

Friday, December 19, 2025

**RE: Town of Goderich Environment Committee Comments  
Proposed Amendments to the Conservation Authorities Act  
Environmental Registry of Ontario – Deadline December 22, 2025**

The Town of Goderich Environment Committee appreciates the opportunity to provide comments on the Ministry of Environment, Conservation and Parks' (MECP) proposed amendments to the Conservation Authorities Act (CAA), including the creation of the Ontario Provincial Conservation Agency (OPCA) and the proposed consolidation of Ontario's 36 Conservation Authorities (CAs) into seven Regional Conservation Authorities.

**While the Town of Goderich Environment Committee supports efforts to improve coordination, data sharing, and consistency across the conservation authority system, we do not support the proposed regionalization and consolidation of Conservation Authorities. Instead, the Town strongly recommends a federation model that retains existing watershed-based Conservation Authorities while enabling shared provincial services, standards, and collaboration.**

The proposed consolidation of 36 Conservation Authorities into seven large regional entities raises significant concerns for the Town of Goderich, particularly regarding cost, governance, local accountability, service delivery, and watershed-based decision-making.

**1. Lack of a Business Case and Cost Transparency**

The Province has not provided a business case to demonstrate that the creation of the OPCA and consolidation of Conservation Authorities will result in improved services or efficiencies.

Key unanswered questions include:

- a) What is the total cost to establish and operate the OPCA?
- b) What are the one-time and ongoing costs of consolidating 36 Conservation Authorities into seven?

c) Who will bear these costs, particularly given that Conservation Authorities are already primarily funded by municipalities?

Member municipalities currently contribute over 80% of the Maitland Valley Conservation Authority's (MVCA) operating budget, while provincial funding accounts for approximately 2%. Requiring Conservation Authorities to fund the OPCA, without a clear funding commitment from the Province, risks placing additional financial pressure on municipalities and taxpayers.

## **2. Loss of Local Governance and Municipal Voice**

Maitland Valley Conservation Authority is a locally governed, watershed-based organization that is highly responsive to community needs. Municipalities, landowners, and community partners directly shape MVCA's priorities and services.

The proposed OPCA governance model and consolidation into regional authorities would:

- a) Reduce municipal influence over service priorities,
- b) Distance decision-making from local communities, and
- c) Undermine the foundational principle of Conservation Authorities as local, watershed-based partnerships between municipalities and the Province.

This is particularly concerning given that municipalities are the primary funders of Conservation Authorities.

## **3. Risk to Rural and Agricultural Priorities**

The Town of Goderich Environment Committee is deeply concerned that the needs of rural communities and the agricultural sector will not be adequately recognized or prioritized within large, regionally consolidated Conservation Authorities. The proposal indicates that the lead authority in each region will be located in an urban centre, raising concerns that urban priorities may dominate decision-making at the expense of rural watershed issues.

## **4. Threats to Effective Flood and Hazard Management**

A core mandate of Maitland Valley Conservation Authority is reducing the risk of loss of life and damage to property caused by flooding and erosion, including along the Lake Huron shoreline.

MVCA's development review and permitting services are both efficient and effective: In 2024, MVCA's average permit processing time was 5.7 days, compared to the provincial average of 12.5 business days.

MVCA staff work closely with landowners to ensure safe development outside hazardous areas, emphasizing customer service and local knowledge.

The Town of Goderich Environment Committee questions whether a centralized digital permitting platform can match MVCA's turnaround times, local expertise, and high level of customer service. Additionally, the costs to develop, implement, and maintain this platform have not been disclosed.

### **A Better Path Forward: A Federation Model**

Rather than regional consolidation, the Town of Goderich Environment Committee strongly supports a federation model for Conservation Authorities.

Under this approach, existing watershed-based Conservation Authorities would remain intact and locally governed. Shared provincial services could be developed collaboratively, including centralized data management and floodplain mapping; optional shared digital permitting tools; and province-wide performance standards developed with Conservation Authorities. Participation in shared services would respect local capacity, performance, and needs.

This model would preserve the strengths of local Conservation Authorities while achieving the Province's objectives of consistency, efficiency, and collaboration—without the disruption and risk associated with forced consolidation.

### **The Need for a Renewed Provincial–Municipal Partnership**

Conservation Authorities were founded on three core principles:

Watershed-based management;  
Partnership between the Province and municipalities; and  
Focus on local watershed priorities.

To restore healthy and resilient watersheds, the Province must renew this partnership by:

1. Working collaboratively with Conservation Authorities and municipalities,
2. Providing a significantly greater share of funding, comparable to provincial investment levels in the 1980s and 1990s,
3. Supporting capacity-building rather than restructuring.

Currently, the Province contributes only about 5% of funding across all Conservation Authorities, a level that is inconsistent with the Province's growing expectations of the CA system.

### **Collaboration Works: "Healthy Lake Huron" as a Model**

Healthy Lake Huron (HLH) is a collaborative partnership of governments, Conservation Authorities, community groups, and landowners working together to protect and improve Lake Huron's water quality and watershed health. It delivers practical, science-based stewardship and nutrient-reduction initiatives through cooperation rather than centralized governance.

HLH demonstrates what is possible through collaboration rather than consolidation. This partnership—between federal, provincial, county agencies, five Conservation Authorities, and community groups—has successfully supported stewardship initiatives that improve water quality along the Lake Huron shoreline.

Applying this collaborative, watershed-based approach across Ontario would deliver effective, cost-efficient results while maintaining strong local engagement and accountability.

### **Conclusion**

The Town of Goderich Environment Committee respectfully urges the Province to:

1. Halt the proposed regionalization and consolidation of Conservation Authorities,
2. Reject a centralized governance model that weakens local decision-making,
3. Adopt a federation model that strengthens collaboration while preserving watershed-based authorities, and
4. Commit to meaningful reinvestment in Conservation Authorities as partners in protecting Ontario's environmental, economic, and community well-being.

Healthy watersheds are the foundation of Ontario's prosperity and our life-support system. Protecting them requires local knowledge, strong partnerships, and sustained provincial commitment—not consolidation.

Leah Noel  
Chair

Town of Goderich Environment Committee as a Committee of Council