

December 17th, 2025

Public Input Coordinator
MECP Conservation and Source Protection
Government of Ontario
Submitted online

Re: Consultation Response Regarding Conservation Authority Modernization (ERO 025-1257)

Dear Input Coordinator,

Ontario Greenhouse Vegetable Growers (OGVG) appreciates the opportunity to provide comments on the proposed changes to Ontario's conservation authority framework, as outlined in Environmental Registry of Ontario posting **ERO 025-1257**. OGVG represents over 4,300 acres of tomatoes, cucumbers and peppers throughout Ontario and supports over 35,000 jobs through the full value chain. Our members appreciate the Ministry's intent to streamline regulatory processes, reduce duplication, and improve service delivery. Our perspective seeks to balance efficiency with the need to preserve essential expertise that supports Ontario's agricultural sectors, specifically the greenhouse sector.

Balanced Support for Modernization

We recognize the objectives behind reducing overlap between conservation authorities (CAs) and other provincial or municipal regulatory bodies. Many agricultural and agri-food operators have long expressed concerns regarding inconsistent permitting processes, variable interpretation of policies, and delays affecting land-use decisions. Efforts to clarify roles and improve predictability are welcomed.

However, while we support the principle of modernization, we urge caution in changes to, or scaling back of conservation authority functions without ensuring that the essential environmental and hydrological knowledge they provide remains accessible. These are areas where CAs, due to their mandate and long-standing presence, have accumulated critical institutional knowledge.

The Importance of Retaining Institutional Knowledge

Conservation authorities possess decades of field data, modeling expertise, and regional environmental insight. A sudden or uncoordinated transfer of responsibilities could create knowledge gaps that undermine both environmental protection and agricultural productivity. Specifically:

- **Watershed data and modeling:** CAs provide hydrological and stormwater modelling that municipalities and farmers rely on for planning drainage, infrastructure, and expansion.
- **Soil, erosion, and nutrient management expertise:** Their practical experience is essential to designing workable solutions that protect water quality while supporting crop yields.
- **Regional consistency:** Without a central body preserving these records, agricultural operators, particularly greenhouse operations, may face inconsistent or incomplete technical information depending on the municipality.

A reduced CA framework must therefore include clear mechanisms for maintaining and coordinating this information.

Considerations for the Greenhouse Sector

The greenhouse sector, concentrated in regions such as Essex, Niagara, and Durham, has unique environmental and land-use needs. These operations depend heavily on:

- reliable drainage infrastructure,
- stormwater and nutrient recovery systems, and
- predictable permitting for expansions and water-taking.

Without the institutional knowledge held by local conservation authorities, greenhouses may encounter:

- delays in engineering reviews,
- uncertainty around floodplain or watercourse impacts, and
- limited guidance for environmentally responsible expansion.

Retaining CA expertise is essential to avoid unintended regulatory gaps that could hinder this major economic sector.

Recommendations

To ensure that modernization achieves its objectives without compromising environmental stewardship or agricultural growth, we recommend:

1. **Establish a centralized environmental knowledge repository** that aggregates watershed data, mapping, hydrological models, and historic records currently held by CAs.
2. **Implement transition plans** to avoid interruption in permitting and advisory services for high-impact sectors such as greenhouse agriculture.
3. **Provide clear communication channels** for agricultural stakeholders to access technical guidance during and after the transition.
4. **Retain specialized CA staff or expertise clusters** for areas with intensive agricultural use to ensure continuity and sector-specific knowledge.

Thank you for considering our input. We would welcome further dialogue as the proposal moves forward.

Sincerely,



Richard Lee
Executive Director