



**ONTARIO
RIVERS
ALLIANCE**

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Public Input Coordinator
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Conservation and Source Protection Branch
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Re: ERO-025-1257 – Proposed boundaries for the regional consolidation of Ontario’s Conservation Authorities

Dear Public Input Team:

The Ontario Rivers Alliance (ORA) is a not-for-profit grassroots organization with a mission to protect, conserve, and restore riverine ecosystems across the province. The ORA advocates for effective policy and legislation to ensure that development affecting Ontario rivers is environmentally responsible, socially just, and climate resilient.

Ontario is proposing to “free up resources” and speed approvals by consolidating Conservation Authorities (CAs). However, CAs are front-line risk management institutions whose core mandate is to keep development out of hazard lands and prevent worsening floods and erosion. The proposal itself acknowledges that CA permitting exists to stop unsafe development in floodplains, shorelines, river and stream valleys, and wetlands, and to prevent development from worsening flooding and erosion impacts.

ORA strongly opposes ERO-025-1257, which proposes to consolidate Ontario’s 36 watershed-based CAs into just seven regional entities. This proposal would fundamentally undermine the effectiveness, accountability, and scientific integrity of Ontario’s CA system at a time when climate change is rapidly increasing flood risk, erosion hazards, and pressures on drinking water sources and natural infrastructure.

CAs are not administrative conveniences. They are life-safety institutions whose statutory responsibilities include flood forecasting and warning, hazard land management, source water protection, watershed monitoring, and ecological restoration. These functions are inherently place-based, dependent on detailed watershed knowledge, long-term datasets, and trusted relationships with municipalities, Indigenous communities, landowners, farmers, and local emergency managers. Scaling this mandate up to seven mega-regions will not improve outcomes; it will weaken them.

The Ministry of Environment, Conservation and Parks’ rationale for consolidation rests on claims of “fragmentation,” inconsistency in service delivery, and unpredictable approval timelines. Even



if some variability exists, amalgamation is neither a logical nor evidence-based remedy. Administrative consistency can be achieved through provincial service standards, shared digital tools, peer collaboration, and targeted investments in technical capacity. Eliminating watershed-scale governance in favour of regional bureaucracies trades manageable administrative challenges for systemic operational risk.

Floodplain and hazard permitting decisions are highly sensitive to local conditions, including channel morphology, ice-jam dynamics, wetland connectivity, sediment processes, legacy infrastructure, and sub-watershed storm responses. Climate change is rendering historical hydrology increasingly unreliable, making local professional judgment more—not less—critical. Larger administrative regions increase decision distance, dilute institutional memory, lengthen response chains, and raise the probability of error. When mistakes occur in hazard management, the consequences are measured in flooded homes, damaged infrastructure, contaminated drinking water, and public liability—not in processing delays.

The proposal asserts that “service continuity” will be maintained through consolidation, including uninterrupted flood forecasting and warning, permitting, and source water protection. However, the Ministry provides no transition plan, no staffing or retention strategy, no emergency-management continuity framework, no IT integration plan, and no funding commitments to support this claim. Flood forecasting and warning are real-time, high-stakes public safety functions. Disrupting institutions that deliver these services—without a detailed, transparent, and independently assessed implementation plan—is irresponsible.

The fact that this ERO required correction because multiple municipalities were initially assigned to incorrect regions should not be dismissed as a minor technical issue. It illustrates the high risks inherent in over-centralization: misalignment between watershed boundaries, political jurisdictions, source protection areas, and governance structures. Watersheds do not scale neatly into administrative mega-regions, and errors at this level translate into confusion, weakened accountability, and governance gaps.

Of particular concern is the explicit framing of this proposal as a means to better align CA services with provincial priorities related to housing, infrastructure, and economic growth. Hazard permitting must never be subordinated to growth targets. CAs exist precisely to say “no” when development would place people and communities at risk. Re-engineering these institutions to accelerate approvals risks transforming life-safety infrastructure into a throughput-driven regulatory function. That is not modernization; it is institutional capture.

When viewed in isolation, this proposal is framed as an administrative restructuring. However, when viewed alongside the Province’s concurrent legislative and policy initiatives to accelerate approvals for development, infrastructure, and energy projects, the functional effect becomes clear. CAs are statutory permitting bodies for floodplains, wetlands, shorelines, and river and stream valleys—precisely the landscapes affected by new transmission corridors, renewable energy projects, access roads, and associated infrastructure. Consolidating CAs into large regional entities reduces local decision points, weakens municipal influence, and structurally aligns hazard permitting with province-wide throughput objectives. Whether applied to housing, transmission, or so-called “renewable” energy development, this restructuring risks subordinating watershed safety and ecological integrity to accelerated project delivery.



It is also important to recognize that Ontario already maintains a province-wide ministry structure specifically designed to administer and support large-scale permitting and development activities. The Ministry of Natural Resources and Forestry operates through regional and district offices across Ontario, with staff embedded throughout the province and longstanding expertise in provincial permitting, Crown land administration, and oversight of energy, infrastructure, and resource projects. CAs were never intended to duplicate this role. Their mandate is distinct and complementary: to provide independent, watershed-based risk management, flood protection, source water protection, and local land-water stewardship rooted in place-specific knowledge and municipal accountability. Restructuring CAs to function as large regional permitting bodies blurs this critical separation of roles and risks undermining the independent safeguard function that CAs were created to provide. Weakening watershed-based CAs in an attempt to centralize capacity that already exists elsewhere in government does not improve efficiency; it erodes checks and balances that protect public safety and environmental integrity.

The proposed consolidation also threatens the effectiveness of drinking water source protection under the Clean Water Act. Source protection depends on sustained local engagement, detailed watershed characterization, and long-standing trust with municipal operators, agricultural producers, and landowners. CAs play a critical role in supporting farmers and rural landowners in protecting drinking water sources. In large regional authorities, smaller watersheds and rural communities risk becoming peripheral priorities, eroding the very protections Ontario put in place following the Walkerton tragedy.

Importantly, CAs themselves have raised serious concerns about this proposal. CA boards and senior staff have emphasized that municipalities fund between 25 and 50 percent of CA operating budgets, while provincial funding represents only a small fraction of total costs. Consolidation risks centralizing control while leaving municipalities financially responsible, undermining democratic accountability and fiscal fairness. CAs have also warned that proposed mega-regional boards could dilute municipal representation, concentrate influence in larger urban centres, and leave smaller and rural municipalities without a meaningful voice in decisions that directly affect local flood risk, land use, and drinking water safety.

CAs have further noted that the Province has failed to account for the real and immediate transition costs of amalgamation, including IT system integration, human resources restructuring, governance reconfiguration, and policy harmonization. These costs would divert limited resources away from front-line functions such as flood forecasting, hazard permitting, watershed monitoring, and restoration—precisely the services communities rely on for protection.

Finally, CAs have demonstrated that the system the Province seeks to dismantle is not broken. Many CAs have already implemented digital permitting, shared services, transparency reforms, and cost-recovery reviews, and report meeting provincial service timelines in the vast majority of cases. The Province has not demonstrated that consolidation is necessary where CAs are already modernizing and delivering results.

Ontario's CAs are among the province's most effective climate-adaptation institutions. They provide flood mitigation, natural infrastructure management, watershed monitoring, and ecological restoration that save lives and reduce long-term public costs. Weakening these



institutions in the name of administrative efficiency contradicts Ontario's own climate resilience objectives and exposes municipalities, taxpayers, and future generations to greater risk.

ORA Recommendations:

1. Reject the proposed consolidation of Ontario's 36 CAs into seven regional entities and retain watershed-based governance structures that are locally accountable and grounded in place-specific scientific expertise.
2. Ensure that CA governance and permitting functions are not restructured, directly or indirectly, to facilitate accelerated approvals for energy, transmission, or other large-scale infrastructure projects at the expense of watershed-scale risk management.
3. **Affirm and preserve the distinct and complementary roles of CAs and the Ministry of Natural Resources and Forestry.** Ontario already maintains a province-wide ministry structure, with regional and district offices, designed to administer and support large-scale permitting and development activities. CAs serve a different and essential function: independent, watershed-based risk management, flood protection, source water protection, and local land-water stewardship. Any reforms must maintain this separation of roles and must not restructure CAs to duplicate provincial permitting or project-support functions already housed within the MNRF.
4. Address service inconsistency without amalgamation by establishing province-wide minimum service standards for permitting, transparent fee frameworks, shared digital tools, and cross-authority technical collaboration—without dismantling watershed governance.
5. Invest in the real bottleneck: flood risk science and capacity, including stable funding for climate-informed floodplain mapping, hydrologic monitoring, data management, and professional staffing across all CAs.
6. If any form of regional restructuring is pursued, require a publicly released, independently reviewed transition plan that demonstrates how flood forecasting and warning, emergency response, source water protection, Indigenous engagement, and local accountability will be maintained without degradation, with clear stop-go decision points if risks cannot be mitigated.

Ontario does not have a CA problem; it has a climate risk problem. CAs are part of the solution. Consolidating them into mega-regions will weaken Ontario's first line of defence against flooding, erosion, and water contamination, and will increase—not reduce—long-term public risk and cost.

Thank you for this opportunity to comment!

Respectfully,

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