

December 16, 2025

Ministry of the Environment, Conservation and Parks
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To Whom it May Concern:

On October 31, 2025, the Ontario Ministry of the Environment, Conservation and Parks announced plans to create a provincial board-governed agency, the Ontario Provincial Conservation Agency to provide leadership, governance, and strategic direction to Ontario's Conservation Authorities.

We understand that the Ministry has requested input on the potential implications of these proposed changes.

I am writing on behalf of the Ontario Mutual Insurance Association (OMIA). We are the trade association representing 34 farm mutuals operating across Ontario. Our members are property-casualty insurers organized and incorporated as mutuals under Ontario statute. Our policies are written and issued in Ontario and almost all the properties insured under our policies lie within the boundaries of established Conservation Authorities.

Our members underwrite farm, home, automobile, and commercial insurance policies. Each of our mutuals is over 100 years old, with the oldest having been established in the 1850s. Our companies are predominantly located in small towns and cities across the province. Each of our members' policyholders is a fully participating mutual member. The boards of directors of our mutuals are composed of policyholders and all policyholders are eligible to vote at annual general meetings and participate in any refunds granted from surplus.

As small insurers who operate solely in Ontario, we have a long history of cooperation with Conservation Authorities. With the advent of more extreme and volatile weather patterns flood damage has become the priority peril for all insurers in Ontario. As largely rural and localized insurers we are particularly vulnerable to these events and have come to rely on sound watershed management and close cooperation on planning and resilience with local Conservation Authorities.

In reviewing the rationale for creating regional conservation authorities and creating a Provincial oversight body we believe there are several significant risks that could have a negative impact on our mutuals and our policyholders who are directly exposed to weather and flooding perils.

We believe it is imperative that local watershed knowledge is maintained and strengthened. We believe that regionalization efforts can often result in increased costs related to administrative oversight without resulting efficiencies. At the same time, the timeliness and responsiveness of front-line services and the effective local delivery of programs are lost. We believe that Conservation Authorities in Ontario currently have significant on-the-ground expertise, combined with long-standing relationships with municipalities and Indigenous communities. We also believe that the real-time responsiveness of local Conservation Authorities during storms and emergencies is critical to responding to sudden weather events.

A critical success factor in Ontario's long-term land-use planning and resilience strategies stems from the close tie between municipal governance and conservation authority governance. We believe this could be significantly undermined, perhaps in unintended ways, by the creation of a provincial oversight body that creates larger regions that will not be responsive to local issues and will miss many of the nuances associated with local watershed management.

We also believe that the agricultural sector and rural communities are particularly vulnerable to regionalization and the potential to have shortsighted land-use planning and development override long-term resilience and flood control.

To the degree that improvements can be made to the existing system, both in terms of modernization and improved use of technology, we support those efforts. However, we strongly believe that local governance and attention to communities at the local level within watersheds is paramount to helping us as member-based mutual insurance companies manage our risk as insurers and in enabling us to continue to provide affordable coverage in the face of significantly changing weather events.

We strongly urge the Ministry to reconsider this regionalization initiative until a more thorough study is done on how it will enhance or detract from the current model. We believe this is especially important given that funding for conservation authorities is largely generated at the municipal and individual conservation authority level, as opposed to provincially.

Thank you for the opportunity to provide comments.

Yours truly,

A handwritten signature in blue ink that reads "John L. Taylor". The signature is written in a cursive, flowing style.

John L. Taylor BBA, FCIP, FCLA, CHRL
President