

December 15, 2025

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th Floor
Peterborough, ON
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**RE: Grand River Source Protection Authority comments on ERO proposal 025-1257
“Proposed boundaries for the regional consolidation of Ontario’s conservation
authorities”**

At their meeting on December 12, 2025, the Grand River Source Protection Authority (SPA), as the lead SPA for the Lake Erie Source Protection Region, received report SPA-12-25-01 containing comments for consideration and submission to ERO 025-1257.

The Grand River SPA subsequently passed the following resolution with respect to the above:

THAT Report Number SPA-12-25-01 – Proposed regional consolidation of conservation authorities and the source protection program be received as information;

AND THAT Report SPA-12-25-01 be submitted to the Province through the Environmental Registry.

As such, please allow the attached report SPA-12-25-01 to serve as the formal comment submission on ERO 025-1257 on behalf of the Grand River Source Protection Authority.

Sincerely,



Kaitlyn Rosebrugh
Senior Source Protection Program Coordinator
Lake Erie Source Protection Region

Source Protection Authority

Report number: SPA-12-25-01

Date: December 12, 2025

To: Members of the Grand River Source Protection Authority

Subject: Proposed regional consolidation of conservation authorities and the source protection program

Recommendation:

That Report Number SPA-12-25-01 – Proposed regional consolidation of conservation authorities and the source protection program be received as information;

AND THAT Report Number SPA-12-25-01 be submitted to the Province through the Environmental Registry.

Summary:

The Province is consulting on proposed regional consolidation of conservation authorities. The proposed changes may affect governance of the drinking water source protection program. The Grand River Source Protection Authority will submit comments on ERO Posting 025-1257 on the proposed regulatory changes.

Report:

On October 31, 2025, the Province of Ontario announced plans to strengthen coordination and consistency across conservation authorities, followed by:

- On November 6, 2025, introduction of [Bill 68, Plan to Protect Ontario Act \(Budget Measures\), 2025](#), which includes amendments to the *Conservation Authorities Act* (CAA) to establish the Ontario Provincial Conservation Agency. Bill 68 received Royal Assent on November 27, 2025.
- On November 7, 2025, posting of a consultation on proposed boundaries for the regional consolidation of Ontario's conservation authorities ([ERO 025-1257](#), comment period closes December 22, 2025).

Senior conservation authority staff and Board members participated in a question-and-answer session held by staff of the Ministry of the Environment, Conservation and Parks (MECP) regarding these changes on November 18, 2025, and a second information session was held with program managers from Source Protections Regions across the province on November 20, 2025.

The consultation materials state that there would be no overall change to the extent of conservation authority jurisdiction within the province, and that regional conservation authorities would continue to deliver provincially mandated programs, including the drinking water source protection program under the *Clean Water Act* (CWA). Staff have reviewed the provincial proposals to identify potential impacts to the source protection program and proposed recommendations to minimize disruption to the program.

Ontario Provincial Conservation Agency

Schedule 3 of Bill 68 amended the CAA to establish the Ontario Provincial Conservation Agency (the Agency), whose objects are to:

- Oversee the governance and operations of conservation authorities (CAs), including promoting consistency, assessing effectiveness and financial performance, and developing and implementing digital services.
- Support a standardized and centralized system for processing applications for permits in natural hazard areas (under O. Reg. 41/24, Prohibited activities, exemptions and permits).
- Oversee the transition from 36 CAs to fewer regional conservation authorities.
- Advise the Province on matters relating to CAs.

No direct implications for the drinking water source protection program have been identified related to Bill 68 at this time. However, as the objects of the Agency include oversight of consolidation of CAs and providing direction on matters relating to program delivery, there could be indirect impacts.

Regional Consolidation of CAs

Through ERO 025-1257, the Province is consulting on a proposal to consolidate the existing 36 CAs into seven regional conservation authorities, to reduce administrative duplication, build capacity for frontline program delivery, and align CAs services with provincial priorities. Regional CAs would continue to operate with municipal governance and oversight under the CAA. The Province has proposed the following criteria for determining the boundaries for regional CAs:

- Maintaining watershed-based jurisdictions
- Reducing duplication and overlap for municipalities who currently are within the jurisdiction of more than one CA
- Balancing technical expertise and capacity across CAs
- Ensuring uninterrupted delivery of CA programs, including source protection

The provincial proposal groups the Grand River, Long Point Region, Catfish Creek, Kettle Creek, Upper Thames River, Lower Thames Valley, Essex Region, and St Clair Region conservation authorities into a single Lake Erie Regional Conservation Authority, with jurisdiction over 81 municipalities. This regional CA would encompass the jurisdictions of the Lake Erie Source Protection Region; Thames-Sydenham Source Protection Region; and the Essex Region Source Protection Area.

The posting contains five consultation questions relating to the transition into regional conservation authorities, governance considerations, and approaches to ensure strong relationships with municipalities and communities within the new structure.

Considerations for the Source Protection Program

Key elements of the governance of the source water program are defined in the CWA and regulations with reference to current CA boundaries, and could be affected by the provincial proposal, including:

- Source Protection Area, which is defined as the area over which a CA has jurisdiction (s. 4(1), CWA and O. Reg. 284/07).
- Source Protection Authority, the power and duties of which are to be exercised and performed by a CA (s. 4(2), CWA).
- Source Protection Regions, which are consolidated Source Protection Areas per O. Reg. 284/07.
- Source Protection Committees, which are established by each lead Source Protection Authority for a Source Protection Region (or for an individual Source Protection Authority if not in a region) (s. 7, CWA). O. Reg. 288/07 prescribes the number of members and composition of SPCs among other matters.

The following comments on ERO 025-1257 are proposed for consideration by the Grand River Source Protection Authority, as the lead CA for the Lake Erie Source Protection Region.

Justice O'Connor's Walkerton Inquiry report recommended watershed-based drinking water source protection planning at the local level by those most directly affected. To ensure that source protection planning and implementation remain responsive to local issues and policy approaches, and to minimize the need for time-consuming administrative changes and conformity exercises, the Province should consider:

- Retaining the current geographic scale of Source Protection Areas. This would ensure that Assessment Reports (ARs) and Source Protection Plans (SPPs) would continue to be reflective of local drinking water threats, vulnerabilities, and policy approaches. It would also help to ensure that conformity exercises and consequential amendments to ARs and SPPs would be minimized. Consolidation of ARs and SPPs to reflect changed Source Protection Area boundaries would be time consuming and contribute little to the outcomes of the source protection program.
- Retaining the current geographic scale of Source Protection Regions (SPRs) as the working administrative scale for source protection program delivery. SPRs have been developed to address inequities in resourcing of local conservation authorities and SPR staff teams have developed local knowledge and relationships with municipalities that are essential to facilitate updates to the plans and address implementation challenges. This knowledge is rooted in a deep understanding of historic and current land uses, and the community values, needs, and priorities that shape local decision-making.
- Maintaining local representation on Source Protection Committees (SPCs) to ensure that municipal, economic, and public interest holders and implementation bodies continue to have a voice in identifying needed amendments to plans and overseeing progress towards achieving the objectives of SPPs. Continued alignment of SPCs with Source Protection Region jurisdictions would help ensure local representation and accountability.
- Adopting the current scale of Source Protection Regions (e.g., the Lake Erie Source Protection Region, consisting of the Grand River, Long Point Region, Kettle Creek and Catfish Creek CAs) as the largest geographic extent for the proposed regional Conservation Authorities. A single regional Source Protection Authority spanning 81 municipalities risks weakening local accountability, distancing decision-making from watershed-specific realities, and diluting the local focus that is foundational to effective watershed management. Local accountability will be even more important given Source Protection Authorities' proposed new responsibilities for approving Source Protection Plan amendments introduced by Bill 56 (as outlined in SPA-11-25-01).
- Reconvening the Joint Advisory Committee to engage knowledgeable conservation authority leaders to advise on governance structures that will address provincial objectives while minimizing disruption to the source protection program because of consolidation of CAs.

Timing and Financial Considerations

The Province has advised that regional consolidation of CAs is not expected to be initiated until after the municipal elections in October 2026. The Province further notes that where and how CAs receive funding (e.g., municipal apportionment for mandatory programs, excluding source water protection) would not change. The Lake Erie Region source protection program is currently funded under a 3-year transfer payment agreement with the MECP, which ends March 31, 2027.

It is recommended that the Province continue to fund the conservation authority-delivered source protection program. Any and all transitional costs that arise within the source protection program resulting from the consolidation of CAs should be borne by the Province.

Financial Implications:

The Grand River Conservation Authority's source protection program is a mandatory program under the *Conservation Authorities Act* and is funded by Ministry of the Environment, Conservation and Parks.

Other Department Considerations:

Not applicable.

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