



December 18, 2025

**VIA ERO SUBMISSION**

Ministry of Environment, Conservation and Parks  
Conservation and Source Protection Branch  
300 Water Street North tower, 5th floor  
Peterborough, ON K9J 3C7

**Re: Bill 68-Conservation Authority Act Amendments to create the Ontario Provincial Conservation Agency and ERO-025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities**

To Whom It May Concern,

Deshkan Ziibiing, also known as Chippewas of the Thames First Nation (COTTFN), is writing to express our deep concerns and opposition to the Ministry of Environment, Conservation and Parks (MECP) ERO-025-1257 proposal to the regional consolidation of Ontario's conservation authorities, as well as the Schedule 3 amendments in Bill 68 to the Conservation Authority Act (CAA) that created the Ontario Provincial Conservation Agency (OPCA).

Deshkan Ziibiing edbendaagzjig's (those that belong to Antler River) Traditional Territory is recognized and affirmed by Canada in the Big Bear Creek Land Claim Settlement Agreement (2013). Within this recognized and affirmed Territory, we are also signatory to pre-Confederation Treaties with the British Crown. Traditional Anishinaabe territory in Southwestern Ontario includes the lands identified and addressed in the McKee Treaty (1790), the London Township Treaty (1796), the Sombra Township Treaty (1796), the Longwoods Treaty (1822), and the Huron Tract Treaty (1827). Deshkan Ziibiing is also a party to several of these Treaties with other Anishinaabe Nations but remains the sole First Nations signatory to the Longwoods Treaty. Deshkan Ziibiing continues to uphold our rights, responsibilities and commitments to protect the regional lands and watersheds of Lake Erie and Lake Huron. We regard all ancestral lands within present-day Southwestern Ontario as part of our consultation territory, as our Treaties with the Crown never "surrendered" our lands or waters.

The rights that Deshkan Ziibiing exercises in relation to our Traditional lands, Treaty lands, Reserve lands, and Addition to Reserve lands, are inherent and grounded most basically in the Creator's gift of lands, waters, and way of life to ndodeminaanig, "our clans." These rights are embodied in our historical and ongoing occupation of our Territory, and in our practice of self-determination as Indigenous Peoples. Our rights as a self-determining people are recognized in several instruments, including the Royal Proclamation of 1763, our Treaties, s. 35(1) of Canada's Constitution Act, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).<sup>1</sup>

Outlined below are Deshkan Ziibiing's detailed concerns regarding the proposed changes to the Conservation Authority's boundaries and the recently passed changes to the CAA to create the OPCA. These include the Province's failure to meaningfully consult First Nations, the historic, ongoing and purposeful exclusion of Indigenous peoples from Conservation Authority watershed governance, and the direct and indirect impacts these reforms pose to Aboriginal and Treaty Rights, watershed protection, and public safety.

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<sup>1</sup> Deshkan Ziibiing/Chippewas of the Thames First Nation Wiindmaagewin Consultation Protocol, [2023](#)





### **Section 35 (1) of the Canadian Constitution, the Duty to Consult, UNDRIP and Reconciliation:**

Section 35 of the Canadian Constitution Act, 1982, acknowledges Indigenous peoples' existing Aboriginal and Treaty rights<sup>2</sup>. This section of the Constitution recognizes Indigenous rights to land, resources, and self-governance, necessitating the Duty to Consult by the government when making decisions affecting these rights. Ontario is therefore **legally bound by the Constitution of Canada** to uphold the Honour of the Crown, which requires acting with integrity, good faith, and fairness in all dealings with Indigenous peoples. The Honour of the Crown must be given full effect in a manner that advances reconciliation and cannot be reduced to a narrow or procedural exercise.<sup>3</sup>

Canada further affirmed these obligations through the enactment of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) Act, which came into force on June 21, 2021. UNDRIP affirms Indigenous peoples' rights to self-determination, participation in decision-making, protection of lands, waters, and resources, and the recognition and enforcement of Treaties<sup>1</sup> and specifically:

**Article 18-** Indigenous Peoples have the ***right to participate in decision-making*** in matters which would affect their rights, through representatives chosen by themselves in accordance with their own procedures, as well as to maintain and develop their own Indigenous decision-making institutions.

**Article 19-** States shall ***consult and cooperate in good faith*** with the Indigenous Peoples concerned through their own representative institutions, in order to obtain their Free, Prior and Informed Consent before adopting and implementing legislative or administrative measures that may affect them.

**Article 25-** Indigenous peoples have the ***right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations*** in this regard.

**Article 32-** 1. Indigenous Peoples have the right to ***determine and develop priorities and strategies for the development or use of their lands or territories and other resources***. 2. States shall ***consult and cooperate in good faith with the Indigenous Peoples*** concerned through their own representative institutions in order to obtain their ***free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources***. 3. States shall provide ***effective mechanisms for just and fair redress for any such activities, and appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural or spiritual impact***.

**Article 37-** Indigenous Peoples have ***the right to the recognition, observance and enforcement of Treaties, agreements and other constructive arrangements*** concluded with States or their successors and to have States honour and respect such treaties, agreements and other constructive arrangements.

Therefore, as Canada has committed to implementing UNDRIP through federal law, Ontario, as a subservient regional body of government within Canada, is equally responsible for upholding these federally recognized and protected standards. Free, Prior, and Informed Consent (FPIC) is not an optional process; it is a minimum international human

<sup>2</sup> *The Constitution Act, 1982*, Schedule B to the Canada Act 1982 (UK), 1982, c 11, s.35.

<sup>3</sup> Chief Justice McLachlin, *Taku River decision* (2004, Supreme Court of Canada), para. 24





rights requirement, recognized nationally in Canada through law, that ensures Indigenous Peoples can meaningfully influence decisions that affect their lands, waters, and the species that sustain their cultures, identities, and responsibilities.

The province of Ontario should also note the recent court ruling in British Columbia, which has confirmed that UNDRIP has legal force through provincial legislation and must meaningfully inform Crown decision-making, signaling the growing judicial recognition of Indigenous jurisdiction and the role of FPIC in Canadian law<sup>4</sup>. Ontario's continued failure to meaningfully recognize, acknowledge, and implement UNDRIP, and to respect the principles of FPIC, will perpetuate provincial consultation frameworks that fall short of the Crown's constitutional and international obligations.

### **Lack of Consultation**

The amendments to the Conservation Authorities Act and the creation of the OPCA introduced through Schedule 3 of Bill 68 were announced on October 31, 2025. Yet, the Bill advanced through the legislative process and received Royal Assent before First Nations had any meaningful opportunity to engage and provide comment. This approach failed to meet the Crown's Duty to Consult and refused to apply the principles of the UNDRIP, including FPIC. Furthermore, municipalities, Conservation Authorities, and other stakeholders were denied any genuine opportunity to influence this legislation, which fundamentally restructures watershed governance and environmental protections in Ontario.

Ontario has also advanced a separate ERO proposal to alter 36 Conservation Authority geographical boundaries and consolidate them into seven large regional authorities, again without meaningful consultation with First Nations. No capacity funding was provided to support technical review, internal coordination, or informed participation, despite the scale, complexity, and rights implications of the proposed changes. Taken together, the Bill 68 Conservation Authority Act amendments, the establishment of the OPCA, and the proposed Conservation Authority boundary changes once again represents a hasty and uncoordinated attempt at restructuring provincial watershed governance unilaterally by the Province.

Watersheds in Southwestern Ontario sustain COTTFN's Aboriginal and Treaty-protected rights to hunt, fish, trap, and gather medicinal and culturally significant plants. Deshkan Ziibi (the Thames River) holds particular cultural, spiritual, and legal importance for COTTFN. The Deshkan Ziibi riverbed remains unceded, as historic Treaties in this region extended to the riverbanks, and the matter is subject to an outstanding land claim. Any regulatory or governance changes affecting the Thames River watershed directly engage unresolved title and Deshkan Ziibiing Anishinaabe jurisdiction over the riverbed, significantly heightening the Crown's duty to consult and accommodate.

In this context, MECP's failure to undertake meaningful consultation in relation to these Conservation Authority changes represents an even more severe breach of the Crown's constitutional obligations under the Duty to Consult.

### **Call to Action:**

Issue an immediate pause on the implementation of Bill 68 amendments related to the OPCA and the proposed Conservation Authority boundary changes until the Province commits to a meaningful, adequately resourced consultation process that meets its constitutional and federal obligations under the Duty to Consult, is co-

<sup>4</sup> [Gitxaala v. British Columbia: BCCA finds that UNDRIP is part of BC and Canadian law, and BC's mineral claim system is inconsistent with UNDRIP](#)





developed with First Nations, aligns with the United Nations Declaration on the Rights of Indigenous Peoples, and upholds the requirement to obtain Free, Prior, and Informed Consent (FPIC). Such a process must respect Deshkan Ziibiing Anishinaabe jurisdiction, Aboriginal and Treaty Rights, and Indigenous knowledge systems, and be supported by appropriate timelines and capacity funding to enable meaningful participation.

### **Historic, Continued and Purposeful Exclusion of First Nations in Conservation Authority Boards**

The failures outlined above are not isolated but reflect a longstanding pattern of excluding First Nations from Conservation Authority governance, despite the critical importance of Indigenous participation in watershed risk management, flooding response, and the protection of water quality and quantity. For years, both First Nations and Conservation Authorities have repeatedly called for First Nation Rights holder representation on CA boards to ensure decision-making respects Aboriginal and Treaty Rights and Indigenous knowledge systems. Yet, these requests have been consistently denied and not taken seriously by the province. Bill 68 and the creation of the OPCA now entrench this exclusion by concentrating decision-making authority within provincially controlled governance structures that exclude First Nations altogether and remove them from meaningful participation in watershed decisions that directly affect their lands and rights.

#### **Call to Action:**

Enshrine First Nation Rights holder representation on Conservation Authority Boards and the OPCA Board, with full decision-making authority, including:

- Equal board composition (50% First Nations, 50% others).
- Consent-based decision-making for matters affecting Aboriginal and Treaty Rights, watershed integrity, or cumulative impacts.
- Stable, long-term provincial capacity funding to support First Nation participation in these boards, for technical review, and Indigenous Knowledge integration

### **Canada Water Agency Jurisdiction and First Nations Rights and Responsibilities**

It is essential to situate the proposed restructuring of Conservation Authorities within the broader federal framework for freshwater governance established through the Canada Water Agency in 2024. Under this framework, the Government of Canada has affirmed its commitment to fostering reconciliation with Indigenous peoples in the exercise of its freshwater-related powers and responsibilities, and to respecting Aboriginal and Treaty Rights recognized and affirmed under section 35 of the Constitution Act, 1982.

The Canada Water Agency framework further commits the federal government to implementing the principles of the United Nations Declaration on the Rights of Indigenous Peoples and to promoting cooperation on freshwater issues with provincial and territorial governments and Indigenous peoples. Central to this approach is the recognition that effective watershed governance must be grounded in both scientific knowledge and Indigenous knowledge, developed and applied through meaningful collaboration with Indigenous communities.

In this context, Ontario's move toward centralized and large-scale regional watershed governance, without meaningful First Nations participation, risks further misalignment with emerging federal approaches to freshwater management.



Rather than advancing cooperative, rights-respecting, and knowledge-based governance, the proposed consolidation of Conservation Authorities and the creation of the OPCA may complicate intergovernmental coordination and undermine opportunities for collaborative watershed management, which are increasingly recognized as essential at the national level.

### **Ontario's unsubstantiated issues with current Conservation Authorities**

Ontario has not sufficiently demonstrated that the creation of the OPCA or the proposed consolidation of 36 Conservation Authorities into seven regional authorities is necessary, effective, or supported by scientific evidence or a credible business case. While the Province has asserted that the existing Conservation Authority system is fragmented, produces inconsistent approval timelines, and impedes development, it has failed to substantiate these claims with data, performance metrics, or comparative analysis.

Critically, the Province has neither examined nor disclosed any assessment of reasonable alternatives to this drastic restructuring and amalgamation. Major governance reforms of this magnitude require a transparent evaluation of alternatives, including less disruptive options that address identified concerns without dismantling established watershed-based governance. We therefore offer the following points to expand on these concerns:

There is no evidence on the record demonstrating that Conservation Authorities are “holding back” development in Ontario<sup>5</sup>. Where performance information is available, it indicates the opposite. Conservation Authorities operate under legislated permitting timelines and established service standards, and publicly reported data from multiple authorities show that permit decisions are routinely issued well within required timeframes. Delays that do occur are commonly attributable to incomplete applications, complex site conditions, or the need to address flood, erosion, or natural hazard risks—functions that Conservation Authorities are legally mandated to perform. Characterizing this due diligence as obstruction misrepresents the role of CAs and conflates sound environmental review with delay<sup>6</sup>.

Ontario has also failed to demonstrate that Conservation Authorities are ineffective at protecting communities from floods and natural hazards, despite suggesting this in the ERO posting<sup>7</sup>.

No evidence has been provided showing systemic failure of the existing watershed-based model or linking flood or erosion impacts to fragmented CA systems and governance structures. Absent such evidence, restructuring governance at this scale introduces risk rather than mitigating it, particularly where emergency response and hazard management depend on local hydrological knowledge and established inter-agency relationships.

Importantly, many of the Province's stated objectives, such as consistency, efficiency, shared services, and digital modernization, are achievable within the existing Conservation Authorities Act framework. Ontario already possesses the legislative authority to establish standardized policies, timelines, fee structures, and digital systems, and Conservation Authorities have demonstrated willingness to collaborate on modernization initiatives. The

<sup>5</sup> Narwhal quoting [October 31, 2025 Press Conference Environment Minister Todd McCarthy](#) regarding Conservation Authority changes

<sup>6</sup> [Client Service Standards for Conservation Authority Plan and Permit Review, 2019](#)

<sup>7</sup> ERO posting- 025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities





creation of the OPCA and large-scale amalgamation, therefore, cannot be justified as the only or necessary pathway to achieve these goals.

Ontario has not justified the scale of consolidation being proposed. Reducing 36 Conservation Authorities to 7 represents a drastic restructuring that risks eroding watershed-specific governance, weakening accountability, and undermining the local relationships that enable effective permitting, restoration, and hazard response. While limited regional coordination or shared services may be appropriate in some contexts, Ontario has not explained why such coordination requires dismantling existing authorities or creating mega-regions spanning vast, ecologically distinct areas. Furthermore, the reduction and consolidation of CAs into fewer, larger units increases provincial obligations to the constitutional responsibility to the First Nations 'Duty to Consult', as larger catchment areas correlate to the provinces' obligations to engage and consult with impacted First Nations meaningfully.

Finally, the Province has not accounted for the transition costs and implementation risks associated with consolidation. Governance restructuring, IT and data migration, policy harmonization, staffing changes, and the establishment of a new provincial agency will divert time, funding, and expertise away from frontline watershed management. Ontario has also not clearly committed to funding these changes, raising concern that costs may be downloaded to municipalities and Conservation Authorities, further weakening capacity. Perpetuating exclusionary forms of provincial watershed governance will further exacerbate risks to First Nations communities already directly impacted by increased flooding and boil-water advisories.

In the absence of a transparent feasibility study, cost analysis, or other supporting analysis, Ontario has not demonstrated a sound justification for dismantling Ontario's 79-year-old watershed-based Conservation Authority system, the only system of its kind in Canada.

When considered alongside the broader context of Bill 5, the creation of Special Economic Zones, the erosion of environmental protections under the Endangered Species Act, and the Province's sustained weakening of Conservation Authorities in recent years, these changes point not to evidence driven reform of watershed governance, but to a deliberate shift toward centralized provincial control intended to remove regulatory constraints and expedite development in support of provincial political priorities.

### **Undermining Watershed Protection and Public Safety through Centralized OPCA Control**

The expedited creation of the Ontario Provincial Conservation Agency (OPCA) and the proposed consolidation of Conservation Authorities fundamentally centralizes provincial watershed governance under the Ministry of the Environment, Conservation and Parks (MECP). This governance shift is meant to replace locally grounded, watershed-based decision-making inclusive of municipalities; replacing it with a centralized provincial agency, structurally removed, segregated and divorced from local watershed contexts, First Nation Rights holders and stakeholders. We believe these changes are short-sighted and dangerous and could significantly increase risks to watershed protection and public safety, thereby impacting Aboriginal and Treaty Rights. We remind the provincial government that:

Under the tenure of a Progressive Conservative provincial government led by Premier George A. Drew, Conservation Authorities were intentionally created in 1946 and designed around watershed boundaries because of the non-partisan dangers to human life associated with extreme weather, river flooding risks, erosion, water quality, and ecosystem function – all of which are inherently local and place-specific. Local Conservation Authority boards' staff possess detailed, site-specific knowledge of watershed conditions, hazard zones, and infrastructure





vulnerabilities that cannot be replicated at a large regional or provincial scale. Even where not mandated, collaboration between Conservation Authorities and First Nations has produced practical, place-based outcomes that strengthen watershed governance and community resilience. For example, in the case of the Thames River, the innovative 'Shared Waters Approach' has provided a forum for CAs, First Nations, and representatives of higher government to convene and collaborate on various initiatives related to regional watershed issues and concerns. Chippewas of the Thames First Nation is also the only First Nation in Ontario to directly collaborate on historic and future flood scenario modelling work with Conservation Authorities to support improved First Nations climate change adaptation and resilience through improved watershed governance and collaboration on flood risk mapping.

Reducing 36 Conservation Authorities to seven regional entities would create jurisdictions so large that meaningful watershed-level oversight becomes impractical. For example, the proposed Lake Erie Regional Conservation Authority would consolidate eight distinct watersheds, encompass more than 80 municipalities, and overlap with multiple First Nations Treaty and Traditional Territories, each with distinct hydrological dynamics, land-use pressures, risk profiles, and associated Crown obligations under the Duty to Consult. Treating these distinct watersheds as interchangeable within a single regional authority undermines the efficiency and effectiveness of core Conservation Authority functions, including risk mitigation and environmental protection, by disregarding local context and replacing place-based decision-making with generalized oversight.

Smaller watershed-specific knowledge and local operational expertise cannot be centralized into large governance structures without increasing the risk of oversight failures, decision-making errors, and delayed responses, all of which elevate the potential for harm to people, property, and ecosystems. From a First Nation perspective, these suggested changes have direct and adverse impacts on the exercise of Aboriginal and Treaty Rights. For Deshkan Ziiibiing edbendaagzijig, any negative impacts to watersheds are impacts to Indigenous Rights. While home to the greatest biodiversity in Canada, Southern Ontario is now among the most populous, developed, and ecologically altered landscapes in the country. In this region, First Nations such as COTTFN have borne the cumulative burden of colonization and this degradation of land, water and culture for generations. As such, COTTFN has initiated a Cumulative Effects Study, which confirms that development has already impaired members' ability to exercise their Aboriginal and Treaty Rights. Early findings show reduced access to hunting, fishing, medicinal plant gathering, and culturally important species. Members increasingly report having to travel far beyond Treaty lands to exercise rights that were guaranteed to them. Further weakening watershed governance through OPCA centralization and Conservation Authority amalgamation will deepen these harms and facilitate continued infringement of Indigenous rights and responsibilities to land and water.

The OPCA framework explicitly states that its purpose is to align Conservation Authority activities with provincial priorities related to growth and development, which departs from the original mandate of Conservation Authorities to protect human life and the environment from risks and natural hazards. This alignment risks subordinating ecosystem protection and public safety to development objectives, enabling the Province to override environmental and watershed concerns in the interest of expediting approvals while increasing long-term liabilities and risks, particularly for First Nations communities. When watershed governance is removed from local decision-making and consolidated under minister-directed, centralized control tied to provincial priorities, environmental oversight becomes vulnerable to political pressure, eroding the precautionary function of Conservation Authorities and increasing risk for all Ontarians.





**Call to Action:**

Preserve locally governed, watershed-based Conservation Authorities as the foundation of flood risk management, hazard mitigation, and environmental protection, recognizing that local expertise cannot be replaced through centralized oversight.

Reconsider and substantially reduce the scale of any proposed consolidation, ensuring that watershed governance boundaries remain manageable, place-based, and responsive to local conditions and risks.

Ensure that OPCA oversight cannot override or displace local and Indigenous decision-making on watershed protection, public safety, or development approvals.

**Conclusion**

Chippewas of the Thames First Nation opposes Ontario's proposed consolidation of Conservation Authority boundaries under ERO-025-1257 and the Schedule 3 amendments to the Conservation Authorities Act enacted through Bill 68, which created the Ontario Provincial Conservation Agency (OPCA). Together, these measures represent a far-reaching shift toward centralized provincial control over watershed governance, advanced without evidence, meaningful consultation, or First Nations participation. By proceeding in this manner, Ontario failed to meet its constitutional obligations under section 35 of the Constitution Act, 1982 and the Duty to Consult. It failed to uphold the principles of the United Nations Declaration on the Rights of Indigenous Peoples, including the requirement to obtain free, prior, and informed consent. These reforms entrench the historic exclusion of First Nations from Conservation Authority governance, undermine local and watershed-specific expertise, and risk weakening environmental protection and public safety. For COTTFN, where cumulative ecological degradation has already impaired the exercise of constitutionally protected Aboriginal and Treaty rights, further centralization of watershed governance authority will compound these harms and deepen ongoing infringements on Indigenous rights and responsibilities.

**In summary, this submission calls on the Province to immediately:**

1. Pause the implementation of Bill 68 Schedule 3, the Ontario Provincial Conservation Agency (OPCA), and the proposed Conservation Authority boundary consolidation until meaningful, adequately resourced consultation has occurred with First Nations, through a fulsome, rights respecting process consistent with section 35 of the Constitution Act, 1982, the United Nations Declaration on the Rights of Indigenous Peoples, and the requirement to obtain Free, Prior, and Informed Consent (FPIC).
  - a. Respectful consultation with Conservation Authorities, municipalities, and other affected stakeholders must also occur.
2. Provide transparent, evidence-based justification for the creation of the OPCA and any Conservation Authority consolidation, including publicly released feasibility studies, cost-benefit analyses, risk assessments, business cases, and an evaluation of reasonable alternatives.
3. Ensure that Conservation Authority governance structures include meaningful First Nation Rights holder participation on Conservation Authority Boards that are granted decision-making positions, rather than advisory roles.





4. Require the preservation of local governance, watershed-specific expertise, and watershed-based management to protect public safety, water resources, ecosystems, and Aboriginal and Treaty Rights by reconsidering the scale of the proposed consolidation, especially in the COTTFNs Treaty and Traditional Territory. While limited coordination or targeted consolidation may be appropriate in some circumstances, the proposed reduction from 36 Conservation Authorities to seven regional entities is unjustifiably drastic. Any changes must be co-developed with Conservation Authorities and First Nations, grounded in watershed realities, and supported by evidence demonstrating that the scale of consolidation is necessary and proportionate.

COTTFN expects a timely, written response from the province demonstrating how it will address these concerns and bring its actions into compliance with its constitutional, Treaty, and UNDRIP obligations.

Sincerely,

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