

From: the 20 member groups and hundreds  
of individuals members of Biodiversity and  
Climate Action Niagara Biodiversity



Re: ERO 025-1257 Bill 68

Thursday, December 18th, 2025

Dear Premier, Ministers and other members of the PC Caucus:

The many groups and individual members of Biodiversity and Climate Action Niagara are requesting that you do not implement Bill 68 that would reduce Ontario's 36 Conservation Authorities (CAs) to 7 and create a centralized agency to govern them, for the following reasons:

- 1. There are better ways to standardize processes and gain efficiencies across the system without the costs and disruption that would be caused by mergers.** There is no reason the government's desired results could not be achieved through a committee process, guided by the province, with the participation of the CAOs of the current authorities. Through this process the government could achieve its objectives of implementing a strategic direction for authorities, drawing up performance indicators as well as creating a single platform for permits. Best practices among CAs could also be identified and then implemented across all CAs. This would allow CAs to continue to perform their core mandate of undertaking watershed-based programs to protect people and property from flooding and other natural hazards, to fulfill provincially mandated programs such as drinking water source protection under the *Clean Water Act*, and to conserve natural resources for economic, social and environmental benefits, without any of the disruption and disorganization that amalgamation would cause. **It will be less costly and less risky to improve what exists.**
- 2. The costs of consolidation to taxpayers are unacceptable.** Taxpayers are already footing the bill for Conservation Authorities with about 8% (in some CAs as low as 2%) of funding coming from Provincial coffers and 53% from municipal ones. Then there is another 35% that is paid by the public for use of CA facilities/areas or through fundraising activities with the remainder being charged for permits. Cost savings expected through amalgamation never materialize, as we have seen through numerous examples; plus the actual cost of trying to merge different authorities with different systems, physical locations, programs etc. will be a high risk endeavour and bound to lead to operational failures where CAs will be unable to meet their core mandates as staff efforts will be diverted to a lengthy and complicated transition. **Taxpayers do not want to foot the bill for this plan that they did not ask for and that will only lead to a decline of important functions and services on which they rely.**
- 3. Creating another level of bureaucracy is inefficient and its creation adds costs to overburdened taxpayers.** There is no reason to create an Agency to achieve the objectives the government has outlined. There are better ways of doing that as stated in our suggestion above in point #1. Surely this agency will have staff, and its board will be paid. This is an unnecessary cost to the already overburdened taxpayer. It is also deeply concerning that this proposal allows the Agency to apportion its costs to the Conservation Authorities who will then have to pass

those new costs down to the municipal taxpayers who are paying the lion's share of CA budgets. Municipalities are rightfully concerned that this will direct locally raised tax dollars away from local watershed management and projects and to the Provincial Agency. **And, while they will have to bear the costs, local citizens, and their elected representatives, will now have virtually no say on how CAs operate in their area.**

- 4. The purpose of the Bill is counter to the core mandate of Conservation Authorities.** The mandate of CAs is undertake watershed-based programs to protect people and property from flooding and other natural hazards, and to conserve natural resources for economic, social and environmental benefits. Your government has clearly stated the consolidation is about "getting shovels in the ground faster". The primary function of government is to protect their citizens. That's why CAs were created. With increasingly chaotic weather and increasing development, it is more important than ever for CAs to focus on their core mandate and be diligent about protecting against building in flood plains and hazard lands where the lives of people and the value of property is at risk. **The government should not be compromising public safety and ignoring serious economic losses by pressuring CAs to focus on facilitating development over their core mandate.**
- 5. The areas covered by the current Conservation Authorities are right-sized.** The current CAs are based on local watersheds and decades of local knowledge, science and research informs any decisions made about them. Reducing the number of CAs and lumping many different watersheds together that are geographically and hydromorphologically unique makes no sense. **Local knowledge will be diluted. Management of such vast geographical areas will be difficult. Connections to critical, local community partners will be fractured as the centre of decision-making moves to distant CA headquarters and a provincial agency.**
- 6. The consolidation lessens local decision-making, accountability and transparency.** Today, local CAs are accountable to the local taxpayers, through their local Councils. Their budgets are presented and scrutinized and approved (or not) by locally elected officials. Under Bill 68, crucial decisions will be made by unelected people in an Agency far from the people funding the CAs and with local Councils simply being bag men for lords who are accountable to no one but themselves. **Transparency will be lost as local governments and their citizens will be in the dark about how the Agency makes decisions that have a profound impact on their communities. This is simply not acceptable.**
- 7. Ministerial Overreach.** Bill 68 includes provisions that would grant the Minister the power to approve specific development proposals, opposed by CAs based on natural hazard and public safety criteria. This poses a safety hazard to the public and undermines the authorities' mandate. **The advice of local experts with deep technical knowledge should not allowed to be overridden by an elected official with no expertise.**

## Questions:

1. Has the Province developed a business case for this change and, if so, where can we find it?
2. Have Indigenous communities been consulted on this proposal and where can we find their comments? Were municipalities consulted? Were CAs consulted?

3. Why have you passed Bill 68 before the commenting period is over? As has happened in the past, this demonstrates a serious disregard for the concerns of Ontario's citizens.
4. What evidence do you have that our current Conservation Authorities are restricting or seriously delaying growth on non-hazardous lands? While it is true your government is far from meeting its housing targets, industry analysts agree this is due to several factors including the price of new homes rising to a level that is unaffordable for most people. It's also due to the development industry building too many large single-family homes on greenfield sites too far from work/services/community hubs/good public transportation options, and too many tiny unliveable condos that don't meet the needs of the market which is looking for more affordable rental options and family-sized units in lower-rise buildings. Finally, the biggest unaddressed housing issue is the lack of non-market housing — something your government needs to address. Finally, we also know the availability of land is not an issue as many studies, including the one footnoted, have shown there is sufficient, serviced land designated for development that can meet Ontario's housing needs.<sup>1</sup>

**In conclusion:**

Biodiversity and Climate Action Niagara is not against development per se. We know people in Ontario need housing. But they need housing they can afford, near where they work and where transportation infrastructure, community services, employment opportunities and amenities exist. Ontarians also need to be protected from natural hazards. They need to know that the impacts of climate change on the landscape are being understood and mitigated in ways that protect their lives and their property. They need to know their drinking water is safe and that they have access to the wonderful natural areas of Southern Ontario that remain, many of which have been held in the safe guardianship of CAs. Community groups, municipalities and organizations need to know that they can continue to partner with their CAs on flood mitigation, natural areas restoration and other projects that protect and enhance their communities. And finally, in these difficult financial times for so many, citizens need to know they won't be unfairly bearing new costs for a Provincial project that has no clear benefits and offers greater risks and costs.

**We ask that you not implement Bill 68 and that you bring together the current CAs to find ways that can achieve your objectives without the risks and costs.**

Sincerely,  
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<sup>1</sup> <https://environmentaldefence.ca/wp-content/uploads/2023/03/REVIEW-OF-EXISTING-HOUSING-UNIT-CAPACITY-IDENTIFIED-IN-MUNICIPAL-LAND-NEEDS-ASSESSMENTS-R.pdf>