

Community Planning

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Our File: L11 2025 Bill 68 and regional consolidation of Conservation Authorities

Ministry of Municipal Affairs and Housing
777 Bay Street, 13th floor
Toronto, Ontario M5G 2N4

Via Email: ca.office@ontario.ca

To whom it may concern:

Re: Bill 68 and ERO 025-1257 Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

Please accept the County of Oxford's submission in response to the ERO 025-1257 Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities.

Oxford County is a two-tier municipal government in southwestern Ontario, comprised of eight area municipalities: the City of Woodstock, the Town of Ingersoll, the Town of Tillsonburg, and the Townships of Blandford-Blenheim, East Zorra-Tavistock, South-West Oxford, Norwich, and Zorra.

Under the current Conservation Authority (CA) composition, Oxford falls within the jurisdiction of 4 CAs, and is represented by 10 local Area Municipal representatives across the 4 CA Boards. The County, however, is the participating municipality under the Conservation Authorities Act, including with respect to budgetary matters.

Proposed Changes

In general, Ontario's 36 conservation authorities are proposed to be consolidated into 7 regional conservation authorities. It is noted that the Province's rationale for the proposed consolidation of CAs is to reduce duplicative administrative costs, free-up resources for frontline conservation, and better align conservation authorities' services with provincial priorities on housing, the economy, infrastructure, and climate resilience.

Similarly, the Province also recently passed Bill 68 the Plan to Protect Ontario Act (Budget Measures) 2025, which amended the Conservation Authorities Act (CAA) to give the Province the ability to create an Ontario Provincial Conservation Authority (OPCA). The stated purpose of the creation of the OPCA is to oversee the governance of authorities and other aspects of authorities such as their operations, including the programs and services they provide, to further the purposes of the Act.

The Province has also stated that regional CAs would continue to focus on managing natural hazards and watershed health, drawing on decades of local knowledge and partnerships. With better tools and more resources for front-line staff, the regional CAs would operate with greater consistency and transparency, deliver faster services to municipalities and permit applicants, while ensuring decisions continue to be based on sound science.

Under the proposed changes, the County's current 4 CAs would be consolidated with four additional CAs (whose watersheds also drain to Lake Erie), to form a new "Lake Erie Regional Conservation Authority". While the ERO posting materials note this area would have a composition of 81 municipalities, this does not include upper tier municipalities such as Oxford. With the inclusion of upper tier municipalities this new authority would encompass more than 90 municipalities (upper, single, and lower-tier) extending from Windsor, northeastwards towards Orangeville in Dufferin County.

Regional Conservation Authority Consolidation – General Comments

While the County supports the concepts of enhancing expertise, capacity, and program delivery across Ontario for CAs, we do not support the extent of CA consolidation being proposed. As such, we urge the Province to work collaboratively with municipalities and local Conservation Authorities to identify the most cost-effective level and framework for the administration of CAs, one that advances both provincial and local objectives without diminishing local input, accountability, and control. Key considerations and recommendations in this regard include:

- Keeping the size of CAs at a scale that allows them to remain connected and accountable to the local communities and municipalities they serve,
- Restoring the ability to have shared services agreements between and among CAs, to allow for greater efficiency in the delivery of shared services where it makes sense to do so at a local level,
- Providing for governance models which continue to support local decision-making through municipal representation that appropriately balances rural and urban priorities and interests,
- Support local offices and existing staffing levels to preserve local expertise, relationships, and responsiveness,
- Provide for greater standardization at a regional level with updated technical guidance, policy approaches, and modernization tools,
- Provide for protective measures to ensure that resources are not redistributed to other watersheds or diluted through centralization. Policies should also ensure watershed-level financial tracking, transparent capital planning, preservation of local advisory roles, and management of CA owned/operated lands must continue according to established priorities, and,
- Recognizing that service levels vary across CAs because each CA's programs and services - developed under the oversight of its local Board of Directors - are tailored to the unique needs of their communities, local watershed conditions, municipal priorities and budgets, and community input.

From their inception in 1946, CAs have always been intended to be local bodies that are meant to focus on preventative measures and watershed management to protect, restore, and enhance environmental health, with a focus on natural hazards including flooding and erosion. The watershed-based format of CAs also supports municipalities ability to work together on shared environmental problems, address upstream actions that affect downstream communities, and plan and manage lands and waters by taking an integrated and science-based approach.

To this end there are several areas which represent significant areas of concern for the County, in relation to the proposed consolidation of CAs, including the proposal Lake Erie CA such as:

- The size and scope of the consolidations, as currently proposed, is simply too large and would negatively impact the ability for CAs to remain connected to the local communities and deliver effective services to the municipalities they serve. Municipalities and local CAs have the greatest understanding of local needs, priorities, and how to most efficiently and effectively implement CA responsibilities and Provincial direction in their particular local context and, therefore, it is critical that they be directly involved in the determination of the most appropriate revised boundaries for any consolidation of CAs.
- The potential loss of rural voice and representation on the boards of consolidated CAs is particularly concerning, especially given that the majority of the land area of the respective Lake Erie CA authority is rural/agricultural in nature, yet could become easily overpowered by urban perspectives and priorities from large urban centers, given the number of them located within this large portion of Southwestern Ontario.

- The relationship between the proposed Regional Conservation Authority Boards and the provincial OPCA remains unclear. If the OPCA functions as an overly centralized authority, it could limit regional boards' independence and discourage qualified people from working at and serving on CA boards. It also introduces new costs that are not within local control. Clearly defining roles and decision-making powers is essential to maintain effective governance and local accountability.
- Service levels vary across Conservation Authorities because each CA's programs and services is developed under the oversight of its local Board of Directors. This approach tailors its programs and services to the unique needs of their communities, local watershed conditions, municipal priorities and budgets, and community input. Creating uniform service levels across a regional structure means some areas may see improvements, while others may experience a reduction in the services they currently receive. It may also result in important, locally valued programs and services being lost, as support is redirected elsewhere. How will the program costs be equitably distributed over the broader regional CA?
- Similarly fees are also locally established to offset and cover the costs of Class 1, 2 and 3 services (under the CAA) they are related to. How can the OPCA harmonize fees, when the costs of the services are not the same locally across the entire Province? Further CA fees should not be a source of revenue to cover administrative costs associated with the OPCA.
- Technical matters such as flooding behaviour and risks, erosion patterns, and watercourse dynamics vary dramatically from one watershed to another. If regionalization stretches teams too thin, we risk losing on-the-ground expertise, local flood records, and real-time responsiveness during storms and emergencies.

Maintaining and strengthen relationships with local communities and stakeholders

Moving to a more regional service model for Conservation Authorities could potentially assist in improving consistency, efficiency, and equity in service delivery. That said, the size and scale of such regional CAs must be considered very carefully, as oversized CAs (i.e. anything larger than the current Source Protection Region model) risks becoming too distant from local issues, slowing decision-making, diminishing accountability and local responsiveness, and underrepresenting rural municipalities and areas, with limited to no additional benefits.

Further, it is noted that potential benefits such as standardized permitting practices, technical standards, shared GIS systems, and modernized public portals, to help reduce variability across the current 36 authorities – could simply be achieved by establishing a common framework for all CAs and the Province delivering on updated technical manuals, guidance documents and related standards and implementing parts of the [Province's Flood Strategy](#).

Similarly, collaborative policy and fee harmonization, clear service expectations, defined response times, and accessible points of contact to help ensure fairness and reliability could also be achieved through a common regional framework, without the degree of consolidation currently being proposed. Further, the proposed reorganization of conservation authorities covers vast areas and populous regions in Southwestern Ontario which may skew or unbalance representation and perspective, as well as drive up costs and requirements for permits in rural areas. Fee rates and service levels should reflect the costs and services needed for the communities and watersheds they serve.

Maintaining watershed offices, local expertise, and consistent points of contact to allow residents, farmers, businesses, and municipalities to access staff who understand their specific conditions is essential. Local watershed advisory committees, which further ensure decisions are informed by community knowledge and that specialized issues are addressed appropriately, must also be maintained. It is unclear how a Regional CA model would achieve this.

Oversized Regional CAs may also negatively impact responsive service delivery. Maintaining timely permitting, accessible staff, and clear avenues for raising concerns, is essential for maintaining trust. When properly scaled and structured, CAs can capture the efficiencies of consolidation through other tools like

shared service agreements (if they were once again allowed by the Province) without diminishing the voice, visibility, or needs of individual watersheds and municipalities.

Preserving local abilities to fundraise and attract local volunteers is also essential. If organizations with separate foundations are forced to amalgamate, watershed-based fundraising must remain distinct and separate to protect local support, stewardship, and conservation efforts. Donors contribute based on local impacts; regionalizing donations risks undermining engagement. Mechanisms are needed to keep fundraising, reporting, and donor recognition tied to specific watershed projects and the communities where they are located.

Governance structure including suggestions around board size, make-up and the municipal representative appointment process

Effective governance for CAs requires board representation that remains locally accountable and fairly representative. In large regions, such as the proposed Lake Erie authority with over 90 municipalities, a one-member-per-municipality model is unworkable. Smaller boards of roughly 25-30 elected officials, proportionally representing population, geography, and financial contribution, would support strategic decision-making while preventing dominance by any single municipality. Shorter board terms could further balance leadership.

To preserve strong local input, the model should include watershed-specific advisory committees, such as Local Watershed Advisory Committees, agricultural or development advisory groups, and an Indigenous Advisory Circle to ensure meaningful Indigenous engagement. This structure ensures fair representation, protects rural and small-municipality voices, maintains local program priorities, and supports consistent, accountable decisions.

The Province also needs to substantively clarify the role, purpose, and costs of the OPCA. Local CAs and municipalities should not be the source of funding for the OPCA, nor should the OPCA interfere with the delivery of local permitting and services.

Transparent and Consultative Budgeting Process

Municipalities pay the majority of the costs for conservation authority services. Based on the proposed model, it appears that this will continue to be true even as the new legislation and proposed regional CA model diminishes the ability of municipalities to exercise meaningful oversight and control over local watershed management decisions. This is further compounded by the creation of the OPCA, whose costs (beyond whatever initial funding is offered by the Province) will also have to be borne by local CAs and in turn municipalities.

Maintaining a transparent budgeting process requires consistency, clarity, and accessible engagement for all prescribed and member municipalities. A standardized multi-year budget framework would improve predictability, while a clear apportionment formula - based on assessment values, population, and watershed area - should continue to guide municipal contributions, with options to use geo-referenced property assessment data for greater accuracy.

To maintain strong local input in budgeting processes, a Municipal Budget Advisory Committee and watershed-based consultation meetings should be established, ensuring representation from both rural and urban municipalities. Budget documents must be clear, publicly available, and shared early to align with municipal budget cycles. Multiple engagement options (e.g. council presentations, virtual workshops, written feedback, and one-on-one briefings) should be incorporated to ensure that municipalities can participate effectively.

Ongoing transparency should be reinforced through clear reporting on municipal input, accessible annual financial statements, and consistent differentiation between costs and revenues for Category 1, 2, and 3 programs as set out in the CAA.

In addition, the Province should also restore the ability for Conservation Authorities to enter into their own shared service agreements, where opportunities at a local level allow for greater efficiency and sharing of services where it makes sense to do so.

The protection of local reserves, land assets, and infrastructure - built through decades of local investment must be incorporated into any regional model. CA's own and operate significant infrastructure and land holdings. These assets must continue to be managed according to established priorities. Protective measures are needed to ensure resources are not redistributed to other watersheds or diluted through centralization. Policies should ensure watershed-level financial tracking, transparent capital planning, and preservation of local advisory roles continues.

Similarly a thorough financial and legal due diligence process should be incorporated into transition plans to assess existing liabilities, assets, and any restrictions on current funding or land transfers. Under the proposed model, all assets and reserves will be transferred to the regional CA, significantly reducing the ability of local municipalities to influence decisions about lands and resources in their own communities going forward. This should be refined to ensure that local decision making remains on a local watershed basis for the long term.

Conclusion

For conservation authorities to remain effective and trusted, they must stay closely connected to local communities and municipalities despite operating at a larger scale. If consolidated regions become too large, municipalities risk under-representation and the loss of attention to specialized watershed needs, such as: agriculture, drinking water, localized flooding, or unique recreational priorities. A revised and right-sized regional framework would help ensure these local concerns remain visible with urban and rural representation on CA Boards. The Province should support the sharing of services between CAs under appropriate circumstances, an ability lost through more recent changes to the CAA.

The Province should pursue continued and meaningful dialogue and engagement with municipalities and CAs to achieve an appropriate CA framework and that any move toward a more regional CA model (i.e. any consolidation of current CAs) maintains a scale and distribution of CA's that addresses the concerns outlined above (i.e. not generally exceeding the geographic size and scale of the current Source Protection Authorities).

Given the limited consultation timeframe provided and the timing of the local Provincial information session (i.e. December 12), these comments have been prepared by County staff on behalf of the County, with only limited, initial consultation with County Council and our area municipal partners on the comments and concerns identified by staff. As such, it is expected that the various Area Municipalities within the County may also be submitting their own comments in response to this consultation.

Oxford County looks forward to continued and meaningful consultation with the Province and anticipates providing additional input as additional information becomes available. Thank you for the opportunity to submit comments on the proposed changes. If you have any questions regarding this submission, please feel free to contact April Nix, Manager of Planning Policy at anix@oxfordcounty.ca or by phone at 519-539-9800 ext. 3208.

Sincerely,

Original signed by

Paul Michiels
Director of Community Planning
County of Oxford

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Via Email