

December 19th, 2025

RE: ERO Posting No. 025-1257 – Proposed boundaries for the regional consolidation of Ontario’s conservation authorities

Dear Minister McCarthy,

On behalf of Middlesex County Council, I am writing to provide comments on ERO Posting No. 025-1257 regarding the proposed boundaries for the regional consolidation of Ontario’s conservation authorities.

Middlesex County recognizes and appreciates the Province’s stated objectives of improving consistency, transparency, and efficiency within the conservation authority system, particularly with respect to permitting timelines, natural hazard management, and alignment with broader provincial priorities. The County is supportive of continued modernization and welcomes further discussion on how these objectives can be best achieved.

At the same time, this proposal raises several important questions related to governance, funding responsibility, service continuity, and the long-term role of municipalities within a regional conservation authority framework. Our comments are offered in the spirit of seeking additional clarity and information to support sound policy development and effective implementation should the Province proceed in this direction.

Before advancing consolidation, the Province may wish to consider whether the intended outcomes could be achieved through targeted legislative and regulatory amendments under the leadership of the proposed Ontario Provincial Conservation Agency (OPCA). Enhanced provincial coordination, standardized technical guidance, digital integration, and shared service platforms may be achievable without restructuring the conservation authority system in its entirety. Further information on why full consolidation is required, as opposed to these alternative approaches, would assist municipalities in understanding the necessity and proportionality of the proposed changes.

Key Factors to Support a Successful Transition

Middlesex County would be divided between two proposed regional conservation authorities, with portions of the County falling within the Lake Erie Regional

Conservation Authority and the Huron–Superior Regional Conservation Authority. The Lake Erie Regional Conservation Authority would encompass approximately 81 municipalities and the Huron-Superior Regional Conservation Authority would encompass 7 municipalities, and a large disjointed geographic area. This scale prompts questions regarding how meaningful municipal representation, accountability, and responsiveness would be preserved, particularly for smaller and rural municipalities with distinct land-use contexts and capacity considerations. Clarification on how governance structures would ensure balanced influence across such a large and diverse membership would be helpful.

In addition, consolidation of this magnitude would require significant transition planning. The County seeks confirmation that all transition costs, organizational, technological, legal, and operational, would be fully supported by the Province and not transferred to municipalities. Clear commitments regarding service continuity for permitting, flood forecasting and warning, and source water protection during any transition period are also critical.

Potential Opportunities and Benefits

The County acknowledges that a regional model may offer opportunities for shared technical capacity, standardized hazard approaches, and improved support for smaller authorities. However, many existing conservation authorities already meet or exceed provincial standards. Additional information on the anticipated costs, timelines, and net benefits of consolidation, compared to enhanced provincial coordination, would assist municipalities in evaluating the proposal.

Similarly, objectives such as digital modernization, integrated GIS platforms, and consistent data systems are strongly supported. These outcomes may be achievable through direct provincial investment and OPCA oversight without amalgamation. Further clarification on why consolidation is required to achieve these outcomes would be beneficial.

Governance and Funding Considerations

Under a regional model with a large number of contributing municipalities, traditional governance and apportionment approaches raise important questions. Boards of the size implied by the proposed boundaries may be difficult to manage effectively and may dilute direct municipal oversight.

This leads to a fundamental question for consideration: **if regional conservation authorities are intended to function as provincially directed, watershed-scale entities delivering services that align closely with provincial priorities, should**

they continue to rely on municipal funding contributions?

Municipal financial participation has historically been linked to governance representation and local accountability. Requiring municipalities to contribute financially without proportional or meaningful representation risks undermining transparency and confidence in the system. If the Province determines that a regional conservation authority model is the preferred approach, a fully provincially funded model may be the most appropriate and equitable solution. Such an approach would:

- Eliminate the disconnect between funding responsibility and governance influence;
- Provide stable and consistent funding across regions; and
- Better reflect the provincial interest in natural hazard management, watershed planning, and climate resilience.

Budget Transparency and Municipal Engagement

Under the current municipal funding model, maintaining a transparent and consultative budgeting process across a large regional authority would be challenging. While structured consultation and reporting frameworks could be developed, municipalities may still be placed in the position of funding decisions over which they have limited influence.

A provincially funded model would significantly reduce these challenges by removing municipal apportionment altogether, while still allowing municipalities to remain engaged through technical committees, watershed-based advisory structures, and regular reporting on outcomes and performance.

Maintaining Local Relationships and Service Delivery

Regardless of the funding and governance model, maintaining a strong local presence will be essential. Local offices, staff, and established partnerships are critical to timely permitting, emergency response, land stewardship, and community engagement. Any regional approach should clearly articulate how local knowledge, relationships, and programs, such as tree planting, environmental education, and trail stewardship, will be preserved and supported.

Closing

In summary, Middlesex County respectfully offers the following considerations for the Province's review:

- Clarification on why full consolidation is required, as opposed to enhanced provincial coordination under OPCA;
- Assurance that transition costs and risks to service continuity will be fully provincially addressed;
- Recognition that governance and accountability challenges increase significantly at the proposed regional scale; and
- Consideration of full provincial funding as a logical and equitable complement to a regional conservation authority model.

Middlesex County remains committed to working collaboratively with the Province and appreciates the opportunity to provide input. We welcome continued dialogue to ensure that any reforms strengthen watershed outcomes, respect local knowledge, and establish a governance and funding framework that is clear, fair, and sustainable.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Clarke". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Susan Clarke
Warden, Middlesex County