

December 19, 2025

AA-031-25

Via E-mail: ca.office@ontario.ca

Ministry of the Environment, Conservation and Parks
Conservation and Source Protection Branch
300 Water St, North Tower, 5th Floor
Peterborough ON K9J 3C7

**Re: Cataraqi Region Conservation Authority Submission to ERO 025-1257
Consultation (proposed Regional Consolidation of Conservation
Authorities)**

I am writing in response to the Environmental Registry posting ERO 025-1257, Proposed boundaries for the regional consolidation of Ontario's conservation authorities. Cataraqi Region Conservation Authority (Cataraqi Conservation) offers the following responses to the list of question within the posting, as well as some additional comments about the proposed changes to the Conservation Authority business model.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Paul Proderick
Chair
Cataraqi Conservation



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cc: Hon Todd McCarthy, Minister of Environment, Conservation and Parks
Hon. Steve Clark, MPP, Government House Leader
MPP Ric Bresee
MPP Ted Hsu
MPP John Jordan
Hassaan Basit, Chief Conservation Executive
Board Members, Cataraqi Conservation
Gary Oosterhof, Vice Chair, Cataraqi Conservation
Conservation Ontario
all Conservation Authorities

Encl.: Cataraqi Conservation Submission to ERO 025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities



**Cataraqui Region Conservation Authority
(Cataraqui Conservation)**

Response to

ERO#025-1257

**Proposed boundaries for the regional consolidation
of Ontario's conservation authorities**

Submission: Written Submission

Organization Name: Cataraqui Region Conservation Authority

Date: December 18, 2025

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Overview of Cataraqui Conservation Comments

On November 7, 2025, the Ontario government posted ERO #025-1257 seeking feedback on proposed boundaries for consolidation of Ontario's 36 conservation authorities into regional conservation authorities, and the criteria applied to inform proposed boundaries.

Cataraqui Region Conservation Authority (Cataraqui Conservation) has and will continue to work closely with the Province, municipalities and colleagues at other conservation authorities to improve transparency, efficiency, fiscal responsibility, and partnerships. Over the last several years, Cataraqui Conservation has been adaptable and innovative to ensure compliance with other legislative amendments to the Conservation Authorities Act and Regulations.

However, Cataraqui Conservation **does not support the proposed consolidation into the St Lawrence Regional Conservation Authority**. We believe there are better approaches such as shared services, collaboration, harmonization and modernization, which can realize the stated objectives without risk of significant disruption to continued program delivery and value for money.

Cataraqui Conservation proposes that:

- Consolidation be paused
- A workplan be developed by OPCA to translate goals for consistency, modernization and efficiency into actionable steps for CAs; consideration of cost-benefit and reasonable implementation timelines should be undertaken
- Existing conservation authorities remain in place with the current governance model that allows oversight by elected municipal representatives of programs and services tailored to the geography and communities of the local watershed
- OPCA works with CAs to update technical guidelines and prepare province-wide standards and policies for permitting, as well as a digital permitting platform
- Key performance indicators be set to ensure that Provincial objectives are being met
- Hazard mapping projects and technology improvements be supported with a sustainable provincial funding share
- Clusters of CAs work jointly to establish shared services agreements for administrative and corporate functions to achieve efficiency through common platforms, policies, procurement, and methodology

Some key matters of interest to Cataraqui Conservation should consolidation proceed include: the role of municipalities in governance and representation in the new larger regions; transition of financial and land holdings; budget process and municipal apportionment; and program and services continuation.

ERO Questions and Responses

1. Key factors for a successful transition and outcome of regional consolidation:

Cataraqui Conservation does not support the proposed regional consolidation of conservation authorities. Consolidation would entail complex and expensive legal, operational and human resource processes. Transition costs could far outstrip any savings from efficiencies or modernization.

In recent years, the Province has used legislation, regulations, technical rules, guidance, and policies to effect changes to CA focus, natural hazard review, and other aspects of CA business. It would be possible for the Province's desired outcomes to be achieved through specific provincial directives and collaborative work among existing conservation authorities in contrast to consolidation into new regional bodies.

CA Staff have developed a detailed understanding of local watersheds which guides their work, whether flood forecasting and warning, hazard mapping, operating flood control infrastructure, monitoring watershed conditions, or designing restoration and stewardship programs. This critical local knowledge and understanding will need to be valued and preserved to ensure effective program delivery if CAs are consolidated.

If consolidation proceeds, then success depends on:

- Development of a business plan, including timelines, cost-benefit analysis, steps and milestones, KPIs and service standards, points of contact, permitting continuity measures, board and staff communications, and staff retention measures
- Phased implementation that does not negatively impact service delivery and also respects available financial and staff resources
- Revisiting the groupings of CAs within the proposed regional conservation authorities to better align with stated watershed selection principles; consider groupings with smaller geographic areas than current proposal and are similar in character
- On-going consultation and collaboration with municipalities and conservation authority Boards and staff
- Governance framework that allows each municipality to be represented and fulfill fiduciary responsibility to their constituency
- Retention of local knowledge and staff expertise
- Continuation of programs and services tailored to local priorities and needs

- Retention of local offices and staff, including management, for front-line service and fostering of relationships with local organizations, volunteers and municipal staff
- Continued emphasis on protecting life and reducing property damage from flooding and erosion throughout watershed management, development review, plan input, and other CA activities
- Support for municipal partners, the development community, and landowners with timely, reliable services;
- Focus on enhancing the economic, environmental and community health of the watershed;
- Provision of meaningful opportunities for people to connect at the local level

2. Opportunities or benefits of a regional conservation authority framework

In our opinion the Province's objectives can be achieved through shared systems, collaboration and voluntary service agreements between CAs. Service agreements could have the benefits of:

- Using modern tools across multiple watersheds with shared resources and technical expertise
- Joint procurement and shared staffing positions
- Simple governance using existing CA Boards to approve budgets, policies and projects under agreements and joint operational management by CA staff
- Programs that are currently offered on a local scale could be expanded to a regional scope
- Technical expertise could be shared to enhance development review, watershed monitoring, flood forecasting, and operation of water and erosion mitigation infrastructure

If consolidation proceeds, then opportunities or benefits may include:

- OPCA in collaboration with CAs, AMO and Conservation Ontario could update Provincial policies and standards, leading to reduced inconsistencies and consistent implementation outcomes
- Technical expertise could be shared toward floodplain mapping and development review

3. Suggestions for governance structure at the regional level:

The proposed consolidation would see each regional CA with a substantially larger number of municipalities in nearly all cases. For example, under the current representation formula in s.2(2) of the CA Act, the Board of the new St Lawrence Regional Conservation Authority would have over 70 municipal representatives from more than 40 member municipalities. A Board with so many members would clearly not function effectively.

An effective governance model would:

- Maintain the current local CA Board structure
- Continue current representation formula to ensure a direct line of communication, and a degree of accountability, for all municipalities
- Local CA Boards would then each be entitled to appoint a set number of representatives to a regional management board

Category 2 and Category 3 programs and services function by mutual agreement between CAs and municipalities. These services address watershed issues and local needs, are governed by Board representatives from our member municipalities and are funded by a combination of municipal apportionment, fees and grants. Given that these services are by agreement and are not funded with Provincial transfers, the oversight role of the OPCA should not be extended to this portion of CA business.

4. Maintaining a transparent and consultative budgeting process:

The proposed creation and operation of a new provincial Agency could be expected to have considerable costs. Given that the proposed Agency would have the power to recover costs from the Regional CAs, municipalities are very concerned that funding of the OPCA will be apportioned to regional CAs, and hence member municipalities, without municipal input.

Levy capacity and the tax base of municipalities varies from watershed to watershed, which has been considered pragmatically in the local decisions of each CA Board about service levels, fees and budgets over the years. Sudden changes in the allocated amount of apportionment to municipalities based on new CVA percentages within the consolidated regions or services not previously accessed may create financial hardship; a phased transition would assist in this shift.

During consolidation, it would be necessary to transfer the assets, land holdings, liabilities, contracts, agreements, etc. from the existing CAs to the new entity. protecting watershed reserves, infrastructure, and land assets. Many municipalities are concerned how locally funded reserves, land assets and long-term capital

programs will be treated within a consolidated structure. The costs (legal, labour), effort to determine financial position of each CA and time required to accomplish these tasks could be significant and highly contentious. Support will be needed to facilitate discussions, calculations and fair valuation for the municipal partners.

Utilizing service agreements as contrasted to consolidation could have the benefits of:

- Avoiding unnecessary transition costs
- Tailoring programs and services to portions of the watershed where needed and allocating the costs to the benefitting CA
- Joint procurement and shared staffing positions that can be billed back out to the benefitting CA

If consolidation proceeds, then budgeting should be done on a subregional level:

- Local offices would prepare portion of budget with review by local committee following a modified version of the budgeting process under O. Reg. 402/22
- Proposed subregional budgets and apportionments could then be proposed to the regional CA for final approval
- This would allow for the continuation of a familiar budgeting process within a new structure

5. Maintaining and strengthening relationships with local communities and stakeholders:

CAs are very responsive and accessible to partners, clients and the public while providing a high level of personalized customer service. There are concerns that if CAs are consolidated, then service levels, access to staff and relationship building would not be feasible or sustainable over the large geographic extent and number of clients within the proposed regional CAs. Currently staff are highly visible in the watershed, meet people on-site, attend events, present to groups and interact with visitors at our conservation areas. Strong relationships have been established with municipal colleagues and community groups.

Sustaining relationships with local stakeholders could be supported by the following actions:

- Maintain local presence in governance through continuation of Boards that approximate current CA watershed extents
- Maintain local offices and delivery to ensure CAs remain responsive to local needs
- Continue with local brand identity, infrastructure, programming, and staffing
- Decision makers within the proposed centralized permitting system should be based within the watershed area served to have efficient travel for site visits, access for clients and familiar with the local community and knowledge of local conditions
- Facilitate continued business relationship between CAs and the Foundations and Friends groups that volunteer and provide funding on a local basis

Thank you for the opportunity to review and provide comments on the Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO#025-1257).