed members of the local boards form the regional board would work. The local boards would prepare local budgets to ensure local programming and the regional board would oversee the standardization and provision of services that should be provided on a larger regional basis.

Question 4: Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

- Significantly increasing the geographical area, far beyond a single watershed, destroys a transparent and consultative budgeting process across member municipalities unless local budgeting is maintained
- Create local watershed sub-regions of the regional authority, to facilitate accountability, transparency and consultative budgeting. The sub-regions, through the sub-regional Boards would be responsible for generating their sub-regional budgets and consulting with their respective municipalities. While ERPs (Enterprise Resource Planning), financial statements/report, and audit function can be centralized to the regions. There are certain aspects of financial planning and management that should remain decentralized and assigned to the sub-regions, such as budgeting for local capital project undertakings, as local staff have superior knowledge of the needs of the sub-region, as opposed to staff at a head office.
- Regional responsibilities in a two tiered structure would have to be budgeted regionally but reviewed locally to maintain a transparent and consultative budgeting process.

Question 5: How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

- Local service delivery creates relationships. The ability to connect with technical staff in-person and particularly during storm/flood events, is especially impactful for both residents and municipal partners. Maintaining a local presence with local expertise,

providing local service is the single most effective way to ensure that relationships with community and stakeholders are maintained.

- Significant funds are raised locally for various projects. This includes the donation of lands by families for the enjoyment of their communities. Assurances that these funds and lands will be utilized for their intended purposes and meet donor expectations is especially key given the current funding model.

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GSCA Submission to ERO Posting 025-1257

December 18, 2025 Via Environmental Registry of Ontario

Subject: Comments on ERO Posting No. 025-1257 – Proposed Boundaries for Regional Consolidation of Ontario's Conservation Authorities

To Whom It May Concern:

Grey Sauble Conservation Authority (GSCA) appreciates the opportunity to comment on the proposed consolidation of Ontario's conservation authorities. We share the Province's objectives of improving efficiency, consistency, and modernization in service delivery. GSCA has already implemented significant improvements, including digital permitting, streamlined processes and enhanced customer service, and we remain committed to advancing these objectives.

However, GSCA does **not support the proposed consolidation into the Huron–Superior Regional Conservation Authority**. This model would create a geographically vast entity (over 23,500 km² and 80 municipalities) combining watersheds with little shared hydrology, climate, or economic alignment.

Such a structure risks:

- **Loss of Local Accountability and Rural Voice:** GSCA currently operates with strong municipal representation and local decision-making. Under the proposed model, local priorities could be overshadowed by urban centres hundreds of kilometers away.

- **Increased Costs and Bureaucracy:** No cost-benefit analysis or feasibility assessment has been provided. Transition costs (IT integration, HR harmonization, rebranding) and additional layers of governance will likely increase municipal cost apportionment and offer little in the way of savings to GSCA's member municipalities.

- **Reduced Responsiveness:** Larger administrative structures often slow processes, contrary to the Province's stated goal of streamlining approvals.

- **Disruption of Community Partnerships:** GSCA manages 29,000 acres of land, much of it donated by local residents with the expectation of local stewardship. GSCA also works with a network of dedicated volunteers and partners. Consolidation into a vast regional conservation authorities risks eroding these relationships and the trust that has been built locally.

GSCA supports modernization without amalgamation, through:

- Province-wide standards and policies for permitting.
- Provincially developed and updated technical guidelines.
- Refined Key Performance Indicators (KPIs) to ensure that Provincial objectives are being met.
- Shared digital platforms and tools.
- Sustainable provincial funding to enable modernization and service delivery.

Responses to ERO Consultation Questions

1. **Key factors for a successful transition and outcome of regional consolidation:**

   GSCA does not support the proposed regional consolidation of conservation authorities and is firmly of the opinion that the Government's objectives would be better served without adding red-tape and bureaucracy. However, if consolidation proceeds, success depends on:

   - Pausing the current consolidation proposal to allow the Ontario Provincial Conservation Agency time to develop a well thought out business plan, including cost-benefit analysis and feasibility assessments.
   - Clear provincial leadership and phased implementation to avoid service disruption.
   - Retention of local knowledge and staff expertise, which is critical for ongoing program management.
   - Retention of local offices and staff, including management, to provide continuance of local partnership, accessibility and front-line service.
   - Continuation of locally prioritised and tailored programming to reflect local community needs.
   - Transparent governance frameworks that preserve municipal influence and watershed identity.
   - Dedicated provincial funding for all transition costs.
   - Robust communication strategies to keep municipalities, stakeholders, and the public informed and engaged throughout the process.

2. **Opportunities or benefits of a regional conservation authority framework**

   GSCA is of the opinion that these benefits can be achieved through collaboration, shared systems and voluntary service agreements without the cost and complexity of consolidation. The potential benefits of such service agreements could include:

   - Shared technical expertise and modern tools across multiple watersheds.

- Consistent permitting standards and digital platforms that improve predictability for applicants. These should be provided by the Province regardless of consolidation.

- Opportunities for joint procurement and shared services to reduce duplication.

3. Suggestions for governance structure at the regional level

The current governance structure provides the most representative and accountable system by offering each funding partner a meaningful voice at the governance table. GSCA has eight (8) participating municipalities represented by eleven (11) Board Directors appointed from each of the participating municipalities. This system provides a well-balanced structure that allow the participating municipalities the opportunity to design programs and policies that align with local municipal priorities, align with local municipal budgets, and represent the needs of the local community. If the Province proceeds with consolidation, the following governance structure may provide the next best option:

- A streamlined board (10–20 members) with representation grouped by upper-tier municipalities or counties to maintain fairness and efficiency.

- Utilizing the existing Upper Tier and Single Tier frameworks for local governance and apportionment to provide a more manageable option. That is, members of the Regional CA Board would be appointed from local upper tier or single tier municipalities within the Region's jurisdiction.

- In this model, it is recommended that apportionment would also move to the Upper Tier / Single Tier level.

- Clear protocols for communication between regional boards and municipalities.

- The creation of Regional Boards provides an opportunity to include other community groups within the Board structure, including local Indigenous representation and local industry representation. If this option is considered, it is recommended that the additional representatives would be excluded from budget votes.

4. Maintaining a transparent and consultative budgeting process

The current budget process provides for the most transparent, accountable, accessible and consultative budgeting process as each participating municipality is afforded the opportunity to review draft budgets and representation at the Board table is such that individual municipal input is factored into budget decisions. This will be lost by the proposed consolidation model.

If consolidation moves forward, the following process should be utilized:

- A standardized regional budget framework with clear timelines and assumptions.

- Locally developed operating and capital budgets for each local office that are factored into the regional budget framework. These budgets can be reviewed and presented to sub-regional (local) budget advisory committees to ensure local priorities are considered.

- Publicly accessible budget documents and early consultation aligned with municipal budget cycles.
- Transparent levy apportionment formulas and regular financial reporting to all member municipalities.

5. Maintaining and strengthening relationships with local communities and stakeholders

Relationships with local communities and stakeholders have been developed over years or decades. Unless local offices, staff and leadership are maintained, not only will relationships weaken, they are at risk of disappearing altogether.

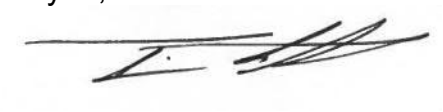
- Retain local offices and staff presence to ensure accessibility and responsiveness.
- Maintain clear communication channels and decision-making processes for local issues.
- Preserve local branding and identity to sustain trust and engagement.

Closing Statement

GSCA urges the Province to prioritize modernization through shared standards, tools, and funding rather than large-scale structural amalgamation. We remain committed to working collaboratively to achieve efficiency and consistency while preserving the watershed-based governance model that has served Ontario effectively for decades.

Submitted by:
Grey Sauble Conservation Authority
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Thank you,



Tim Lanthier
Chief Administrative Officer
Grey Sauble Conservation Authority



Robert Uhrig
Chair
Grey Sauble Conservation Authority

Motion No.: FA-25-097 **Moved By: Jon Farmer**
December 17, 2025 **Seconded By: Scott Mackey**

WHEREAS the Province of Ontario has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring; and

WHEREAS Bill 68 (Schedule 3) has effectively created the Ontario Provincial Conservation Agency whose objects include overseeing conservation authorities and the transition to a regional watershed-based framework for conservation authorities in Ontario with municipal cost contribution yet to be defined; and

WHEREAS the Conservation Authorities Act enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses; and

WHEREAS the municipalities within the northern portions of Bruce and Grey Counties established the North Grey Region Conservation Authority in 1957 and the Sauble Valley Conservation Authority in 1958 which amalgamated into the Grey Sauble Conservation Authority (GSCA) in 1985; and

WHEREAS GSCA generates approximately 50 percent of its own revenues and local municipalities provide approximately 43% of total GSCA funding, while the Province of Ontario provides less than 7%; and

WHEREAS under this proposal, the Grey Sauble Conservation Authority (GSCA) would be consolidated into a new "Huron-Superior Regional Conservation Authority" that is over 23,000 square kilometres in size and consists of 80 municipalities; and

WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers; and

WHEREAS conservation authorities collectively own and manage thousands of hectares of land, much of which was donated or sold by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities; and

WHEREAS no governance model has been provided to ensure that local municipalities are still able to make local decisions related to the functioning and programs of the conservation authorities; and

WHEREAS no business plan, cost-benefit analysis, or feasibility assessment has been provided to justify the proposed consolidation; and

WHEREAS the Province already has the authority to establish overarching legislation, regulations and standards through the Conservation Authorities Act and the Ministry of Environment, Conservation and Parks to address issues related to permitting, by establishing guidance, online permitting platforms and technical standards through legislation that could help build homes; and

WHEREAS the GSCA has already undertaken significant modernization work aligned with provincial objectives, including Information Technology / Information Management, and leveraging technology to streamline planning and permit review processes processing 100% of major permits within the provincial timelines in 2024.

NOW THEREFORE BE IT RESOLVED:

THAT the Board of Directors of the Grey Sauble Conservation Authority calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; and

THAT the Board of Directors of the Grey Sauble Conservation Authority does not support the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257 as the proposal lacks sufficient justification, would significantly diminish local governance, and fails to recognize the effectiveness and efficiencies already achieved within existing watershed-based models; and

THAT the Board of Directors of the Grey Sauble Conservation Authority affirms that large-scale regional consolidation is unnecessary, would introduce substantial transition costs, and would divert resources away from frontline watershed programs. The Council further asserts that restructuring at this scale would erode local decision-making, weaken municipal accountability, and disrupt long-standing community partnerships that are central to delivering responsive watershed management; and

THAT while the Board of Directors of the Grey Sauble Conservation Authority supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down approach structure without strong local accountability and governance risks creating unnecessary cost, red-tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; and

THAT the Board of Directors of the Grey Sauble Conservation Authority urges the Province to strengthen centralized standards, resources, and tools rather than undertaking broad structural amalgamation and to provide sustainable, predictable provincial funding across conservation authorities to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years; and

THAT the Board of Directors of the Grey Sauble Conservation Authority believes that the Province's proposed new online permitting portal can be implemented within the existing conservation authority framework without requiring structural amalgamation; and

THAT the Board of Directors of the Grey Sauble Conservation Authority requests that the Ministry engage meaningfully and collaboratively with affected municipalities, conservation authorities, and local First Nations before advancing any consolidation, to ensure that any changes reflect both local needs and the practical realities of implementation; and

THAT this resolution be included in the Grey Sauble Conservation Authority's ERO response and forwarded to the Premier of Ontario, the Minister of the Environment, Conservation and Parks, local MPPs, all of Ontario's municipalities, conservation authorities, AMO, and Conservation Ontario.

Carried

Proposed boundaries for the regional consolidation of

Ontario's conservation authorities (ERO#025-1257)

Submission: Final Written Submission

Organization Name: Conservation Ontario

Date: Wednesday, December 17, 2025

Contact Name: Angela Coleman, General Manager

Conservation Ontario: ERO Questions and Responses

The purpose of this submission is to provide the collective feedback of the 36 Conservation Authorities (CAs) who are the members of Conservation Ontario.

To prepare this submission we have taken input from: elected officials, Indigenous community members, board members, municipalities, CA and municipal leadership and staff, businesses, concerned citizens, environmental groups, agricultural groups, and other partners.

In an organization as diverse as Conservation Ontario, there are a range of opinions, which reflect: local preferences, circumstances, and watershed needs. This diversity is accommodated by the current structure of CAs and is a strength of the current model.

Members are concerned that this would be lost by the ERO Proposal. By consolidating to seven CAs, the result would be organizations too large to deliver effective governance, oversight, and accountability to municipal funders and their residents and taxpayers.

Based on these consultations, we report that a majority of our members:

- support the broad goals of the government of achieving better outcomes;
- oppose the changes outlined in the ERO Proposal as a means of achieving those goals; and,
- support continued evolution of the system and prefer alternatives to the Proposal that would result in voluntary consolidation, supported by adequate business rationale and time for meaningful consultation, including with First Nations/Indigenous rights holders.

In the alternative, should the government decide to proceed with the ERO Proposal, we recommend measures to mitigate risks inherent in this ERO Proposal.

This includes an innovative model whereby the “back office” operations of the CAs would be consolidated, as contemplated by the ERO Proposal, but local boards would be retained for accountability and decision-making.

In keeping with our culture of decision-making, we have encouraged individual CAs to send their own submissions commenting on their local circumstances and preferences, and these should be reviewed together with this submission to gain an understanding of the range of local CA perspectives across Ontario.

Conservation Ontario represents the interests of its members and remains committed to effective partnership with the Province to achieve effective, modernized outcomes for local, watershed-based conservation and resource management.

Thank you for the opportunity to provide feedback.

What do you see as key factors to support a successful transition and outcome of regional CA consolidation?

a. *Ensuring support for regional CA boundaries*

Support from key partners, specifically, municipalities, is key to the ongoing success of CAs in Ontario.

Conservation authorities, municipalities, and Conservation Ontario remain concerned that the scale of the proposed regional consolidation may be too large to preserve successful watershed management in Ontario.

To deliver on its mission, a new regional conservation authority model must be grounded in fundamentals of effective watershed management, including:

- protecting life and reducing property damage from flooding and erosion;
- supporting municipal partners, the development community, and landowners with timely, reliable services;
- enhancing the economic, environmental, and community health of the watershed;
- providing meaningful opportunities for people to connect at the local level; and,
- meeting the demands of a rapidly growing population at a time of climate pressure.

If regionalization stretches teams too broad, we risk losing:

- on-the-ground expertise;
- local environmental conditions and records (e.g. localized infrastructure flooding);
- relationships and funding support from: municipalities, Indigenous communities, donors, businesses, the agricultural community, watershed residents, and other partners;
- real-time responsiveness during storms and emergencies;
- support from the scientific community; and,
- effective oversight and buy-in from municipal funding partners.

To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, CAs must be appropriately accountable.

- The principle of “pay for say” should be reflected in the design of new CAs, as it is today.
- The proposed catchment area of the proposed consolidated CAs would, in many cases, combine almost 100 municipalities, stretching oversight and “pay for say” beyond what is workable and undermining confidence in the governance of CAs.
- Additionally, the proposed Huron-Superior consolidated CA includes a northern CA with southern CAs; the north should stay with the north for shared policy, cultural and geographic reasons.

Recommendation 1: That the Province consider achieving modernization goals through the current 36 CA corporations using: legislative and regulatory amendments, technological solutions, and compliance verification.

Recommendation 2: That the Province demonstrate the statutory objects of the CAs can be effectively delivered within the proposed new regional boundaries.

Recommendation 3: That the Province collaborates with an implementation working group including: Association of Municipalities of Ontario (AMO), Conservation Ontario, CAs, municipalities, and other experts to consider options and evaluate proposed solutions within this Proposal.

b. The Proposal risks delaying performance improvements currently under way

The proposed changes risk undermining the implementation of provincial improvements that have already been introduced.

In recent years, the Province has significantly changed the role of CAs in land use planning matters as part of its broader initiative to build more homes faster. Insufficient time has passed to fully implement and evaluate the impact of recent amendments on development outcomes. Given the volume and speed of legislative changes, industry stakeholders are still processing the effect and significance of various legislative changes.

All stakeholders, including the development industry, benefit from certainty. The Proposed Consolidation will introduce additional unknowns and new processes at an already uncertain time in the market.

c. If implemented, the Proposal would benefit from a measured and predictable rollout

Slowing the pace of consolidation would permit the Province to monitor the impact of recent changes while ensuring future changes are rolled out in a measured and predictable fashion.

Guidance may be taken from the Province's experience with municipal amalgamation in the 90s and 2000s to ensure that any proposed consolidation of CAs is well-timed and efficiencies at the local level are evaluated prior to implementing structural changes.

Recommendation 4: That the Province consider a longer implementation timeline to fully address: board governance and appointment frameworks; funding mechanisms, allocations & reserve structures; and service continuity matters. Phasing standards, guidelines, and directives across all CAs, *before any consolidation* (should consolidation be required at all), offers greater stability and predictability.

This approach minimizes multiple significant changes occurring at the same time, reducing risks of disruption to program delivery, and creating conditions for better outcomes and buy-in.

Recommendation 5: That a stable, clear, transition plan be prepared collaboratively with the implementation working group. To minimize potential disruptions, this plan should consider: service standards, points of contact, permitting continuity measures, board and staff communications, staff retention measures, and costs.

Recommendation 6: That transition costs for any consolidation be fully funded by the Province.

d. *Retention of staff*

During organizational consolidation, staff retention is a critical issue that significantly impacts the success of integration.

Key challenges include cultural misalignment, job redundancy, changes in leadership, lack of communication, and disruption to routine ways of delivering programs and services. To address these issues, a focus on clear communication, employee engagement, and support is required.

Retaining staff and preserving local watershed knowledge is critical to the success of regional CA consolidation. This knowledge is rooted in a deep understanding of historic and current land uses, cultural connections to watersheds, and the community values, needs, and stewardship priorities that shape local decision-making.

Recommendation 7: That staff retention strategies be prepared in cooperation with Conservation Ontario and CAs and communicated to effectively manage any proposed consolidation, and further that, engaging existing leadership be a key priority. Should this Proposal, or parts of it, be implemented, stability and engagement of leadership are essential to minimize service disruptions and maintain staffing levels.

Recommendation 8: That the Province provide a letter to each CA (or that can be shared by Conservation Ontario) to provide to staff to reinforce the importance of staff working at Ontario's 36 CAs to maintain staffing, service levels, certainty, and morale.

e. Measuring and monitoring outcomes

The expressed purpose of the consolidation is to reduce overlap and increase efficiency. The Province should develop metrics to measure the impact of consolidation on development outcomes.

Recommendation 9: That the Province measures and monitors impacts of this Proposal.

f. Support and capacity for municipalities

Many municipalities do not have in-house capacity to perform watershed planning or other environmental services that are undertaken by CAs. This includes review of development applications that involve environmental considerations and municipal environmental projects.

For example, smaller municipalities often rely on the expertise of the local CA where land use planning matters intersect with questions related to the natural environment.

Recommendation 10: Conservation Ontario is identifying municipalities that rely on the services of CAs in this specific way to ensure that these relationships can be maintained within the new, proposed structure. We encourage collaboration with the Province, AMO, municipalities, and CAs to identify current risks and new opportunities.

Recommendation 11: That the Province evaluates and considers programs and approvals that can be done faster and more efficiently at the local level, on a fee for service basis, to reduce red tape in Provincial approvals.

2. What opportunities or benefits may come from a regional CA framework?

a. Ensuring consistent standards

Across the Province, CAs have developed policies based on provincial guidance documents (e.g. the Ministry of Natural Resources and Forestry Erosion Hazard Guidelines). Outdated frameworks and standards can lead to different interpretations, development approvals and outcomes across the Province. Provincial approvals of policies, guidance, and standards have not kept pace with modern needs.

Recommendation 12: That the Province update Provincial policies and standards together with AMO, Conservation Ontario, CAs, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.

b. Additional investment

Additional investment is required to ensure key deliverables, such as floodplain mapping, are technically defensible and proactively in place for all watersheds across Ontario.

Municipal, regional, and federal governments have been key partners with the Province in this space for many years.

Recommendation 13: That the Province invests stable, adequate, multi-year funding into CA programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

c. Pooling of resources and collaboration between technical experts

Effective watershed governance relies on strong connections to local needs, priorities, and knowledge, which then guide natural hazard management, shape infrastructure decisions, strengthen watershed health, stewardship programs, and community partnerships.

Specific knowledge of the local watershed and environment is integral to the ability of CAs to carry out their permitting function under the *Conservation Authorities Act*. Bringing experts from across CAs together may provide greater opportunities for collaboration, specialization, and information sharing as well as pooling resources. Consolidation of CAs is not required to achieve this outcome; however, a more centralized system and investment of baseline resources are required.

Recommendation 14: That an integrated digital platform that connects the fundamental strengths of multiple CAs, across multiple offices and disciplines, be developed to deliver enhanced watershed programming in Ontario.

3. Do you have suggestions for how governance could be structured at the regional CA level, including suggestions around board size, make-up and the municipal representative appointment process?

a. Subregional Appointment Bodies

Currently, there are 36 CAs, each representing varying numbers of municipalities, ranging from as few as 1 to as many as 39. Subsection 2(2) of the *Conservation Authorities Act* sets out the number of representatives that each municipality may appoint as members. Unless the Minister permits otherwise, at least 70 per cent of a municipality's appointees to a CA are required to be selected from among members of the municipal council.

Under the proposed consolidation, each regional CA would represent a larger number of municipalities, ranging from 35 to over 100 municipalities per authority.

To provide a manageable governance structure, changes to the *Conservation Authorities Act* are anticipated to reduce the number of municipal appointees to the regional CA. Absent

changes to the governance structure, this will cause some municipalities to lack representation at the regional CA level.

One potential solution to avoid entirely disenfranchising many municipalities is to create a tiered governance structure whereby regional CAs are authorized to establish one or more subregional councils.

The Regional CA would have the power to appoint representatives from member municipalities to the subregional council.

This ensures a direct line of communication, and a degree of accountability, between municipalities that do not have a direct appointee on the regional CA and the regional CA itself.

Such subregional councils would be responsible for exercising the powers and duties and performing functions that have been delegated to the subregional council by the Regional CA with respect to matters relating to that part of the Regional CA.

This model has proven successful in the past when it was applied to municipal community council structures created at the time of amalgamation to solve the problem of ensuring that local decisions were made by local councillors in newly amalgamated Municipalities.

While this is a potential model, we re-state that the current system does a much better job of providing accountability, local buy-in, and pay for say.

Recommendation 15: That any proposed modernization efforts maintain strong connections to local priorities, local expertise, and municipal perspectives. Achieving the right balance between centralized oversight and meaningful local involvement and support is essential for successful, ongoing, watershed management in Ontario.

b. Transparent appointment process

The criteria for appointments to regional CAs should be consistent and transparent across the Province while accounting for regionality.

4. Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional CA?

Best practices exist across Ontario's 36 CAs. If any changes are implemented towards a regional CA model of governance, subregional budgeting is important.

a. Subregional budgeting

Subregional councils within the proposed regional CA could continue to follow a modified version of the budgeting process under O. Reg. 402/22. The proposed subregional budgets and apportionments could then be proposed to the regional CA for final approval.

The regional CA could have the authority to approve the budgets or amend and approve the budgets (similar to a Library Board budget or a Police Board Budget). This would allow for the continuation of a familiar budgeting process within a new structure.

Another key factor to consider during the transition to consolidation is protecting watershed reserves, infrastructure, and land assets. Many watershed municipalities and CAs are concerned how locally funded reserves, land assets, and long-term capital programs will be treated within a consolidated structure.

Recommendation 16: That should any proposed consolidation proceed, subregional approaches to budgeting be maintained to assure delivery of local programs and services at the watershed level.

5. How can regional CAs maintain and strengthen relationships with local communities and stakeholders?

a. Maintain local presence in governance and delivery

The implementation of sub-regional watershed councils described above would ensure continued presence of a local voice in priority setting and decision-making. In addition, subregional offices must be maintained to ensure CAs remain responsive to local needs (e.g. bilingualism). This includes offices, brand identity, infrastructure, programming, and staffing.

Permitting decisions related to development are generally made at the local level. For example, under the *Building Code Act, 1992,* each municipality is required to appoint a Chief Building Official who is an independent officer responsible for administering building permits.

The Ontario Superior court has stated, "It is central to the role played by CBOs that they know the character of their community and the local conditions."[4] Decision makers within the proposed centralized permitting system should be familiar with the local community and attention should be paid to ensuring adequate knowledge of local conditions.

b. Stakeholder outreach

Communication of any meaningful changes must be shared with regional watershed municipalities and other interest holders, such as the development/homebuilders' sectors, the agricultural sector, and other groups that require approvals or receive deliverables from various programs and services. This level of planning is essential because the proposed boundaries represent major watershed restructuring and the merging of multiple complex organizations that require coordinated efforts that should not be rushed.

c. Comprehensive Communication Strategy

A clear, well-coordinated communication strategy is essential to support any potential transition. Strategies must provide timely and accessible information on the new regional boundaries, updated points of contact, any changes to permitting or operational processes, and how municipal relationships and responsibilities will function throughout the transition period.

Early outreach to municipalities, Indigenous communities, landowners, agricultural groups, developers, and other key interest holders will help set expectations and reduce uncertainty. Personalized engagement, including town halls, small-group stakeholder meetings, and one-on-one conversations with municipal representatives, provide opportunities to address region-specific questions and reinforce local connections.

Announcement of the parameters of subregional or watershed councils to maintain stability and function during the transition are also essential.

Additional Comments:

Ontario Provincial Conservation Agency

Conservation Authorities and Municipalities have expressed concern about the proposed governance structure of the OPCA.

As currently designed, the agency will report to a provincial ministry and be governed entirely by provincially appointed board members. At the same time, CAs, and therefore municipalities, will be required to fund all or a portion of the agency's operations through existing levy/apportionment processes. This means that municipalities may ultimately contribute all or a significant share of the OPCA's budget without having any meaningful role in shaping its governance, its priorities, or its strategic direction.

For municipalities that rely heavily on CA guidance for land-use planning, hazard management, infrastructure development, and emergency response, this creates a disconnect between financial responsibility and decision-making influence.

Not only would this be a precedent-setting method for funding a provincial agency, it establishes a system in which municipalities help fund a provincial agency but have no formal avenue to participate in its oversight, which raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs.

Recommendation 17: That the Ontario Provincial Conservation Agency be funded by the Province of Ontario rather than funds levied from municipalities and the local property tax base.

Thank you for the opportunity to review and provide comments on the *Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO#025-1257).* Conservation Ontario represents the interests of its members and remains committed to effective partnership with the Province to achieve effective, modernized outcomes for local, watershed-based conservation and resource management.

December 17, 2025

Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities (ERO#025-1257)

Ganaraska Region Conservation Authority Submission

The Ganaraska Region Conservation Authority (GRCA) has reviewed the Province of Ontario's proposal to amend the *Conservation Authorities Act* and consolidate Ontario's 36 Conservation Authorities into seven regional bodies overseen by a new provincial agency (ERO Posting #025-1257). The GRCA does not support consolidation.

This proposal represents the most significant change to Ontario's environmental management system in 80 years.

Historically, the Province funded up to 50% of Conservation Authority operations; today, provincial support has fallen to less than 2%, leaving municipalities to fund the majority of the operations. GRCA is concerned that the proposed restructuring would shift governance away from the municipalities who created and fund Conservation Authorities, resulting in a significant loss of local decision-making, community accountability, and rural representation.

While GRCA supports provincial goals to improve consistency and modernize digital permitting, these objectives can be achieved without removing local governance or amalgamating watershed agencies into large provincial structures.

Summary of GRCA's Position

The Ganaraska Region Conservation Authority (GRCA) does not support consolidation for the following reasons.

1. Consistent policies, and resources across the existing conservation authority boundaries can be achieved without structural consolidation through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks; or Conservation Ontario.

2. Conservation authorities are locally based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks to lives and property. GRCA has been supported by its seven municipalities, this vision has proven a successful model for nearly 80 years.

3. There has been no cost-benefit analysis prepared by the province demonstrating the fact that if consolidation were to take place, there would be a cost benefit. Furthermore, conservation authorities and municipalities were not consulted about the proposed consolidation.

Key Factors for Not Supporting Consolidation

Several key factors have been identified for not supporting the proposed consolidation.

1.The Approach to the Proposed Changes Lacks Transparency – GRCA Supports Timely Approvals for the Development of Resilient Communities

GRCA is concerned about the limited information provided to support the restructuring proposal. Municipalities and Indigenous communities received minimal advance notice, no cost-benefit analysis or transition plan has been released, and the proposal offers no clarity on how land transfers, municipal service agreements, risk management offices, or emergency response roles would function. As the primary funders of Conservation Authorities, municipalities must be properly consulted and engaged in any proposed changes to the existing system.

The ERO posting also does not reference Bill 68 (Schedule 3) — the legislation enabling consolidation — making it difficult for the public to understand the full scope of changes. The proposed changes were introduced within an omnibus bill without the benefit of a standalone legislative process that would allow for comprehensive public input, stakeholder consultation, or sufficient scrutiny regarding their long-term environmental, financial, and public safety implications.

Despite claims of inefficiency, GRCA issues over 99% of permits within provincial timelines, and provincial reports. It is important to note that the Province's Housing Affordability Task Force Report, does not identify Conservation Authorities as barriers to housing or development.

GRCA plays an essential role in helping municipalities meet their development targets: 100% of planning reviews and development-related screenings are completed within municipal timelines, and GRCA staff work directly with municipal planners, developers, and property owners to resolve issues early, reduce delays, and support local economic growth.

In 2023, the Province removed Conservation Authorities' ability to provide natural heritage reviews and hydrogeological services for municipalities. This change has not worked for rural Ontario, forcing municipalities to hire private consultants at higher cost, with longer timelines, and with less local knowledge — undermining the coordinated, affordable service model that previously supported rural development.

2. Rationale for Consolidation has not been Justified

GRCA has built relationships with municipal partners to address their needs and provide quality service. GRCA currently serves 7 municipalities in whole or in part with a population of 190,470. Under the proposed regional model there are 48

municipalities and a population which is 6.5 times or 1,250,000. With an increase in service area there will be a decrease in efficiency of service delivery.

The Province imposed timelines are being met for development applications. Furthermore, GRCA staff always answer the telephone. Callers get a senior staff person to speak to when inquiring. GRCA staff offer that any applicant may have a meeting with staff via an online platform within one week of any submission to get initial comments. GRCA staff have worked hard to build trust with our community, such that they have a local expert that they can deal with when contacting the Authority about their inquiry or application.

GRCA staff are experts in many fields in addition to planning and permitting. These staff include a GIS department that updates mapping quickly (often within a day or two) and uses cutting-edge technology. GRCA staff have effectively managed the Ganaraska Forest which continues to benefit our watershed as a flood prevention measure as well as being an extremely popular recreational attraction. GRCA staff monitor watershed conditions and provide flood notifications and recommendations. GRCA staff undertake in-house floodplain mapping that is cost-effective for our municipal partners and allows staff to update the watershed models and mapping on a regular basis. The GRCA, in partner with member municipalities offer a diversity of stewardship programs to engage watershed residents in watershed protection and restoration. Furthermore, GRCA has been and continues to be a fiscally responsible organization.

GRCA has a history of effectively and efficiently sharing staff with other Conservation Authorities to ensure required staff resources are available in all program areas.

3. Cost Efficiencies have not been Identified

The Province is establishing the Ontario Provincial Conservation Agency (OPCA). The Province may provide funding for the establishment of the OPCA for the first couple of years however it has not been stated how the OPCA will be funded in future years. It is anticipated the funding will come from municipalities. This results in municipalities contributing to all or a significant share of the OPCA's budget without having any meaningful role in shaping its governance, its priorities, or its strategic direction. The OPCA would require significant resources while local watershed advisory boards would still be needed to guide priorities and provide oversight.

The province has not developed a business case to support the proposed changes. GRCA believes these changes will not improve services and create efficiencies. The cost of consolidation has not been provided, and it has not been established who will pay for these costs. As a local organization, GRCA is responsive to community needs.

Municipalities, landowners, and community partners drive the services and priorities of the organization. If the OPCA is going to provide strategic direction to Conservation Authorities, and Conservation Authorities are consolidated into seven regional Conservation Authorities, then this would mean less municipal input on service priorities.

GRCA is deeply concerned about whether the needs of rural communities and the agricultural sector will be adequately recognized and prioritized in this consolidation, particularly since the lead Conservation Authority is expected to be an urban one in each region.

A core priority for GRCA is reducing the risk of loss of life and community damage caused by flooding and erosion. We are responsible for approving development in or near natural hazard areas, ensuring that new construction and additions are not at risk from flooding or erosion in floodplains or along the Lake Ontario shoreline. GRCA has a proven track record of effectively approving development consistent with applicable legislation and guidelines as well as ensuring that existing development downstream is not further impacted from development activities upstream. The GRCA and our community are particularly aware of flooding impacts as a result of the 1980 storm that affected the Ganaraska River causing considerable damage in Port Hope. GRCA's contributions to hazard management continue to result in significant benefits including safety of residents, a reduction in damage to property and cost-savings to residents, our municipalities and the province thereby ensuring our communities remain safe and resilient from the impacts of natural hazards.

The GRCA permitting process is efficient and consistent— in 2024, the average time to process all types of permits was just 5.7 days. From start to finish, our staff work closely with landowners, emphasizing customer service and helping them identify safe building locations outside hazardous areas. Will the proposed digital permitting platform be able to match our turnaround times and maintain this high level of customer experience? Additionally, what will the costs be for developing and maintaining this platform? The average time for reviewing and issuing permits by all Conservation Authorities is 12.5 business days.

ERO Discussion Questions and Answers

What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?

Political and staff support from key partners, specifically, municipalities, is key to the ongoing success of conservation authorities in Ontario. GRCA watershed municipalities do not support the proposed regional consolidation for many reasons including loss of local service delivery, expertise and in-house capacity for environmental and technical services provided by conservation authorities. The scale of the regional consolidation may be too large to preserve successful watershed management functions so any new

model must be grounded in the fundamentals of watershed management with an ability to introduce collaboration and flexibility, both in the proposed approach and the timelines for implementation. This will be critical to ensure that the transition does not introduce unnecessary processes, added bureaucracy, or uncertainty.

What opportunities or benefits may come from a regional conservation authority framework?

Consistent standards and policies are a potential benefit of regional consolidations. That said, the same consistency can exist if consolidations do not occur. Conservation Ontario can assist in standardizing program delivery and policies for the conservation authorities to follow. Conservation Authorities already pool resources and share technical expertise in a collaborative manner.

Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?

With regards to the suggested governance model at the regional level, a 12-to-18-member Board of Directors is a manageable size that is effective. Given this number of representatives, it would be very difficult to appoint members and still have the expectation of adequately representing the interests of 48 municipalities. These changes will cause some municipalities to lack representation at the regional conservation authority level. One potential solution to avoid entirely disenfranchising many municipalities is to create a tiered governance structure whereby regional conservation authorities are authorized to establish subregional watershed councils to more effectively represent local watershed issues and interests. These councils could be given the responsibility of appointing representatives to the Regional Conservation Authority Board.

Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

Within the regional conservation authority there will be various priorities and budget pressures among the 48 municipalities, which will make budget deliberations very difficult, and the process may seem inequitable to some municipalities. As suggested in the previous point, subregional watershed councils could be created within the proposed regional conservation authority and could continue to follow a modified version of the existing budgeting process. The proposed subregional budgets and apportionments could then be proposed to the regional conservation authority for final approval. The regional conservation authority could have the authority to approve the budgets or amend and approve the budgets. This would allow for the continuation of a familiar budgeting process within a new structure. Another key factor to consider during the transition to consolidation is protecting watershed reserves,

infrastructure, and land assets. Many watershed municipalities and conservation authorities are concerned how locally funded reserves, land assets, and long-term capital programs will be treated within a consolidated structure.

How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

For the regional conservation authorities to maintain and strengthen relationships with local communities, existing local offices should be maintained and remain visible within the community. This will also result in watershed-specific expertise remaining locally and accessible to the residents. The implementation of sub-regional watershed councils described above would ensure continued presence of a local voice in priority setting and decision-making. In addition, subregional offices must be maintained to ensure conservation authorites remain responsive to local needs. This includes not only offices, but includes brand identity, infrastructure, programming, and staffing. Attempts should be made to maintain the existing names of local conservation authorities in the naming of subregional watershed councils as they represent a rich legacy of serving their local communities and the names often have indigenous origins (i.e. Ganaraska, Nottawasaga, Otonabee, Quinte, Mississippi, Mattagami, Crowe, etc.).

Alternative Amalgamation

GRCA does not support the proposed regional consolidations and believes the best, most effective and cost efficient option is to remain as the 36 conservation authorities. However, there may be merit in exploring alternative amalgamations.

Board of Directors Resolution

GRCA 50/25
MOVED BY: Joan Stover
SECONDED BY: Miriam Mutton

WHEREAS the Ganaraska Region Conservation Authority Board of Directors acknowledges and supports the Province's goals of improved efficiency of watershed management, through the implementation of digital applications and permitting system, consistent policies, flood standards, fees, and technology; and

WHEREAS consistent policies, and resources across the existing conservation authority boundaries could be achieved without structural consolidation through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks; or Conservation Ontario; and

WHEREAS conservation authorities are locally based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks

to lives and property. In the case of GRCA, supported by its 7 municipalities, this vision has proven a successful model for nearly 80 years; and

WHEREAS the GRCA, with the guidance and support of our 7 member municipalities, demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. GRCA has successfully leveraged funding to support programs and services that are locally important and are driven by community engagement through GRCA's Conservation Land Strategy and the Watershed Based Resource Management Strategy; and

WHEREAS GRCA consistently meets or exceeds provincial service standards, and participates in staff-sharing initiatives with neighbouring conservation authorities that already deliver many of the efficiencies the Province seeks; and

WHEREAS plans to regionalize conservation authorities through consolidation would dilute local accountability and municipal partnership and is contrary to the basic principle that decisions are best made closest to the communities they affect. Effective representation by municipal partners remains core to the success of conservation authorities. The GRCA, while not unique among conservation authorities in this respect, is effective in working with our community to support sustainable development, and keeping communities safe; and

WHEREAS being front-line means being responsive and accountable to the community by delivering the services that are essential and valued to the best interest of the community. The front line of provincial priorities on housing, the economy, infrastructure, and climate resilience are in the decisions between municipalities working together to address issues around floodplain (and hazard) protection and resilient upland and landscape management. Further, staff and Board are responsive and accountable to the needs of the watershed community, while meeting or exceeding provincial service standards. The staff and Board are reachable through publicly available contact information. Local governance and direction combined with local service provision allows GRCA to continue to be responsive to our community; and

WHEREAS consolidation will result in substantial transition costs, not the least of which is time. In all facets, that would divert resources from front-line service delivery and delay desired outcomes. Further, the loss of local watershed knowledge and community relationships will add greater uncertainty, loss of trust, and delay for our watershed residents. This includes the agricultural community, businesses, builders, developers, and our municipal partners that seek timely and effective local advice, which is provided through local pre-consultation; and

WHEREAS a proposed regional watershed would create a geographically vast and administratively complex organization when joining the seven conservation authorities as proposed in eastern Lake Ontario. This would be considerably worse if local offices do

not remain available and accountable to its membership, partners and the communities they serve.

THEREFORE BE IT RESOLVED:

THAT the Ganaraska Region Conservation Authority Board of Directors does not support the proposed "Eastern Lake Ontario Regional Conservation Authority" boundary configuration as outlined in Environmental Registry Notice 025-1257; and

FURTHER THAT meaningful modernization can occur within the current watershed-based governance framework; and

FURTHER THAT the GRCA Board endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government's priorities of efficiency, red-tape reduction and timely home construction; and

FURTHER THAT the Board asks that the Ministry of the Environment, Conservation and Parks engage directly with affected municipalities and conservation authorities across Eastern Lake Ontario through a working group; and

FURTHER THAT the Board of Directors direct staff to make a submission to the Environmental Registry of Ontario consultations asking the Province to pause any consolidation until more consultation can take place ; and

FURTHER THAT a letter from the Chair containing this resolution, be forwarded to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics; and
- the Ministry of the Environment, Conservation and Parks (CA Office); and
- Ontario's Chief Conservation Executive, Hassaan Basit; and
- Local Member of Provincial Parliament David Piccini, Northumberland – Peterborough South and
- All local watershed municipalities, all municipalities in Ontario, and Counties within GRCA 's watershed.

CARRIED UNANIMOUSLY.

Thank you for the opportunity to review and provide comments on the proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO#025-1257).

December 17, 2025

Ontario Minister of Environment, Conservation and Parks
5th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3

Sent via email: minister.mecp@ontario.ca

To Hon. Todd McCarthy

Re: Grey Highlands Resolution 2025-732

Please be advised that the following resolution was passed at the December 17, 2025 meeting of the Council of the Municipality of Grey Highlands.

2025-732
That Council receive report CAO.25.10, Conservation Authorities Act proposed changes for information; and

Whereas the Conservation Authorities Act (1946) empowers municipalities such as Grey Highlands to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses; and

Whereas the Municipality of Grey Highlands is a unique vast rural area that contains three watershed jurisdictions within its boundaries, being served by the Saugeen Valley Conservation Authority (SVCA), the Grey Sauble Conservation Authority (GSCA), and the Nottawasaga Valley Conservation Authority (NVCA); and

Whereas local municipalities, including Grey Highlands, currently provide a significant portion of total conservation authority funding, while the Province of Ontario provides a much smaller share; and

Whereas municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers; and

Whereas conservation authorities collectively own and manage thousands of acres of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities; and

Whereas Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined; and

Whereas the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks; now

Therefore be it resolved that the Council of the Municipality of Grey Highlands calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; and

That while Grey Highlands supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; and

That Grey Highlands supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives; and

That a copy of this resolution be sent to the Ontario Minister of Environment, Conservation, and Parks, to the local MP and MPPs, the Association of Municipalities of Ontario, the Rural Ontario Municipal Association, Saugeen Valley Conservation Authority, Grey Sauble Conservation Authority, Nottawasaga Valley Conservation Authority and all municipalities in Ontario.

A recorded vote was requested by Deputy Mayor Nielsen.
By a vote of 7-0, CARRIED.

If you require anything further, please contact this office.

Sincerely,

Amanda Fines-VanAlstine
Manager of Corporate Services/Municipal Clerk
Municipality of Grey Highlands

cc. MP, Alex Ruff alex.ruff@parl.gc.ca
MPP, Paul Vickers paul.vickers@ontario.ca
Association of Municipalities of Ontario resolutions@smo.on.ca
Rural Ontario Municipal Association roma@toma.on.ca
Saugeen Valley Conservation Authority publicinfo@svca.on.ca
Grey Sauble Conservation Authority t.lanthier@greysauble.on.ca
Nottawasaga Valley Conservation Authority admin@nvca.on.ca
All municipalities in Ontario

Grand River Conservation Authority

Report number: GM-11-25-104

Date: November 28, 2025

To: Membership of the Grand River Conservation Authority

Subject: Environmental Registry Posting 025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Recommendation:

THAT Report Number GM-11-25-104 Environmental Registry Posting 025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities be received as information.

Summary:

On October 31, 2025, Ontario announced its intent to modernize the Conservation Authorities system, including the introduction of Bill 68 to create the Ontario Provincial Conservation Agency (OPCA), a new provincial body intended to strengthen coordination and oversight. Shortly afterward, the Province released a proposal to consolidate Ontario's 36 Conservation Authorities into seven larger regional bodies. Under this proposal, the Grand River Conservation Authority (GRCA) would become part of the Lake Erie Regional Conservation Authority, an area covering approximately 25,000 km² and 81 municipalities. The Environmental Registry posting invites feedback on proposed boundaries, governance structures, transition processes, and approaches to maintaining strong municipal and community relationships throughout the transition.

The GRCA Board recognizes the value in modernizing the current system and supports efforts to enhance consistency, improve permitting, modernize technical standards, and strengthen coordination across Ontario. A more cohesive framework has the potential to address long-standing capacity gaps and provide clearer expectations for municipalities, the development sector, and the public. However, the Board remains concerned that the scale of the proposed regional consolidation may be too large to preserve the strengths that have historically made watershed management successful in Ontario. Effective watershed governance relies on strong connections to local needs, priorities, and knowledge, which in turn guide natural hazard management, shape infrastructure decisions, and strengthen watershed health, stewardship programs, and community partnerships. A region spanning 81 municipalities risks weakening local accountability, distancing decision-making from watershed-specific realities, and diluting the local focus that is foundational to effective watershed management. Moreover, if municipalities are expected to continue funding conservation authority operations, including the new regional structures and potentially the OPCA, municipalities will require a strong governance model that ensures meaningful municipal input, influence, and direction on watershed issues.

The GRCA further notes that consolidation at this scale could impact long-standing watershed investments, including approximately $1 billion in flood management infrastructure and 50,000 acres of conservation lands that have been managed in alignment with watershed priorities for decades. Maintaining the direct link between funding, local decision-making, and watershed needs is essential to sustaining this work.

The Board believes the Province's modernization goals can still be achieved more effectively through a refined, right-sized regional model aligned with the scale of existing Source Protection

Regions. Such an approach would strengthen province-wide consistency and capacity while preserving meaningful municipal involvement and ensuring that watershed management continues to be guided by the local priorities, expertise, and partnerships that have long supported effective conservation across Ontario.

Report:

On October 31, 2025, the Province of Ontario issued a news release announcing its intent to create a new provincial agency to provide leadership and coordination for Ontario's 36 Conservation Authorities. The stated aim of the agency is to improve consistency, accountability, and efficiency across the conservation authorities system, particularly in the areas of permitting, planning, and watershed management.

On November 6, the Province introduced Bill 68: *Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2)*. Schedule 3 of the Bill proposes amendments to the *Conservation Authorities Act* that would enable the establishment of the Ontario Provincial Conservation Agency (OPCA). Under the proposed framework, the OPCA would oversee the governance framework of the new regional conservation authorities, exercise authority over their operations, and recover costs and expenses through apportionment to those authorities. The agency would also be responsible for assessing, reporting on, and providing direction regarding regional finances, strategic planning, performance standards, and centralized permitting, as well as advising the provincial government on the progress of regional authorities. Governance of the OPCA would rest with a provincially appointed board of 5 to 12 members. Bill 68 has passed First Reading and is currently in its Second Reading, with Royal Assent anticipated in short order.

On November 7, the Ministry of the Environment, Conservation and Parks (MECP) posted a proposal on the Environmental Registry of Ontario (ERO) seeking feedback on proposed boundaries and criteria to consolidate Ontario's 36 Conservation Authorities into seven regional conservation authorities, organized primarily along watershed boundaries. The Grand River Conservation Authority(GRCA) is proposed to be included in the Lake Erie Regional Conservation Authority. This Regional Conservation Authority will consolidate the following conservation authorities: Essex Region, Lower Thames, St.Clair Region, Upper Thames River, Kettle Creek, Catfish Creek, Long Point Region, and the Grand River. The area of this Regional Conservation Authority is approximately 25,000km^2 and includes 81 municipalities; no upper-tier municipalities are listed. The posting also contains five consultation questions relating to the transition into regional conservation authorities, governance considerations, and approaches to ensure strong relationships with municipalities and communities within the new structure. The ERO posting is open for public comment until December 22, 2025.

The Chair and the CAO have attended meetings with provincial staff and the Minister of the Environment, Conservation and Parks (MECP) to discuss the proposed OPCA and the associated ERO posting. The Chair and the CAO also participated in a recent special meeting of the Conservation Ontario Council on Schedule 3 of Bill 68 and the ERO posting to gain a clearer understanding of the perspectives and approaches of other conservation authorities and Conservation Ontario. The Province hosted a webinar for Conservation Authorities to highlight key components of the ERO proposal and answer questions. In addition, the GRCA's Conservation Authorities Act Ad-hoc Committee met to review the proposed legislative amendments and the ERO posting and provided direction to staff in preparing the comments outlined below.

ERO Questions and Responses

1. What do you see as Key Factors to support a successful transition and outcome of the regional conservation authorities consolidation?

A new regional conservation authority must be grounded in the fundamentals that ensure effective watershed management, which include:

- protecting life and reducing property damage from flooding and erosion;
- supporting municipal partners, the development community, and landowners with timely, reliable service;
- enhancing the economic, environmental, and community health of the watershed;
- providing meaningful opportunities for people to connect with nature; and,
- continually evolving as an organization to meet the demands of a rapidly growing region

Maintaining this clear, locally informed focus will be essential for the success of any new regional conservation authority. The following suggestions are some considerations to support a successful transition:

I. Development of a Transition Plan: There needs to be a clear, phased transition plan to help avoid any service disruptions during the transition process. This plan must provide a detailed roadmap that clearly outlines timelines, milestones, and phasing. During this transition phase, the province will need to clearly identify roles and responsibilities during the “in-between” period when multiple similar but distinct organizations are merging. Communication of this plan must also be shared with regional watershed municipalities and other interest holders, such as the development/homebuilders' sectors, the agricultural sector, and other groups that require approvals or receive deliverables from various programs and services. This level of planning is essential because the proposed boundaries represent major watershed restructuring and the merging of multiple complex organizations, which requires coordinated efforts that cannot be rushed. A longer implementation timeline would ensure that these issues are fully considered and addressed. In addition, phasing in the required standards, guidelines, and directives across all conservation authorities before consolidation could provide greater stability. This phased approach would avoid multiple significant changes occurring at the same time, reduce the risk of disruptions to program delivery, and create conditions for a more effective and successful consolidation process.

II. Retention of Local Knowledge and Staff Expertise: Retaining staff and preserving local watershed knowledge is critical to the success of the new regional conservation authorities. This knowledge is rooted in a deep understanding of historic and current land uses, cultural connections to watersheds, and the community values, needs, and stewardship priorities that shape local decision-making. Effective watershed management depends on integrated expertise in hydrology/hydraulics, natural hazards, ecology, creating connections to the watershed features and planning, as well as familiarity with the unique conditions of each sub-watershed. Conservation authorities depend on strong, established partnerships with a wide range of local groups and interest holders, including municipalities, community and stewardship organizations, private landowners, farmers, and the development industry, to deliver their programs and services effectively and address new or emerging watershed challenges. These partnerships are crucial for navigating complex regulatory frameworks, accessing funding programs, and advancing projects that provide both environmental and economic benefits. Preserving this network, and the staff who hold this knowledge, is vital during consolidation, as experienced personnel carry the institutional memory and trust that communities depend on. Staff retention ensures continuity, protects decades of cultivated relationships, and supports a smooth transition that maintains both service quality and community confidence in the new regional authority.

III. Comprehensive Communication Strategy: A clear and well-coordinated communication strategy will be essential to support the transition from individual watershed-based

authorities to larger regional conservation authorities. This strategy must provide timely and accessible information on the new regional boundaries, updated points of contact, any changes to permitting or operational processes, and how municipal relationships and responsibilities will function throughout the transition period. Its success will depend on province-wide, consistent messaging that reinforces shared objectives while also incorporating region-specific details and local implementation examples to maintain familiarity and trust. Early outreach to municipalities, Indigenous communities, landowners, agricultural groups, developers, and other key interest holders will help set expectations and reduce uncertainty. A variety of communication tools, such as dedicated transition webpages, FAQs, newsletters, continued access to the province's interactive boundary maps, direct email briefings, and social media updates, can ensure information is accessible and tailored to different audiences. Personalized engagement, including town halls, small-group stakeholder meetings, and one-on-one conversations with municipal representatives, will provide opportunities to address region-specific questions and reinforce local connections. Establishing clear escalation pathways, contact lists, and creating a transition-specific regional service desk will further support clarity. Together, these measures will help create a consistent, transparent, and responsive communication approach that builds confidence and supports a smooth transition to the new regional watershed model.

Another key factor to consider during the transition to amalgamation is protecting watershed reserves, infrastructure, and land assets. Many watershed municipalities and the GRCA are concerned about how their locally funded reserves, land assets, and long-term capital programs will be treated within an amalgamated structure. Strong assurances are needed to ensure that assets built over decades through local investment are not diverted to support unrelated regional priorities.

The GRCA owns approximately $1 billion in floodplain infrastructure, supported by an efficient maintenance and capital renewal program and healthy reserves intentionally built to support lifecycle and risk-management needs. In addition, the GRCA owns approximately 50,000 acres of land, including conservation areas, ecological lands, water management properties, and other lands, each acquired and managed in accordance with long-standing watershed-specific priorities.

In an amalgamation or consolidation into a larger regional entity, strong protective measures are required to ensure that the GRCA’s resources and assets are maintained in ways that continue to support long-standing watershed priorities. Key concerns include the potential redistribution of well-developed GRCA reserves to support capital needs in other watersheds that have not made comparable investments, and the risk that the GRCA’s mature and efficient infrastructure maintenance program could be weakened if resources become centralized or redirected. GRCA watershed municipalities have emphasized that the GRCA’s 50,000 acres of land must receive the same level of stewardship attention as existing infrastructure and financial reserves, including the protection of passive recreation trails that hold significant local value. Long-standing conservation and land management priorities, along with the community benefits provided by these local trails, must remain stable under any regional model. Protective measures must also ensure that resources for flood protection, capital renewal, and land management remain dedicated to the watershed where they originated, and that high-performing programs are not required to subsidize deferred maintenance in less-resourced areas. Additional concerns relate to the possibility that reduced local decision-making authority could limit the ability of municipalities and the GRCA to safeguard the intent and priorities attached to these important assets. These concerns can be mitigated by establishing clear financial and reserve-protection policies, maintaining watershed-level tracking of revenues and expenditures, creating transparent and equitable capital prioritization frameworks, preserving local advisory roles through watershed-based committees, and ensuring that land,

infrastructure, and reserve management practices respect existing infrastructure needs, stewardship commitments, and long-standing community investments.

A further consideration is the amalgamation of organizations with separate supporting foundations; in such cases, ensuring the integrity of fundraising is critical. Donors often prefer to support initiatives at the watershed or community scale, where the impacts of their contributions are visible and tied to local priorities. A regionalized model risks diluting this connection, potentially affecting donor engagement and revenue. To maintain donor confidence, an amalgamated structure must include mechanisms to preserve watershed-based fundraising and reporting, and publicly acknowledge donors in ways that reflect the specific locations/projects they choose to support rather than treating all contributions as part of a single regional fund.

2. What opportunities or benefits may come from a regional conservation authority framework?

Consolidating conservation authorities into a regional framework can create more consistent permitting practices, technical standards, and service levels across municipalities, reducing the variation that currently exists between the 36 agencies. A unified structure also supports stronger alignment with provincial expectations through shared permitting systems, common GIS platforms, and standardized public portals that modernize service delivery and improve accessibility.

Consolidation can also lead to a more equitable distribution of resources, giving smaller or rural municipalities access to specialized expertise that may have been limited by local budgets or staffing. Larger organizations are generally better positioned to secure federal or provincial funding for broader, high-impact projects.

The administrative framework in place at larger organizations also provides an opportunity for efficiency, as they have subject matter experts who perform dedicated internal service roles. These roles can be leveraged in consolidation to provide dedicated attention to organizational compliance, such as health and safety legislation, and risk management.

The size of each regional unit is a very important consideration. Consolidating too many areas into one very large authority can create new challenges, such as distance from local issues, slower decision-making, and difficulty maintaining community relationships; therefore, finding a balanced approach is essential. A regional model can still support strong local representation and responsiveness when designed thoughtfully. Municipal priorities can be maintained through governance structures that include voices from all participating municipalities, supported by sub-regional offices and advisory committees that keep decision-making connected to local needs. Harmonizing policies and fee structures can be done collaboratively, providing opportunities for municipalities and interest-holder groups to help shape fair and consistent standards for the region. Setting clear service expectations, such as defined response times, local points of contact, and accessible public information, helps to ensure that a larger agency remains responsive and reliable.

Greater consistency across policies, standards, and processes also creates a more stable operating environment for municipalities, developers, and the public. When expectations are predictable (clear permitting requirements, uniform fees, and consistent timelines), people can plan with more confidence. By using its (proposed) authority to create directives that support these elements, the OPCA can further reinforce this predictability and clarity. This stability strengthens customer service because staff use the same tools and guidance across the region, reducing confusion and delays. Ultimately, consistent service delivery helps ensure that watershed communities receive the same level of support regardless of their size or location, provided the regional units are scaled in a way that supports both efficiency and meaningful local engagement.

3. Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?

A successful governance model for the new regional conservation authorities must balance local accountability, fair representation, and operational efficiency. In regions with very large numbers of municipalities, such as the proposed Lake Erie Regional Conservation Authority, which would include at least 81 municipalities, a one-member-per-municipality board is unrealistic and would make strategic decision-making extremely difficult. A streamlined, revised Board of Directors is therefore essential.

A revised Board structure should be small enough to function strategically while still representing the diversity of the watershed. A board of approximately 25–30 members, similar to the Board of Directors for the GRCA, could achieve this balance if seats are allocated proportionally by population and geography and with regard to financial contribution. To avoid concentration of influence, no single municipality should be able to dominate board decisions. The new Board should contain elected officials only. Shorter board terms could be introduced to promote shared leadership, especially in cases where several municipalities are represented through a single grouped seat. At the regional level, the Board would retain independent responsibility for the budget, hearings, staffing decisions, policy approval, and overall governance authority.

To maintain strong local accountability while keeping the main board streamlined, the governance model should incorporate a clear subcommittee and advisory structure. Local Watershed Advisory Committees could be established for each major watershed or sub-basin (e.g., Grand, Thames, St.Clair, etc), composed of municipal councillors and/or citizen appointees. These committees would provide advice for local context on program policy, advise on watershed-level programs and services, and offer input on budget priorities. Additional advisory committees at either regional or watershed scale could be created based on local needs, such as agricultural advisory groups or home-builder liaison committees. Given the presence of approximately seven First Nations within the proposed regional area, an Indigenous Advisory Circle would support meaningful engagement and ensure that Indigenous perspectives are incorporated respectfully and consistently into decision-making.

Under a consolidated Conservation Authority framework, the governance model should:

- Maintain a small, strategic, and efficient board.
- Ensure strong local and watershed-specific input through subcommittees and grouped representation.
- Provide fair, transparent representation across the jurisdiction.
- Protect the voices of rural, agricultural, and small municipalities.
- Ensure that local program priorities (e.g., Wastewater Optimization, Rural Water Quality Programs, etc.) continue to be addressed.
- Deliver consistent, predictable, and accountable decision-making across the jurisdiction.

This structure supports efficiency and coordination while preserving meaningful local input. It helps ensure that the new conservation authority can operate effectively at a larger scale without compromising its responsiveness to the communities it serves.

The relationship between the Regional Conservation Authority Board and the OPCA is not clearly defined in the proposed model, and this lack of clarity may have significant implications for governance effectiveness. If the OPCA operates as a highly centralized umbrella board with substantial authority over regional conservation authorities, the independence and responsibility traditionally held by regional boards could be greatly reduced. A diminished governance role would make it far less likely that qualified individuals (both municipal representatives and, if permitted, citizen appointees) would be willing to serve on regional boards, as the scope for meaningful decision-making and local accountability would be substantially constrained. Clear

articulation of roles and authorities will be essential to avoid undermining board capacity, local engagement, and accountability.

4. Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

A transparent and consultative budgeting process for a larger regional conservation authority requires a clear, consistent, and accessible approach that supports all participating municipalities, regardless of size or capacity. Establishing a standardized multi-year budget framework can improve predictability and help municipalities plan their own budgets effectively.

A transparent apportionment formula based on criteria such as assessment value, population, and portion of watershed area located within municipalities is currently used and could be used moving forward. Where portions of municipalities are in different conservation authority jurisdictions, consideration could be given to geo-referencing property tax assessment roll numbers so that the apportionment calculation is based on current value assessment (CVA) in a watershed rather than the percentage of geographical area applied to the municipality's total CVA.

To maintain meaningful local input within a large region, a Municipal Budget Advisory Committee could be established as a sub-committee of the Regional Board, and could include membership from the local watershed advisory committees, including both rural and urban municipality representation. Additionally, sub-regional or watershed-based consultation meetings could be held to ensure that local priorities and capital needs are considered in budgeting decisions. Budget documents should be publicly available, written in clear language, and shared/consulted on early enough to align with municipal budget cycles. Offering multiple engagement opportunities, for example, presenting at councils when requested, providing virtual workshop sessions, soliciting written feedback, and conducting one-on-one briefings, ensures that any municipality, regardless of size and location, can participate fairly in the process. Finally, reporting back on municipal input, producing accessible annual financial reports, and clearly and consistently distinguishing between Category 1, 2, and 3 program and service costs, revenues, and grant funding all reinforce transparency and accountability.

5. How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

Regional conservation authorities can maintain and strengthen relationships with local communities and interest-holders by staying deeply connected at the local municipal level, even as they operate on a broader scale. The size of each regional authority is critical: if the conservation authority becomes too large, municipalities risk being under-represented, and their specialized watershed needs, such as agricultural programs/issues, drinking water management, localized flooding concerns, or unique outdoor experiences and priorities, can become diluted within a large administrative structure. Municipalities want assurance that scaling up will not cause their distinct issues to be overshadowed by larger population centres or to become a lesser priority due to the increased diversity of issues and competing interests that will inevitably exist within a much larger jurisdiction. A balanced, right-sized regional framework preserves this visibility and ensures that local concerns remain central to decision-making.

Maintaining watershed offices, expertise in local issues and knowledge, ability to maintain on the ground presence, and consistent points of contact ensures that residents, businesses, farmers, and municipalities can easily access staff who understand their watershed's specific conditions and community priorities. With the proposed size of regional conservation authorities, establishing local watershed-specific advisory committees ensures that decisions are grounded in local knowledge and that specialized concerns are effectively addressed.

Finally, ensuring service delivery remains responsive, through timely permitting, accessible staff, and clear pathways for raising concerns, helps communities feel heard and supported during and after the transition to a regional model. A thoughtfully sized regional authority can achieve the benefits of consolidation while still preserving the visibility, voice, and specialized needs of every watershed and municipality.

Additional Comments

The GRCA is providing additional comments on the proposed OPCA and offering an alternative regional consolidation model that we believe will effectively address the Province's concerns while preserving strong local engagement and watershed-focused decision-making.

Modernizing Conservation Authorities While Preserving Local Responsiveness

The Board recognizes and respects the Province's concerns regarding the current state of Conservation Authorities. Over time, the conservation authority system has become fragmented, with varying levels of capacity, outdated processes, and inconsistencies in service delivery. Individual conservation authorities also face significant disparities in size and resources, with some lacking access to modern tools, technology, and technical expertise needed to deliver certain programs and services effectively, as well as the capacity to support evidence-based decision-making. We acknowledge that these capacity gaps mean some conservation authorities face challenges in sustainably delivering the full range of programs and services expected of them. Modernization is needed, and there is clear value in creating a permitting system that is further streamlined, more transparent and predictable, and better able to support economic growth, reduce delays, and protect watershed communities. Likewise, reducing duplication, adopting consistent standards, and leveraging shared technology and internal services are sensible and necessary steps toward strengthening Ontario's overall watershed management framework. From this perspective, consolidation can help address real issues by improving coordination, enhancing efficiency, and enabling more reliable service delivery across the province.

At the same time, the GRCA Board has significant concerns that the proposed regional model is too large in scale to be effective. While consolidation can help address capacity challenges, overly expansive regions risk weakening the very principles that have made watershed-based management successful. The Grand River watershed is a notable example. Established in 1934, the Grand River Conservation Commission, one of the founding organizations of today's GRCA, has long demonstrated that effective watershed management relies on strong collaboration with municipal partners and on programs designed to meet watershed-specific needs and issues. This locally grounded approach has allowed decisions to be informed by practical, locally based knowledge and supported by strong, responsive relationships with the municipalities and communities most directly affected. For example, the Grand River watershed has a network of flood-management infrastructure, including multipurpose reservoirs, dikes, and flood-control berms. These structures form an integrated system operated and maintained through close collaboration between the GRCA and watershed municipalities. Sustaining this partnership is essential to ensuring the effective operation and upkeep of flood-management infrastructure, as well as protecting lives and reducing property damage caused by flooding and erosion. A regional structure that is too broad may unintentionally distance decision-making from this essential local context. It can also reduce meaningful municipal participation, which is vital to maintaining public trust and effective environmental stewardship across Ontario.

Smaller, regionally focused watershed models, such as the current Source Protection Regions, are a proven regional watershed model and demonstrate how a balanced governance structure can achieve consistency and efficiency without sacrificing local responsiveness. This scale aligns well with having one effective governance board over multiple organizations, science-based watershed boundaries, and support for coordinated planning among municipalities. It also helps maintain decision-making at a scale where local knowledge and community involvement

remain strong and effective, while accounting for the need for grouped CAs to share and manage technical resources. The current number of Source Protection Regions in Ontario is 19. By operating within manageable geographic areas, they ensure that services are tailored to the unique environmental, social, and economic characteristics of each watershed, while still benefiting from shared resources and standardized processes.

In summary, the GRCA Board agrees that modernization is needed and that consolidation, when appropriately scaled, can address real capacity and consistency issues. However, a balanced approach that enhances efficiency without eroding local engagement is essential. A refined model aligned with the scale and logic of existing source water protection regions would better meet provincial objectives while preserving the strengths of Ontario's long-standing watershed-based planning and management system. Consideration could also be given at this stage to whether a Provincial Agency would be required to support and implement this model.

Assessing the OPCA: Benefits, Risks, and the Importance of Local Oversight

The GRCA Board recognizes the Province's intention in establishing the Ontario Provincial Conservation Agency (OPCA) to modernize the conservation authority system in a way that supports timely development and local infrastructure projects, while strengthening the essential role conservation authorities play in managing watersheds and protecting communities from floods and other natural hazards. These goals are both important and necessary. A system that delivers services more consistently, transparently, and predictably will benefit municipalities, developers, and communities alike, particularly as Ontario continues to grow and climate-related risks intensify. The GRCA Board agrees that modernization is needed and supports efforts to enhance both efficiency and environmental protection across the province.

The creation of the OPCA aims to provide centralized leadership, efficient governance, and strategic direction for all conservation authorities. In principle, this offers several clear advantages: a coordinated provincial body can help ensure faster, more consistent permitting and provide the oversight needed to align conservation authorities with modern standards and best practices. By strengthening core watershed management functions and focusing on natural hazard protection, the OPCA has the potential to reinforce the foundational mandate of conservation authorities. This direction is appropriate, as communities across Ontario depend on timely, science-based decisions to address increasing flood risks, aging infrastructure, and complex development pressures.

The OPCA will also lead several key modernization initiatives, including developing a single digital permitting platform, standardizing service delivery through province-wide performance expectations, and supporting updated floodplain mapping to ensure decisions are grounded in the best available data. These initiatives have the potential to significantly improve customer service, reduce delays, and enhance consistency across the province. Likewise, centralized data systems and modern tools can help staff make better, evidence-based decisions. Streamlining processes and reducing duplication are logical steps toward a more efficient and reliable permitting system.

The agency will also oversee the implementation of a regional, watershed-based consolidation of conservation authorities. The GRCA Board understands the rationale for consolidation, addressing disparities in size and capacity, modernizing outdated processes, and ensuring that all conservation authorities can meet provincial expectations. With stronger tools, shared technology, and enhanced technical resources, many of the conservation authorities will indeed be better positioned to deliver high-quality services. Ensuring that updated maps, hydrologic modelling, and modern data platforms are available across Ontario is essential support to help provide consistent natural hazard management.

The GRCA Board is concerned about the proposed governance structure of the OPCA. As currently designed, the agency will report to a provincial ministry and be governed entirely by

provincially appointed board members. At the same time, conservation authorities, and therefore municipalities, will be required to fund all or a portion of the agency's operations through existing levy/apportionment processes. This means that municipalities may ultimately contribute all or a significant share of the OPCA's budget without having any meaningful role in shaping its governance, its priorities, or its strategic direction. For municipalities that rely heavily on conservation authority guidance for land-use planning, hazard management, infrastructure development, and emergency response, this creates a disconnect between financial responsibility and decision-making influence.

Not only would this be a precedent-setting method for funding a provincial agency, it also establishes a system in which municipalities help fund a provincial agency but have no formal avenue to participate in its oversight, which raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs. The scale of the proposed regional conservation authority consolidation model amplifies these concerns. Larger regional conservation authorities risk limiting opportunities for local input and reducing the nuanced, watershed-specific decision-making that has historically made conservation authorities effective.

The GRCA Board acknowledges the Province's desire for greater consistency, efficiency, and alignment across conservation authorities and supports these goals. This could be achieved under the current model through additional regulations and verifying compliance at all conservation authorities, or it could be achieved through the actions of the new agency. Regardless, modernization efforts must maintain a strong connection to local priorities, local expertise, and municipal perspectives. Achieving the right balance between centralized oversight and meaningful local involvement will be key to ensuring the OPCA strengthens watershed management across Ontario while preserving the collaborative principles that have long underpinned successful conservation work in the province.

Conclusion
In conclusion, the GRCA Board supports the Province's goal of modernizing Ontario's conservation authority system and acknowledges the value of enhancing consistency, efficiency, and technical capacity throughout the province. The Board has emphasized the importance of a thoughtful, well-planned transition, the preservation of local knowledge and municipal relationships, and the need for a governance model that ensures accountability to the municipalities that will both rely on and will continue to fund the new system. While consolidation offers meaningful opportunities, the scale of the proposed regional structure and the governance framework of the OPCA present risks that could weaken local responsiveness and watershed-based decision-making. A more balanced, right-sized regional model, grounded in strong municipal involvement and science-based watershed boundaries, would better achieve the Province's objectives while maintaining the strengths, partnerships, and community trust that have defined conservation authority work in Ontario for decades.

Financial Implications:

Not applicable.

Other Department Considerations:

Not applicable.

Submitted by:

Samantha Lawson
Chief Administrative Officer

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December 2, 2025

Re: Bill 68: *Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2)* and the Proposed consolidating the 36 Conservation Authorities

Dear Grand River watershed Municipal Councils,

On October 31, 2025, the Province of Ontario announced its intention to create a new provincial agency, the Ontario Provincial Conservation Agency (OPCA) to provide leadership and coordination across Ontario's 36 Conservation Authorities. These changes have now been enacted through Bill 68: *Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2)*, which has received Royal Assent. As a result, the Conservation Authorities Act has been amended to formally establish the OPCA. Under this new framework, the OPCA will oversee governance, strategic planning, performance standards, and centralized permitting for all Conservation Authorities, led by a provincially appointed board.

On November 7, the Province also proposed consolidating the 36 Conservation Authorities into seven large regional authorities. While this proposal aims to address capacity gaps and improve consistency, it also poses several risks, including the potential loss of local priorities, watershed-specific expertise, and meaningful municipal input. Larger regional structures will distance decision-making from the local context, partnerships, and on-the-ground knowledge that have long supported effective watershed management. Their scale also raises concerns that diverse watershed needs may be overshadowed, local priorities diluted, and long-standing municipal relationships weakened. The GRCA encourages municipalities to submit comments to the Environmental Registry of Ontario (ERO) before the December 22, 2025 deadline.

The Province has indicated that these reforms aim to address long-standing challenges in the current system, including inconsistent capacity, outdated processes, and variability in permitting and service delivery. The GRCA acknowledges these challenges and supports efforts to improve consistency, efficiency, and technical capacity across Ontario.

On Friday, November 28, the GRCA Board of Directors met to formalize the organization's comments to the Province regarding both the creation of the new provincial agency and the proposed consolidation of the 36 Conservation Authorities into regional bodies. These comments reflect the GRCA's key concerns and recommended path forward.

The GRCA has identified several critical considerations to support a successful transition:

1. **Scale of the Proposed Regional Model**
   The proposed regions are significantly larger than current watershed-based frameworks. This expansion of the proposed size could create new challenges, such as distance from local issues, slower decision-making, and difficulty maintaining local relationships; therefore, finding a balanced approach is essential. Smaller, regionally focused watershed models, such as the current Source Protection Regions, are proven regional models that demonstrate how a balanced governance structure can achieve consistency

and efficiency without sacrificing local responsiveness. By operating within manageable geographic areas, such as the Source Protection Regions, CAs can ensure that services are tailored to the unique environmental, social and economic characteristics of each watershed, while still benefiting from shared resources and standardized processes

2. **Protection of Local Knowledge, Assets, and Investments**
   The GRCA maintains significant watershed-specific infrastructure, reserves, and land assets built through decades of watershed investment. Key concerns include the potential redistribution of well-developed GRCA reserves to support capital needs in other watersheds that have not made comparable investments, and the risk that the GRCA's mature and efficient infrastructure maintenance program could be weakened if resources become centralized or redirected. Clear assurances are required to ensure these resources remain dedicated to the watershed communities they were intended to serve.

3. **Governance, Accountability, and Municipal Representation**
   The GRCA Board has significant concerns about the governance structure of the OPCA. The agency will report to a provincial ministry and be governed entirely by provincially appointed board members. At the same time, conservation authorities, and therefore municipalities, will be required to fund all or a portion of the agency's operations through the existing levy/apportionment process. This means that municipalities may ultimately contribute all or a significant share of OPCA's budget without having any meaningful role in shaping its governance, priorities, or strategic direction.

   Additional clarity is also needed regarding the governance responsibilities of the new Regional Conservation Authority Boards. A strong Regional Conservation Authority Board must balance local accountability, fair representation, and operational efficiencies.

The GRCA supports modernization of the Conservation Authorities system but recommends a right-sized regional model more closely aligned with existing Source Protection Regions. This approach would advance provincial objectives for consistency and efficiency while preserving the strengths of watershed-based decision-making, municipal collaboration, and local responsiveness.

The GRCA Board has requested that this background information be shared with watershed municipalities along with a request for your support for the GRCA's concerns and proposed alternate model. A sample resolution for your consideration for submission is as follows:

> *"WHEREAS the Government of Ontario recently approved Bill 68, which establishes the Ontario Provincial Conservation Agency;*
>
> *AND WHEREAS the Government of Ontario is proposing the consolidation of the province's 36 conservation authorities into seven regional conservation authorities, including the Grand River Conservation Authority(GRCA), which will be amalgamated amongst eight current authorities to become part of the Lake Erie Regional Conservation Authority (LERCA);*
>
> *AND WHEREAS the 38 municipalities within the GRCA watershed boundaries today and the 81 municipalities that are proposed to make up the LERCA in 2027 will be levied to fund both the regional conservation authority as well as the provincial conservation agency;*
>
> *AND WHEREAS the new organizations will result in the degradation of local governance, local fiscal accountability, local service delivery, local environmental focus*

and unprecedented funding by local municipalities of both a large regional authority and a provincial agency;

AND WHEREAS the GRCA Board of Directors has responded to Bill 68 and the proposal for Conservation Authorities consolidation with a constructive and thoughtful alternative that retains local governance, local service delivery, local environmental focus and local fiscal accountability while responding constructively to the Government of Ontario's concerns about accountability, planning and responsiveness;

NOW THEREFORE BE IT RESOLVED THAT the Minister of Environment, Conservation and Parks and the Chief Conservation Executive meet GRCA representatives to review the GRCA alternative proposal to Conservation Authorities consolidation;

AND THAT the Minister and the Chief Conservation Executive seriously consider the GRCA proposal for conservation authorities as it enunciates a path forward that will address the Government's concerns most democratically and productively;

AND THAT this motion be circulated to the Premier of Ontario, Minister of Environment, Conservation & Parks, Chief Conservation Executive and local Members of Provincial Parliament for their information and action, where appropriate."

The GRCA will continue to monitor the implementation of Bill 68 and the ERO proposal and will keep municipalities informed as additional details become available. The GRCA has already submitted its formal comments to the Province based on the Board-approved positions summarized above. A copy of the GRCA's comprehensive response to the ERO posting is attached for your reference.

If you have questions or would like a presentation to Council, please reach out to Samantha Lawson, CAO, at any time.

Sincerely,



John Challinor II, Chair
Grand River Conservation Authority

Ganaraska Region Conservation Authority
2216 County Road 28
Port Hope, ON L1A 3V8

Phone: 905-885-8173
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MEMBER OF
CONSERVATION ONTARIO

November 28, 2025

Proposed Regional Consolidation of Conservation Authorities, ERO Notice #025-1257
Ganaraska Region Conservation Authority Resolution GRCA 51/25

On October 31, 2025, Minister Todd McCarthy, Minister of the Environment, Conservation and Parks (MECP), announced that the provincial government will introduce legislation to amend the *Conservation Authorities Act* to create a new provincial agency, the Ontario Provincial Conservation Agency (OPCA) under Bill 68. On November 27, 2025, Bill 68, *Plan to Protect Ontario Act* (Budget Measures), 2025 (No. 2) received Royal Assent.

Another key action announced at this time, by the Minister of the Environment, Conservation and Parks, together with the Chief Conservation Executive, is the proposal to consolidate the province's 36 conservation authorities into seven regional conservation authorities, while maintaining alignment with watershed boundaries. On Friday, November 7th, the MECP posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), the ERO posting remains open for public comment for a total of 45 days until December 22, 2025 at 11:59 p.m.

The proposed consolidation recommends Ganaraska Region Conservation Authority (GRCA) join with Central Lake Ontario, Kawartha Region, Otonabee Region, Lower Trent Region, Crowe Valley and Quinte Region Conservation Authorities forming the Eastern Lake Ontario Regional Conservation Authority (ELORCA). This regional conservation authority would include 48 municipalities across the proposed region. As well, the area covered by the ELORCA is 16 times the current jurisdiction of the GRCA and larger than the area covered by the island of Jamaica. The population included is more than the population of some Canadian Provinces.

At the November 27, 2025, Ganaraska Region Conservation Authority Board of Directors meeting, a staff report entitled "Bill 68, Schedule 3 Proposed Changes to the *Conservation Authorities Act* and Proposed Boundaries for Regional Consolidation of Ontario Conservation Authorities" which can be found at the following link, https://grca.on.ca/wp-content/uploads/2025/11/grca_ca-act-amendments-as-per-bill-68-update.pdf, was presented and the following resolution was received as written in the report:

GRCA 50/25
MOVED BY: Joan Stover
SECONDED BY: Miriam Mutton

WHEREAS the Ganaraska Region Conservation Authority Board of Directors acknowledges and supports the Province's goals of improved efficiency of watershed management, through the implementation of digital applications and permitting system, consistent policies, flood standards, fees, and technology; and

WHEREAS consistent policies, and resources across the existing conservation authority boundaries could be achieved without structural consolidation through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks; or Conservation Ontario; and

WHEREAS conservation authorities are locally-based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks to lives and property. In the case of the GRCA, supported by its seven municipalities, this vision has proven a successful model for nearly 80 years; and

WHEREAS the GRCA, with the guidance and support of our seven member municipalities, demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. GRCA has successfully leveraged funding to support programs and services that are locally important and are driven by community engagement through *GRCA's Conservation Land Strategy* and the *Watershed Based Resource Management Strategy*; and

WHEREAS GRCA consistently meets or exceeds provincial service standards, and participates in staff-sharing initiatives with neighbouring conservation authorities that already deliver many of the efficiencies the Province seeks; and

WHEREAS plans to regionalize conservation authorities through consolidation would dilute local accountability and municipal partnership and is contrary to the basic principle that decisions are best made closest to the communities they affect. Effective representation by municipal partners remains core to the success of conservation authorities. The GRCA, while not unique among conservation authorities in this respect, is effective in working with our community to support sustainable development, and keeping communities safe; and

WHEREAS being front-line means being responsive and accountable to the community by delivering the services that are essential and valued to the best interest of the community. The front line of provincial priorities on housing, the economy, infrastructure, and climate resilience are in the decisions between municipalities working together to address issues around floodplain (and hazard) protection and resilient upland and landscape management. Further, staff and Board are responsive and accountable to the

needs of the watershed community, while meeting or exceeding provincial service standards. The staff and Board are reachable through publicly available contact information. Local governance and direction combined with local service provision allows the GRCA to continue to be responsive to our community; and

WHEREAS consolidation will result in substantial transition costs, not the least of which is time. In all facets, that would divert resources from front-line service delivery and delay desired outcomes. Further, the loss of local watershed knowledge and community relationships will add greater uncertainty, loss of trust, and delay for our watershed residents. This includes the agricultural community, businesses, builders, developers, and our municipal partners that seek timely and effective local advice, which is provided through local pre-consultation; and

WHEREAS a proposed regional watershed would create a geographically vast and administratively complex organization when joining the seven conservation authorities as proposed in eastern Lake Ontario. This would be considerably worse if local offices do not remain available and accountable to its membership, partners and the communities they serve.

THEREFORE BE IT RESOLVED:

THAT the Ganaraska Region Conservation Authority Board of Directors does not support the proposed "Eastern Lake Ontario Regional Conservation Authority" boundary configuration as outlined in Environmental Registry Notice 025-1257; and

FURTHER THAT meaningful modernization can occur within the current watershed-based governance framework; and

FURTHER THAT the GRCA Board endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government's priorities of efficiency, red-tape reduction and timely home construction; and

FURTHER THAT the Board asks that the Ministry of the Environment, Conservation and Parks engage directly with affected municipalities and conservation authorities across Eastern Lake Ontario through a working group; and

FURTHER THAT the Board of Directors direct staff to make a submission to the Environmental Registry of Ontario consultations asking the Province to pause any consolidation until more consultation can take place; and

FURTHER THAT a letter from the Chair containing this resolution, be forwarded to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics; and
- the Ministry of the Environment, Conservation and Parks (CA Office); and
- Ontario's Chief Conservation Executive, Hassaan Basit; and

- Local Member of Provincial Parliament David Piccini, Northumberland – Peterborough South and
- All local watershed municipalities, all municipalities in Ontario, and Counties within GRCA's watershed.

CARRIED UNANIMOUSLY.

The GRCA encourages all partners to review the posting at the following link: https://ero.ontario.calnotice/025-1257 and submit comments prior to the closing date of December 22, 2025.

For further information, please contact the undersigned at info@grca.on.ca

Yours sincerely,



Vicki Mink
Chair, Ganaraska Region Conservation Authority

CC:
- the Minister of the Environment, Conservation and Parks and his Opposition critics; and
- the Ministry of the Environment, Conservation and Parks (CA Office); and
- Ontario's Chief Conservation Executive, Hassaan Basit; and
- Local Member of Provincial Parliament David Piccini, Northumberland – Peterborough South and
- All local watershed municipalities, all municipalities in Ontario, and Counties within GRCA's watershed.

Nottawasaga Valley
Conservation Authority

4 December 2025

By EMAIL

Hon. Todd McCarthy MPP
Minister of the Environment, Conservation and Parks
College Park, 5th Floor, 777 Bay Street
Toronto, ON M7A 2J3

Re: NVCA Board Submission on the Proposed Regional Consolidation of Ontario's Conservation Authorities

Dear Minister McCarthy,

On behalf of the Board of Directors of the Nottawasaga Valley Conservation Authority (NVCA), I am writing to provide our formal comments regarding the Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities pursuant to the enclosed resolution (see attachment 1), which our Board passed unanimously. Our staff will also be making a detailed submission through the Environmental Registry of Ontario.

As you know, conservation authorities were created by municipalities under provincial statute to deliver watershed-based resource management, hazard protection and local environmental stewardship. They are funded and governed locally because their work is most effective when aligned with the distinct conditions, needs and local priorities of the watersheds they serve. Today, municipalities provide between 25% and 50% of the operating funds that make conservation authority services possible, while the province contributes approximately 3%. The authority-municipality partnership is, therefore, both operational and financial, and inherently grounded in local accountability.

The NVCA Board supports the Province's goals of efficiency, service modernization, digitization and fiscal prudence. In fact, NVCA has already implemented many of these improvements, including: digital permitting; shared-service models; external service and cost-recovery reviews; and strengthened transparency and communication practices, which our past correspondence (see attachment 2) to you and your officials has outlined in greater detail. These changes demonstrate that meaningful modernization is already achievable within the existing watershed-based framework.

Our Board is not in favour of amalgamation. As you may know, earlier this year we carefully explored an amalgamation proposal to merge our authority with a neighbouring one. This proposal was opposed by our Board, as well as opposed by the overwhelming majority of our shared member municipalities.

We specifically have concerns with the proposed "Huron–Superior Regional Conservation Authority", which would merge NVCA with six other conservation authorities across a geographic span of over 1,400 kilometres and 78+ municipalities — from Thunder Bay through Northern Lake Huron and into fast-growing regions of Southern Ontario in the Greater Toronto Area. This configuration would combine watersheds and communities with little shared hydrology, climate, infrastructure reality or economic alignment. It would also impose transitional costs for governance restructuring, IT integration, human resources amalgamation and policy harmonization. These transitional costs could divert resources from frontline permitting, hazard management and restoration work that municipalities and residents rely on.

In addition, the proposed consolidation risks weakening the very local accountability and municipal partnership that underpin conservation authority effectiveness. Decisions about permitting, floodplain management and watershed planning are best made by those who understand local site conditions, municipal growth patterns and community needs. A distant, mega-regional structure merging the GTA, the North and rural regions may make it more difficult for builders, farmers and municipalities to receive timely advice, resolve issues early and keep critical housing and infrastructure projects on schedule. We are also worried about the possible loss of the municipal voice, given the lack of clarity around how future board governance would be conducted.

The Board also notes that two of the proposed consolidated authorities — the Lake Simcoe Region Conservation Authority and the Lakehead Region Conservation Authority — operate in distinct contexts. Lake Simcoe functions under its own statute and the Lake Simcoe Protection Plan, while Lakehead serves Northern Ontario communities with vastly different watershed and infrastructure challenges than our region. We believe a single administrative structure cannot reasonably or efficiently meet all of these unique requirements.

For these reasons, the NVCA Board does not support the proposed "Huron–Superior" configuration as presented. Instead, we request further provincial consultation directly with all affected municipalities and conservation authorities before finalizing any boundary decisions or legislative amendments.

Should the Province continue to explore consolidation, the NVCA Board believes there are more geographically coherent and fiscally responsible alternatives. For example, a model focusing only on merging conservation authorities with contiguous Georgian Bay-area watersheds may better achieve alignment, reduce transition costs and would preserve local accountability while maintaining Lake Simcoe Region and Lakehead Region as distinct entities appropriate to their unique legislative or geographic contexts. There may well be benefits to having consolidation across Georgian Bay from a service-delivery perspective and in accessing federal grants. We wish to be clear that consolidation is not our

preference, but if the province proceeds with consolidation, this approach is our recommendation.

We appreciate the opportunity to comment and would welcome direct dialogue with your Ministry as this important file proceeds. Our aim is to work to achieve the goals you are seeking, but in a manner we consider more likely to be effective. Protecting people, property, and our shared natural environment requires solutions that are efficient, fiscally responsible and firmly grounded in the realities of Ontario's diverse watersheds. We believe such outcomes are achievable, and we stand ready to contribute constructively to that work.

Sincerely,



Jonathan Scott
Chair, Board of Directors
Nottawasaga Valley Conservation Authority

cc:

Hon. Sylvia Jones, MPP for Dufferin—Caledon
Hon. Caroline Mulroney, MPP for York—Simcoe
Hon. Doug Downey, MPP for Barrie—Springwater—Oro-Medonte
Hon. Lisa Thompson, MPP for Huron—Bruce
Hon. Jill Dunlop, MPP for Simcoe North
Hon. Andrea Khanjin, MPP for Barrie—Innisfil
Brian Saunderson, MPP for Simcoe—Grey
Paul Vickers, MPP for Bruce—Grey—Owen Sound
Conservation Ontario
Association of Municipalities of Ontario
Member Municipalities in the Proposed Region
Grey Sauble Conservation Authority
Saugeen Valley Conservation Authority
Maitland Valley Conservation Authority
Ausable Bayfield Conservation Authority
Lake Simcoe Region Conservation Authority
Lakehead Region Conservation Authority

Attachment 1: NVCA Board Resolution
Attachment 2: Letter - NVCA’s progress in modernisation, efficiency and accountability

Ontario
LEGISLATIVE
ASSEMBLY

Lisa Thompson, MPP
Huron-Bruce

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Email: lisa.thompsonco@pc.ola.org

December 22nd, 2025

The Honourable Todd McCarthy
Minister of Environment, Conservation and Parks

Re: Proposed Huron-Superior Conservation Authority

Dear Minister McCarthy,

After recent discussions I have had with local riding stakeholders and municipalities, I am writing to share concerns regarding particularly the creation of the proposed Huron-Superior Conservation Authority.

Conservation Authorities are responsible for protecting local communities, managing flood and erosion risks, and supporting healthy watersheds.

As you have shared with me, we must follow the science. It is in that spirit that I share with you that local efforts to ensure public safety, managing flood and erosion risks, and supporting healthy watersheds that drain specifically into Lake Huron, must be considered unique. A locally driven, watershed-based model ensures decisions reflect local conditions and community priorities, and I respectfully share with you that a Conservation Authority dedicated specifically to the shoreline of Lake Huron is necessary.

I am concerned that the proposed Huron-Superior Conservation Authority would combine Lake Huron watersheds with regions in north-western Ontario that face fundamentally different geographic, environmental, and socio-economic conditions. Watersheds feeding into Lake Huron bear little resemblance to those in the northwest, and applying a single regional governance model risks diluting the focus and expertise required to address local shoreline, floodplain, and agricultural impacts. I have also heard concerns that this consolidation would reduce municipal input and accountability, from a rural affairs perspective.

Conservation Authorities were founded on partnership, local watershed management, and collaboration between municipalities and the province. I encourage the Ministry of Environment, Conservation and Parks to continue to realize efficiencies, strengthen capacity and support local solutions that protect our local watersheds.

Sincerely,



Lisa Thompson
MPP Huron-Bruce

Cc: Huron Soil and Crop, Huron County Federation of Agriculture, Bruce County Federation of Agriculture.

Essex Region Conservation
the place for life

admin@erca.org
Phone 519-776-5209
Fax 519-776-8688
360 Fairview Avenue West
Suite 311, Essex, ON N8M 1Y6

Wednesday, November 19, 2025

Re: Resolution 90/25 (Bill 68 and ERO Posting 025-1257)

On October 31, 2025, the Ministry of Environment, Conservation and Parks (MECP) circulated a media release "Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities" outlining the intention to establish a new provincial board-governed agency to provide leadership, governance, and strategic direction to Conservation Authorities (CAs) across the province. You can view the Minister's media conference here. Conservation Authorities across the province only learned of the province's intention an hour before its announcement, meaning that this consolidation plan was developed in the absence of any consultation or discussion with those with decades of watershed knowledge and boots-on-the-ground experience.

On November 6, 2025, Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2) was introduced in the Ontario legislature and passed first reading. It is anticipated that second and third readings will occur in the next weeks, and the bill will be enacted in early December 2025. Schedule 3 of Bill 68 contains language to amend the Conservation Authorities Act with provisions for the creation of the *Ontario Provincial Conservation Agency* and outlines the objects, governance structure, funding model, etc. of this new agency.

On November 7, 2025, the MECP posted ERO #025-1257 Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities for a commenting period ending December 22, 2025. This proposal consolidates Ontario's 36 Conservation Authorities into just 7 regional conservation authorities.

Ontario's Conservation Authorities are watershed-based agencies (meaning that the boundaries have regard for geographic significance that may not adhere to municipal boundaries). A map depicting the new proposed regional conservation authorities clearly indicates the broad areas encompassed with these proposed changes, which far surpass local watershed-based areas.

The formation of regional Conservation Authorities may have significant impacts for a broad number of local stakeholders in all consolidated regions. No specific evidence-based analysis has been provided to necessitate or justify a larger, regional conservation authority or the need for a distinct and separate provincial agency providing oversight, that historically was the responsibility of a specific ministry. Not only will this consolidation result in exorbitant costs related to dissolution of 36 authorities, the development of, and migration to shared systems (IT, Finance, HR etc.), but it will add an additional layer of cost and complexity.

If the province is intending to proceed in a transparent fashion, then those boards and agencies (36 Conservation Authorities) currently engaged in integrated watershed management should participate in a fulsome consultation process, prior to this legislation proceeding to second and third readings. At this time, there is no consultation beyond the ERO, which is proposing boundaries for the new regional entities. There are serious concerns and many questions that have been asked and remain unanswered, including:

- the funding mechanism for the new provincial oversight agency.
- the new governance model and potentially inadequate local representation on a regional board.
- the merging of disparate policies, for distinctly different watersheds, into a "one-size-fits-all" policy framework, that could dilute and negate site-specific management approaches in favor of overarching policies that span diverse watersheds.
- the centralization of programs and services, which are currently customized and responsive to local needs, conditions, priorities and funding opportunities.
- the impacts on administrative and support staff and how "redeployment" will work, practically and logically.
- the impacts to the related charitable foundations, specifically those with narrow objects supporting their geographically limited conservation authority.
- the impact of dissolution on each of the applicable existing conservation authorities and implications under the Income Tax Act for authorities who are also registered charities.
- the ultimate transfer of assets such as property and other significant assets (infrastructure dams, dykes, power generation, etc.) currently owned by 36 autonomous bodies

Under the new proposed Lake Erie Region Conservation Authority, approximately 81 municipal parties could not hope to reasonably have a voice that the ERO posting attempts to describe, that being, "…under consolidation the new regional conservation authorities would remain independent organizations operating with municipal governance and oversight, in accordance with requirements under the Conservation Authorities Act…". It is a geographic impossibility that the interests of the Windsor-Essex-Pelee region would be of interest, concern or familiar to a land-locked geographical extent up to 300 kms distant.

ERCA currently has a Board of Directors comprised of 9 member municipalities represented by 19 elected officials (4 from our largest municipality, 2 from each of our county municipalities and 1 from the Township of Pelee). This local governance model ensures accountability and transparency to the local ratepayers and councils who fund the majority of the operational budget for the mandatory programs and services of the Essex Region Conservation Authority. If proposed governance maintains a similar calculation for regional representation, the ultimate board size would be completely unwieldy.

As the province moves forward with plans for amalgamation, we would like to see the province commit to:

- actual, full consultation with municipalities regarding funding both the Agency and the new potential regional conservation authority.
- maintaining a strong local voice that is both accountable to the ratepayer and able to provide transparent and timely responses to inquiries, applications and programs for this local watershed.

- maintaining local expertise that is knowledgeable and can implement programming at an appropriate watershed extent.
- maintaining local offices / branches to operate, reporting to a larger Regional office.
- clarity on the path forward for those conservation authorities with foundations.
- transparently providing actual costing of potential costs for amalgamation/consolidation.

Attached to this correspondence is a resolution passed by the ERCA Board of Directors at a meeting held November 13, 2025.

Stakeholders are encouraged to review the information provided in the links in this letter and provide comments through the posting ERO #025-1257 Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities, well in advance of the **closing date of December 22, 2025**.

Should you require further information, please contact me by email at admin@erca.org.

Regards,

Molly Allaire

Molly Allaire
Chair, Essex Region Conservation Authority

Attached: ERCA Board Resolution 90/25, November 13, 2025

CC: The Honourable Todd McCarthy, Minister of the Environment, Conservation and Parks
Andrew Dowie, MPP (Windsor-Tecumseh); Anthony Leardi MPP (Essex);
Hon. Trevor Jones MPP (Chatham-Kent-Leamington); Lisa Gretzky MPP (Windsor West)
Local Municipal Councils
Chief Nikki van Oirschot, Caldwell First Nation
Chief Leela Thomas, Walpole Island First Nation
Association of Municipalities of Ontario
Conservation Ontario
Conservation Authorities in Ontario
Local environmental groups and other stakeholders

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Phone 519-776-5209
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360 Fairview Avenue West
Suite 311, Essex, ON N8M 1Y6

Proposed New Ontario Provincial Conservation Agency

Resolution No. 90/25

Moved by Angelo Marignani
Seconded by Ryan McNamara

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the *Conservation Authorities Act*; and

WHEREAS under this proposal, the Essex Region Conservation Authority (ERCA) would be merged into a new "Lake Erie Regional Conservation Authority" together with the:

- Lower Thames Valley CA
- St. Clair Region CA
- Upper Thames River CA
- Kettle Creek CA
- Catfish Creek CA
- Long Point Region CA
- Grand River CA

forming a single organization stretching from Windsor, Essex County and Pelee Island, through north of Waterloo region; and

WHEREAS the Board acknowledges and supports the Province's goals of improved efficiency, consistency and fiscal prudence in conservation delivery, but finds that the proposed "Lake Erie Region" configuration would:

1. Create a geographically vast and administratively complex entity, joining northern, rural and fast-growing southern municipalities throughout the province with little shared watershed connection or economic alignment;

2. Dilute local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they affect;

3. Generate substantial transition costs — including human-resources integration, governance restructuring, IT migration and policy harmonization — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province's own business-planning principles of value for money, cost containment and service continuity; and,

4. Risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it harder for applicants to obtain timely local advice, resolve issues or expedite housing and infrastructure approvals that support the Province's "Get It Done" agenda; and

WHEREAS the ERCA has already undertaken significant modernization work aligned with provincial objectives, including:

- implementation of a digital permitting and inspection system that has reduced turnaround times;
- improvements in transparency and client communication;
- data and network systems, including security and redundancy
- numerous internal reviews to identify opportunities for cost savings and efficiencies
- conversion of redundant support and non-mandatory positions to front-line mandatory service positions

demonstrating that meaningful modernization can occur within the current watershed-based governance framework; and

WHEREAS the Board further recognizes that the Essex Region Conservation Authority serves Southwestern Ontario communities facing vastly different climatic, hydrological and infrastructure realities, with no single river running through the Essex region by itself defining the watershed and being surrounded on three sides by water, with topography that is prairie-like and subject to costal erosion and flood-prone areas, which would be ill-served by a larger overarching administrative structure extending over 300 kilometers to townships north of the Kitchener-Waterloo Guelph area;

THEREFORE BE IT RESOLVED THAT:

1. The Board of Directors does not support the proposed "Lake Erie Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257; and

2. The Board instead endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government's priorities of efficiency, red-tape reduction and timely housing delivery; and

3. The Board requests that the Ministry engage directly with affected municipalities and conservation authorities across Southwestern Ontario most specifically, the Windsor-Essex and Pelee Island municipalities before finalizing any consolidation boundaries or legislative amendments; and

4. That this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:

    - the Minister of the Environment, Conservation and Parks and his Opposition critics;

- local Members of Provincial Parliament;
- local Municipal Councils
- the Association of Municipalities of Ontario and Conservation Ontario;
- local First Nations
- local environmental groups and other stakeholders, and
- all Conservation Authorities in Ontario

- **CARRIED**

I, Nicole Kupnicki, Manager, Human Resources & Council Services of the Essex Region Conservation Authority, do hereby certify this to be a true and complete copy of Resolution No. 90/25, passed by the Essex Region Conservation Authority Meeting of the Board of Directors on the 13th day of November, 2025.

DATED at Essex, Ontario
this 14th day of November, 2025. Nicole Kupnicki

Quinte CONSERVATION

2061 OLD HIGHWAY 2, RR#2, BELLEVILLE, ON, K8N 4Z2
PHONE: (613) 968-3434 • FAX: (613) 968-8240
www.quinteconservation.ca

December 19, 2025

SENT ELECTRONICALLY

RE: Quinte Conservation Board of Directors position on the regional consolidation of Ontario's 36 Conservation Authorities

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Dear Minister McCarthy,

Please be advised that the following resolution QC-25-92 was passed at the Quinte Conservation Authority Regular Board Meeting held on December 18, 2025:

WHEREAS the Ministry of the Environment, Conservation and Parks have posted Environmental Registry Notice No. 025-1257 (Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the Conservation Authorities Act; and

WHEREAS under this consolidation proposal, the Quinte Conservation (QC) would be merged into a new "Eastern Lake Ontario Regional Conservation Authority" together with Central Lake Ontario CA, Kawartha Region CA, Otonobee Region CA, Ganaraska Region CA, Lower Trent Region CA, Crowe Valley CA and forming a single organization stretching from Oshawa, Kawartha Lakes, Hastings County, Tyendinaga Mohawk Territory and areas within Lennox & Addington; and

WHEREAS QC, in 1994 amalgamated the Napanee Region Conservation Authority, Moira River Conservation Authority and Prince Edward Region Conservation Authority forming a 6000 square kilometer jurisdiction to provide integrated services for 18 municipalities, including flood forecasting, planning and regulations, communications, education, stewardship, source water protection and enabling services that are fully supported by our municipal partners; and

WHEREAS the QC Board of Directors acknowledges and supports the province's goals of improved efficiency of watershed management, through the implementation of digital applications and permitting system, consistent policies, flood standards, fees, and technology

but find the proposed "Eastern Lake Ontario Regional Conservation Authority" configuration would:

1. Create a geographically vast and administratively complex entity, joining northern, rural and fast-growing south-eastern municipalities through the province with little shared watershed connection or economic alignment;

2. Dilute or eliminate the local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they serve;

3. Generate substantial transition expenses – including Human Resources, governance restructuring, IT migration and policy harmonization, that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the province's own business planning principle of "value for money, cost containment and service continuity"; and

4. Risk greater uncertainty and delay for developers, builders and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it more difficult for applicants to obtain timely local advice, resolve condition issues or expedite housing and infrastructure approvals that support the province's "Build Faster" agenda; and

WHEREAS consistent policies, and resources across the existing conservation authorities' boundaries could be achieved through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks or Conservation Ontario; and

WHEREAS conservation authorities are locally based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks to lives and property. In the case of QC, this vision has proved a successful model for over 75 years; and

WHEREAS QC, in 1994 amalgamated the Napanee Region Conservation Authority, Moira River Conservation Authority and Prince Edward Region Conservation Authority forming a 6000 square kilometer jurisdiction to provide integrated services for 18 municipalities, including flood forecasting, planning and regulations, communications, education, stewardship, source water protection and enabling services that are fully supported by our municipal partners; and

WHEREAS QC, with the guidance and support of our 18 member municipalities, demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. QC has successfully leveraged funding to support programs and services that are locally important and are driven by community engagement through QC's Strategic Plan and our Asset Management Plans; and

WHEREAS conservation authorities across the province operate efficiently by working in close partnership with member municipalities. This structure enables resources to be directed toward on-the-ground initiatives that advance our mandate while addressing local community needs, achieving an effective balance in scale, management and service delivery; and

WHEREAS being front-line means being responsive and accountable to the community by delivering the services that are essential and valued to the best interest of the community. The front line of provincial priorities on housing, the economy, infrastructure, and climate resilience are in the decisions between municipalities working together to address issues around floodplain (and hazard) protection and resilient upland and landscape management. Further, our staff and Board are responsive and accountable to the needs of the watershed community, while meeting or exceeding provincial service standards. Our staff and Board are reachable through publicly available contact information. Local governance and direction combined with local service provision allows QC to continue to be responsive to our community; and

WHEREAS the QC Board of Directors recognizes that the staff of QC serves a multitude of Eastern Ontario communities facing vastly different climatic, hydrological and infrastructure realities, and being surrounded by the Bay of Quinte, Lake Ontario and a number of local lakes, with properties subject to coastal erosion and flood-prone areas, which would be ill-served by a larger overarching administrative structure extending over more than 16,000 square kilometres;

THEREFORE, BE IT RESOLVED:

THAT, the Quinte Conservation Board of Directors does not support the proposed "Eastern Lake Ontario Regional Conservation Authority" boundary configuration as outlined in Environmental Registry Notice 025-1257; and

THAT, meaningful modernization can occur within the current watershed-based governance framework; and

THAT, the QC Board of Directors endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government's priorities of efficiency, red-tape reduction and timely home construction; and

THAT, the Board asks that the Ministry of the Environment, Conservation and Parks engage directly with affected municipalities and conservation authorities across Eastern Ontario before finalizing any consolidation boundaries or legislative amendments; and

THAT, a forthcoming ERO response at the approval of the QC Board of Directors be forwarded to the Environmental Registry of Ontario consultations; and

FURTHER THAT, a letter from the Chair containing this resolution, and ERO response, be forwarded to:

-Minister Todd McCarthy, Ministry of the Environment, Conservation and Parks; and
-Ministry of the Environment, Conservation and Parks (CA Office); and
-Hassan Basit, OPCA Chief Conservation Executive; and
-MPP Tyler Allsopp (Bay of Quinte); and
-MPP Ric Bresee (Hastings-Lennox and Addington); and
-MPP John Jordan (Lanark-Frontenac-Kingston); and
-Warden Bob Mullins, Hastings County
-Warden Nathan Townsend, Lennox and Addington
-Warden Gerry Lichty, North Frontenac
-Mayor Steve Ferguson, Corporation of Prince Edward County
-Association of Municipalities of Ontario; and
-Rural Ontario Municipal Association; and
-Conservation Ontario;
- All 36 Conservation Authorities in Ontario; and
-18 local municipalities within Quinte Conservation.

CARRIED - UNANIMOUSLY

Thank you for the opportunity to engage in this discussion and provide constructive feedback and advocacy on this matter.

Sincerely,

Don Kuntze
Chair
Quinte Conservation Board of Directors

Janice Maynard
Vice - Chair
Quinte Conservation Board of Directors

Cc:
Ministry of Environment, Conservation and Parks (CA Office)
Hassan Basit, Chief Conservation Executive (Ontario Provincial Conservation Agency)
MPP Tyler Allsopp (Bay of Quinte)
MPP Ric Bresee (Hastings-Lennox and Addington)
MPP John Jordan (Lanark-Frontenac-Kingston)
Warden Bob Mullins, Hastings County
Warden Nathan Townsend, Lennox and Addington
Warden Gerry Lichty, North Frontenac
Mayor Steve Ferguson, Corporation of Prince Edward County
Association of Municipalities of Ontario
Rural Ontario Municipal Association
Conservation Ontario
36 individual Conservation Authorities in Ontario
18 local watershed municipalities within Quinte Conservation

From: [redacted]
To: [redacted]

Subject: ERO #025-1257
Date: December 10, 2025 8:26:19 AM

**[CAUTION]: This email originated from outside of the organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

Actually - this concerns ALL of us. Including whoever is reading this and whoever is working in that office. My Mum and I regularly drive all the backroads that we can find and are so distressed with the lack of protection of our beautiful lands that are disappearing under developments. The land we need to protect our food resources for the country not just the province and the land we need to preserve all of our natural resources including watersheds and our wildlife.

The idea to combine what IS protected into some kind of larger authority where things will slip through the cracks and where the borders of these conservation areas could be at risk (see Caledon Swan Lake) is a terrible one and our household is completely against it. I may not be completely in the know of all the details but I do know that this province is cutting corners.

The Conservation Authorities that are already in place are doing a wonderful job and know their specific regions in and out.

This is a huge province. Have you ever driven top to bottom (where it's even possible since it's so vast you can't even get to a chunk of it - for now a anyway - if Ford has his way I'm sure most of it will get mowed down eventually) - have you ever driven fully across it!? I have. From our border with MB it took 24 hours just to Mississauga. You can get to Florida in the same amount of time. Not that anyone is going there anymore nor should they, I'm just pointing out the vastness of this province.

Seven Authorities will never cut it with the work that needs doing and that the thirty six are currently doing. The getting down on the ground with the children and teaching them why it needs protecting. The trails that need maintaining. The buildings that hold the educational areas etc etc etc. (They do so much I can't even list it all - things the majority of us take for granted)

You might think (not the person reading this but the people whose idea this was) that this is going to save money. Hm. How well have any of the changes the province has made worked for our healthcare system? Will it end up privatised and owned by rich people and end up being only for the rich? Will you outsource everything and it cost us taxpayers more then deem it not financially feasible and make cuts later on so that things can be shut down leaving these vulnerable areas at risk?

These conservation areas are for the people of this province. Including you. Protect them at all costs. Don't let all the work done over the year get lost by greed and dumb ideas.

Protect and keep the 36.

I've cc'd all the Authorities that I could find emails for. Thank you for all you do. Thank you to everyone behind the scenes that are taken for granted. Please let me know what else I can do in this fight for our beautiful province and all of its regions.

I've also sent this to my local MPP. Please hear our voices. Some people in the suburbs don't leave these developed areas and have no idea what is at risk for their children's future who may want to enjoy and learn and even work in these areas. Protect our Greenbelts and protect our 36 Conservation Authorities.

Regards,

Simone Tranter (and my Mum)

Long Point Region Conservation Authority

Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO#025-1257)

Submission: Written Submission

Organization Name: Long Point Region Conservation Authority

Date: Thursday, December 18, 2025

Address: 4 Elm Street, Tillsonburg, ON N4G 0C4

Email Address: jmaxwell@lprca.on.ca

Phone Number: 519-842-4242

ERO Submission: LPRCA Response to ERO Posting #025-1257

Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

Long Point Region Conservation Authority (LPRCA) appreciates the opportunity to comment on Ontario's proposal to consolidate 36 Conservation Authorities (CAs) into seven Regional Conservation Authorities (RCAs). This submission provides feedback intended to encourage sound policy development, protect public interest, and ensure effective watershed management.

The Long Point Region Conservation Authority Board of Directors does not support the Regional Conservation Authority consolidation proposal outlined in the Environmental Registry of Ontario notice. LPRCA maintains that the proposed RCA boundaries are far too large to sustain the effective, locally responsive services and programs that conservation authorities currently deliver. The scale of the proposed RCAs would reduce local autonomy, dilute, or eliminate the voices of rural municipalities, and increase financial pressures. To date, insufficient evidence has been provided to demonstrate that the proposed consolidations would result in more effective or cost-efficient program delivery. In the absence of a comprehensive cost-benefit analysis and meaningful consultation with municipalities and CAs, the proposed approach risks slowing approval processes and undermining informed, locally driven decision-making.

Before proceeding with consolidation, the Province is encouraged to fully evaluate whether modernization goals could be achieved through the new Ontario Provincial Conservation Agency (OPCA), without restructuring the existing CA framework.

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1. **What do you see as key factors to support a successful transition and outcome of regional CA consolidation?**

LPRCA notes that any successful transition to a regional conservation authority model must have the support of those who established and fund CAs (member municipalities), provincial government, those responsible for CA governance (Boards of Directors), and the staff who deliver programs locally. Such support is most effectively cultivated through locally driven consultation rather than through top-down directives.

LPRCA recommends that the Province pursue its modernization objectives within the existing CA framework by leveraging legislative and regulatory amendments, technological improvements, and enhanced compliance verification.

2. **What opportunities or benefits may come from a regional CA framework?**

In analyzing the potential opportunities or benefits that may come from a regional CA framework, it is also important to note the potential disadvantages that may come from a regional CA framework. Listed below are the pros (advantages) and cons (disadvantages):

Pros:

- A single digital permitting system, province-wide permit performance standards, and updated floodplain maps
- Standardized permitting policies, permitting fees, and levels of staffing
- Standardized HR and administrative policies and procedures
- Potential overhead/administration efficiencies in a centralized support environment
- Modernization of software such as electronic digital retention management systems for CAs that don't have the capacity

Cons:

- No evidence has been provided that the benefits of the RCA will outweigh the costs for member municipalities
- Standardized permitting policies minimizes the local challenges of each individual watershed as many CAs face similar issues; however, there is also unique geographic/landscape issues related to permitting and floods & natural hazards within each CA
- Standardized permitting fees could substantially increase fees for permit applicants
- Local knowledge/staffing will be lost through streamlining and centralization
- Increased upfront levies to member municipalities to implement the regional consolidation and if efficiencies are not realized and in addition of the OPCA levying CAs (indirect tax) could potentially lead to long-term increased municipal levies for member municipalities
- Standardizing RCA logo's, signage, vehicle fleets will be costly to implement
- CAs in a healthy financial position with low dependence on municipal levies will be penalized upon consolidation to subsidize CAs with a higher dependence on municipal levies
- Reorganizational structure costs are inevitable, and the financial impact should not be transferred to the member municipalities as this consolidation is driven by the Province

The proposal for a regional conservation authority framework has prompted discussion around the existing deficiencies within the current CA system. However, these challenges can be effectively addressed through targeted provincial investment to enhance and standardize tools such as flood hazard mapping, technical guides, and regulation mapping. Additionally, the Province could continue to update policies and standards to better align with its objectives.

LPRCA does not believe that the proposed regional CA framework would provide any opportunities or benefits that cannot already be achieved within the existing CA structure.

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3. **Do you have suggestions for how governance could be structured at the regional CA level, including suggestions around board size, make-up and the municipal representative appointment process?**

There is no governance model or structure within the proposed regional conservation authority framework that would ensure adequate municipal representation for all member municipalities that would be funding the RCA. The proposed structure would also disproportionately affect rural municipalities by diluting or eliminating their representation and voices in favour of larger urban centres. Given the extensive geographic scale of the proposed RCA, competing priorities among watersheds are inevitable. Without direct municipal representation from smaller watershed communities, the programs and services in those areas would be placed at significant risk.

The Ontario Provincial Conservation Agency authority, scope and limits need to be clarified, and the governance model must define the decisions reserved for the RCA board.

---

4. **Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional CA?**

The current budgeting process under O. Reg 402/22: Budget and Apportionment is transparent and consultative under the current 36 local CA model. Under the proposed RCA consolidation model, the local input, transparency, consultation and representation will be lost due to the sheer size of the proposed RCA.

A system that would support the proposed RCA could be created, but at what price?

There is no sufficient system that would allow transparency and genuine consultation with municipal funders under the proposed RCA with 81 municipalities given the geographic scale.

---

5. **How can regional CAs maintain and strengthen relationships with local communities and stakeholders?**

To maintain and strengthen relationships with local communities and stakeholders, an organization must maintain a local presence through local offices and staff to provide timely permitting, program delivery, operations, community engagement and effective stewardship. Flood forecasting and warning systems are critical public safety functions that must not be disrupted and needs to include local knowledge of the land. LPRCA provides recreational opportunities for the public. Any centralization or asset disposition would jeopardize public benefit, as decisions made at a regional or provincial level may not reflect local community needs or priorities. LPRCA has a community committee that was established as a condition of a land donation that provides valuable local input into the management of the land. These unique types of relationships need to be considered in any new governance model.

The Province should engage in constructive and transparent consultation with CAs and municipalities who established, fund and govern their local CAs before proposing changes that will continue to levy for the proposed RCA and the OPCA all while reducing local municipal input/representation, governance and control.

Many local residents have left significant financial and property assets to LPRCA with the intention of preserving and continuing works at the local level. Many of these have been left in legacy through property names, signage, galleries, and park additions. How will these property and legacy assets be protected through the RCA process? This transition will erode public trust if not properly managed. Continuation of these types of donations is put at risk due to local connection being lost.

TOWNSHIP OF O'CONNOR

330 Highway 595, R.R. #1, Kakabeka Falls, Ontario P0T 1W0
Tel. (807) 476-1451 Fax (807) 473-0891
E-Mail - twpoconn@tbaytel.net www.oconnortownship.ca

Mayor
Jim Vezina

Clerk-Treasurer
Lorna Buob

Councillors
Alex Crane
Brendan Rea
John Sobolta
Carly Torkkeli

November 26, 2025

Honourable Todd McCarthy
Minister of the Environment, Conservation and Parks
Macdonald Block Mailing Facility
77 Wellesley St W, 11th Fl
Toronto, ON
M7A 1N3 minister.mepc@ontario.ca

Dear Minister McCarthy:

Council, at their meeting held on November 24, 2025, passed a resolution calling on the Government of Ontario to maintain local, independent, municipally governed, water-shed conservation authorities. The Township of O'Connor is opposed to the proposed Huron-Superior Regional Conservation Authority boundary configuration outlined in the Environmental Registry Notice 025-1257.

I have enclosed a copy of the resolution for your consideration and trust you will give it your full consideration and support.

Yours truly

Lorna Buob
Clerk-Treasurer

Encl.

Cc: Kevin Holland, MPP – Thunder Bay – Atikokan kevin.holland@pc.ola.gc
Lise Vaugeois, MPP, Thunder Bay – Superior North LVaugeois-QP@ndp.on.ca
Marcus Powlowski, MP – Thunder Bay – Rainy River marcus.powlowski@parl.gc.ca
Hon. Patty Hajdu – MP Thunder Bay – Superior North patty.hajdu@parl.gc.ca
Association of Municipalities of Ontario amo@amo.on.ca
Conservation Ontario bfox@conservationontario.ca
Lakehead Region Conservation Authority tammy@lakeheadca.com
All local municipalities
All Conservation Authorities in Ontario

TOWNSHIP OF O'CONNOR
R. R. #1 KAKABEKA FALLS, ONTARIO POT 1W0

NOVEMBER 24, 2025 NO. 10

Moved by J. Sobolta

Seconded by C. Torkkeli

WHEREAS the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses;

AND WHEREAS the municipalities within Lakehead Region established the Neebing Valley Conservation Authority in 1954 which enlarged to the Lakehead Region Conservation Authority (LRCA) in 1963;

AND WHEREAS local municipalities currently provide approximately 50% of total conservation authority funding, while the Province of Ontario provides approximately 5%;

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of hectares of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities;

AND WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks;

NOW THEREFORE BE IT RESOLVED THAT the Township of O'Connor calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND THAT while the supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure

without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND THAT the Township of O'Connor supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives;

AND THAT the Township of O'Connor is opposed to the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257;

AND THAT the Township of O'Connor recommends that the Lakehead Region Conservation Authority form the "Northwestern Ontario Regional Conservation Authority";

AND THAT the Ministry engage directly with affected municipalities of the Lakehead Region Conservation Authority, before finalizing any consolidation boundaries or legislative amendments;

AND THAT a copy of this resolution be forwarded to the Environmental Registry of Ontario consultations and to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics;
- local Members of Provincial Parliament;
- local Members of Parliament;
- the Association of Municipalities of Ontario;
- Conservation Ontario;
- All local municipalities; and
- All Conservation Authorities in Ontario.

J. Vezina
MAYOR

CERTIFIED TRUE COPY
TOWNSHIP OF O'CONNOR

☒ CARRIED ☐ DEFEATED

RECORDED VOTE

Lora Bueti
CLERK-TREASURER

ALEX CRANE	☐	CARLY TORKKELI	☐
BRENDAN REA	☐	JIM VEZINA	☐
JOHN SOBOLTA	☐		

LAKEHEAD REGION
CONSERVATION AUTHORITY

130 Conservation Road, PO Box 10427
Thunder Bay, ON P7B 6T8
Phone: (807) 344-5857 | Fax: (807) 345-9156

November 27, 2025

Re: Proposed Regional Consolidation of Conservation Authorities, ERO Notice #025-1257
Lakehead Region Conservation Authority Resolution #130/25

With the passing of Bill 68 on November 25, 2025, the Province of Ontario has established a new oversight body called the "Ontario Provincial Conservation Agency" (OPCA) to oversee Conservation Authorities (CAs) and the transition to a regional watershed-based framework for CAs in Ontario.

At the November 26, 2025 Lakehead Region Conservation Authority (LRCA) Board Meeting, the LRCA Board of Directors passed a resolution opposing the Province's proposed "Huron-Superior Regional Conservation Authority" boundary configuration as outlined in Environmental Registry Notice 025-1257, which proposes to consolidate the LRCA into a region 1,500 kilometres from the Lakehead Watershed with 72 other southern Ontario municipalities. The resolution also recommends that the LRCA form a stand alone independent Regional Conservation Authority, as the "Northwestern Ontario Regional Conservation Authority" to ensure that the interests of Northwestern Ontario are equitably represented. Additionally, the Board is also requesting that the Ministry engage directly with affected municipalities of the LRCA before finalizing any consolidation boundaries.

The Board of Directors acknowledges the Province's goals in amalgamating conservation authorities; however, strongly believes that the LRCA is unique both in location and the region that it serves and therefore should not be amalgamated with conservation authorities with no watershed or municipal connection.

LRCA Resolution #130/25 has been attached. The LRCA encourages all partners to review the posting https://ero.ontario.ca/notice/025-1257 and submit comments prior to the closing date of December 22, 2025.

For further information, please contact the undersigned at info@lakeheadca.com.

Yours truly,

Donna Blunt

Donna Blunt
Chair

Encl.: LRCA Board Resolution #130/25

c.c.:

Hon.Todd McCarthy, Minister of the Environment, Conservation and Parks
Peter Tabuns, MPP. Critic, Environment, Conservation and Parks
Kevin Holland, MPP, Thunder Bay – Atikokan
Lise Vaugoeis, MPP, Thunder Bay- Superior North
Marcus Powlowski, MP – Thunder Bay – Rainy River
Hon. Patty Hajdu – MP Thunder Bay – Superior North
Association of Municipalities of Ontario
Conservation Ontario
All local municipalities
All Conservation Authorities in Ontario

LRCA Resolution #130/25 Moved by: Sheelagh Hendrick
Seconded by: Brian Kurikka

With Respect to the posting by the Ministry of the Environment, Conservation and Parks Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the Conservation Authorities Act;

***AND THAT** under this proposal, the Lakehead Region Conservation Authority (LRCA) would be merged into a new "Huron-Superior Regional Conservation Authority" together with:*

- *Grey Sauble Conservation*
- *the Saugeen Valley Conservation Authority*
- *the Maitland Valley Conservation Authority*
- *the Ausable Bayfield Conservation Authority*
- *the Nottawasaga Valley Conservation Authority*
- *the Lake Simcoe Region Conservation Authority*

forming a single organization encompassing the eastern shores of Lake Huron, the southern shores of Georgian Bay, Lake Simcoe, and the western shores of Lake Superior in Northwestern Ontario;

***AND THAT** the LRCA Board acknowledges and supports the Province's goals of improved efficiency, consistency and fiscal prudence in conservation delivery,*

***AND THAT** the Lakehead Region Conservation Authority is a self-sufficient entity that is; accountable to its member municipalities;*

- *financially resilient;*
- *consistently processes permits in less than 7 days;*
- *operates in the City of Thunder Bay that has exceeded their housing target by 143%;*
- *has modern financial and IT processes that prioritize security and redundancy; and*
- *is a locally recognized leader in the conservation and protection of the Lakehead Watershed; and*
- *all staff are front line workers,*

***AND THAT** the Board further recognizes that the Lakehead Region Conservation Authority is unique as it does not abut any other Conservation Authority and solely serves Northwestern Ontario communities that face vastly different climatic, hydrological, geographic and infrastructure realities, and would be disconnected to the proposed larger overarching*

administrative structure that is physically based 1,500 kilometres from the north with 72 other municipalities;

The Board finds that the proposed "Huron-Superior Region" configuration would :

- *Create a geographically vast and administratively complex entity, joining Northwestern Ontario with fast-growing Southern Ontario municipalities that are 1,300-1,500 kilometres apart with no shared watershed connection or economic alignment;*
- *dilute local accountability and municipal partnership, contrary to the principle that decisions are best made at the local level;*
- *generate substantial transition costs — including human-resources integration, governance restructuring, IT migration and policy harmonization, rebranding — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province's business-planning principles of value for money, cost containment and service continuity; and*
- *risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with local conditions are replaced by distant regional structures, making it harder for applicants to obtain timely local advice, resolve issues or expedite housing and infrastructure approvals that support the Province's "Get It Done" agenda;*

THEREFORE BE IT RESOLVED THAT:

The Board of Directors is opposed to the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257;

***AND THAT** the Board recommends that the Lakehead Region Conservation Authority form the 8th Regional Conservation Authority as the "Northwestern Ontario Regional Conservation Authority";*

***AND THAT** further provincial evaluation is conducted with a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government's priorities of efficiency, red-tape reduction and timely housing delivery;*

***AND THAT** the Ministry engage directly with affected municipalities of the Lakehead Region Conservation Authority, before finalizing any consolidation boundaries or legislative amendments;*

***AND THAT** this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:*

- *the Minister of the Environment, Conservation and Parks and his Opposition critics;*
- *local Members of Provincial Parliament;*
- *local Members of Parliament;*
- *the Association of Municipalities of Ontario;*
- *Conservation Ontario;*
- *All local municipalities; and*
- *All Conservation Authorities in Ontario.*

Carried

LSRCA Board of Directors' Resolution No. BOD-117-25 – December 19, 2025

BOD-117-25 **Whereas** the Provincial Government has amended the *Conservation Authorities Act* through Bill 68 "Plan to Protect Ontario (Budget Measures)" that allows for establishing the Ontario Provincial Conservation Agency to oversee the transition to Regional Conservation Authorities, and direct the strategic direction, finances, and operational activities of the new Regional Conservation Authorities; and

Whereas the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to consolidate Ontario's 36 conservation authorities into 7 regional entities as part of a broader consolidation; and

Whereas under this proposal, the Lake Simcoe Region Conservation Authority would be consolidated into a new "Huron-Superior Regional Conservation Authority", together with the Nottawasaga Valley Conservation Authority, Grey Sauble Conservation Authority, Saugeen Valley Conservation Authority, Maitland Valley Conservation Authority, Ausable Bayfield Conservation Authority, and Lakehead Region Conservation Authority, forming a single organization of Lake Huron watershed conservation authorities.

Therefore, be it Resolved That Staff Report No. 40-25-BOD regarding Lake Simcoe Region Conservation Authority's Environmental Registry of Ontario response to proposed consolidation of Conservation Authorities be received; and

Further that the Attachment A, the Lake Simcoe Region Conservation Authority's comments letter, be approved as amended for submission by the December 22, 2025 deadline for submissions; and

Further That the Lake Simcoe Region Conservation Authority recognizes and supports the Province's desired outcome of improved consistency and modernized digital permitting processes, aligned with its goals and objectives for cutting red tape and getting more homes built faster, and safely; and

Further That the Lake Simcoe Region Conservation Authority recommends that the Province engages in detailed consultation with all conservation authorities, municipalities, and watershed stakeholders in a meaningful manner and provide the detailed information required to implement such a significant undertaking; and

Further That should the proposed regional consolidation of conservation authorities be implemented, the current implementation of the *Lake Simcoe Protection Act* and Plan by the Lake Simcoe Region Conservation Authority be transferred to the proposed Huron-Superior Region Conservation Authority; and

Further That should the proposed consolidation proceed, the Lake Simcoe Region Conservation Authority requests the Province establish consistency between the *Lake Simcoe Protection Act*

jurisdiction and the Lake Simcoe Region Conservation Authority jurisdiction through the inclusion of Upper Talbot River Arm and the portion of the City of Orillia that is within the Lake Simcoe watershed; and

Further That in order to achieve the stated goals of consistency through consolidation and elimination of duplication of efforts, consideration be given to requests from municipalities regarding municipal boundaries when determining membership in individual conservation authorities; and

Further That should the proposed consolidation proceed, consideration be given to the consolidation of Lake Simcoe Region Conservation Authority, Nottawasaga Valley Conservation Authority, and Grey Sauble Conservation Authority to be called the Lake Simcoe Georgian Bay Regional Conservation Authority; and

Further That the Lake Simcoe Region Conservation Authority recommends the removal of the Lakehead Region Conservation Authority from the proposed Huron-Superior Regional Conservation Authority. **Carried**

December 22, 2025

Via email to ca.office@ontario.ca

MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON
K9J 3C7

Dear Minister McCarthy and Chief Conservation Officer Basit:

Environmental Registry Ontario Posting No. 025-1257
Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Thank you for the opportunity to provide comments on ERO No. 025-1257 regarding the proposed boundaries for the regional consolidation of Ontario's conservation authorities.

The Lake Simcoe Region Conservation Authority (LSRCA) shares the Province of Ontario's vision for improving service delivery, increased efficiencies, improved governance while committing to working collaboratively to achieve mutually desired outcomes. At the same time, we recognize that achieving these outcomes will require careful planning, clear direction, and significant coordination to address the many operational, financial, and governance considerations involved.

The following feedback regarding the questions posed in ERO No. 025-1257 is the culmination of thorough consideration of the Province's proposal and meaningful consultation with senior staff and our Board of Directors. This collaborative approach reflects our commitment in ensuring that practical implementation challenges are addressed.

1. What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?

To identify key factors for a successful transition, we considered both the strategic and operational requirements necessary to achieve the proposed objectives. Our feedback reflects practical insights to ensure that these recommendations are grounded in experience and informed by governance best practices.

Provincial Direction and Leadership

- Early, consistent provincial guidance on mandate, expectations, governance structure, and transition objectives.

- Clear understanding of the operational role the Ontario Provincial Conservation Agency (OPCA) provides for existing conservation authorities and proposed Regional Conservation Authorities (RCA).

Governance Structure and Transition Planning

- Designated and/or established leadership teams are critical for success.
- Clearly defined roles and responsibilities for leadership teams with shared vision and defined decision-making authority.
- Province-wide transition plan with clear sequencing of milestones.
- Regional transition Board comprised of representatives from each of the existing conservation authorities within each respective RCA. This transition board may act as the bridge between the existing Boards, RCA leadership team, and the OPCA.
- Robust change management and communication strategies for staff, partners, municipalities, and the public.

Organizational Understanding and Integration

- Early assessment of organizational structures, staff complement, and technical capacities. Each conservation authority offers a range of skills and depth that needs to be fully evaluated and emboldened ensuring successful implementation.
- Harmonization of human resources policies, job descriptions, benefits, health and safety programs, and work arrangements.
- Salary grids, permitting and planning fee structures, and other related financial aspects need to be evaluated and measured within the local and regional cost of living and affordability considerations.
- Integration of information technology systems, financial platforms, and cybersecurity measures. Clear understanding of short- and long-term requirements and transition needs.

RCAs and Source Protection

- Harmonization of RCA and Source Water Protection (SWP) boundaries and programs should be considered through the proposed consolidation process with clear understanding of challenges and opportunities.
- The South Georgina Bay – Lake Simcoe SWP region poses a unique challenge as a large portion of this region is not included in any conservation authority boundary.

Financial Strategy and Transparency

- Clear approach to transition financing, levy impacts, and reserve treatment, and assets.
- Funding for transition costs.
- Provincial co-funding to ensure equitable governance.

Understanding Local and Regional Priorities, Issues and Opportunities

- Developing a thorough understanding of local and watershed issues, priorities and opportunities is critical.
- Understanding the local issues, priorities and opportunities will allow for the development of a full understanding of what may be consolidated into, or is consistent with, a regional focus.
- Ignorance of local concerns, issues or voices can easily create distrust, lack of participation, conflict, and lack of stakeholder or municipal support.

2. What opportunities or benefits may come from a regional conservation authority framework?

In considering the opportunities and benefits of regional consolidation, we focused on how a unified framework could enhance governance, capacity, and service delivery. The following points highlight the potential for improved efficiency, stronger partnerships, and long-term strategic alignment.

Consistent and Transparent Governance

- A standardized upper-tier governance model will improve transparency, oversight, and strategic decision-making across watersheds. We encourage the province to consider amending the *Conservation Authorities Act* to designate the Counties as the member in the RCAs. For example, this proposed governance model would effectively change the proposed Huron-Superior RCA from approximately 80 municipalities to 15. This model proposes that counties, separated cities, and regional municipalities are the RCA members. This creates a stronger peer-to-peer relationship and greatly assists in efficient budget process for the RCA, while reducing the workload at the lower tier municipal level.
- Reduced complexity for municipal partners through fewer conservation authorities, less duplication, and more consistent policy direction.
- Opportunities may exist to expand RCA jurisdiction into areas not currently within the jurisdiction of an existing conservation authority or RCA.

Enhanced Regional Capacity and Leadership

- Greater ability to attract, retain, and coordinate senior leadership and technical expertise.
- Strengthened relationships with provincial and federal partners through a unified structure.

Strategic and Long-Term Planning Benefits

- Region-wide alignment of priorities and watershed strategies and opportunities for merging of locally driven issues or priorities.

- Improved ability to measure and report outcomes consistently across larger geographies. In the context of the proposed Huron-Superior RCA, an example of this is broader linkage to the Lake Huron and the Great Lakes programs.
- Consistent service standards and delivery.

Economies of Scale and Innovation

- Shared investments in technology and modernization. Examples may include LIDAR, software licensing, records management, asset management, and flood warning.
- Capacity-building programs and knowledge transfer opportunities across the RCA.
- Stronger relationships with larger NGOs and stakeholder groups. As an example, a regional task force with the land development and housing industry could focus on best practices, solutions transfer across the RCA, develop consistent technical standards, and much more.
- Larger potential target audience for foundations and fundraising initiatives to raise funds for both locally focused and regional programs.

Expansion of Conservation Authority Jurisdiction

- The RCA framework may allow for future expansion of conservation authority jurisdiction within Ontario. An example would be expansion from Lake Simcoe through to Georgian Bay, allowing for recognized connection to Lake Huron.

3. Do you have suggestions for how governance could be structured at the regional conservation authority level?

In developing recommendations for governance structure, we considered models that balance representation, transparency, and efficiency. Our prompts focus on ensuring fair municipal representation and strong decision-making capacity within a regional framework.

Board Composition

- Municipal composition and representation are an absolute must. We recommend a board composition of 12 - 20 members representing the member municipalities.
- Consideration of staggered terms for board members to ensure a level of consistency over time.
- One Board chair and two Vice-Chairs with specific term limits and recommend a requirement that each of those positions must come from different primary watersheds within the region (eg. Saugeen, Lake Simcoe, Maitland).

Fairness and Transparency

- Mechanisms to ensure balanced geographic representation and prevent voting blocs.
- Clear communication protocols between regional boards and participating municipalities.

Budget Equity Representation

- The proposed Huron-Superior RCA represents a large region with significant differences in size and economic stature of member municipalities. A clearly defined system for voting regarding budget that reflects the scale of the member municipalities must be implemented similar in construct to what is currently prescribed for conservation authorities.

Clarify OPCA's Governance and Oversight

- Detailed clarity is required to fully understand the relationship of the OPCA's oversight of the RCAs, as well as its role as the agent for the government.
- Representation from across the seven proposed RCAs is encouraged.
- Clarity of reporting structure for CAO/CEOs of the RCAs under the OPCA is required.

4. Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities?

Our feedback emphasizes the importance of transparency and consistency to maintain trust among member municipalities and for local ratepayers. These recommendations aim to ensure clarity in levy amounts, equitable cost-sharing, and strong provincial support for transition funding.

OPCA / Provincial Expectations

- Consistent provincial co-funding to support equitable governance and reduce municipal concerns over subsidizing provincial responsibilities.
- Strong financial and technical support for financial transition is a must.
- The province is strongly encouraged to work with the RCAs to provide detailed clarity and timeframes for all finance and budgeting expectations.
- Timely information that supports RCA budgeting processes such as apportionment is a must. Clarity around apportionment is also a must as it evolves, as there is the potential for apportionment values to increase/decrease for municipalities based on RCA composition and other factors.

Unified Budget Framework

- A single, region-wide budgeting framework with standardized assumptions, timelines, and reporting expectations.
- Regional budget oversight led by a central finance team with significant input across all local operational areas and program areas.

Transparency Measures

- Regular financial reporting at the regional level to all participating municipalities. This may include, as example, a detailed budget companion document indicating revenue and expenditure across all program areas and be expanded to provide local focus.
- During the financial transition, also ensure detailed reporting and transparency to all municipalities within the RCA (participating or not).
- Clear communication on levy requirements and benefit apportionment for all Category 1 programs and services.
- Establish clear expectations and guidelines for developing budgets and agreements for Category 2 and 3 programs to assist in transparency, consistency, and accountability.

5. How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

When considering how to maintain strong local relationships, we focused on preserving watershed identity and ensuring meaningful engagement within a regional model. Our recommendations reflect the need for clear communication, advisory structures, and processes that keep local priorities visible and respected.

Accessibility

- The proposed RCAs generally are large geographic regions with local conservation authority offices within their respective watersheds. It is critical for the RCA leadership team to be accessible across the RCA. Establishing trust and respect is critical for the RCA to succeed and thrive. Accessibility means being available and being in the local office or the local municipality to address issues or specific topics as often as possible. Solely governing or leading from a “regional office” will not be acceptable and therefore requires support from the OPCA to ensure accessibility is a clear expectation.

Clear, Early Communication

- Regular updates to municipalities, stakeholders, and the public on governance changes and regional decision-making structures.

Preserving Local Identity

- Maintain all local current conservation authority offices as principal locations for access and information for watershed residents and other stakeholders.
- Consider the concept of a local advisory body to advance local watershed priorities and issues.
- Transparent processes for municipal input and engagement.

Decision Making

- Decision making is a critical element for success. Where possible, local decision making should be maintained and supported. Whether a permit approval, purchase order, or land management decision, a clearly defined decision-making process is required. Challenging decisions can utilize the full breadth of the RCA staff capacity when required.

Other Considerations

While regional consolidation offers clear opportunities, the success of this initiative depends on more than structural changes. It requires significant investment in planning, resources, and coordination. Without early and consistent provincial leadership, clear governance frameworks, and robust financial strategies, there is a risk that efficiencies and improved service delivery may not materialize as intended.

Harmonizing organizational systems, policies, and cultures across multiple authorities will be a complex process. Areas such as integrating information technology platforms, aligning human resources practices, managing transition costs, and ensuring consistent, holistic communications with staff and the public will require careful planning and support. Conservation authorities have advanced numerous initiatives to modernize planning and permit review processes. The recent LEAN review, along with similar reviews undertaken by other conservation authorities, should be considered and utilized to provide additional insights that inform strategic decisions related to organizational streamlining and consolidation. Rebranding efforts will also need to be coordinated thoughtfully to maintain clarity and confidence throughout the transition, helping to avoid delays and sustain staff engagement.

Maintaining strong local relationships and ensuring watershed-specific priorities remain visible within a regional model will require intentional planning and engagement. Clear communication and advisory structures will be key to preserving local knowledge and community trust, which are essential for effective conservation work.

The current fee freeze continues to create challenges. The LSRCA operates on a cost recovery basis based on the approach that development should pay for development. The ongoing fee freeze is unsustainable for the aforementioned approach. The LSRCA encourages the Minister of Environment, Conservation and Parks to lift the fee freeze for 2026.

The proposed conservation authority consolidation also creates a unique opportunity to resolve a longstanding inconsistency between the jurisdictional boundary of the Lake Simcoe Region Conservation Authority and jurisdictional boundary of the *Lake Simcoe Protection Act* (LSPA and supporting Plan). The current inconsistency is that what is known as the Upper Talbot Arm and the watershed area of the City of Orillia are within the jurisdiction of the LSPA but are not currently within the LSRCA jurisdiction. This creates challenges for application of levies under the LSPA, inconsistency of permit requirements under S.28 of the *Conservation Authorities Act,* and other related challenges. Should the proposed consolidation of conservation authorities

proceed, the province is strongly encouraged, to bring alignment between the LSPP and proposed RCA boundaries.

One of the stated considerations for the RCA consolidation of conservation authorities is to reduce the amount of conservation authorities a municipality has within their jurisdiction. Considering appropriate boundary changes that would allow for municipalities to fall within only one conservation authority would be prudent. While this may detract from a watershed principle, it would reduce duplication while increasing efficiencies and consistency.

We encourage the province to consider alternative RCA alternatives that are more reflective of scale and regional circumstances. The LSRCA recommends that the province create an RCA comprised of the LSRCA, Nottawasaga Valley Conservation Authority, and the Grey Sauble Conservation Authority, which would encompass the watersheds of Georgian Bay. We also recommend the name of the proposed RCA being the Lake Simcoe – Georgina Bay Regional Conservation Authority.

The Lakehead Region Conservation Authority is a great northern Ontario conservation authority and truly linked to the conservation authorities in northern Ontario. We recommend the province remove Lakehead from the Huron-Superior RCA.

In Conclusion

We appreciate the Province of Ontario's leadership and the opportunity to provide input. If the proposed consolidation of existing conservation authorities into regional conservation proceeds, we are committed to working collaboratively to ensure successful transition.

We look forward to continuing this dialogue and contributing to solutions that protect Ontario's watersheds and communities for the next seven generations.

Yours truly,





Councillor Clare Riepma
Chair

Rob Baldwin
Chief Administrative Officer

Association of Municipalities of Ontario

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Toronto, Ontario M5H 3B7
Telephone: 416.971.9856

Toll-free in Ontario:
1.877.426.6527
Fax: 416.971.6191

Sent by email to: minister.mecp@ontario.ca

December 24, 2025

The Honourable Todd McCarthy
Minister of Environment, Conservation and Parks
5th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3

Subject: Recommendations for Successful Conservation Authority Transformation

Dear Minister McCarthy,

The Association of Municipalities of Ontario and Conservation Ontario are writing to provide joint feedback on ERO 025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities (CAs) complementing our respective and separate ERO submissions.

We support the goals of this proposal. Accelerating local approvals helps protect Ontario's economy amid global uncertainty. Faster, more predictable approvals, that maintain environmental protections and prioritize frontline conservation can unlock the new infrastructure and development required for a growing, competitive province.

Municipal and local partnership is key to CA success. The success of the CA model is local: expertise, governance, community trust, and partnerships. If regionalization results in structures that cover too large a geographic area, we risk losing what makes CAs effective:

- **Loss of local expertise**: Watershed-based CAs have extensive on-the-ground expertise and understanding of unique environmental conditions, enabling timely and effective decision-making on local development, and real-time responsiveness during storms and emergencies.
- **Loss of effective municipal oversight:** Municipal accountability and oversight help CAs effectively balance watershed management and community growth.
- **Loss of strong local relationships:** Key stakeholders (such as municipalities, Indigenous communities, businesses, the agricultural community, watershed residents, and other partners) provide funding, donations, and build public trust.

Over 100 municipalities have passed or are considering resolutions urging the Province to move forward by working together with municipalities and CAs to achieve provincial objectives while preserving local governance, accountability, and expertise.

AMO and CO propose a right-sized, simplified regional model that:

- is grounded in science-based watershed boundaries
- maintains strong municipal involvement and oversight
- preserves local relationships and community trust
- balances the need to stay connected at the community level with the needs of certainty, predictability, and consistency of service delivery standards for permitting and approvals
- avoids unnecessary complexity by allowing lands, major agreements (including employment), reserve funds etc. to remain within existing corporations

To achieve this, AMO and CO recommend that the Province:

1. Work together with an implementation working group (including AMO, Conservation Ontario and select CAs, municipal, developers, and Indigenous representatives) to jointly develop practical solutions, including:

    - service standards, permitting faster and standardized approvals
    - governance and boundary design
    - funding models, allocations, and reserve structures
    - shared “back office” efficiencies and,
    - clear transition planning including: service continuity; points of contact; permitting continuity measures; board and staff communications; and staff retention measures.

2. Commit to a clear implementation timeline and transition plan supported by the implementation working group to position transformation for success. This will ensure continuity of service certainty for all stakeholders.

3. Share comprehensive financial, operational, and governance impact analysis to support evidence-based decision-making.

4. Restore a 50-50 municipal-provincial funding partnership for CAs, reflecting expanded Provincial role in CA operations while ensuring affordability and long-term stability.

All stakeholders, including the development industry, benefit from certainty. This approach minimizes the risk of multiple significant changes occurring at the same time, limits disruption to program delivery, and creates conditions for better outcomes and buy-in.

Ministry McCarthy, we thank you for the opportunity to provide feedback and look forward to discussing these concerns with you. Please contact Karen Nesbitt, Director of Policy and Government Relations at AMO (knesbitt@amo.on.ca), to arrange a meeting at your earliest convenience.

Sincerely,

Robin Jones
AMO President
Mayor of the Village of Westport

Dave Barton
Chair, Conservation Ontario
Vice-Chair, Toronto and Region Conservation Authority
Mayor, Township of Uxbridge

cc: The Honourable Rob Flack, Minister of Municipal Affairs and Housing
Sarah Harrison, Deputy Minister, Ministry of Environment, Conservation and Parks
Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and Housing

MATTAGAMI REGION CONSERVATION AUTHORITY

100 Lakeshore Road, Timmins, Ontario P4N 8R5 TEL. 705-360-2660 FAX 705-360-2692
www.mattagamiregion.ca info@mattagamiregion.ca

December 9, 2025

SENT ELECTRONICALLY

RE: Mattagami Region Conservation Authority position on the regional consolidation of Ontario's conservation authorities

Please be advised that the following resolution 2025-1730 was passed at the Mattagami Region Conservation Authority' Regular Board Meeting held on December 3, 2025:

> WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the Conservation Authorities Act; and
>
> WHEREAS under this proposal, the Mattagami Region Conservation Authority (MRCA) would be merged into a new "Northeastern Ontario Regional Conservation Authority" together with the:
>
> - Nickel District Conservation Authority
> - North Bay-Mattawa Conservation Authority
> - Sault Ste. Marie Conservation Authority
>
> forming a single fragmented organization stretching from Sault Ste. Marie north to Timmins and southeast to Mattawa; and
>
> WHEREAS the Board acknowledges and supports the Province's goals of improved efficiency, consistency and fiscal prudence in conservation delivery, but finds that the proposed "Northeastern Ontario Region" configuration would:
>
> 1. Create a geographically vast and administratively complex entity throughout the province with little shared watershed connection or economic alignment;
> 2. Dilute local accountability and municipal partnerships, contrary to the principle that decisions are best made closest to the communities they affect;
> 3. Generate substantial transition costs — including human-resources integration, governance restructuring, IT migration and policy

harmonization — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province's own business-planning principles of value for money, cost containment and service continuity;

4. Risk greater uncertainty and delays in program delivery, permitting and hazard management where local staff are merged with larger and more distant regional structures; and

WHEREAS the MRCA has consistently demonstrated fiscal responsibility, effective stewardship, and strong partnerships with municipalities, Indigenous communities, landowners, and stakeholders throughout the region; and

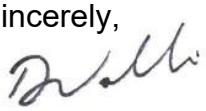
WHEREAS the Board further recognizes that the MRCA serves the City of Timmins, within the Arctic watershed and faces vastly different climatic, hydrological and infrastructure realities, which would be ill-served by a larger overarching administrative structure extending over 600 kilometres to the Great Lakes; and

WHEREAS the Province already possesses the authority to establish overarching legislation, regulations and standards through the Conservation Authorities Act and its administrative Ministry;

THEREFORE, BE IT RESOLVED THAT the Mattagami Region Conservation Authority Board of Directors:

1. Formally opposes the proposed conservation authority amalgamations as they pertain to the MRCA and their member municipality as outlined in Environmental Registry Notice 025-1257; and
2. Urges the Province of Ontario to maintain the existing watershed-based governance structure, which ensures local accountability, comprehensive hazard management, and effective environmental protection; and
3. Requests meaningful consultation with municipalities, Indigenous communities, and Conservation Authority boards prior to any legislative or structural changes affecting watershed management in Ontario; and
4. THAT copies of this resolution be forwarded to the Minister of Environment Conservation and Parks, local Members of Provincial Parliament, the City of Timmins, Wabun Tribal Council, Mushkegowuk Council, Conservation Ontario, and Conservation Authorities.

Sincerely,



David Vallier
General Manager, Mattagami Region Conservation Authority

December 18, 2025

Minister of Environment, Conservation and Parks
College Park
5th Floor.
777 Bay St.
Toronto, ON M7A 2J3
Email: minister.mecp@ontario.ca

Honourable Minister McCarthy,

Re: Municipality of Meaford Response to Proposed Consolidation of Ontario's Conservation Authorities

Please be advised that the Council of the Municipality of Meaford adopted the following resolution at its meeting on December 15, 2025.

Moved by: Councillor Uhrig
Seconded by: Deputy Mayor Keaveney

Whereas the Conservation Authorities Act enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses; and

Whereas the municipalities within Grey and Bruce Counties established the North Grey Region Conservation Authority in 1957 and the Sauble Valley Conservation Authority in 1958 which amalgamated into the Grey Sauble Conservation Authority (GSCA) in 1985; and

Whereas local municipalities currently provide approximately 44% of total GSCA funding, while the Province of Ontario provides approximately 7%; and

Whereas municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local

watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers; and

Whereas conservation authorities collectively own and manage thousands of hectares of land, much of which was donated or sold by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities; and

Whereas Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency whose objects include overseeing conservation authorities and the transition to a regional watershed-based framework for conservation authorities in Ontario with municipal cost contribution yet to be defined; and

Whereas the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring; and

Whereas under this proposal, the Grey Sauble Conservation Authority (GSCA) would be consolidated into a new "Huron-Superior Regional Conservation Authority" that is over 23,000 square kilometres in size and consists of 80 municipalities; and

Whereas the Province already has the authority to establish overarching legislation, regulations and standards through the Conservation Authorities Act and the Ministry of Environment, Conservation and Parks to address issues related to permitting, by establishing guidance, online permitting platforms and technical standards through legislation that could help build homes; and

Whereas the GSCA has already undertaken significant modernization work aligned with provincial objectives, including Information Technology / Information Management, and leveraging technology to streamline

planning and permit review processes processing 100% of major permits within the provincial timelines in 2024;

Therefore be it resolved that the Municipality of Meaford calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; and

Be it further resolved that the Municipality of Meaford does not support the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257 as the proposal lacks sufficient justification, would significantly diminish local governance, and fails to recognize the effectiveness and efficiencies already achieved within existing watershed-based models; and

Be it further resolved that the Municipality of Meaford affirms that large-scale regional consolidation is unnecessary, would introduce substantial transition costs, and would divert resources away from frontline watershed programs. The Council further asserts that restructuring at this scale would erode local decision-making, weaken municipal accountability, and disrupt long-standing community partnerships that are central to delivering responsive watershed management; and

Be it further resolved that while the Municipality of Meaford supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down approach structure without strong local accountability and governance risks creating unnecessary cost, red-tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; and

Be it further resolved that the Municipality of Meaford urges the Province to strengthen centralized standards, resources, and tools rather than undertaking broad structural amalgamation and to provide sustainable, predictable provincial funding across conservation authorities to enable local CAs to advance ongoing digitization and systemization work that has

already resulted in improved efficiency and consistency in recent years; and

Be it further resolved that the Municipality of Meaford believes that the Province's proposed new online permitting portal can be implemented within the existing conservation authority framework without requiring structural amalgamation; and

Be it further resolved that the Municipality of Meaford requests that the Ministry engage meaningfully and collaboratively with affected municipalities, conservation authorities, and local Indigenous communities before advancing any consolidation, to ensure that any changes reflect both local needs and the practical realities of implementation; and

Be it further resolved that this resolution be included in the Municipality's ERO response and forwarded to the Premier of Ontario, the Minister of the Environment, Conservation and Parks, all of Ontario's municipalities, MPPs, conservation authorities, AMO, and Conservation Ontario.

Carried - Resolution #2025-46-09

Yours sincerely,

Allison Penner
Deputy Clerk / Manager, Legislative Services
Municipality of Meaford
21 Trowbridge Street West, Meaford
519-538-1060, ext. 1110 | apenner@meaford.ca

cc: The Honourable Doug Ford, Premier of Ontario
All Ontario Municipalities
All Ontario Members of Provincial Parliament
All Ontario Conservation Authorities
Association of Municipalities of Ontario (AMO)
Conservation Ontario
Submission to Environmental Registry Notice 025-1257

CONSERVATION SUDBURY

401-199 rue Larch Street
Sudbury, ON P3E 5P9
705-674-5249
ConservationSudbury.ca

December 12, 2025

RE: Conservation Sudbury position regarding the regional amalgamation of Ontario's conservation authorities as proposed through Environmental Registry Notice 025-1257

The following resolution was passed at the Nickel District Conservation Authority's meeting of December 11, 2025.

Resolution no. 2025-75
Moved by: Jennifer Davidson
Seconded by: Joscelyne Landry-Altmann

WHEREAS municipalities have historically established and governed their conservation authority es under the *Conservation Authorities Act*;

AND WHEREAS municipalities provide approximately 54% of conservation authority funding, while the Province of Ontario provides approximately 5%. (2023 MECP data);

AND WHEREAS for decades Conservation Sudbury and its predecessors have established programs and services to local watershed needs, maintained accountable service standards, and ensured fair and predictable costs for ratepayers.

AND WHEREAS the Authority operates the Lake Laurentian Conservation Area providing access to all visitors at no cost, maintains and operates flood control infrastructure across Greater Sudbury including dams in Copper Cliff and New Sudbury, weirs in Coniston, berms in Dowling and Capreol, and the box culvert under downtown Sudbury;

AND WHEREAS Conservation Sudbury owns and manages extensive lands for conservation, public protection, and recreational purposes, many of which are leased to private operators and to the City of Greater Sudbury for recreational purposes, including Timberwolf Golf Course, Adanac Ski Hill, Rotary Park, Garson Park, Carmichael Park, and portions of Fielding Park;

AND WHEREAS the Provincial Government has proposed the consolidation of Ontario's 36 conservation authorities into 7 large regional conservation authorities (RCAs) overseen by a new layer of bureaucracy named the Ontario Provincial Conservation Agency (OPCA), a move that would dilute local governance and put municipal cost distribution in question;

AND WHEREAS in time, the OPCA will levy participating municipalities for some of its operating costs and will collect fees from the authorities, and Conservation Sudbury, as proposed, would be merged with authorities operating from offices located in Sault Ste-Marie (SSMRCA), Timmins (MRCA), and North Bay (NBMCA);

AND WHEREAS assets of the existing authorities would be pooled under any new regional authority, that would include all lands, buildings, chattels, bank accounts and reserves as well as all loans and other liabilities;

AND WHEREAS the imposition of a new oversight agency, lacking local or public accountability, risks creating unnecessary costs for municipalities and authorities alike, adding “red tape” and unnecessary bureaucracy, and undermines an authority’s efficiency and responsiveness to local community needs;

THEREFORE, BE IT RESOLVED THAT the Government of Ontario:

1. Maintains local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation that allow appropriate levy decisions, community-focused services, proper management of conservation lands and allocation of reserves to projects and infrastructure in the communities where the funds were raised;
2. Avoids imposing a centralized agency that will introduce additional costs, red tape, and bureaucracy, reducing efficiency and responsiveness to local needs;
3. Delays any decision to consolidate conservation authorities to allow: a) an assessment of the need for consolidation, and a complete cost analysis to the Authority and municipality, b) for meaningful engagement needed to address the concerns and risks of the proposed consolidation, c) for the review of alternative consolidation models and processes that would result in better outcomes related to Provincial priorities
4. Collaborates with municipalities and conservation authorities to improve consistency, capacity, and program delivery across Ontario without compromising local accountability;
5. Maintains existing land (property) and financial reserves to be used within, and for the benefit of, Greater Sudbury in which these originated and were improved upon.
6. Rejects the proposed “Northeastern Ontario Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257.
7. Requires the Minister to directly engage affected municipalities before finalizing any consolidation boundaries or any other legislative amendments impacting their conservation authorities.

AND BE IT FURTHER RESOLVED that a copy of this resolution be sent to:

- The City of Greater Sudbury
- The Environmental Registry of Ontario Consultations prior to the deadline of December 22, 2025
- The Honourable Todd J. McCarthy, Minister of the Environment, Conservation and Parks
- MPP Peter Tabuns, Official Opposition Critic
- Frances Gélinas, MPP for Nickel Belt
- Jamie West, MPP for Sudbury
- The Association of Municipalities of Ontario
- Conservation Ontario
- All municipalities within the proposed Northeastern Regional Conservation Authority boundary that includes the Cities of Timmins, Sault Ste-Marie and North Bay, as well as Prince Township, the Municipalities of Callander, Calvin, East Ferris, Mattawan and Powassan, the Town of Mattawa and the Townships of Bonfield, Chisholm and Papineau-Cameron.

THE CORPORATION OF THE

TOWN OF SAUGEEN SHORES

MOVED BY: Councillor Dave Myette **RESOLUTION NO:** _____

SECONDED BY: Councillor Bud Halpin **DATE:** _____

Whereas the Saugeen Valley Conservation Authority "The Authority" was established in 1950, 75 years ago by a group of municipalities, as a response to problems associated with flooding; and

Whereas the Town of Saugeen Shores is the single largest member by apportionment in this collection of 8 member municipalities, comprising of the main channel and mouth of the Saugeen River at Southampton. The Town of Saugeen Shores is the largest contributor of annual levies that cover the operation of the Authority; and

Whereas the member municipalities cover 44% of the operational costs of the SVCA, 7% coming from the Provincial funding and the remaining is generated through internally generated revenue and permitting fees; and

Whereas the fees charged by Conservation Authorities have been frozen for 3 years which has had the effect of shifting the financial burden onto levies and by extension the property tax payers; and

Whereas the Provincial Conservation Authorities association (Conservation Ontario) has and continues to provide the respective Authorities with guidance, oversight, and consistency of regulation application; and

Whereas the development of the "Agency" is proposed to be funded by municipalities and serves only to add another layer of Government bureaucracy, which by definition will serve only to increase financial burden on member Municipalities; and

Whereas one of the stated objectives of the "Agency" is development of a single digital permitting platform. This approach will serve to alienate a significant portion of our residents who do not have access to internet services, due to rural location or due to religious beliefs; and

Whereas the SVCA is located in a primarily rural geographic region, that due to the proposed consolidation of 7 Authorities will be seemingly overshadowed by much larger and more densely populated authorities with much larger urban components; and

Whereas the SVCA has worked hard to achieve a streamlined and efficient operation and service delivery model, due in large part to the direct oversight by a Board comprised of member municipalities appointed elected officials; and

Whereas the proposed consolidated Huron-Superior Authority would be comprised of up to 80 municipalities, 23,000 sq/km and by extension, a Board of Directors that would be so large as to be unmanageable, and would surely result in smaller rural municipalities losing direct control over the operation of the Authority; and

Whereas the inclusion of Lakehead Region CA in North West Ontario, could have detrimental reproductions arising from travel distance and geographic differences alone; and

Whereas the Saugeen Valley Conservation Authority owns and manages thousands of acres of CA land, many of which are income generating, through user fees, land leases, managed forest harvest, and campground fees. The Amalgamation plan does not address how these assets, which by extension belong to member Municipalities, would be equitably divested. Many of these properties were granted to the Authority, specifically detailing the nature and terms of ownership which legally must be maintained going forward; and

Whereas Authorities across the province have liquid assets in the form of trusts, and reserves that belong to member municipalities which run the risk of being swallowed up by large Authorities with larger budgets and resources.

Now Therefore, be it Resolved that the Town of Saugeen Shores requests that the Amalgamation into the "Huron Superior Regional Conservation Authority" as outlined in ERO 025-1257 be reconsidered. This in order to maintain the local oversight and protect against as yet unforeseen consequences which will serve to undermine the SVCA's ability to provide regional knowledge-based service delivery and management of properties under our stewardship and ownership; and

Further ensure that should the amalgamations go forward that consideration be given to grouping Rural Authorities with similar watershed characteristics together, while grouping more Urban Authorities together for similar reasons; and

Further ensure that any transitional costs are fully funded by the Province and not borne by member Municipalities, and that Municipalities are provided with clear funding models in 2026 so as to allow for sufficient planning data for the 2027 budgets; and

Further that Saugeen Shores Council urges the Province to engage with affected municipalities and First Nations communities in a meaningful way to collaboratively review the service delivery model, and standardize only where necessary paying attention to the different needs of Rural and Urban Authorities. That the Province use this approach rather than develop another level of administration and the associated financial burden that would surely result; and

Finally that this resolution be included in the Municipalities ERO response and be forwarded to the:

- Premier of Ontario
- Minister of Environment Conservation and Parks,
- Bruce County Council,
- All of Ontario's Municipalities,
- Huron Bruce MPP/ Minister of Rural Affairs,
- The board of Rural Ontario Municipal Association
- AMO and

THE CORPORATION OF THE

TOWN OF SAUGEEN SHORES

MOVED BY: Councillor Dave Myette_____ **RESOLUTION NO:** _____

SECONDED BY: _Councillor Bud Halpin_____ **DATE:** _____

• Conservation Ontario.

- ❑ Carried
- ❑ Carried, as amended
- ❑ Defeated
- ❑ Deferred
- ❑ Referred
- ❑ Tabled
- ❑ Withdrawn

Division of Recorded Vote

	Yes	No	Absent	Conflict
Divinski				
Duhaime				
Grace				
Halpin				
Huber				
Myatt				
Myette				
Stack				
Charbonneau				

*Presiding member called last

_____

Mayor

St. Clair Region Conservation Authority
205 Mill Pond Cres., Strathroy, ON, N7G 3P9
(519) 245-3710 (519) 245-3348 FAX
E-Mail: stclair@scrca.on.ca
Website: www.scrca.on.ca

Member Municipalities

Township of Adelaide-Metcalfe
Municipality of Brooke-Alvinston
Municipality of Chatham-Kent
Township of Dawn-Euphemia
Township of Enniskillen
Municipality of Lambton Shores
Municipality of Middlesex Centre
Village of Newbury
Village of Oil Springs
Town of Petrolia
Town of Plympton-Wyoming
Village of Point Edward
City of Sarnia
Municipality of Southwest Middlesex
Township of St. Clair
Municipality of Strathroy-Caradoc
Township of Warwick

St. Clair Region Conservation Authority: Environmental Registry of Ontario (ERO) Responses

Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities (ERO #025-1257)

This response is provided on behalf of the St. Clair Region Conservation Authority (SCRCA). The SCRCA represents 17 member municipalities and 148,000 residents in its approximately 4,100 square kilometer watershed in southwestern Ontario. The SCRCA watershed is proposed to be consolidated with 7 other Conservation Authorities representing 81 member municipalities to form the Lake Erie Region Conservation Authority.

ERO Proposal #025-1257 would result in a Regional Conservation Authority (RCA), void of meaningful local representation to deliver effective governance and accountability to municipal funders and their ratepayers. The SCRCA:

- Supports the desired goal of achieving better service outcomes;
- Opposes the changes outlined in the ERO Proposal as a means of achieving those goals;
- Supports continued modernization of existing practices and policies but prefers alternatives to the Proposal that would consider voluntary consolidation that is supported by adequate business rationale, sound and third-party peer reviewed financial analysis and meaningful, open consultation rather than proscribed controlled input to the Ministry.

While the SCRCA supports the proposed provincial investments in technology, standardization and modernization, the proposed RCA framework would create complexities and risk local municipal representation and decision-making, local expertise, and delivery of programs and services. Considering the proposed criteria and boundaries for the RCAs and the uncertainties and risks associated with the proposal, the SCRCA does not support the proposed RCA framework. If the government decides to proceed with the ERO Proposal, it is imperative that there are measures in place to mitigate risks that are inherent in consolidations of this size.

1. Key Factors for a Successful Transition and Outcome

What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?

Preserve Local Municipal Governance and Decision-Making
With 81 local municipalities, the proposed Lake Erie Region Conservation Authority would make it incredibly challenging to have meaningful local municipal representation, particularly for smaller and rural communities. The SCRCA's board maintains a respectful balance between urban and rural representatives that reflect the diverse nature of the watershed.

As the largest contributor to Conservation Authority budgets, municipalities must continue to have the same equitable representation and voice they are afforded today. Municipalities must maintain a meaningful voice at all levels of Conservation Authority governance and decision-making, to ensure local issues and concerns are not lost. Support from key partners, specifically

municipalities, is key to the ongoing success of Conservation Authorities in Ontario.

To deliver on its mission, a new Regional Conservation Authority model must be grounded in fundamentals of effective watershed management, including:

- Protecting life and reducing property damage from flooding and erosion;
- Supporting municipal partners, the development community, and landowners with timely, reliable services;
- Enhancing the economic, environmental, and community health of the watershed;
- Providing meaningful opportunities for people to connect at the local level;
- Meet the demands of a rapidly growing population at a time of climate pressure.
- If regionalization stretches teams too broadly, there is a risk of losing the ability to design and deliver environmental programs and services tailored to the unique needs of each watershed and responsive to municipal and community priorities;
- Local, on-the-ground expertise;
- Critical knowledge of local environmental conditions and historical records (e.g., localized flooding impacts);
- Strong relationships and funding support from municipalities, Indigenous communities, donors, businesses, the agricultural community, watershed residents, and other partners;
- Real-time responsiveness during storms and emergencies and other urgent events;
- Engagement and support from the scientific community;
- Effective oversight and buy-in from municipal funding partners;
- To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, Conservation Authorities must be appropriately accountable;
- The principle of “pay for say” should be reflected in the design of new Conservation Authorities, as it is today. The proposed catchment area of the proposed consolidated Lake Erie Regional Conservation Authority would combine more than 80 municipalities, stretching oversight and “pay for say” beyond what is workable and undermining confidence in the governance of Conservation Authorities.

Recommendation 1:
That the Province consider achieving modernization goals through the current 36 Conservation Authority corporations using legislative and regulatory amendments, technological solutions and compliance verification.

Recommendation 2:
That the Province demonstrate the statutory objects of the Conservation Authorities can be effectively delivered within the proposed new regional boundaries.

Recommendation 3:

a) That the Province collaborates with an implementation working group including the Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, municipalities, and other experts to consider options and evaluate proposed solutions within this Proposal.
b) Avoid Delaying Performance Improvements Currently Underway
The proposed changes risk undermining the implementation of provincial improvements that have already been introduced. In recent years, the Province has significantly changed the role of Conservation Authorities in land use planning matters as part of its broader initiative to build more homes faster. Insufficient time has passed to fully implement recent amendments and evaluate their impact on development outcomes. Given the volume and speed of legislative changes, industry stakeholders are still processing the effect and significance of various legislative changes. All stakeholders, including the development industry, benefit from certainty. The proposed consolidation will introduce additional unknowns and new processes at an already uncertain time in the market.

c) Provide Dedicated Provincial Funding for the Transition
A cost-benefit analysis of the proposed consolidation should be completed and properly evaluated by member municipalities. There would be substantial costs associated with merging eight Conservation Authorities into one Regional Conservation Authority, including but not limited to:

- Information technology and data system integration,
- Human resources and union harmonization (two Conservation Authorities within the proposed Lake Erie Region are unionized with different unions while the other six are not),
- Fee and policy alignment,
- Corporate service model consolidation,
- Potential need for rebranding, signage, and legal transitions, and
- Asset and liability assessment.

It is unacceptable to require member municipalities to fund these costs while diminishing their influence. They must not be burdened with the expense of mandated consolidations. Without a rigorous cost-benefit analysis proving that large-scale consolidations will reduce costs and enhance service, the risks clearly outweigh any potential benefits.

d) Protect and Enhance Existing Service Levels
Local Conservation Authority staff attend site visits and face-to-face meetings and know the local geography and political landscape. Despite increasing levels of development in the watershed, SCRCA continues to issue permits within the provincial guidelines. Consolidation risks weakening well-functioning systems through administrative complexity and diluted oversight. Consolidating and potentially centralizing offices could reduce responsiveness, delay decisions, and weaken local expertise and connection to the community.

e) Ensure Financial and Legal Due Diligence
Each Conservation Authority in the proposed region has vast landholdings, complex assets (e.g., water control infrastructure), financial assets and liabilities, foundations, legal proceedings, and unique local agreements. A thorough financial and legal due diligence analysis is necessary to assess restrictions and complexities on transferring these assets from local control to regional oversight and/or ownership.

f) Maintain Local Conservation Authority Board beyond 2026
Slowing the pace of consolidation would permit the Province to monitor the impact of recent changes while ensuring future changes are rolled out in a measured and predictable fashion. Guidance may be taken from the Province's experience with municipal amalgamation in the 1990s and 2000s to ensure that any proposed consolidation of Conservation Authorities is well-timed and efficiencies at the local level are evaluated prior to implementing structural changes.

Recommendation 4:
That the Province consider a longer implementation timeline to fully address:

- Board governance and appointment frameworks; funding mechanisms, allocations, and reserve structures; and service continuity matters.
- Implementing consistent standards, guidelines, and directives across all Conservation Authorities in a phased manner, prior to any consolidation (if required) would improve stability and predictability.
- This approach reduces the risk of program delivery disruptions by avoiding multiple significant changes at the same time, thereby supporting improved outcomes and greater buy-in.

Recommendation 5:
That a stable, clear, transition plan be prepared collaboratively with the implementation of a working group. To minimize potential disruptions, this plan should consider:

- Service standards, points of contact, permitting continuity measures, board and staff communications, and staff retention measures.
- The existing Conservation Authority Boards should remain in place beyond 2026. The local Conservation Authority board could inform a comprehensive cost-benefit analysis on consolidation and help outline the

most effective level of strategic consolidation to achieve both provincial and local objectives with municipal input. Local input and buy-in will be imperative to the success of any new framework.

2. Potential Opportunities or Benefits

What opportunities or benefits may come from a regional conservation authority framework?

The provincial proposal for regional consolidation does not include enough information to effectively evaluate the benefits.

a) Ensure Consistent Standards
   Funding that would be directed into the consolidation costs mentioned above would be better spent on front-line resources that would improve consistency and modernize tools and resources equitably across all Conservation Authorities. Provincial funds directed to improved mapping, technical guidance, policy development and e-permitting services would have immediate benefits across the province. Provincial efforts and funding should be directed to these goals within the existing Conservation Authority framework.
b) Provide Additional Investment
   Additional investment is required to ensure mandatory programs and services are supported. The projected cost of the new Ontario Provincial Conservation Agency is significantly higher than the current transfer payments provided by the Province to the 36 Conservation Authorities.

Recommendation 6:
That the Province update Provincial policies and standards together with the Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.

Recommendation 7:
That the Province invests stable, adequate, multi-year funding into Conservation Authority programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

3. Governance Structure Considerations

Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?

a) Reduce the Geographical Area of the Proposed Consolidation**.**
   In developing the proposed Regional Conservation Authorities, the Province made its decision to form watershed-based jurisdictions, avoiding what it viewed as administrative duplication and balancing expertise. However, this resulted in geographically vast regions that do not account for existing working relationships between Conservation Authorities and municipalities. Other criteria should be weighted, including existing working relationships between Conservation Authorities and municipalities, and the urban versus rural balance. The success of the Conservation Authority governance model has always been that local representatives make local decisions. The geographic size of the region needs to be reduced to protect that principle.
b) Create a Governance Model that is Functional and Fair
   Applying current legislative population formulas would produce a Lake Erie Regional Conservation Authority Board of 120 members, which is unrealistic. A Board of this size risks a loss of local perspectives and challenges in achieving timely, responsive decisions. However, a board that is too small would have the same impact. A reasonable balance needs to be achieved. There will be a loss of local municipal representation in this framework.

c) Maintain Municipal Appointment Authority and Add Indigenous Appointments.
Appointments to the Regional Conservation Authorities must remain municipal to ensure transparency, accountability, and local alignment. Appointments to the Ontario Provincial Conservation Agency should include municipal appointments from each of the Regional Conservation Authority boards. A new structure provides an opportunity for appointments to include Indigenous representation on Conservation Authority Boards as a vital step towards strengthening partnerships and ensuring programs reflect diverse perspectives. This representation would deepen cultural connections, enhance decision-making, and align with previous recommendations to create more inclusive and effective governance.

Recommendation 8: That the Conservation Authority Board should be:

- Maximum 25 members;
- Reflective of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demand;
- Structured to preserve meaningful local influence including Indigenous representation to strengthen partnerships and ensure programs reflect diverse perspectives.

4. Maintaining a Transparent and Consultative Budgeting Process

Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

a) Engage Municipalities in Budget Development
Budgeting must be transparent, co-developed, and grounded in clear service-level commitments. Variations in land type, fee structures, property assessment, and asset conditions must all be accounted for. Another key factor to consider is protecting watershed reserves, infrastructure, and land assets. Watershed municipalities are concerned how locally funded reserves, land assets, and long-term capital programs will be treated within the proposed consolidated structure.

b) Ensure Fair Apportionment
Municipalities risk subsidizing areas with a smaller tax base. Local apportionment should be able to be directed to local assets.

c) Fully Fund the Transition Provincially
Costs for integration, including but not limited to information technology, human resources, capital, data, governance and potential rebranding are extensive and must not fall to municipalities.

Recommendation 9:
That should any proposed consolidation proceed, existing watershed approaches to budgeting be maintained to assure delivery of local programs and services at the watershed level and the transition costs be funded provincially.

5. Maintaining and Strengthening Local Relationships

How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

a) Retain Local Presence
Local offices and staff are essential for timely permitting, program delivery, flood forecasting and warning operations, environmental monitoring, community engagement, and effective stewardship. It is imperative that local knowledge be retained, and decisions reflect local conditions.

b) Protect Local Programs
   Locally delivered conservation authority programs such as tree planting, stewardship services, environmental monitoring, education, community partnerships, and parks are rooted in community identity. They must be preserved.
c) Preserve Community Access to Greenspace
   Municipalities rely on SCRCA lands for recreational opportunities. Any centralization or asset disposition would jeopardize public benefit, as decisions made at a regional or provincial level may not reflect local community needs or priorities.

Recommendation 10:
That assurances are made to confirm the retention of local offices in order to continue delivering current programs locally.

Additional Comments

In addition to the comments provided in response to the questions in the ERO posting, the SCRCA is concerned about the governance structure of the Ontario Provincial Conservation Agency (OPCA). As currently designed, the agency will report to a provincial ministry and be governed entirely by provincially appointed board members. At the same time, Conservation Authorities and, therefore, municipalities, will be required to fund all or a portion of the agency's operations through existing levy/apportionment processes. This means that municipalities will ultimately contribute all or a significant share of the OPCA's budget without having any meaningful role in shaping its governance, priorities, or strategic direction. For municipalities that rely heavily on Conservation Authority guidance for land-use planning, hazard management, infrastructure development, and emergency response, this creates a disconnect between financial responsibility and decision-making influence. Not only would this be a precedent-setting method for funding a provincial agency, it establishes a system in which municipalities help fund a provincial agency but have no formal avenue to participate in its oversight, which raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs.

Summary of St. Clair Region Conservation Authority Recommendations

Recommendation 1:
That the Province consider achieving modernization goals through the current 36 Conservation Authority corporations using legislative and regulatory amendments, technological solutions and compliance verification.

Recommendation 2: That the Province demonstrate the statutory objectives of the Conservation Authorities can be effectively delivered within the proposed new regional boundaries.

Recommendation 3:
That the Province collaborates with an implementation working group including the Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, municipalities, and other experts to consider options and evaluate proposed solutions within this Proposal.

Recommendation 4:
That the Province consider a longer implementation timeline to fully address board governance and appointment frameworks; funding mechanisms, allocations, and reserve structures; and service continuity matters. Phasing standards, guidelines, and directives across all Conservation Authorities before any consolidation (should consolidation be required at all) offers greater stability and predictability.

Recommendation 5:
That a stable, clear, transition plan be prepared collaboratively with the implementation of a working group. To minimize potential disruptions, this plan should consider:

- Service standards, points of contact, permitting continuity measures, board and staff communications, and staff retention measures.
- The existing Conservation Authority Boards should remain in place beyond 2026.

Recommendation 6:

- That the Province update Provincial policies and standards together with Association of Municipalities of Ontario, Rural Ontario Municipal Association, Conservation Ontario, Conservation Authorities, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.

Recommendation 7:

- That the Province invests stable, adequate, multi-year funding into Conservation Authority programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure.

Recommendation 8: That the Conservation Authority Board should be:

- Reflective of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demand;
- Structured to preserve meaningful local influence including Indigenous representation to strengthen partnerships and ensure programs reflect diverse perspectives.

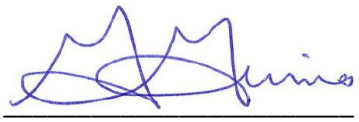
Recommendation 9:

- That should any proposed consolidation proceed, existing watershed approaches to budgeting be maintained to assure delivery of local programs and services at the watershed level and the transition costs be funded provincially.

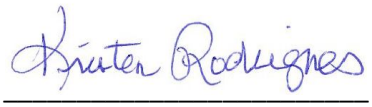
Recommendation 10:

- That the Province upholds the commitment to retain local Conservation Authority offices to deliver programs currently offered to the communities they currently serve.

Respectfully submitted,



Greg Grimes, Chair



Kristen Rodrigues, Vice Chair

THE CITY OF WINDSOR
ONTARIO, CANADA

COUNCIL SERVICES DEPARTMENT

OFFICE OF THE
CITY CLERK

*IN REPLY, PLEASE REFER TO OUR FILE NO.*_____

November 28, 2025

Honourable Doug Ford
Premier of Ontario
Premier's Office
Room 281, Legislative Building, Queen's Park
Toronto, ON M7A 1A1

Dear Premier Ford,

Windsor City Council, at its meeting held November 24, 2025, adopted the following resolution:

Decision Number: CR481/2025
WHEREAS Ontario's Conservation Authorities play a critical role in watershed management, environmental protection, flood mitigation, and public safety across the province; and,

WHEREAS the Province of Ontario has introduced Bill 68, which contains significant and far-reaching amendments to the *Conservation Authorities Act* that would alter governance structures, decision-making authorities, and municipal participation in conservation authority oversight; and,

WHEREAS the proposed changes were introduced within an omnibus bill without the benefit of a standalone legislative process that would allow for comprehensive public input, stakeholder consultation, or sufficient scrutiny regarding their long-term environmental, financial, and public safety implications; and,

WHEREAS municipalities are key partners in watershed management and must retain a strong, meaningful voice in any new governance model to ensure that local knowledge, local priorities, and local risks are fully considered in provincial decision-making; and,

WHEREAS the potential impacts of the proposed amendments may increase risks to the public related to flooding, erosion, natural heritage loss, and environmental degradation if not properly analyzed and addressed through an open and transparent legislative process; and,

THEREFORE BE IT RESOLVED THAT the Council of the City of Windsor strongly urge the Provincial Government of Ontario to withdraw all sections of Bill 68 related to amendments to the *Conservation Authorities Act*; and,

BE IT FURTHER RESOLVED THAT the Province be requested to re-introduce any proposed changes as a standalone bill, to proceed through the full and regular legislative process—including First and Second Readings, Committee review, stakeholder submissions, and public consultation—to ensure that the impacts on watershed management, environmental protection, and public safety are fully and transparently considered; and,

BE IT FURTHER RESOLVED THAT the Province ensure that any future governance framework for Ontario's Conservation Authorities includes robust and clearly defined municipal representation, recognizing municipalities as essential partners in protecting watersheds and mitigating environmental risks; and,

BE IT FINALLY RESOLVED THAT a copy of this motion be forwarded to the Premier of Ontario, the Minister of the Environment, Conservation and Parks, local Members of Provincial Parliament, the Association of Municipalities of Ontario (AMO), the Essex Region Conservation Authority (ERCA), and all Ontario municipalities and Conservation Authorities for their information and support.
Carried.

Your consideration to Windsor City Council's resolution would be most appreciated.

Sincerely,

Anna Ciacelli
Deputy City Clerk and Supervisor of Council Services
AC/lh

cc: Mr. Todd McCarthy, the Minister of the Environment, Conservation and Parks
Mr. Harb Gill, Member of Parliament, Windsor West
Ms. Kathy Borrelli, Member of Parliament, Windsor-Tecumseh-Lakeshore
Mr. Andrew Dowie, Member of Provincial Parliament, Windsor-Tecumseh
Ms. Lisa Gretzky, Member of Provincial Parliament, Windsor West
Association of Municipalities of Ontario (AMO)

Tim Byrne, Chief Administrative Officer & Secretary Treasurer, Board of Directors, Essex Region Conservation Authority (ERCA)
Nicole Kupnicki, Manager, Human Resources & Council Services of the Essex Region Conservation Authority
All Ontario municipalities and Conservation Authorities

7a)

United Counties of
Stormont, Dundas & Glengarry

RESOLUTION

MOVED BY Councillor Densham **RESOLUTION NO 2025-** 159

SECONDED BY **DATE** November 17, 2025

WHEREAS the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses;

AND WHEREAS the municipalities within Stormont, Dundas and Glengarry (SDG) established South Nation Conservation (SNC) in 1947 and the Raisin Region Conservation Authority (RRCA) in 1963;

AND WHEREAS local municipalities currently provide between 25% and 50% of total conservation authority funding, while the Province of Ontario provides approximately 3%;

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of acres of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities;

AND WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks;

NOW THEREFORE BE IT RESOLVED THAT the Council of the United Counties of Stormont, Dundas and Glengarry calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local

representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND FURTHER THAT while the United Counties of SDG supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND FURTHER THAT the United Counties of SDG supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives.

AND FURTHER THAT a copy of this resolution be sent to the Ontario Minister of Environment, Conservation, and Parks, to the local MP and MPPs, the Association of Municipalities of Ontario, the Rural Ontario Municipal Association, and all municipalities and Conservation Authorities in Ontario.

☑ CARRIED ☐ DEFEATED ☐ DEFERRED

WARDEN

Recorded Vote:	
Councillor Bergeron	___
Councillor Broad	___
Councillor Densham	___
Councillor Fraser	___
Councillor Guindon	___
Councillor Landry	___
Councillor MacDonald	___
Councillor McDonald	___
Councillor McGillis	___
Councillor St. Pierre	___
Councillor Williams	___
Warden Lang	___

7a)

United Counties of
Stormont, Dundas & Glengarry

RESOLUTION

MOVED BY Councillor Densham **RESOLUTION NO 2025-** 159

SECONDED BY **DATE** November 17, 2025

WHEREAS the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses;

AND WHEREAS the municipalities within Stormont, Dundas and Glengarry (SDG) established South Nation Conservation (SNC) in 1947 and the Raisin Region Conservation Authority (RRCA) in 1963;

AND WHEREAS local municipalities currently provide between 25% and 50% of total conservation authority funding, while the Province of Ontario provides approximately 3%;

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of acres of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities;

AND WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks;

NOW THEREFORE BE IT RESOLVED THAT the Council of the United Counties of Stormont, Dundas and Glengarry calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local

representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND FURTHER THAT while the United Counties of SDG supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND FURTHER THAT the United Counties of SDG supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives.

AND FURTHER THAT a copy of this resolution be sent to the Ontario Minister of Environment, Conservation, and Parks, to the local MP and MPPs, the Association of Municipalities of Ontario, the Rural Ontario Municipal Association, and all municipalities and Conservation Authorities in Ontario.

☑ CARRIED ☐ DEFEATED ☐ DEFERRED

WARDEN

Recorded Vote:	
Councillor Bergeron	___
Councillor Broad	___
Councillor Densham	___
Councillor Fraser	___
Councillor Guindon	___
Councillor Landry	___
Councillor MacDonald	___
Councillor McDonald	___
Councillor McGillis	___
Councillor St. Pierre	___
Councillor Williams	___
Warden Lang	___

MUNICIPALITY OF
SHUNIAH

COUNCIL RESOLUTION

Resolution No.: 380-25

Date: Nov 25, 2025

Moved By: _____

Seconded By: _____

WHEREAS the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses;

AND WHEREAS the municipalities within Lakehead Region established the Neebing Valley Conservation Authority in 1954 which enlarged to the Lakehead Region Conservation Authority (LRCA) in 1963;

AND WHEREAS local municipalities currently provide approximately 50% of total conservation authority funding, while the Province of Ontario provides approximately 5%;

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of hectares of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities;

AND WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the *Conservation Authorities Act* and the Ministry of the Environment, Conservation and Parks;

NOW THEREFORE BE IT RESOLVED THAT the Municipality of Shuniah calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND THAT while the Municipality of Shuniah supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure

without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND THAT the Municipality of Shuniah supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives;

AND THAT the Municipality of Shuniah is opposed to the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257;

AND THAT the Municipality of Shuniah recommends that the Lakehead Region Conservation Authority form the "Northwestern Ontario Regional Conservation Authority";

AND THAT the Ministry engage directly with affected municipalities of the Lakehead Region Conservation Authority, before finalizing any consolidation boundaries or legislative amendments;

AND THAT a copy of this resolution be forwarded to the Environmental Registry of Ontario consultations and to the Minister of the Environment, Conservation and Parks and his Opposition critics, local MPPs, local MPs, the Association of Municipalities of Ontario (AMO), Conservation Ontario, All local municipalities, and All Conservation Authorities in Ontario. + Premier Ford.

☑ **Carried** ☐ **Defeated** ☐ **Amended** ☐ **Deferred**

Wendy Landry

Signature

Municipality of Shuniah, 420 Leslie Avenue, Thunder Bay, Ontario, P7A 1X8

Submission to the Environmental Registry of Ontario

ERO Posting: Proposed Regional Consolidation of Conservation Authorities

Submitted by: South Nation Conservation (SNC)

December 22, 2025

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1. Introduction and Overall Position

South Nation Conservation (SNC) appreciates the opportunity to provide comments on the Province's proposal to restructure Ontario's Conservation Authority system through large-scale regional consolidation overseen by a new provincial agency.

This proposal represents the most significant change to Ontario's environmental management framework in over 80 years. While SNC supports efforts to modernize services, improve efficiency, and strengthen coordination, we are deeply concerned that the current proposal lacks transparency, evidence, and sufficient consideration of local governance, rural representation, watershed science, and municipal accountability.

Consolidation at this scale and speed creates a high risk to service continuity. Organizational capacity would be diverted to managing the consolidation process, rather than supporting provincial priorities, legislated responsibilities, and local programs. The compressed timelines increase the risk of staff attrition in critical public-safety roles and will impose significant financial costs on local ratepayers.

Conservation Authorities were created as locally governed, watershed-based institutions, established by municipalities, funded primarily by municipalities, and accountable to municipalities. Any reform must preserve this foundational model. Structural consolidation that removes local decision-making authority—without a return to meaningful provincial funding—would fundamentally undermine the effectiveness, accountability, and public trust that Conservation Authorities have built over generations.

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2. Lack of Transparency and Evidence Undermines the Proposal

SNC has serious concerns regarding the limited transparency accompanying the proposed restructuring.

Municipalities and Indigenous communities received minimal advance notice, and the ERO posting does not clearly reference the legislative amendments contained in Bill 68 (Schedule 3) that would enable consolidation. This limits the ability of municipalities, stakeholders, donors, and the public to fully understand or assess the implications of the proposal.

No cost-benefit analysis, transition plan, or evidence-based justification has been provided. Notably, the Province's Housing Affordability Task Force Report does not identify Conservation Authorities as a barrier to housing or economic development.

SNC consistently delivers strong performance outcomes:

- 98% of regulatory permits are issued within provincial timelines
- 100% of planning reviews are completed within municipal timelines

- 100% of sewage system permits under Part 8 of the Ontario Building Code are issued on time, with an average review period of 9 days

These results demonstrate that Conservation Authorities already support timely, sustainable development and do not support the premise that structural consolidation is required to improve outcomes.

Past provincial changes—such as removing Conservation Authorities' ability to provide natural heritage and hydrogeological services—have already demonstrated unintended consequences for rural municipalities who needed to hire their own consultants, forcing higher costs, longer timelines, and reduced local knowledge. These outcomes underscore the need for careful, evidence-based reform.

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3. Watershed-Based Management, Local Expertise, and Effective Permitting

Watershed-based management depends on strong local expertise. Natural hazards, erosion processes, drainage systems, groundwater conditions, and land-use pressures vary significantly across Ontario and require place-based knowledge to manage safely and effectively.

The Ontario Superior Court has affirmed, in the context of municipal permitting under the *Building Code Act*, that decision-makers must understand the character of their community and local conditions. This principle applies equally to Conservation Authority permitting, where decisions directly affect public safety, property protection, and environmental risk.

Eastern Ontario includes highly sensitive conditions such as:

- Leda clay plains and retrogressive landslide zones
- High phosphorous loads and an established Phosphorous Credit Trading Program
- Flood-prone river systems and flat landscapes
- Highly variable groundwater conditions

These realities cannot be effectively managed through distant, centralized decision-making.

SNC is one of the oldest and geographically largest Conservation Authorities in Ontario and has undergone multiple jurisdictional expansions over the past decade—at the request of municipalities—including extensions to the St. Lawrence River and Ottawa River systems. These expansions reflect municipal confidence in the Conservation Authority model and a desire for shared, locally delivered services.

SNC also demonstrates effective shared-service delivery through programs such as the Ontario Building Code Part 8 Sewage System Program, delivered on behalf of 16 municipalities with specialized staff, high-quality service, and no direct cost to municipalities. This model illustrates how shared expertise can improve efficiency without removing local governance.

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4. Provincial Funding Concerns

When Conservation Authorities were created, the Province and municipalities were equal partners, each contributing approximately 50% of operating funding. Provincial support has since declined to approximately 3% of current operations.

Municipalities have continued to invest because the work protects people, property, drinking water, and local economies. South Nation Conservation is a partner of choice for its member municipalities.

The Province now proposes to:

- Eliminate Conservation Authorities without municipal consent
- Redirect municipal funding to provincially controlled agencies
- Centralize environmental decision-making without restoring funding

This represents provincial control without provincial investment. Unlike health or education restructurings—where services are provincially funded—environmental management has been consistently downloaded to municipalities. Municipal funding must not be redirected to support new bureaucracies and municipalities should be able to decide the future of their Conservation Authority and jurisdictional boundaries.

Future funding of the new Ontario Provincial Conservation Agency should be clarified to ensure that the Province fully funds this new agency without contributions from local rate payers.

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5. Local Governance, Municipal Oversight, and Rural Representation

The proposed consolidation risks marginalizing rural communities within extremely large regions—comparable in size to small European countries.

Representation under regional models would be driven by municipal levy contributions, meaning urban centres could dominate decision-making despite the fact that:

- The majority of the land base is rural.
- Rural municipalities rely most heavily on Conservation Authority services and staff expertise.
- Conservation Authorities function as the primary environmental staff extension for small municipalities.

Current governance models demonstrate a strong balance between urban and rural funding and decision-making, where a single urban centre (Ottawa) already contributes most of the local funding while achieving consensus with rural municipalities. Large regional boards with multiple urban centres and over 40 rural municipalities would make it extremely difficult to maintain equitable rural representation and local accountability.

While consolidation may offer future benefits in service coordination, the proposed size of the regions would be incredibly difficult to manage operationally. It already takes several hours to drive through these areas and consolidation of that size would risk marginalizing rural communities.

Amalgamations or regional consolidations should only occur where supported by member municipalities to ensure continued local decision-making and financial accountability.

6. Protecting Category 3 Services Supported by Municipalities: Place-Based Stewardship

Many essential Conservation Authority services are municipally supported Category 3 programs, including:

- Agricultural stewardship and drainage support
- Tree planting, forest, and woodlot management
- Cost-share water quality improvement projects on private land
- Environmental education and outreach

These services reflect local priorities and deliver measurable environmental and economic benefits. Structural consolidation risks weakening or eliminating these locally supported programs as they are not uniformly offered in other jurisdictions. Opportunities to protect and strengthen these programs should be considered.

Agricultural stewardship programs depend on trust, local relationships, and deep understanding of soils, drainage systems, and farm operations. Conservation Authorities work closely with drainage superintendents, farmers, and municipalities to deliver coordinated solutions. Agricultural organizations also have close working relationships with SNC where programs are jointly developed, and landowner stewardship projects are implemented through peer-to-peer farm networks.

Replacing these community-based partnerships with centralized administration risks undermining farm viability, environmental protection, and rural resilience.

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7. Bilingual Services and Cultural Identity

SNC is the only bilingual Conservation Authority in Southern Ontario, serving municipalities designated under the *French Language Services Act*. Respecting French-language rights is both a legal obligation and a core cultural value.

Any restructuring must guarantee full bilingual capacity without downloading additional costs or administrative burdens onto municipalities. Larger regional structures risk weakening service quality, responsiveness, and cultural representation.

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8. Donor Lands and Community Stewardship Must Be Respected

SNC manages over 13,000 acres of conservation land, much of it donated by residents and farm families with the expectation of permanent local stewardship.

These lands are subject to:

- Donor intent and charitable trust obligations
- Conservation easements and municipal agreements
- Legal and tax requirements

Transferring these lands to a new agency could undermine donor trust, violate legal obligations, and damage long-standing community partnerships. Conservation lands were built by communities and must remain locally stewarded.

9. Modernization Can Proceed Without Structural Amalgamation

SNC already demonstrates that consistency, efficiency, and coordinated service delivery can be achieved without dissolving local Conservation Authorities**.**

Across Eastern Ontario, SNC participates in strong regional partnerships that align policies, share expertise, and deliver services seamlessly across municipal boundaries. The Ottawa Conservation Authority Partners (SNC, RVCA, and MVCA) coordinate land use planning reviews, watershed monitoring, and the joint delivery of stewardship programs such as tree planting and water quality improvement projects. SNC administers City of Ottawa programs on behalf of the conservation partners and coordinates regional initiatives such as the Eastern Ontario Farm Stewardship Collaborative. SNC also maintains shared service delivery models with neighbouring authorities, including with the Raisin Region Conservation Authority for drinking water source protection and community programs.

These collaborations extend to natural hazard management. Along the Lower Ottawa River, the Ottawa CA partners work closely with the Ottawa River Secretariat and affected municipalities to monitor river conditions, share data, and deliver coordinated flood forecasting and communications. This model demonstrates that effective, science-based watershed management already occurs across jurisdictions, without the disruption, cost, and risk associated with structural amalgamation.

SNC supports modernization initiatives that strengthen the system while preserving local governance, including:

- A provincial online permitting portal to improve transparency and customer service
- Updated and evidence-based natural hazard policies
- Shared-service models for technology, information management, and corporate services
- The use of service corporations or regional shared-service hubs to support back-end efficiencies

Shared services or service corporations can deliver many of the outcomes the Province seeks through consolidation, while avoiding its risks. These models:

- Reduce administrative duplication while protecting frontline capacity
- Build technical and corporate capacity for smaller Conservation Authorities
- Are scalable, reversible, and easier to refine over time
- Provide greater organizational stability and reduce the risk of staff attrition
- Preserve the local knowledge, responsiveness, and accountability of existing field staff

In contrast, full amalgamation is irreversible and carries significant transition risk. Once local governance structures, staffing models, and community relationships are dismantled, they cannot easily be rebuilt if unintended consequences arise.

Modernization can — and should — proceed within Ontario’s existing watershed-based framework. Structural amalgamation is not required to achieve consistency or improved service delivery and would weaken the municipal relationships and local expertise that underpin effective environmental management.

10. Conclusion and Recommendations

SNC urges the Province to pause the proposed consolidation and engage in meaningful, evidence-based consultation with municipalities, Conservation Authorities, Indigenous communities, agricultural partners, and other stakeholders.

The challenges facing Ontario — climate change, population growth, development pressure, and increasingly complex natural hazards — require stronger Conservation Authorities, not the dismantling of institutions that communities have relied on for nearly eight decades.

With the passage of Bill 68 and the creation of the Ontario Provincial Conservation Agency (OPCA), it is essential that the Province clearly define the role, scope, governance, and funding of this new body. Any new provincial agency must be:

- Fully funded by the Province, with no cost recovery from municipal levies.
- Designed to support, not override, municipal governance of Conservation Authorities.
- Governed with balanced representation from urban and rural municipalities, agriculture, and Conservation Authorities, with geographic diversity across Ontario.
- Work collaboratively with partners and stakeholders to ensure changes are constructive and achieve desired outcomes.

SNC recommends that the Province:

- Restore meaningful and sustained provincial funding aligned with provincial priorities
- Advance modernization through shared services, service corporations, and centralized tools rather than amalgamation
- Respect municipal authority to establish, modify, or dissolve Conservation Authority boundaries
- Protect adequate rural and agricultural representation in all governance models
- Maintain the principles of Integrated Watershed Management
- Protect bilingual services, donor lands, and Category 3 municipal programs
- Ensure reforms are transparent, evidence-based, and collaborative
- Provide sufficient transition timelines and provincial funding to protect existing service delivery
- Consider a focused role for the OPCA in permit appeals and hearings, rather than operational control
- If consolidation is deemed necessary, pursue targeted, voluntary, and incentivized approaches, supported by provincial funding

Environmental management works best when decisions are made close to the land, the people, and the communities they serve. Conservation Authorities exist because municipalities chose to create, govern, and fund them — and that foundational principle must continue to guide reform.

With the right commitment, collaboration, and provincial investment, this moment can strengthen Ontario’s conservation system rather than destabilize it — building on what already works, respecting local governance, and ensuring communities remain protected in the face of growing environmental risk.

The Town of Goderich
57 West Street
Goderich, Ontario
N7A 2K5
519-524-8344
townhall@goderich.ca
www.goderich.ca

November 21, 2025

SENT VIA EMAIL - minister.mecp@ontario.ca

The Honourable Todd J. McCarthy
Minister of Environment, Conservation and Parks
College Park, 5th Floor
777 Bay Street
TORONTO, Ontario
M7A 2J3

Dear Minister McCarthy:

On October 31, 2025, the Ontario Ministry of Environment, Conservation and Parks (MECP) announced proposed amendments to the *Conservation Authorities Act* (CAA), to establish the Ontario Provincial Conservation Agency (OPCA) to provide leadership, governance, and strategic direction to Conservation Authorities (CAs). The agency will be responsible for:

- Developing a single digital permitting platform;
- Streamlining and standardizing service delivery by setting provincewide performance, standards

  as well as maintaining centralized data and updated floodplain mapping; and
- Overseeing the consolidation of Conservation Authorities.

The Ministry of Environment, Conservation and Parks are proposing that the agency would require the local Conservation Authorities to pay for the costs of the Ontario Provincial Conservation Agency.

Additionally, the MECP has introduced an amendment to the Conservation Authorities Act that outlines the proposed boundaries for establishing Regional Conservation Authorities. The proposed consolidation will entail, including reducing the number of Conservation Authorities from 36 to 7.

MECP has indicated that they plan to consult with stakeholders, municipalities, conservation authorities, and Indigenous communities. This consultation includes a policy proposal notice period posted on the Environmental Registry of Ontario for 45 days, inviting feedback on the

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proposed boundaries and criteria for the regional consolidation of Ontario's 36 CAs with a deadline of December 22, 2025.

The Town understands that the timelines for the proposed CAA amendments are as follows:

- Consultation occurs throughout the Q1 2026;
- Conservation authorities operate within current governance structure until after the 2026 Municipal election; and
- Changes come into force January 1, 2027.

The Town of Goderich has identified several concerns relating to the proposed CAA amendments:

- What is the cost of establishing and operating the proposed Ontario Provincial Conservation Agency (OPCA)? The OPCA would require significant resources while local watershed advisory boards would still be needed to guide priorities and provide oversight.

- What is the anticipated total cost of consolidating the 36 Conservation Authorities to 7?

- As a local organization, the Maitland Conservation is responsive to community needs. Municipalities, landowners and community partners drive the services and priorities of the organization. A move to the OPCA, and the consolidation of Conservation Authorities, would mean less municipal input on service priorities, yet member municipalities currently financially contribute over 80% of the MVCA's operating budget, while the Province provides approximately 2%.

- Will the needs of rural communities and the agricultural sector will be adequately recognized and prioritized in this consolidation? Particularly since the lead Conservation Authority, for each of the 7 new regional conservation authorities, is expected to be in an urban setting in each region.

- A core priority for Maitland Valley Conservation Authority is reducing the risk of loss of life and community damage caused by flooding and erosion. MVCA are responsible for approving development in or near natural hazard areas, ensuring that new construction and additions are not at risk from flooding or erosion in floodplains or along the Lake Huron shoreline.

- MVCA's permitting process is efficient and consistent. In 2024, the average time to process all types of permits was just 5.7 days. The average time for reviewing and issuing permits by all conservation authorities is 12.5 business days.

The Town of Goderich
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- From start to finish, MVCA staff work closely with landowners, emphasizing customer service and helping them identify safe building locations outside hazardous areas. Will the proposed digital permitting platform be able to match MVCA's turnaround times and maintain this high level of customer experience? Additionally, what will the costs be for developing, implementing and maintaining this new platform?

The Town of Goderich encourages the Provincial government to partner with the current Conservation Authorities to build capacity and support local solutions to watershed issues. This will require a multi-year commitment to reinvesting in Conservation Authorities.

In order to protect Ontario's prosperity, the Town would like to see an emphasis placed on developing and protecting the health of watersheds. They are the foundation of not only our economic prosperity but our life support system as well. Clean water, diverse forests and healthy soils directly support key sectors like tourism, forestry and agriculture, which in turn support economically strong local communities.

Healthy Lake Huron (HLH) is a model of collaboration between federal, provincial and county agencies, 5 Conservation Authorities and several community groups. HLH has been successful in supporting stewardship initiatives aimed at improving water quality along the Lake Huron shoreline. Using this collaborative approach across all the watersheds in Ontario to build healthy watersheds would result in effective, cost-efficient results.

Working seamlessly together, we can achieve superior results.

Respectfully,

[redacted]

Chief Administrative Officer

Cc: The Honourable Doug Ford, Premier of Ontario
The Honourable Lisa Thompson, Minister of Rural Affairs, and MPP for Huron-Bruce
The Honourable Rob Flack, Ministry of Municipal Affairs and Housing
Association of Municipalities of Ontario
Environmental Registry of Ontario
Ed McGugan, Chair of the Maitland Valley Conservation Authority

Town of The Blue Mountains

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THORNBURY, ON N0H 2P0
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OFFICE OF: Mayor Andrea Matrosovs
Email: mayor@thebluemountains.ca
Phone: 519-599-3131 Ext 406

December 5, 2025

Minister of Environment, Conservation and Parks
College Park
5th Floor
777 Bay St.
Toronto, ON M7A 2J3
Email: minister.mecp@ontario.ca

RE: Town of The Blue Mountains Opposition to Bill 68 and the Proposed Consolidation of Ontario's Conservation Authorities

Honourable Minister McCarthy,

The Town of The Blue Mountains Council would like to express our concerns regarding Bill 68 and the proposed consolidation of Ontario's 36 Conservation Authorities into seven regional authorities. As a community with a strong and long-standing partnership with our local conservation authorities, we believe the proposed regional restructuring does not align with the best interests of our residents or the unique environmental needs of our community.

As a Council, we support provincial efforts to enhance efficiency through standardized fee schedules, policies, guidelines and online permitting systems. However, we believe that these improvements can be achieved without compromising the local expertise, responsiveness and accountability that watershed-based authorities currently provide.

The proposed consolidation raises significant concerns for The Blue Mountains Council regarding the loss of local expertise and the reduction of accessible, timely support for residents, builders and developers. Local conservation authorities possess a deep knowledge of watershed conditions, natural hazards and community priorities that cannot be effectively replicated at a broader regional scale. Centralizing the functions of local conservation authorities risks diluting the community-driven programming and tailored services that protect natural resources and support sustainable development in The Blue Mountains, while also diminishing meaningful municipal representation in decision-making. We are further concerned that a top-down

structure may introduce unnecessary transition costs, red tape and additional layers of bureaucracy, which hinder efficiency, rather than improve it.

Given these concerns, we urge you to reconsider the implications of the proposed amalgamation and to directly engage with municipalities and conservation authorities before finalizing any consolidation boundaries or legislative amendments. We respectfully request that the province consider alternative approaches that maintain local, municipally governed, watershed-based conservation authorities while supporting shared objectives of modernization and efficiency improvements. We believe that strengthening and supporting existing structures, rather than replacing them, will help to preserve local expertise, ensure consistent service delivery, and uphold the principles of community-focused governance.

Thank you for considering the perspective of the Town of The Blue Mountains. We look forward to your response and hopeful reconsideration of this proposal.

Warm regards,

Sincerely,



Mayor Andrea Matrosovs
Town of The Blue Mountains

The Corporation of the
TOWNSHIP OF DORION
DORION, ONTARIO
POT 1KO
TELEPHONE 807-857-2289
FAX 807-857-2203

Date: December 2, 2025

Resolution No. 25-290

Moved by .....

Seconded by .....

WHEREAS the *Conservation Authorities Act* (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses;

AND WHEREAS the municipalities within Lakehead Region established the Neebing Valley Conservation Authority in 1954 which enlarged to the Lakehead Region Conservation Authority (LRCA) in 1963;

AND WHEREAS local municipalities currently provide approximately 50% of total conservation authority funding, while the Province of Ontario provides approximately 5%;

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of hectares of land, much of which was donated by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities;

AND WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the *Conservation Authorities Act* and the Ministry of the Environment, Conservation and Parks;

NOW THEREFORE BE IT RESOLVED THAT the Township of Dorion calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND THAT while the Township of Dorion supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND THAT the Township of Dorion supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives;

AND that the Township of Dorion is opposed to the proposed "Huron-Superior Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257;

AND THAT the Township of Dorion recommends that the Lakehead Region Conservation Authority form the "Northwestern Ontario Regional Conservation Authority";

AND THAT the Ministry engage directly with affected municipalities of the Lakehead Region Conservation Authority, before finalizing any consolidation boundaries or legislative amendments;

AND THAT a copy of this resolution be forwarded to the Environmental Registry of Ontario consultations and to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics;
- local Members of Provincial Parliament;
- local Members of Parliament;
- the Association of Municipalities of Ontario;
- Conservation Ontario;
- All local municipalities; and
- All Conservation Authorities in Ontario.

.....

Reeve / Chair

Carried .....

Carried
(as amended) .....

Defeated .....

	YEAS	NAYS
REEVE		
R. Beatty		
COUNCILLOR		
D. Harris Shallow		
J. Mehagan		
D. Penner		
B. Cadeau		

Resolution
Special Council Meeting

Agenda Number:	7.1.1.
Resolution Number:	2025-215
Title:	Response to Bill 68 – Conservation Authority Changes
Date:	Wednesday, December 10, 2025

Moved by	Mike Tarnowski
Seconded by	Genevieve Lajoie

Whereas the *Conservation Authorities Act* (R.S.O. 1990, c. C.27) enables municipalities to establish conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of Board Members and the provision of annual municipal levies to support mandatory and non-mandatory programs and services;

And whereas the municipalities within Eastern Ontario, including the United Counties of Prescott and Russell (the "UCPR"), are founding municipal partners of the South Nation Conservation Authority (1947) and the Raisin Region Conservation Authority (1963);

And whereas municipal governments currently provide between 25% and 50% of total conservation authority funding, while the Province of Ontario provides approximately 3%;

And whereas municipalities have, for decades, governed their respective conservation authorities to ensure that programs, services, fee structures, permitting processes, and public service delivery remain aligned with local watershed needs and accountable to ratepayers;

And whereas conservation authorities collectively own and manage significant public lands across Ontario, including lands donated by local residents with the expectation that they would be protected, stewarded, and governed locally for the long-term public good;

And whereas Bill 68 proposes the creation of a new Ontario Provincial Conservation Agency—a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment and governance structures yet to be defined;

And whereas the Province already holds the authority to set provincial standards, regulations, and expectations for conservation authority operations under the *Conservation Authorities Act* and through the Ministry of the Environment, Conservation and Parks;

Be it resolved that the Council of the UCPR call on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities, ensuring strong municipal representation in decisions related to levies, service delivery, land management, and community-focused program outcomes.

Be it further resolved that while the UCPR support provincial objectives related to consistent permitting standards, shared services, and digital modernization, the imposition of a top-down centralized agency risks increasing cost, red tape, and administrative complexity while reducing accountability and responsiveness to local watershed needs.

Be it further resolved that the UCPR support balanced approaches to improving capacity, efficiency, and technical expertise across conservation authorities and request that the Province work collaboratively with municipalities and existing conservation authorities to evaluate where strategic consolidation—if any—is appropriate, effective, and financially sustainable.

Be it further resolved that a copy of this resolution be sent to the Ontario Minister of the Environment, Conservation and Parks; the local Member of Parliament and Member of Provincial Parliament; the Association of Municipalities of Ontario; the Rural Ontario Municipal Association; and all municipalities and conservation authorities in Ontario.

Carried

Mélissa Cadieux, Clerk

Upper Thames River Conservation Authority: ERO Questions and Responses

Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO#025-1257).

This response is provided on behalf of the Board of Directors of the Upper Thames River Conservation Authority (UTRCA). Board members represent 17 member municipalities in the upper watershed of the Thames River. The UTRCA was formed in 1947. The watershed covers 3,430 square kilometres in southwestern Ontario and is home to approximately 593,700 people.

Effective watershed management relies on strong connections to local needs, priorities, and expertise. In the Province's proposal, the UTRCA watershed would be consolidated with seven other Conservation Authorities representing 81 member municipalities to form the Lake Erie Regional Conservation Authority, spreading over 23,000 square kilometers and representing a population of approximately 2.5 million people. The proposal risks undermining effective watershed management.

Historically, the Province funded up to 50% of Conservation Authority operations; today, provincial support has fallen to less than 2%, leaving municipalities to fund the majority of operations. UTRCA is concerned that the proposed restructuring would shift governance away from the municipalities who created and fund Conservation Authorities, resulting in a significant loss of local decision-making, community engagement, and rural representation.

The UTRCA:

- Supports the broad goals of the Province to modernize service delivery to achieve better outcomes, while strengthening hazard protection;
- Opposes the changes outlined in the ERO Proposal as a means of achieving those goals; and,
- Supports continued evolution of the system and prefers alternatives to the Proposal that would result in voluntary consolidation, supported by adequate business rationale and time for meaningful consultation, including with Indigenous rights holders.

ERO Proposal #025-1257 would result in a Regional Conservation Authority too large to deliver effective governance and accountability to municipal funders and their residents and taxpayers.

While the UTRCA supports the Province's generally stated objectives of modernization including the use of digital permitting systems, consistent policies and standards, and enhanced use of technology. The Province already holds the legislative authority needed to implement consistent policies and resources across the existing CA boundaries without consolidation through direction and tools, such as modernized technical guidelines. These objectives can be addressed without the disruption and destabilization inherent in large-scale structural consolidations, and counter to the Province's goals of advancing the housing priority, streamlining, and reducing red tape while ensuring safe development.

Substantial concerns and risks have been identified with the proposed consolidation, particularly with respect to the loss of local decision-making, reduced municipal representation,

uncertainty around transition funding, asset ownership considerations, potential service disruption, loss of local expertise, and impacts on the local delivery of programs and services. The scale of the proposed Lake Erie Regional CA raises additional challenges related to maintaining effective community relationships and ensuring services remain responsive to local watershed conditions. Considering the proposed criteria and boundaries for the RCAs and the uncertainties and risks associated with the proposal, the UTRCA does not support the proposed RCA framework.

Clarity is needed from the Province to understand the problem it is trying to solve. The importance of meaningful consultation and engagement with municipalities, conservation authorities, Indigenous communities and partners prior to any decision being finalized cannot be understated. Additional time for meaningful dialogue is required to discuss alternatives to ensure successful implementation.

A transparent, comprehensive cost-benefit analysis of alternative approaches should be undertaken to inform decision-making in any consolidation model. Where a consolidation is deemed beneficial, it should be supported by a clearly defined and phased transition plan. Full provincial financial support is critical for any transition period to ensure continuity of programs and services and to avoid disruption.

Accordingly, the Province needs to consider the benefits of a measured “pause” of the consolidation proposal to allow the Ontario Provincial Conservation Agency to complete its initial three-year term, undertake meaningful engagement with conservation authorities, municipalities, Indigenous communities and partners, to assess the necessity of consolidation of conservation authorities through an evidence-based approach. This would include clearly identifying issues, providing effective communication and feedback to conservation authorities to address any issues and if necessary, consider alternative models that would more effectively advance provincial priorities related to efficiency, red-tape reduction, and timely housing delivery.

For these reasons, the UTRCA Board passed a formal motion stating its opposition to the proposed Lake Erie Regional Conservation Authority. A copy of the motion has been attached to this response. Notwithstanding the opposition by the Board to the proposal, comments are provided on the five ERO questions in the table below.

ERO Questions	UTRCA Recommendations	UTRCA Comments
1. Key Factors for a Successful Transition and Outcome: What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?	**Recommendation 1:** That the Province consider achieving modernization goals through the current 36 CA corporations using legislative and regulatory amendments, technological solutions, and compliance verification before considering consolidations. **Recommendation 2:** That the Province collaborates with an implementation working group including the Association of Municipalities of Ontario, Conservation Ontario, CAs, Indigenous communities, municipalities, and other experts to consider options and evaluate proposed solutions within this proposal.	**1a. Preserve Local Municipal Governance and Decision-Making** The proposed Lake Erie Region Conservation Authority would consolidate 8 CAs, encompassing 81 local municipalities and 11 First Nation communities (there are none within the UTRCA watershed), and covered by more than 10 Treaties signed with multiple First Nations. Without a doubt, this scale risks diluting local municipal representation, particularly for smaller and rural communities. When the UTRCA's Board size was reduced at the request of the province, in the mid-90s, it was important to maintain a balance of urban and rural representatives to reflect the diverse landscape of the watershed. As the largest contributor to CA budgets, municipalities must continue to have the same equitable representation and voice they are afforded today. Municipalities must maintain a meaningful voice at all levels of CA governance and decision-making to ensure local issues and concerns are not lost. Support from key partners, specifically municipalities, is key to the ongoing success of CAs in Ontario. To deliver on its mission, a new regional conservation authority model must be grounded in fundamentals of effective watershed management, including: • Protecting life and reducing property damage from flooding and erosion, • Supporting municipal partners, Indigenous communities, the development community, and landowners with timely, reliable services, • Meeting the requirements under the *Clean Water Act* for source protection planning, • Enhancing the economic, environmental, and community health of the watershed through stewardship, education, and partnerships

ERO Questions	UTRCA Recommendations	UTRCA Comments
		• Providing meaningful opportunities for people to connect at the local level, and • Meeting the demands of a rapidly growing population at a time of climate pressure. If regionalization stretches teams too broadly, we risk losing: • The ability to design and deliver environmental programs and services tailored to the unique needs of each watershed and responsive to municipal and community priorities, • Local, on-the-ground expertise, • Critical knowledge of local environmental conditions and historical records (e.g., localized flooding impacts), • Strong relationships and funding support from municipalities, Indigenous communities, the agricultural community, donors, businesses, watershed residents, and other partners, • Real-time responsiveness during storms and emergencies and other urgent events, • Engagement and support from the scientific community, and • Effective oversight and buy-in from municipal funding partners. To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, CAs must be appropriately accountable. • The principle of “pay for say” should be reflected in the design of new CAs, as it is today. • The proposed catchment area of the proposed consolidated Lake Erie Regional CA would combine more than 80 municipalities, stretching oversight and “pay for say” beyond what is workable and undermining confidence in the governance of CAs. • Recognise the needs of rural communities and the agricultural sector.

ERO Questions	UTRCA Recommendations	UTRCA Comments
	Recommendation 3: That a stable, clear, transition plan be prepared collaboratively with the implementation working group. To minimize potential disruptions, this plan should consider: service standards, points of contact, permitting continuity measures, board and staff communications, and staff retention measures. The existing CA Boards should remain in place beyond 2026. The local CAs board could inform a comprehensive cost-benefit analysis on consolidation and help outline the most effective level of strategic consolidation to achieve both provincial and local objectives with municipal input. Local input and buy-in will be imperative to the success of any new framework. **Recommendation 4:** That the Province consider a longer implementation timeline to fully address: board governance and appointment frameworks; funding mechanisms, allocations, and reserve structures; and service continuity matters. Phasing standards,	The provincial goals for consistent permit approval processes, shared services, and digital modernization can be realized within the current Conservation Authority structure without imposing a new top-down agency structure that does not have strong local accountability but increases costs to taxpayers. **1b. Avoid Delaying Performance Improvements Currently Underway** The proposed changes risk undermining the implementation of provincial improvements that have already been introduced. In recent years, the Province has significantly changed the role of CAs in land use planning matters as part of its broader initiative to build more homes faster. Insufficient time has passed to fully implement recent amendments and evaluate their impact on development outcomes. Given the volume and speed of legislative changes, industry interest-holders are still processing the effect and significance of various legislative changes. All interest-holders, including the development industry, benefit from certainty. The proposed consolidation will introduce additional unknowns and new processes at an already uncertain time in the market. **1c. Provide Dedicated Provincial Funding for the Transition** A cost-benefit analysis of the proposed consolidation should be completed and properly evaluated by member municipalities. There would be substantial costs associated with merging eight CAs into one regional CA, including but not limited to: • IT and data system integration, • HR and union harmonization (two CAs within the proposed Lake Erie Region are unionized, CUPE and OPSEU, while the other six are not),

ERO Questions	UTRCA Recommendations	UTRCA Comments
	guidelines, and directives across all CAs before any consolidation (should consolidation be required at all) offers greater stability and predictability. This approach minimizes multiple significant changes occurring at the same time, reducing risks of disruption to program delivery, and creating conditions for better outcomes and buy-in. **Recommendation 5**: That transition costs for any consolidation be fully funded by the Province.	• Potential HR costs and consolidation implications of merging multiple HR policies, • Fee and policy alignment, • Corporate service model consolidation, • Rebranding, signage, and legal transitions, and • Asset and liability assessment. It is unacceptable to require member municipalities to fund these costs while diminishing their influence. They must not be burdened with the expense of mandated consolidations. Without a rigorous cost-benefit analysis proving that large-scale consolidations will reduce costs and enhance service, the risks clearly outweigh any potential benefits. Instead, collaboration between the Province, conservation authorities, municipalities, Indigenous communities and partners to determine whether consolidation, at any scale, is the most strategic and effective approach to achieve both provincial and local objectives. **1d. Protect and Enhance Existing Service Levels** The uncertainty around consolidation presents a significant risk to workforce stability, recruitment, and retention. Effective watershed management depends on local integrated expertise in hydrology/hydraulics, natural hazards, ecology, and familiarity with the unique conditions of each watershed. Local CA staff attend site visits and face-to-face meetings and knowledge of the local geography and political landscape. Despite increasing levels of development in the watershed, UTRCA continues to issue 99% of permits within the provincial guidelines and, on average, are issuing permits within 6-7 days of receiving complete applications. Consolidation risks weakening well-functioning systems through administrative complexity and diluted oversight. Consolidating and

ERO Questions	UTRCA Recommendations	UTRCA Comments
		potentially centralizing offices could reduce responsiveness, delay decisions, and weaken local expertise and connection to the community. Centralization will not happen overnight, and effectiveness will likely decline before improvements occur. This could slow permitting in the near term. **1e. Ensure Financial and Legal Due Diligence** Each CA in the proposed region has vast landholdings, complex assets (e.g., water and erosion control infrastructure), financial assets and liabilities, foundations, legal proceedings, and unique local agreements. A thorough financial and legal due diligence analysis is necessary to assess restrictions and complexities on transferring these assets from local control to regional oversight. **1f. Maintain Local CA Board beyond 2026** "Pausing" consolidation would permit the Province to monitor the impact of recent changes while ensuring future changes are rolled out in a measured and predictable fashion. Guidance may be taken from the Province's experience with municipal amalgamation in the 1990s and 2000s to ensure that any proposed consolidation of CAs is well-timed and efficiencies at the local level are evaluated prior to implementing structural changes.
2. Potential Opportunities or Benefits: What opportunities or benefits may come from a regional conservation authority framework?	**Recommendation 6:** That the Province demonstrates that the statutory objects of the CAs can be effectively delivered within the proposed new regional boundaries. **Recommendation 7:** That the Province update policies and	The provincial proposal for regional consolidation does not include enough information to effectively evaluate the benefits. **2a. Ensure Consistent Standards** Funding that would be directed into the consolidation costs mentioned above would be better spent on front-line resources that would improve consistency and modernize tools and resources equitably across all CAs. Provincial approvals of policies, guidance, and

ERO Questions	UTRCA Recommendations	UTRCA Comments
	standards together with Conservation Ontario, CAs, AMO, and municipalities to reduce inconsistencies and promote consistent implementation outcomes.	standards have not kept pace with modern needs. Provincial funds directed to improved mapping, technical guidance, policy development and e-permitting services would have immediate benefits across the province. Provincial efforts and funding should be directed to this goal within the existing CA framework.

ERO Questions	UTRCA Recommendations	UTRCA Comments
	Recommendation 8: That the Province invest stable, adequate, multi-year funding into CA programs including floodplain mapping, monitoring, and water and erosion mitigation infrastructure. **Recommendation 9:** That the Province recalibrate and increase the funding for the Water and Erosion Control Infrastructure funding program as part of the consolidation process, in time for the 2027 budget.	**2b. Provide Additional Investment** Municipal levies currently fund 34% of the total costs of UTRCA programs and services, with the Province contributing less than 2%. For mandatory programs and services, the municipal contribution in the UTRCA watershed is 67% while the provincial transfer payments cover less than 5% of operating expenses. The remaining costs are covered by leveraging the municipal investment with funds from user fees, grants, and contracts. Mandatory programs and services provided by the UTRCA include; • flood forecasting and warning, • low water response, • operation and maintenance of water control and erosion control infrastructure, • provide input on land-use planning to ensure that decisions are consistent with the natural hazard policies of policy documents; • administering permits issued under section 28 of *Conservation Authorities Act* and associated enforcement activities, • the conservation and management of lands, • provincial surface quality and groundwater quantity monitoring, and • Source Protection authority under the Clean Water Act. Additional Provincial investment is required to ensure mandatory programs and services of the UTRCA are supported without a reduced level of service delivery provided to the public. In addition, the UTRCA has aging major flood control structures requiring ongoing monitoring and maintenance. The current provincial Water and Erosion Control Infrastructure funding program cap of $5 million for the entire province is completely inadequate.

ERO Questions	UTRCA Recommendations	UTRCA Comments
	Recommendation 10: That an integrated digital platform that connects the fundamental strengths of multiple CAs, across multiple offices and disciplines, be developed to deliver enhanced watershed programming in Ontario.	**2c. Pooling of resources and collaboration between technical experts** Effective watershed governance relies on strong connections to local needs, priorities, and knowledge, which then guide natural hazard management, shape infrastructure decisions, strengthen watershed health, stewardship programs, community education and partnerships and outdoor recreation. Specific knowledge of the local watershed and environment is integral to the ability of CAs to carry out their permitting function under the *Conservation Authorities Act*. Bringing experts from across CAs together may provide greater opportunities for collaboration, specialization, and information sharing as well as pooling resources. Consolidation of CAs is not required to achieve this outcome; however, a more centralized system and investment of baseline resources are required.
3. Governance Structure Considerations: Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?	**Recommendation 11:** That the Regional Conservation Authority Board should be: • Maximum 30 members (ideally between 15-20 to be effective), • Reflective of population, levy contribution, land base, watershed complexity, urban and rural needs, and service demand, • Structured to preserve meaningful local influence, • Include Indigenous representation to strengthen partnerships and ensure	**3a. Reduce the Geographical Area of the Proposed Consolidation** In developing the proposed regional CAs the province-based decisions on watershed-based jurisdiction, administrative duplication and balancing expertise. This resulted in geographically vast regions that do not account for existing working relationships between CAs and municipalities. Other criteria should be weighted, including existing working relationships between CAs and municipalities, and urban versus rural balance. The success of the CA governance model has always been that local decisions are made by local representatives. The geographic scope of the region needs to be reduced to protect that principle. **3b. Create a Governance Model that is Functional and Fair** Applying current legislative population formulas would produce a Lake Erie Regional CA Board of 120 members, which is unmanageable and

ERO Questions	UTRCA Recommendations	UTRCA Comments
	programs reflect diverse perspectives.	ineffective. A Board of this size risks a loss of local perspectives and challenges in achieving timely, responsive decisions. There is a loss of local municipal representation in this framework. **3c. Maintain Municipal Appointment Authority and Add Indigenous Appointments** Appointments to the regional conservation authorities must remain municipal to ensure transparency, accountability, and local alignment. Appointments to the Ontario Provincial Conservation Agency should include municipal appointments from each of the RCA boards. A new structure provides an opportunity for appointments to include Indigenous representation on CA Boards as a vital step toward strengthening partnerships and ensuring programs reflect diverse perspectives. This representation of rightsholders would deepen cultural connections, enhance decision-making, and align with previous recommendations to create more inclusive and effective governance.
4. Maintaining a Transparent and Consultative Budgeting Process: Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?	**Recommendation 12:** That should any proposed consolidation proceed, existing watershed approaches to budgeting be maintained to assure delivery of local programs and services at the watershed level.	**4a. Engage Municipalities in Budget Development** Budgeting must be transparent, co-developed, and grounded in clear service-level commitments. Issues of budgeting, reserve allocations, Category 3 program funding, and other financial matters require provincial consultation with current CAs and need to be in place prior to consolidation. Another key factor to consider is protecting watershed reserves, infrastructure, and land assets. Many watershed municipalities are concerned how locally funded reserves, land assets, and long-term capital programs will be treated within the proposed consolidated structure. **4b. Ensure Fair Apportionment**

ERO Questions	UTRCA Recommendations	UTRCA Comments
		Municipalities risk subsidizing areas with a smaller tax base. Local apportionment should be directed to local assets.
5. Maintaining and Strengthening Local Relationships: How can regional conservation authorities maintain and strengthen relationships	**Recommendation 13:** That local offices be retained to deliver programs.	**5a. Retain Local Presence** Local offices and staff are essential for timely permitting, program delivery, flood forecasting and warning operations, environmental monitoring, community engagement, and effective stewardship. It is imperative that local knowledge be retained, and decisions reflect local conditions. **5b. Protect Local Programs** Locally delivered conservation authority programs such as the UTRCA's Southern Ontario At Risk Reptiles (SOARR), Green Leaders, Tree Power / tree planting, stewardship services, environmental monitoring, education, community partnerships, and parks are rooted in community identity. They must be preserved. **5c. Preserve Community Access to Greenspace** Many municipalities rely on UTRCA lands for recreational opportunities because local land acquisition is cost prohibitive. Any centralization or asset disposition would jeopardize public benefit, as decisions made at a regional or provincial level may not reflect local community needs or priorities.

Additional Comments

In addition to the comments provided in response to the questions in the ERO posting, the UTRCA is concerned about the governance structure of the Ontario Provincial Conservation Authority.

As currently designed, the agency will report to a provincial ministry and be governed entirely by provincially appointed board members. At the same time, CAs and, therefore, municipalities, will be required to fund all or a portion of the agency's operations through existing levy/apportionment processes. This means that municipalities may ultimately contribute all or a significant share of the OPCA's budget without having any meaningful role in shaping its governance, priorities, or strategic direction.

For municipalities that rely heavily on CA guidance for land-use planning, hazard management, infrastructure development, and emergency response, this creates a disconnect between financial responsibility and decision-making influence.

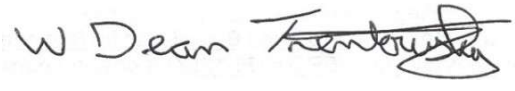
Not only would this be a precedent-setting method for funding a provincial agency, it establishes a system in which municipalities help fund a provincial agency but have no formal avenue to participate in its oversight, which raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs.

Summary Statement

UTRCA urges the Province to prioritize modernization through shared standards, tools, and funding rather than large-scale structural consolidations. We remain committed to working collaboratively to achieve efficiency and consistency while preserving the watershed-based governance model that has served Ontario effectively for decades. The Province needs to consider the benefits of a measured "pause" of the consolidation proposal to allow the Ontario Provincial Conservation Agency to complete its initial three year term, undertake meaningful engagement with conservation authorities, municipalities, Indigenous communities and partners, to assess the necessity of consolidation of conservation authorities through an evidence-based approach. This would include clearly identifying issues, providing effective communication and feedback to conservation authorities to address any issues and if necessary, consider alternative models that would more effectively advance provincial priorities related to efficiency, red-tape reduction, and timely housing delivery.

Thank you for the opportunity to review and provide comments on the proposed boundaries for the regional consolidation of Ontario's conservation authorities.

Submitted by:
Upper Thames River Conservation Authority





W. Dean Trentowsky
Chair

Tracy Annett
General Manager

Attachment: Board of Directors Motion, November 25, 2025

Mover: Skylar Franke
Seconder: George Way
Board of Directors Motion, November 25, 2025

At the November 25, 2025, meeting, the Upper Thames River Conservation Authority (UTRCA) Board of Directors adopted the following motion. They further directed staff to circulate a letter to all member municipalities of the Upper Thames watershed and First Nation communities affected by the proposed change in geographic boundaries, with a focus on the economic and legal ramifications and other relevant ramifications of the proposed legislative changes by the province.

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the Conservation Authorities Act;
AND WHEREAS under this proposal, the Upper Thames River Conservation Authority (UTRCA) would be merged into a new "Lake Erie Regional Conservation Authority" together with the: Essex Region CA, Lower Thames Valley CA, St. Clair Region CA, Kettle Creek CA, Catfish Creek CA, Long Point Region CA, and Grand River CA, forming a single organization stretching from Windsor, through London, Brantford, and north of Waterloo region;
AND WHEREAS the Board acknowledges and supports the Province's goals of improved efficiency, consistency, and fiscal responsibility in conservation delivery, but find that the proposed "Lake Erie Region" configuration would create a geographically vast and administratively complex entity; dilute local accountability and municipal partnership; generate substantial transition costs, including human resources integration, governance restructuring, IT migration, and policy harmonization that would divert resources from the front-line service delivery making it hard for applicants to obtain timely local advice, resolve issues, or expedite housing and infrastructure approvals that support the Province's goals;
AND WHEREAS UTRCA has always worked with its member municipalities, the province, and partners to be fiscally responsible while ensuring the conservation, restoration, development, and management of natural resources within the upper Thames River watershed including modernizing its programs and services and aligning them with provincial guidance and neighbouring CAs and will continue to do so;
THEREFORE BE IT RESOLVED THAT UTRCA Board of Directors does not support the proposed "Lake Erie Regional Conservation Authority" boundary configuration outlined in the Environment Registry Notice 02-1257; and the Board instead requests that the Ministry engage directly with affected municipalities and conservation authorities to evaluate a reduced geographic scope for consolidation that better reflects established relationships and enhances cost-efficient delivery of integrated watershed management, grassroots connections, and local understanding;
AND FINALLY THAT this resolution be forwarded to the Minister of Environment, Conservation and Parks, local members of Provincial Parliament, Association of Municipalities of Ontario, Rural Ontario Municipalities Association, all municipalities and CAs within the proposed Lake Erie Regional Conservation Authority, and Conservation Ontario.

A recorded vote was requested.

Jean Coles - For
Jim Craigmile - For
Peter Cuddy - Against
Skylar Franke - For
Tom Heeman - For
Anna Hopkins - For
Sandy Levin - For
Hugh McDermid - For
Paul Mitchell - For
Harj Nijjar - For
Brian Petrie - For
Mark Schadenberg - For
George Way - For
Scotty Zehr - For
Dean Trentowsky - For

The motion was carried with fourteen members in favour and one against.

Township of Zorra
163 Brock Street PO Box 189 Thamesford Ontario N0M 2M0
519-485-2490 www.zorra.ca admin@zorra.ca

December 18, 2025

The Honourable Doug Ford
Premier of Ontario
Via Email: premier@ontario.ca

Dear Premier Ford,

RE: Bill 68 and Proposed Consolidation of Conservation Authorities

At the December 17, 2025 meeting of the Council of the Township of Zorra, the following resolution was passed:

Moved by: Paul Mitchell
Seconded by: Kevin Stewart
"WHEREAS the Conservation Authorities Act (1946) enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses;

AND WHEREAS the Township of Zorra established the Upper Thames River Conservation Authority (initially formed in 1947);

AND WHEREAS local municipalities currently provide approximately 35% of total conservation authority funding, while the Province of Ontario provides approximately 2% (2026 budget);

AND WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers;

AND WHEREAS conservation authorities collectively own and manage thousands of acres of land. Many of these properties were entrusted to the UTRCA for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities;

AND WHEREAS Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency, a Crown corporation that would assume governance responsibilities and consolidate Ontario's 36 conservation authorities into seven regional authorities, with municipal cost apportionment yet to be defined;

AND WHEREAS the Province already possesses the authority to establish overarching legislation, regulations, and standards through the Conservation Authorities Act and the Ministry of the Environment, Conservation and Parks;

NOW THEREFORE BE IT RESOLVED THAT the Council of the Township of Zorra calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands;

AND FURTHER THAT while the Township of Zorra supports provincial goals tor consistent permit approval processes, shared services, and digital modernization, imposing a new top-down agency structure without strong local accountability and governance risks creating unnecessary cost, red tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs;

AND FURTHER THAT the Township of Zorra supports efforts to balance expertise, capacity, and program delivery across the province, and requests that the Province work collaboratively with municipalities and local conservation authorities to determine the most effective level of strategic consolidation to achieve both provincial and local objectives.

AND FURTHER THAT a copy of this resolution be sent to:

- Premier Doug Ford
- the Ontario Minister of Environment, Conservation, and Parks,
- Ernie Hardeman, MPP for the riding of Oxford
- Rural Ontario Municipal Association
- All municipalities in the UTRCA watershed
- All Conservation Authorities in Ontario
- Conservation Ontario

Disposition: Carried

Should you require anything further or have questions or concerns, please do not hesitate to contact the undersigned.

Thank you,

Karen Martin
Director of Corporate & Protective Services/Clerk

CC: All those noted on resolution (by email)

25-060

Office of the Warden

595 9th Avenue East, Owen Sound Ontario N4K 3E3
519-372-0219 / 1-800-567-GREY / Fax: 519-376-8998

December 17, 2025

To: Hon. Todd McCarthy
Minister of Environment, Conservation and Parks
minister.mecp@ontario.ca
VIA EMAIL ONLY

Re: Grey County Council Comments on Proposed Changes to the Conservation Authorities Act

Please be advised that the Council for the Corporation of the County of Grey endorsed the following resolution:

CW171-25
Moved by: Councillor Greig
Seconded by: Councillor Dobreen

That report PDR-CW-70-25 be received;

That County staff be directed to submit report PDR-CW-70-25 as the County of Grey comments on Environmental Registry Posting 025-1257; and

That the County of Grey requests assurance from the Province that the establishment of the new Ontario Provincial Conservation Agency will not be funded by the municipal portion of Conservation Authority levies and that it will not be funded from current Conservation Authority budgets; and

That Grey County requests the Province pause on passing any further changes to Conservation Authority structure until further analysis has been conducted and additional details are released on new proposed models; and

That report PDR-CW-70-25 be shared with Members of Provincial Parliament Paul Vickers and Brian Saunderson, as well as member municipalities, AMO and conservation authorities having jurisdiction in Grey County; and

That staff be authorized to carry out the above prior to County Council approval as per Section 26.6(b) of Procedural By-law 5134-22.

Carried

Grey County Council has reviewed the Province's proposed changes to the Conservation Authorities Act and wishes to share our formal comments and recommendations, as adopted by Grey County Council on December 11th, 2025 through Report PDR-CW-70-25.

Key Concerns

Grey County recognizes the importance of modernization but has significant concerns regarding:

- Loss of local governance and watershed-specific expertise under large regional structures. Grey County Council expresses significant concern of the loss of rural identity within a new watershed that is dominated by large urban areas alongside the fact that this new regional structure will be larger than some countries.
- Reduced municipal input and diminished ability to address local priorities effectively.
- Uncertainty around service delivery, including source water protection and risk management functions critical to our communities.
- Lack of clarity in respect to asset management of flood control and water infrastructure.
- Erosion or loss of locally valued services in stewardship, local educational programs and recreational opportunities
- Additional costs without improvements to services (indeed, Council expressed concern that services would be reduced) associated with transitional costs, a new provincial agency, new regional management and administrative structures, levelling up of services, salary and technology equalization.

The suggested move to a Regional Conservation Authority model, and indeed, the Regions themselves do not appear to have any evidence based rationale to support how these will deliver more efficient, effective services, nor how costs will be reduced and Council expressed concerns that at best, services remain static and costs will increase; it is more likely that service levels will be reduced, and costs will increase. Further, Council articulated specific concern that the approach proposed seems

contrary to provincial policy, leading to increased red tape, further bureaucracy and slower and more expensive development review and approvals.

Suggested Improvements

Council supports constructive improvements to Conservation Authorities, including:

- Improved transparency and performance reporting to strengthen accountability, including new provincial wide technical and policy guidance to include additional KPI's. Council showed strong support for the use of Watershed Report Cards as key tools to demonstrate local value of watershed management activities.
- Enhanced collaboration tools for municipalities and authorities to share data and best practices.
- Streamlined permitting processes without compromising environmental protections.
- Investment in digital modernization to improve service efficiency and public access.

Council agreed that through implementing improvements such as these, in collaboration with Conservation Ontario and Conservation Authorities, within the context of the existing structures and legislation, improvements could be identified without costly and disruptive systems overhaul. Further, through implementation of these measures data could be gathered that might be evidence that amalgamations in geographically relevant, specific areas could result in service improvements, where supported and directed by member municipalities to those Conservation Authorities.

Grey County urges the Province to work collaboratively with municipalities and conservation authorities to ensure that modernization efforts preserve local decision-making, protect donated lands, and maintain strong watershed management practices.

Thank you for considering these comments. We welcome further dialogue and remain committed to supporting effective, locally responsive conservation governance.

The full report is attached for your reference. All Grey County Council meetings are streamed and available to watch online. The discussion on this topic starts at approximately minute forty.

Yours truly,



Andrea Matrosovs
Grey County Warden
Andrea.matrosovs@grey.ca
www.grey.ca

Enclosures

cc. Hon. Lisa Thompson, Minister of Rural Affairs lisa.thompson@pc.ola.org
MPP Paul Vickers, MPP for Bruce-Grey-Owen Sound paul.vickers@pc.ola.org
MPP Brian Saunderson, MPP for Simcoe – Grey brian.saunderson@pc.ola.org
Grey County Municipal Clerks
Grey County Municipal Planners
AMO – resolutions@amo.on.ca
Erik Downing, General Manager – Saugeen Valley Conservation Authority - e.downing@svca.on.ca
Tim Lanthier, Chief Administrative Officer – Grey Sauble Conservation Authority - t.lanthier@greysauble.on.ca
Jennifer Vincent, Chief Administrative Officer – Nottawasaga Valley Conservation Authority - jvincent@nvca.on.ca
Samantha Lawson, Chief Administrative Officer – Grand River Conservation Authority - slawson@grandriver.ca

Committee Report

To:	Warden Matrosovs and Members of Grey County Council
Committee Date:	December 11, 2025
Subject / Report No:	PDR-CW-70-25
Title:	Office of the Warden
Prepared by:	Niall Lobley, Deputy CAO and Scott Taylor, Director of Planning
Reviewed by:	Randy Scherzer, CAO
Lower Tier(s) Affected:	All member municipalities in Grey County

Recommendation

1. **That report PDR-CW-70-25 be received;**
2. **That County staff be directed to submit report PDR-CW-70-25 as the County of Grey comments on Environmental Registry Posting 025-1257; and**
3. **That the County of Grey requests assurance from the Province that the establishment of the new Ontario Provincial Conservation Agency will not be funded by the municipal portion of Conservation Authority levies and that it will not be funded from current Conservation Authority budgets; and**
4. **That Grey County requests the Province pause on passing any further changes to Conservation Authority structure until further analysis has been conducted and additional details are released on new proposed models; and**
5. **That report PDR-CW-70-25 be shared with Members of Provincial Parliament Paul Vickers and Brian Saunderson, as well as member municipalities, AMO and conservation authorities having jurisdiction in Grey County; and**
6. **That staff be authorized to carry out the above prior to County Council approval as per Section 26.6(b) of Procedural By-law 5134-22.**

Executive Summary

On October 31, 2025, the province announced changes to the *Conservation Authorities Act* which would:

a) create a new Ontario Provincial Conservation Agency, and
b) consolidate Ontario's current thirty-six conservation authorities into seven new regional conservation authorities.

The stated goals of these changes are to *"reduce duplicative administrative costs, free-up resources for frontline conservation, and better align conservation authorities' services with provincial priorities on housing, the economy, infrastructure and climate resilience."*

On November 27, 2025, Bill 68, the *Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2)* received royal assent. Bill 68 creates the above-mentioned Ontario Provincial Conservation Agency.

County and municipal staff have questions and concerns about the proposed changes. The purpose of this report is to provide Council some background on the proposed changes, as well as outlining the County's questions and concerns, including recommending some additional ideas the province can consider on this topic. It is recommended that this report form the basis for the County's comments back to the province in response to Environmental Registry posting 025-1257.

Background and Discussion

The first *Conservation Authorities Act* in Ontario was passed in 1946. This legislation was passed in response to concerns 'that the renewable resources of Ontario were in an unhealthy state based on poor land use, water, and forestry practices'. A notable hallmark of Ontario's conservation authorities (CAs) legislation is that CAs are based on natural watershed boundaries, rather than political boundaries. Even in the original 1946 legislation, costs of projects were to be shared by municipalities and the provincial government. An important milestone in Ontario's conservation journey was the devastating impacts of Hurricane Hazel in 1954. After the hurricane, Ontario made further changes to the *Conservation Authorities Act "to enable Conservation Authorities to acquire lands for recreation and conservation purposes, and to regulate that land for the safety of the community."* (Source: Conservation Ontario website)

The role of CAs has continued to evolve since the 1950's, and the *Conservation Authorities Act* has been amended many times since then, including several times in the

last seven years. On October 31, 2025, the province announced further changes to the Act. Through the November 7, 2025 Environmental Registry posting (posting # 025-1257, see link in the Attachments section of this report) the province is now seeking feedback on these matters. The proposed changes, if passed, would primarily accomplish the following:

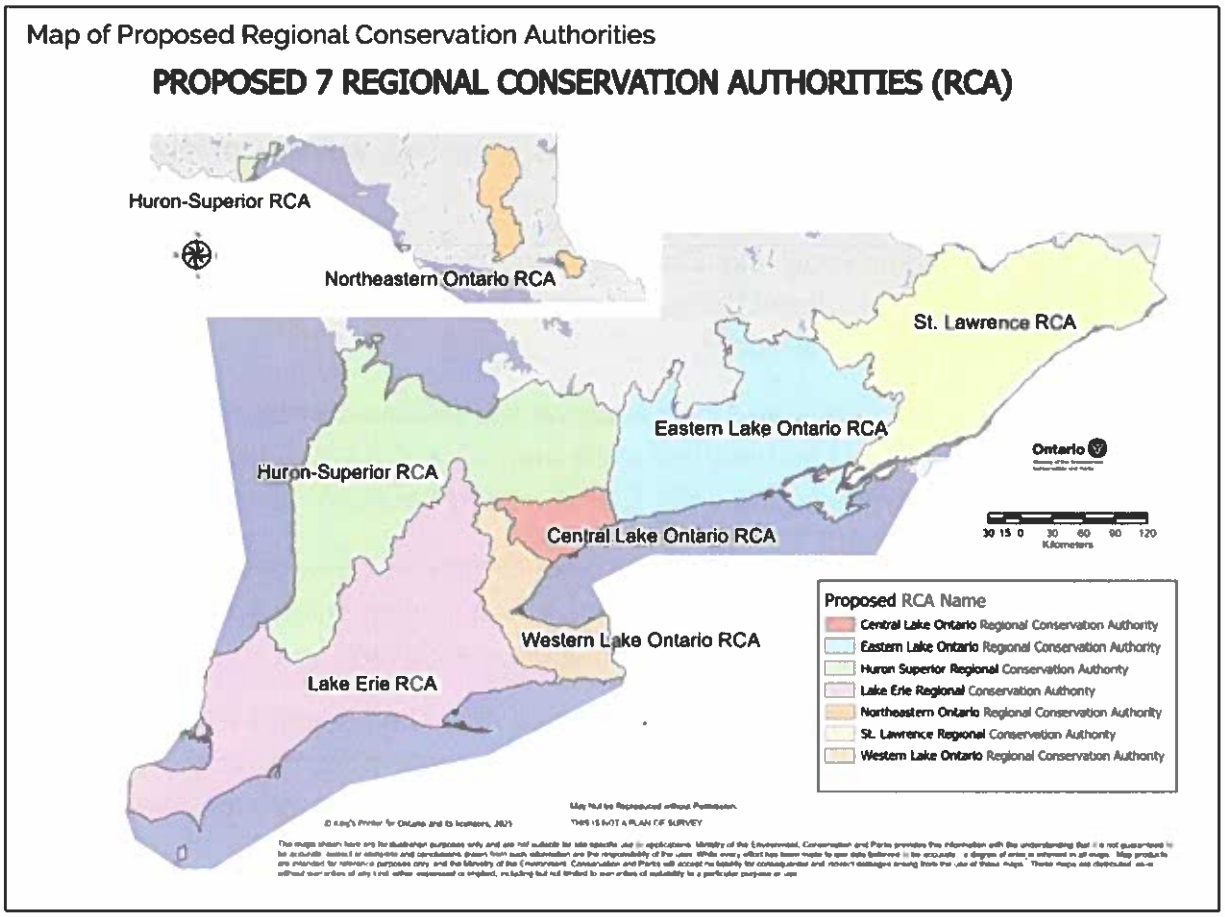
a) create a new Ontario Provincial Conservation Agency, and
b) consolidate Ontario's current thirty-six conservation authorities into seven new regional conservation authorities.

With respect to item (b) above, map 1 below shows the seven new regional conservation authority (RCAs) boundaries, while maps 2 and 3 show the two RCAs with jurisdiction in Grey County, being the Lake Erie RCA and the Huron-Superior RCA.

On November 27, 2025, Bill 68, the *Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2)* received royal assent. As it pertains to the *Conservation Authorities Act* changes, Bill 68 establishes the new provincial agency as follows.

"The Schedule amends the Conservation Authorities Act. The Ontario Provincial Conservation Agency is established. Its objects include overseeing conservation authorities and the transition to a regional watershed-based framework for conservation authorities in Ontario."

Map 1: Proposed Regional Conservation Authorities

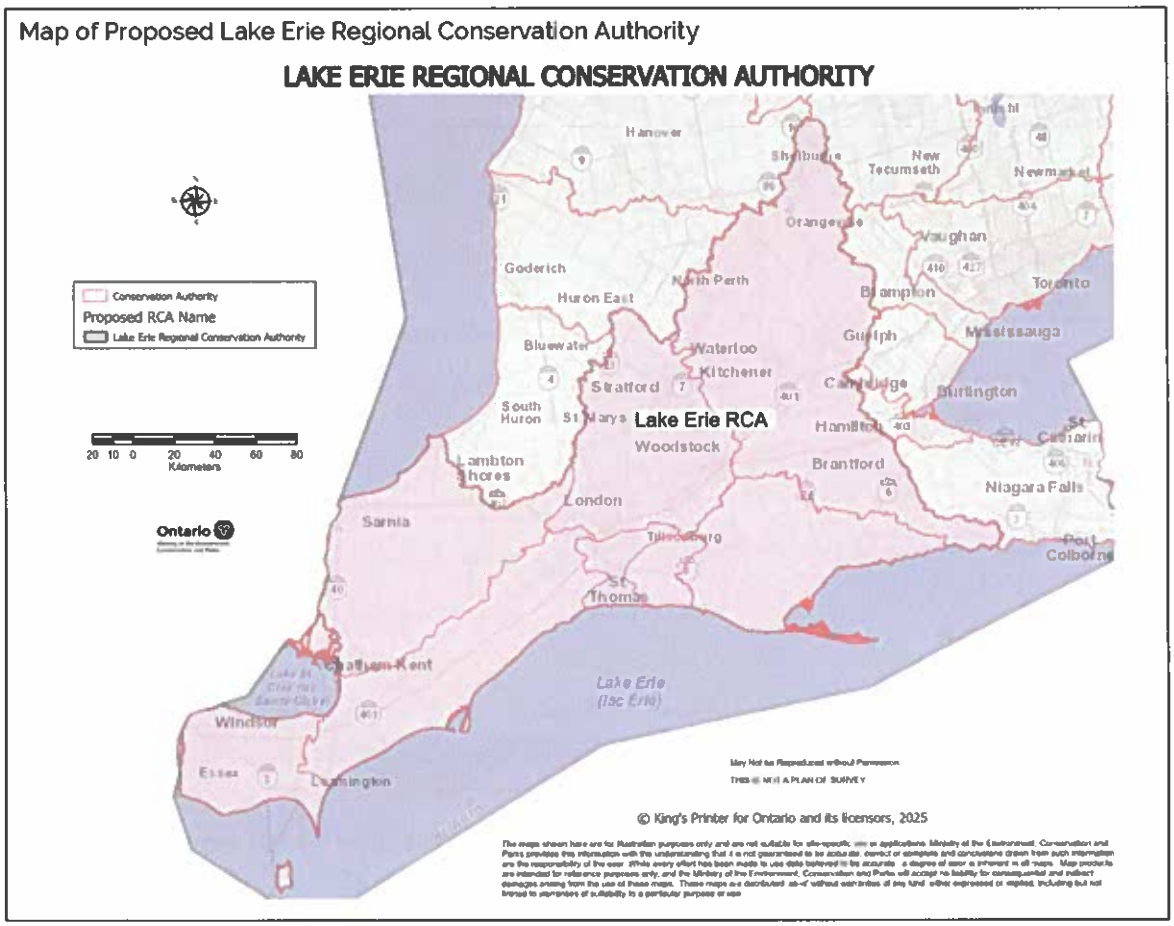


The provincial government's stated purpose for these changes is described as follows in the Environmental Registry posting:

> *"The Government's intention to introduce legislation which, if passed, would amend the Conservation Authorities Act to create the Ontario Provincial Conservation Agency – a provincial board-governed agency – to provide centralized leadership, efficient governance, strategic direction, and oversight of Ontario's conservation authorities…*
>
> *These proposed improvements to the conservation authority system would reduce duplicative administrative costs, free-up resources for frontline conservation, and better align conservation authorities' services with provincial priorities on housing, the economy, infrastructure and climate resilience.*
>
> *The regional conservation authorities would continue to focus on managing natural hazards and watershed health, drawing on decades of local knowledge and partnerships. With better tools and more resources for front-line staff, the regional conservation authorities would operate with greater consistency and transparency,*

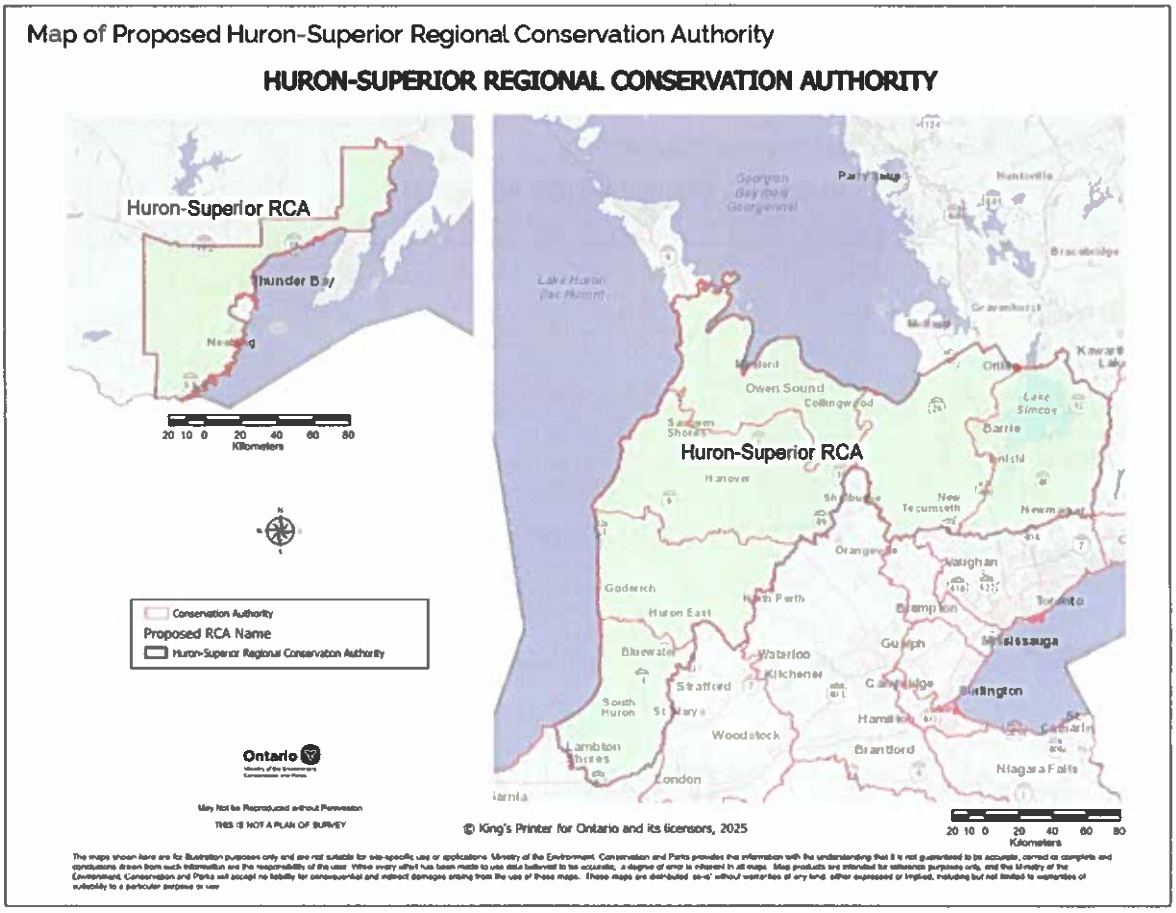
deliver faster services to municipalities and permit applicants, while ensuring decisions continue to be based on sound science."

Map 2: Lake Erie Regional Conservation Authority



The government has further shared that there would be no changes to the overall extent of CAs jurisdiction, and that the RCAs would remain independent organizations with municipal oversight. Furthermore, the RCAs would continue to be involved in mandated programs including drinking water source protection. RCAs would also still be involved in tree planting, data collection, and watershed management activities. The province has further indicated that there would be significant efficiencies through the move to RCA's and confirmed that there will be no job losses through the changes proposed, while noting some management positions would be redeployed to supporting front line conservation efforts.

Map 3: Huron-Superior Regional Conservation Authority



The province has stated that one of the reasons for consolidation of CA boundaries is to reduce the number of municipalities which are served by multiple CAs. If the changes are passed, the number of municipalities served by multiple CAs would be reduced by 63%. Grey County is currently served by the Grand River Conservation Authority (GRCA), Grey Sauble Conservation Authority (GSCA), Nottawasaga Valley Conservation Authority (NVCA), and Saugeen Valley Conservation Authority (SVCA). If passed, the County would be served by the Lake Erie and Huron Superior RCAs. The make-up of the two RCAs is outlined in table 1 below.

Table 1: Lake Erie and Huron-Superior Regional Conservation Authority Composition

	Lake Erie RCA	Huron-Superior RCA
Total # of former CAs being consolidated	8	7
Total # of lower-tier and single-tier municipalities served by the RCA	81	80

Potential Impacts and Questions regarding the Proposed Changes

Following the province's announcement, County staff have had the opportunity to talk to CA staff with jurisdiction in Grey, primarily, GSCA and SVCA staff, as they collectively serve most of Grey. County staff have also discussed the proposed changes with Planning, and some Building staff, from Grey's member municipalities. A summary (in no order of importance) of some of the questions and concerns stemming from these discussions is as follows. Staff welcome additional feedback from members of Council and member municipalities to further shape these questions, comments, concerns and opportunities that may be presented by the new model proposed. Staff are proposing on sharing these concerns with ministry staff alongside a response to the ERO posting as well as in delegations and discussions with MPP's and Ministers at ROMA if there is opportunity to do so.

Ultimately, Grey County staff believe that the proposed RCA model and the new Provincial Conservation Agency will weaken local representation, will see local services lost, and will drive up costs and red tape. Further, it will shift focus away from rural and agricultural communities and diminish local services such as recreation, stewardship and educational programs, services that communities cherish.

1) **Timelines and Pausing a Decision on Further Implementation** – Although Bill 68 has now been passed, the County recommends that the province consider pausing any further changes in favour of completing a cost-benefit analysis (including a workforce and geographical analysis) of the current system of 36 CAs, vs. the proposed regional system of seven RCAs. The County expresses significant concerns at the lack of local service delivery with the proposed seven RCAs and urges the province to taking evidence-based review of where and if amalgamations are of value. Regionalization should only proceed if there are known performance indicator (KPI) outcomes that will be improved by such a new system. Moving ahead now, with insufficient study, risks irreparable damage to working relationships fostered over decades, as well as potential damage to watersheds, properties, or waterways. If the province does decide to move forward with amalgamations, the County would recommend an approach of phased amalgamations, targeted to existing regions where KPIs are not being met, to better explore and understand potential challenges and opportunities before province wide role out.

2) **Local Service Delivery** – many CAs offer specific and tailored programs to local communities. Programs such as landowner stewardship incentives, tree planting,

development of Managed Forest Plans, and engaging around land donation under the EcoGift program. These services are not guided by specific legislation but have been developed in partnership with communities specific to local needs. Further, many CAs undertake local initiatives such as Water Festivals and Forest Festivals or tree sales, which work well at a local level but would not be effective on regional levels. Under the proposed RCA model, how will these events, activities, programs, and services be retained at a local level?

3) **Vast Geography and Maintaining Local Relationships** – More details on the regional structure are needed to help inform an understanding of it. The Huron-Superior RCA spans more than 800 kilometres (kms) of geography with a 1,600 kms road distance between its southern and northern communities. One of the benefits of the current model is the relative proximity of the CA staff to the municipalities they serve, and the relationships built between municipalities, the CAs, community organizations, and the development community. Having CA staff that can attend local meetings, or arrange joint site visits, with relatively short notice, is a 'must' in the current system, and needs to be maintained under any new model. The existing relationships between staff could take years to replace, resulting in a less expedient development process, if fractured by the new model. How will existing local offices and their staff continue to be supported? Will the existing local offices continue to provide local services and what assurances can the province give that local access to CA services will be retained? How will each of these sites be managed? Given the vast regional territories, what supervisory and management structures will be in place to support local service delivery? The County would reiterate the need to keep local staff across the watershed.

4) **Emergency Management** – Conservation Authorities have become trusted partners in emergency management, providing expertise and staffing to support emergency management. From flood forecasting and ice and waterway management, through to expertise in lands management and a unique understanding of how the local environment is responding to weather and climate change, CA's local proximity is critical to support municipal emergency management efforts. Regional offices would have difficulty in responding quickly and managing events linked to flooding, frazil ice, or blizzards, if they are not located locally.

5) **Municipal Representation** – Municipal representation for many CAs is driven by the lower-tier municipalities and, for large areas of the province, these are the only tier of municipal governance. There are 80 lower-tier and single municipalities (in addition to the upper-tiers) within the proposed Huron Superior

RCA. There are 81 lower-tier and single municipalities (in addition to the upper-tiers) within the proposed Lake Erie RCA. How will a Board, that represents; communities under 10,000 people or over 100,000 people, urban and rural, coastal and inland, be effectively represented when servicing this many municipalities?

6) **Rural Lens vs. Urban Focus** – Existing levy funding models apportion costs based on assessment value with areas with higher assessment value contributing more. While not precise, this model generally ensures that funding is proportionate to community size, enabling funding influence on Conservation Authorities to be proportionate to the communities they serve. Further, Board composition is based on municipal representation; communities with higher populations have more members and votes on the Board, but the Board is represented by members from all municipalities within its jurisdiction. The new Huron Superior RCA, of which Grey County is part, includes urban communities such as Thunder Bay as well as Aurora, Newmarket, Orillia and Barrie, King Township, rapidly growing, urban centres reflective of typical GTA growth and pressures, a stark difference from Grey County. Together, these represent over 550,000 residents. These communities will likely dominate proportional funding for the new RCA and will likely command significant influence on the work and priorities of the RCA having a disproportionate impact on smaller, rural communities. Where will the needs of smaller rural municipalities like some of the member municipalities within Grey County be met in such a model?

7) **Transitional Costs** – A transition of the scope and scale as proposed will come with high transitional costs. These could be associated with the release of existing facilities, the acquisition of new facilities, new branding, websites and application processes. These transitional costs could also include salary costs such as for equalization of wages across CAs. These costs should not be passed onto municipalities to bare.

8) **Municipal Funding Model** – CAs are supported and funded by member municipalities. Individual CAs set a budget based on meeting local needs. Under recent changes to the CA Act (Bill 108), it developed three classes of services; mandatory, self financed, and municipal service agreements. Some CAs worked with member municipalities to provide broader scopes of services than others. How will funding between disparate CAs be aligned? It is noted that for changes to be implemented after the municipal election in 2026, municipalities will need budget clarity on proposed changes by mid 2026.

9) **New Provincial Agency** – Through the passing of Bill 68 the province has created the Provincial Conservation Agency, to establish strategic leadership and centralized services. It has been indicated that this agency will be funded from

provincial funding, fees for services and cost recovery from Conservation Authorities. As CAs rely on municipal funding for much of their mandatory work, it is possible that municipalities will find increased costs being born by them to fund their RCA's commitment to the new provincial agency. Further, the new agency will be itself managed by a new Board of between 5 and 12 members; how will locally representative voices be reflected on this board?

10) **Equalization Funding between CAs** – Significant funding is likely to be required. There currently is a mix of larger and smaller CAs. In the larger CAs, there has often been the benefit of additional resources and partnerships to develop enhanced tools and resources to help manage areas. Larger CAs often have better detailed ecological mapping, up-to-date watershed mapping, up-to-date flood mapping, and detailed mapping layers in geographic information systems (GIS). These tools are used to ensure effective, data-based decision making. However, access to these tools is not equal to all CAs with some smaller, less flexibly resourced teams not having access to these tools or staffing expertise levels. The province's stated commitment was to equalize and standardize service levels. Who will be funding the required investment to ensure equitable access to resources and tools?

11) **Charitable Foundations and Volunteer Organizations** – Some CAs have offshoot charitable foundations and volunteer organizations (e.g., the Grey Sauble Conservation Foundation, Friends Of 'X' Conservation Area groups), which both fundraise (such as for educational programs) and perform some maintenance / management activities on specific properties. Some of these organizations may be small, whereas elsewhere in the province these foundations raise millions in funds to support local initiatives. How will the legal structures and on-going contributions (financial and in-kind) of such organizations be managed under the new RCA model?

12) **Lands Management** – CAs manage 100,000's acres of land across Ontario. A small fraction of these lands provides for recreation, and an even smaller number of these lands generate revenue to help offset recreational programs. Most of these lands are available informally for recreation, but their prime function is to support healthy watersheds, biodiversity and ecological integrity of systems. Within the new RCAs how will lands be managed, both those with intense use that generate revenue (but need careful management for risk and ecological damage) and those that hold no opportunity for revenue generation, but require essential stewardship and management?

13) **Agreements** – How will recreational agreements with hunting organizations, trail user groups, municipalities, and First Nations with recognized rights be managed across the RCAs? These have had, in some areas, decades of careful

negotiation to develop. How will the use and management of the use of snowmobile and all-terrain vehicles (ATVs) on CA lands be adequately managed? Furthermore, some municipalities and counties, including the County of Grey, have agreements in place with local CAs to contract out forest management, trails, and by-law enforcement services to CA staff on a fee for service basis. Will such municipal agreements still be feasible and honoured under the new RCA model?

14) **Water Control Structures** – The basis for CAs was the protection and management of water. CAs manage thousands of water control structures. How will local staff needs be delivered through the RCA model?

15) **Climate Change Adaptation** – CAs play a critical role in protecting Ontario from loss of life and impacts to property as a result of flooding. With variations in weather due to climate change, the role of CAs across watersheds is only becoming more important. Updated mapping, green infrastructure, ongoing watershed management, and other climate adaptations will need to be adaptive to local conditions and responsive to emerging science. CAs need to retain their independence as a regulatory body to protect Ontario. While additional housing and a prospering economy are key provincial and municipal objectives, so too are the health and safety of our communities. As insurance costs continue to rise, CAs need to continue to safeguard our communities against future financial and physical losses.

16) **Drinking Water Source Protection** – Source Water Protection (SWP) became a priority following the Walkerton tragedy. Local boards, mirroring CA areas, were formed to assess risks and establish protocols for SWP. How will the SWP model, with CAs and local representation be impacted by these changes?

17) **Staffing** – The Minister repeatedly indicated that there would be no job losses. Municipalities have formed working relationships with staff employed locally who have also acquired, at times, many years of local experience. Support for maintaining local jobs to support local delivery are a priority. Not only are these jobs and roles key to delivery of local priorities, these roles provide important employment in local communities helping support families and the communities they live in.

Responses to the Environmental Registry Discussion Questions

In the Environmental Registry there are five discussion questions which the province is seeking feedback on. Responses to each of these questions has been provided below.

1. What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?

If the province proceeds with a regional conservation authority approach, the following matters need to be considered.

a) Only proceeding with any changes if the cost-benefit analysis and KPI improvements demonstrate justification for such changes.
b) Maintaining local staff and staff relationships at CAs throughout the province. Successful transition will depend on clarity about what stays local and what becomes regional.
c) A sustainable governance model with municipal involvement and oversight.
d) A fair model for representation to ensure smaller communities within a larger RCA do not get overshadowed by the larger communities within the RCA.
e) The ability to recognize local and regional differences between CAs and adapt programming and staffing accordingly.
f) The ability to continue to offer local programs and service delivery beyond those that are provincially legislated.
g) Sustainable funding models both throughout the transition period and ongoing thereafter.
h) A transition period which recognizes suddenly merging eight CAs into one regional CA will take time. Processes, software, and staffing will all need time to adjust to this change.
i) Limited bureaucracy between the new provincial agency and the RCAs. The more RCAs can be empowered to act locally, without needing to seek approvals from a centralized provincial agency will benefit future response times and decision making.
j) Maintaining service levels in rural Ontario will be critical, as well as ensuring municipal agreements are protected.
k) The ability to maintain agreements with local clubs or volunteer organizations to help maintain both recreational and operational roles in partnership with CA staff.
l) The ability for municipalities to partner with the new RCAs on funding applications or joint projects which serve a local need.

With these points in mind, the province may wish to consider a possible phased in or transitionary approach to amalgamations assuming that these amalgamations can be justified. By implementing a KPI evaluation of existing CAs, it might be possible to identify where amalgamation and increased resource sharing would be most beneficial. These CAs might be an opportunity to amalgamate initially to explore service enhancements, challenges and opportunities through greater regionalisation. Assuming justified, these benefits could then be phased in through broader amalgamation. This

would allow for an evidence-based approach to transition, without system wide risk and potential costly errors that would be difficult to reverse.

2. What opportunities or benefits may come from a regional conservation authority framework?

Some of the smaller or less funded CAs currently have difficulty maintaining up-to-date mapping and securing certain levels of staffing expertise. In a regional model, if appropriately funded, there could be some level of equalization which allows for the smaller CAs to have better access to resources and staffing levels beyond what they currently have now. Whereas currently some CAs may not be able to employ a hydrogeologist, under the new RCA model, the business case may support hiring such experts.

3. Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?

For the two RCAs which will be serving Grey County, there are 80 and 81 lower-tier or single-tier municipalities in each. Board sizes will not be able to accommodate representation from each municipality. That said, there needs to be fair representation to ensure that smaller communities do not get overshadowed by larger communities on the board. Perhaps there could be upper-tier and single-tier representation on the board, to ensure a more manageable board size. The municipal appointment process should remain local, and not require provincial appointments.

4. Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

As per above, when some of the new RCAs contain 80+ lower-tier or single-tier municipalities, it will be difficult to coordinate an RCA budget process. Municipalities need input into the process, but there needs to be a finite process, such that timely budgets can still get passed. From an operational standpoint, it may be easier for the new RCAs to be entirely provincially funded, along with user fees, vs. relying on municipal property tax levies.

5. How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

As per the answer to discussion question one above, items (a), (c), (d), (e), (h), and (i) will be crucial to ensure local needs are met.

Additional Recommendations for Provincial Consideration

The County understands and supports the province in seeking to modernize, identify efficiencies and support consistent, effective, province wide service delivery that meets the needs of communities and delivers on provincial priorities. The County believes that these outcomes can be met through regulatory and policy changes that do not require disruptive system wide overhaul and that further exploration of these would be of value. For example:

- Technical Guidance – providing updated province wide technical guidance to CAs to support modern and consistent decision making and service delivery.
- Consistent Policy Framework at a regional level – build on the singular regulation already implemented to support consistent policies, perhaps on eco-district levels.
- Existing KPIs (permit approval in 90 days or less) are being met; implement further KPI's that seek to identify gaps in service provisions.
- Online Permitting System – many CAs already use digital platforms for permitting, some dovetail with municipal online permit systems. Work with CAs to implement similar or identical online permitting systems which dovetail with outcomes sought in Bill 60 for municipal planning permit systems. (Note: back ups to digital systems will be needed for residents without access to online systems or who may wish to submit by traditional means).
- Permit fees standardization – the province has frozen permit rates for several years and could, within existing authorities, implement regional or province wide standard permit fees. If the province wanted CAs to abolish permit fees, this could also be achieved providing an alternative source of funding could be identified. The County would note that for many 'development pays for development' has been a guiding principle and that permit costs are the costs associated with the review and approval of development applications, however, there are other means that could be explored here within the existing legislation.
- If there is evidence and data where existing CAs are unable to provide consistent, reliable and timely services, or where their founding municipalities are seeking change; then support amalgamation on a case-by-case basis. Such amalgamations should be on geographically appropriate scales to see if amalgamations provide the cost and efficiency benefits that the province is

seeking to achieve, prior to any whole scale amalgamations across vast geographic regions. For example, the existing Source Protection Regions (of which there are 17) may be a basis for future regional CA's, or, smaller geographic areas, such as those CA's with watersheds draining to Georgian Bay, or Lake Simcoe, East and Central and West Lake Ontario, the North, Lake Huron North and South and Lake Erie, East and West. Regardless of where future amalgamations may be, these should be made based on evidence and data and be watershed relevant and of a scale that maintains the local basis of CAs.

Legislated Requirements

The province is proposing legislative changes to the *Conservation Authorities Act*.

Financial and Resource Implications

The financial and resource implications stemming from the proposed changes are not known at this time. Municipal tax levies provide funding for CAs currently, but it is not yet known how this could change, should the RCA model be implemented. Should the province proceed with these changes, a further report can be prepared outlining the financial impacts.

Relevant Consultation

☒ Internal: Climate Change, CAO/Deputy CAO, Legal Services, and Planning

☒ Contribution to Climate Change Action Plan Targets: See commentary in the report on climate adaptation and impacts

☒ External: Member municipalities, as well as conservation authorities having jurisdiction in Grey County

Appendices and Attachments

Link to Environmental Registry Posting 025-1257

Letter to Province on Conservation Authority Consolidation

Final Audit Report 2025-12-18

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TOWNSHIP OF CHATSWORTH
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January 7, 2026

Saugeen Valley Conservation Authority
1078 Bruce Rd. 12
PO Box 150
Formosa ON N0G 1W0

Via email only: e.downing@svca.on.ca

Re: Resolution – SVCA Draft Budget 2026

Please be advised at Township of Chatsworth Council held on January 7, 2026 the following resolution was carried:

> THAT Committee of the Whole receive information presented by Erik Downing, General Manager/Secretary-Treasurer of Saugeen Valley Conservation Authority regarding the 2026 budget; and
> FURTHER THAT Committee of the Whole recommends to Council that the Saugeen Valley Conservation Authority 2026 budget be supported and the proposed levy for the Township of Chatsworth of $83,152.00

Should you require additional information please contact the undersigned at 519-794-3232 ex. 134 or tyler.zamostny@chatsworth.ca.

Sincerely,

Tyler Zamostny
Deputy Clerk

Cc:
Township of Chatsworth SVCA Board Member: Peter Whitten, Councillor (peter.whitten@chatsworth.ca)