

December 17, 2025

RE: Environmental Registry of Ontario 025-1257 - Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Please accept this correspondence on behalf of the Municipality of Middlesex Centre in response to the above noted ERO posting.

The crucial role Conservation Authorities (CAs) play in the protection of life, property, and infrastructure from flooding and other natural hazards cannot be understated.

Middlesex Centre is in a unique position to comment on the proposal to amalgamate Ontario's CAs. The Municipality has five different CAs within our boundaries: Upper Thames River CA, Ausable Bayfield CA, St. Clair Region CA, Lower Thames Valley CA, and Kettle Creek CA.

The Municipality greatly respects and relies upon the local expertise provided by each of the CAs within our boundaries. While we are supportive of efforts to reduce administrative burdens and duplication, watershed-specific knowledge, local partnerships and local governance are essential and are greatly at risk by the establishment of large regional authorities.

We submit the following in response to the proposal and strongly urge the province to undertake meaningful engagement with CAs and municipalities to find opportunities to reduce administrative burdens. Proceeding with the proposal without a much more robust implementation and operational strategy will only serve to create delays, cost, and administrative burden for years to come.

Opportunities for Consistency

- There are opportunities to support better consistency across CAs, but this does not necessarily require amalgamation. This may include identifying consistent application processes, fees, and review timelines across CAs.
- There is a significant discrepancy in resources across the different CAs which contributes to different service levels.

Loss of Local, Watershed-Based Knowledge

- Local knowledge is crucial to effective decision-making.
- Flooding, erosion, groundwater recharge, and wetland functions can vary dramatically from one sub-watershed to another. Local staff know the exact

choke points, flood-prone roads, drainage patterns, culverts, and natural features that may not always show up through desktop exercises.

Governance and Accountability

- The current model is locally governed and municipality-funded, designed to work at the watershed scale. Having more centralized decision-making in locations far removed from the local context will create additional bureaucracy and delays.
- Local representation on current CA boards ensures not only control over local priorities, but also accountability when decisions affect local infrastructure and development. It is unclear how this change could affect local governance and accountability.

Service Levels and Rural Voices

- We have concerns over the fair distribution of resources within a regionalized context. We fear that smaller (but rapidly growing) municipalities like Middlesex Centre will struggle to receive equitable services within a CA now made up of 81 municipalities.
- The potential impact of this proposal on the agricultural system cannot be disregarded. Rural CAs work directly with farmers to protect our agricultural system through stewardship programs and best practices, and we fear that this proposal will have significant negative impacts on these already underfunded and undervalued services.

Operational Considerations

- The proposal to amalgamate will create significant operational challenges. A regional CA consisting of 81 municipalities will create logistical challenges that need to be considered prior to moving forward with the proposal.
- While CAs are generally underfunded, the current CA funding formula and budgeting processes are well-established. A comprehensive and transparent operational plan would be needed prior to moving forward with the proposal.

We urge the province to pause the current proposal and first undertake meaningful engagement and consultation to explore opportunities to achieve the shared goals of reducing duplicative administrative costs and improving consistency across CAs, and continuing to protect life, property, and infrastructure for the people of Ontario.