



Wednesday, November 19, 2025

Re: Resolution 90/25 (Bill 68 and ERO Posting 025-1257)

On October 31, 2025, the Ministry of Environment, Conservation and Parks (MECP) circulated a media release "[Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities](#)" outlining the intention to establish a new provincial board-governed agency to provide leadership, governance, and strategic direction to Conservation Authorities (CAs) across the province. You can [view the Minister's media conference here](#). Conservation Authorities across the province only learned of the province's intention an hour before its announcement, meaning that this consolidation plan was developed in the absence of any consultation or discussion with those with decades of watershed knowledge and boots-on-the-ground experience.

On November 6, 2025, [Bill 68, Plan to Protect Ontario Act \(Budget Measures\), 2025 \(No. 2\)](#) was introduced in the Ontario legislature and passed first reading. It is anticipated that second and third readings will occur in the next weeks, and the bill will be enacted in early December 2025. Schedule 3 of Bill 68 contains language to amend the Conservation Authorities Act with provisions for the creation of the *Ontario Provincial Conservation Agency* and outlines the objects, governance structure, funding model, etc. of this new agency.

On November 7, 2025, the MECP posted [ERO #025-1257 Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities](#) for a commenting period ending December 22, 2025. This proposal consolidates Ontario's 36 Conservation Authorities into just 7 regional conservation authorities.

Ontario's Conservation Authorities are watershed-based agencies (meaning that the boundaries have regard for geographic significance that may not adhere to municipal boundaries). A map depicting the [new proposed regional conservation authorities](#) clearly indicates the broad areas encompassed with these proposed changes, which far surpass local watershed-based areas.

The formation of regional Conservation Authorities may have significant impacts for a broad number of local stakeholders in all consolidated regions. No specific evidence-based analysis has been provided to necessitate or justify a larger, regional conservation authority or the need for a distinct and separate provincial agency providing oversight, that historically was the responsibility of a specific ministry. Not only will this consolidation result in exorbitant costs related to dissolution of 36 authorities, the development of, and migration to shared systems (IT, Finance, HR etc.), but it will add an additional layer of cost and complexity.

If the province is intending to proceed in a transparent fashion, then those boards and agencies (36 Conservation Authorities) currently engaged in integrated watershed management should participate in a fulsome consultation process, prior to this legislation proceeding to second and third readings. At this time, there is no consultation beyond the ERO, which is proposing boundaries for the new regional entities. There are serious concerns and many questions that have been asked and remain unanswered, including:

- the funding mechanism for the new provincial oversight agency.
- the new governance model and potentially inadequate local representation on a regional board.
- the merging of disparate policies, for distinctly different watersheds, into a “one-size-fits-all” policy framework, that could dilute and negate site-specific management approaches in favor of overarching policies that span diverse watersheds.
- the centralization of programs and services, which are currently customized and responsive to local needs, conditions, priorities and funding opportunities.
- the impacts on administrative and support staff and how “redeployment” will work, practically and logically.
- the impacts to the related charitable foundations, specifically those with narrow objects supporting their geographically limited conservation authority.
- the impact of dissolution on each of the applicable existing conservation authorities and implications under the Income Tax Act for authorities who are also registered charities.
- the ultimate transfer of assets such as property and other significant assets (infrastructure dams, dykes, power generation, etc.) currently owned by 36 autonomous bodies

Under the new proposed Lake Erie Region Conservation Authority, approximately 81 municipal parties could not hope to reasonably have a voice that the ERO posting attempts to describe, that being, “...under consolidation the new regional conservation authorities would remain independent organizations operating with municipal governance and oversight, in accordance with requirements under the Conservation Authorities Act...”. It is a geographic impossibility that the interests of the Windsor-Essex-Pelee region would be of interest, concern or familiar to a land-locked geographical extent up to 300 kms distant.

ERCA currently has a Board of Directors comprised of 9 member municipalities represented by 19 elected officials (4 from our largest municipality, 2 from each of our county municipalities and 1 from the Township of Pelee). This local governance model ensures accountability and transparency to the local ratepayers and councils who fund the majority of the operational budget for the mandatory programs and services of the Essex Region Conservation Authority. If proposed governance maintains a similar calculation for regional representation, the ultimate board size would be completely unwieldy.

As the province moves forward with plans for amalgamation, we would like to see the province commit to:

- actual, full consultation with municipalities regarding funding both the Agency and the new potential regional conservation authority.
- maintaining a strong local voice that is both accountable to the ratepayer and able to provide transparent and timely responses to inquiries, applications and programs for this local watershed.

- maintaining local expertise that is knowledgeable and can implement programming at an appropriate watershed extent.
- maintaining local offices / branches to operate, reporting to a larger Regional office.
- clarity on the path forward for those conservation authorities with foundations.
- transparently providing actual costing of potential costs for amalgamation/consolidation.

Attached to this correspondence is a resolution passed by the ERCA Board of Directors at a meeting held November 13, 2025.

Stakeholders are encouraged to review the information provided in the links in this letter and provide comments through the posting [ERO #025-1257 Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities](#), well in advance of the **closing date of December 22, 2025**.

Should you require further information, please contact me by email at admin@erca.org.

Regards,

Molly Allaire

Molly Allaire
Chair, Essex Region Conservation Authority

Attached: ERCA Board Resolution 90/25, November 13, 2025

CC: The Honourable Todd McCarthy, Minister of the Environment, Conservation and Parks
Andrew Dowie, MPP (Windsor-Tecumseh); Anthony Leardi MPP (Essex);
Hon. Trevor Jones MPP (Chatham-Kent-Leamington); Lisa Gretzky MPP (Windsor West)
Local Municipal Councils
Chief Nikki van Oirschot, Caldwell First Nation
Chief Leela Thomas, Walpole Island First Nation
Association of Municipalities of Ontario
Conservation Ontario
Conservation Authorities in Ontario
Local environmental groups and other stakeholders



Proposed New Ontario Provincial Conservation Agency

Resolution No. 90/25

Moved by Angelo Marignani

Seconded by Ryan McNamara

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the *Conservation Authorities Act*; and

WHEREAS under this proposal, the Essex Region Conservation Authority (ERCA) would be merged into a new "Lake Erie Regional Conservation Authority" together with the:

- Lower Thames Valley CA
- St. Clair Region CA
- Upper Thames River CA
- Kettle Creek CA
- Catfish Creek CA
- Long Point Region CA
- Grand River CA

forming a single organization stretching from Windsor, Essex County and Pelee Island, through north of Waterloo region; and

WHEREAS the Board acknowledges and supports the Province's goals of improved efficiency, consistency and fiscal prudence in conservation delivery, but finds that the proposed "Lake Erie Region" configuration would:

1. Create a geographically vast and administratively complex entity, joining northern, rural and fast-growing southern municipalities throughout the province with little shared watershed connection or economic alignment;
2. Dilute local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they affect;

3. Generate substantial transition costs — including human-resources integration, governance restructuring, IT migration and policy harmonization — that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province’s own business-planning principles of value for money, cost containment and service continuity; and,
4. Risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it harder for applicants to obtain timely local advice, resolve issues or expedite housing and infrastructure approvals that support the Province’s "Get It Done" agenda; and

WHEREAS the ERCA has already undertaken significant modernization work aligned with provincial objectives, including:

- implementation of a digital permitting and inspection system that has reduced turnaround times;
- improvements in transparency and client communication;
- data and network systems, including security and redundancy
- numerous internal reviews to identify opportunities for cost savings and efficiencies
- conversion of redundant support and non-mandatory positions to front-line mandatory service positions

demonstrating that meaningful modernization can occur within the current watershed-based governance framework; and

WHEREAS the Board further recognizes that the Essex Region Conservation Authority serves Southwestern Ontario communities facing vastly different climatic, hydrological and infrastructure realities, with no single river running through the Essex region by itself defining the watershed and being surrounded on three sides by water, with topography that is prairie-like and subject to costal erosion and flood-prone areas, which would be ill-served by a larger overarching administrative structure extending over 300 kilometers to townships north of the Kitchener-Waterloo Guelph area;

THEREFORE BE IT RESOLVED THAT:

1. The Board of Directors does not support the proposed “Lake Erie Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257; and
2. The Board instead endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government’s priorities of efficiency, red-tape reduction and timely housing delivery; and
3. The Board requests that the Ministry engage directly with affected municipalities and conservation authorities across Southwestern Ontario most specifically, the Windsor-Essex and Pelee Island municipalities before finalizing any consolidation boundaries or legislative amendments; and
4. That this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:
 - the Minister of the Environment, Conservation and Parks and his Opposition critics;

- local Members of Provincial Parliament;
- local Municipal Councils
- the Association of Municipalities of Ontario and Conservation Ontario;
- local First Nations
- local environmental groups and other stakeholders, and
- all Conservation Authorities in Ontario

- **CARRIED**

I, Nicole Kupnicki, Manager, Human Resources & Council Services of the Essex Region Conservation Authority, do hereby certify this to be a true and complete copy of Resolution No. 90/25, passed by the Essex Region Conservation Authority Meeting of the Board of Directors on the 13th day of November, 2025.

DATED at Essex, Ontario
this 14th day of November, 2025.



Nicole Kupnicki