



Bay Area
Climate Change
Council

Bay Area Climate Change Council
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December 18, 2025

Re: ERO Posting 025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities

The Bay Area Climate Change Council (“BACCC”) appreciates the opportunity to comment on ERO posting 025-1257 regarding the proposed consolidation of Ontario’s conservation authorities.

BACCC is an environmental collective catalyzing climate action across the Hamilton-Burlington Bay Area. We bring together diverse partners, including municipalities and conservation authorities, to collaboratively build a thriving and resilient net zero carbon community. The Hamilton Region Conservation Authority (“HCA”) is one of our members.

Ontario is already experiencing significant impacts from climate change, and it is essential that any structural changes to conservation authorities strengthen, rather than delay or dilute, the system’s ability to respond. The current conservation authority model is already delivering measurable value at the local level, and this success should be carefully considered in any reorganization.

We echo the HCA’s comments on ERO posting 025-1257, and we emphasize that any reforms should build upon existing local expertise, trust, and relationships; strong locally grounded systems and collaboration are essential for effective climate action and watershed management.

THE IMPORTANCE OF TRUST AND LONG-TERM RELATIONSHIPS

Through our work, BACCC has demonstrated that meaningful climate action depends not only on sound science, policy, and strategy, but also on trust and collaboration. Collective action relies on individual actors having confidence that others understand local conditions, share accountability, and will follow through on shared commitments. We are most effective when we can develop and implement climate action strategies in the context of deep, long-term and trusted relationships.

In the Hamilton-Burlington Bay Area, we have been successfully engaged in planning and cooperation for climate action and watershed management across municipalities, conservation authorities, business and civil society. We make timely decisions, have a shared ownership of outcomes, and can respond to local context.

For example, the HCA's Saltfleet Conservation Area Wetland Restoration Project, led by the HCA in partnership with the City of Hamilton, was the product of long-standing, integrated working relationships that effectively responded to local needs.

Neighbourhoods in the lower Stoney and Battlefield Creek areas were experiencing significant flooding and erosion challenges, and the HCA in collaboration with the City of Hamilton, alongside sustained engagement with First Nations within the relevant treaty territory, delivered locally-funded, cost-effective, climate resilient natural infrastructure in response.

Deep and durable relationships take time to establish and require a degree of stability to maintain. Once broken, they can be difficult to rebuild. It is therefore critical that any systemic changes proceed carefully and with a view to preserving and strengthening the relationships that already exist at a local level.

To that end, if the proposed consolidation of conservation authorities proceeds, we echo and support the recommendations of the HCA and other conservation authorities that governance must protect local voice, municipal accountability, and watershed identity.

THE IMPORTANCE OF LOCAL EXPERTISE

BACCC recognizes the strong policy foundation established through the Provincial Policy Statement, which requires municipalities to consider climate change impacts in planning and land development decisions. This framework reflects the Province's understanding that climate resilience depends on strong local leadership. Conservation authorities play a critical role in supporting this objective by providing locally grounded scientific and technical expertise.

By design, conservation authorities are uniquely positioned as locally responsive institutions that provide significant value to Ontarians and to the local development community. Many developers in Ontario are small businesses that rely on the local expertise of conservation authorities to understand climate risks, particularly in flood-prone areas. As flooding and forest health challenges intensify, this local capacity is increasingly important.

THE IMPORTANCE OF DEEP AND ONGOING ENGAGEMENT

Should the Ministry choose to proceed with consolidation, BACCC respectfully recommends deeper and more structured engagement and collaboration with affected partners. Under the current model, conservation authorities receive, on average, approximately 5% of their funding from the Government of Ontario. In the case of the Hamilton Conservation Authority (HCA), provincial funding represents approximately 1% of its overall budget. Municipal governments provide an important percentage of the funding, while many program-specific resources are secured from other non-provincial sources. In addition, much of Ontario's land base is subject to treaties with First Nations, whose rights, interests, and stewardship roles may be affected by changes to



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conservation authority governance and operations. These factors underscore the importance of collaborative planning with municipalities, First Nations, and other funding partners prior to structural change.

ONTARIO'S OPPORTUNITY

Ontario has a significant opportunity to strengthen climate resilience by advancing modernization initiatives in collaboration with municipalities and local institutions. A coordinated approach that values local relationships and expertise, and builds on existing strengths will better position the province to manage climate risks, reduce long-term costs, and support sustainable economic growth.

BACCC encourages the Province to work closely with municipalities, conservation authorities, First Nations, and other local actors to ensure that any reforms are holistic, evidence-based, and forward-looking, and that they reinforce — rather than weaken — Ontario's capacity for climate adaptation and environmental stewardship.

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