

December 17, 2025

To: Hon. Todd J. McCarthy  
Minister of the Environment, Conservation, and Parks  
Legislative Assembly of Ontario

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**Subject: Amendments to the Conservation Authorities Act and Regional Consolidation of Ontario's 36 Conservation Authorities (ERO Posting 025-1257)**

Dear Minister McCarthy,

This letter outlines comments from the Town of Orangeville (Town) on the recently proposed Bill 68 (Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2)), which received Royal Assent on November 27, 2025, and the associated Environmental Registry of Ontario posting (ERO 025-1257). It is our understanding that Bill 68 amends the Conservation Authorities Act to create the Ontario Provincial Conservation Agency, a provincial board governed agency intended to provide centralized leadership, and oversight of Ontario's Conservation Authorities, while ERO Posting 025-1257 seeks feedback on the Province's plan to consolidate 36 Conservation Authorities (CAs) into 7 regional Conservation Authorities and provides detail on the newly proposed regional Conservation Authority boundaries.

As presented, the proposals will cause significant upheaval to both municipal and conservation authority operations and will have far reaching impacts on both day-to-day business processes, as well as long standing legal agreements which may take years to resolve. Given the scale and significant impact of the proposals, the Town recommends that the Province take the time to extend and expand consultation efforts beyond the current 45 day ERO posting commenting period before moving ahead with the proposals as outlined. Our comments below summarize the Town's questions and concerns with regards to ERO posting 025-1257 and the proposed amendment to the Conservation Authorities Act under Bill 68:

**1) Impacts on local Source Water Protection Program**

The Town is concerned with the impacts of the newly proposed regional CA boundaries on the Credit Valley-Toronto and Region-Central Lake Ontario (CTC) Source Protection Program. The three Source Protection Authorities (SPAs) that make up the CTC Source Protection Region (CTC SPR) are the legal entity that administers the Clean Water Act, 2006, and the associated local source protection programming (i.e. the Source Protection Plan). As per the Clean Water Act (S.4), the Source Protection Authority is identified as the local Conservation Authority. For the Town of Orangeville, our Source Protection Authority (the Credit Valley Source Protection Authority) is therefore identified as the CVC Conservation Authority, and

we are part of the greater CTC Source Protection Region, which is made up of two other Source Protection Authorities including the Toronto Region SPA (i.e. the TRCA CA), and the Central Lake Ontario SPA (i.e. CLOCA CA). Under the newly proposed regional CA boundaries, the three SPAs (i.e. 3 CAs) that make up the CTC Source Protection Region will be separated and further consolidated into three separate larger regional CAs, thereby dissolving the legal entity (i.e. the SPA/CA) that is appointed to deliver local source protection programming. Given the amalgamation of these three SPAs (i.e. CAs) into 3 distinct larger regional CAs, it is unclear how the greater CTC Source Protection Region programming will continue to be delivered, particularly as together all three SPAs have for the last decade been governed under a single Source Protection policy framework known as the CTC Source Protection Plan (i.e. the Credit Valley-Toronto and Region-Central Lake Ontario Source Protection Plan). Under these proposed boundary changes the legal entity identified as the CTC Source Protection Region and the three CTC Source Protection Authorities that make up the region will cease to exist, introducing the possibility that the Town of Orangeville may be required to join a different SPA that aligns with proposed regional CA boundaries. This would require the Town to adopt and implement a different set of source protection policies.

Over the last 10 years the Town has dedicated significant staff effort and resources to implement the existing CTC Source Protection Plan and its associated policies, in addition to working closely with the local Credit Valley SPA (i.e. the CTC CA) to advance source protection programming within our municipal jurisdiction. Town staff have significant concerns around potentially changing the source protection policy regimes and the effect this would have on the over 10 years of effort that has gone into implementing the existing CTC Source Protection Plan policies. If the Town were required to come under the purview of a different Source Protection Authority, and therefore be required to adopt the policies of a different Source Protection Plan, this would necessitate a significant conformity exercise that would threaten to undo over 10 years of investment into implementing the existing CTC Source Protection Plan. At this time, it is not clear if or how the CTC Source Protection Program will continue to be administered under the newly proposed regional CA model, and the Town cannot support the proposed CA amalgamation until these details are fully understood.

Moreover, CVC CA, acting in their capacity as the SPA, provides the Town of Orangeville with individualized support on niche initiatives specific to our local area. One of these initiatives includes the Joint Municipal Water Management Agreement - an initiative between the municipalities of Orangeville, Mono, Amaranth and East Garafraxa, to collectively manage and protect cross-jurisdictional drinking water sources. The CVC CA's role in acting as the coordinator in this initiative and providing technical expertise and leadership to advise member

municipalities has been invaluable to the survival and success of this collaborative, and crucial to the protection of local drinking water supplies. The Town is concerned that this individualized approach and the local knowledge and expertise to lead such initiatives will be lost if CVC is amalgamated into a larger regional conservation authority, as proposed.

## **2) Impacts on Municipal MOUs**

The Town of Orangeville has existing, long-standing Memoranda of Understanding (MOUs) with our local CA for additional services that are beyond the scope of the CA's core mandate under the CA Act. Under these MOUs our local conservation authority (CVC CA) helps us provide important services and expertise that a Town of our size cannot afford to deliver in-house. With the proposed consolidation of CAs, the Town is concerned with the impact that this amalgamation will have on these existing MOUs, and how this will ultimately impact our ability to provide the services that these MOUs enable. We are concerned that the dissolution of these MOUs will saddle the municipality with additional costs and resource burdens required to provide such services in-house in order to maintain service continuity.

## **3) Potentially higher costs and less influence for municipalities**

The proposal aims to consolidate our local CA (CVC CA) with three other existing CAs. Consolidating four corporate entities will take years, and the administration required to undertake this task across Ontario will require substantial funding and planning. With municipalities being the primary funders of CAs, the Town is concerned that the administrative costs of amalgamating these corporate entities will ultimately be passed down to the municipality. The proposed Western Lake Ontario RCA (WLOORCA) which would include our local CA, along with 3 other CAs would encompass 27 local municipalities and nearly 3 million residents. This scale will dilute our local municipal representation on conservation authority boards, particularly being a municipality of smaller size. The Town will ultimately have less influence, and our ability to advocate for local priorities will be substantially diminished, all while bearing the higher costs to fund the administrative corporate amalgamation of the CAs.

The Town believes that many of the efficiencies that the Province is looking to achieve through this proposal (i.e. province-wide coordination of CAs and CA policies, shared digital and technical resources, and consistent practices that strengthen the work of conservation authorities) can be achieved without dissolving the existing CA structure, and without the amalgamation of CA boundaries. By proposing to consolidate the existing CA structure into regional CAs, the Province is introducing years of corporate restructuring and the

associated costs of issues related to such corporate restructuring (i.e. costs related to HR, corporate service model consolidation, rebranding, and legal transitions). The Province's efficiency goals can be achieved much more quickly and effectively, and at lower cost to taxpayers, by keeping the existing CA structure but still undertaking the substantial work to standardize and co-ordinate CA technical resources, policies, and practices to achieve the desired savings and efficiencies.

The Town is also concerned about the future funding of the Ontario Provincial Conservation Authority Board. It is understood that the Province has committed to funding and setting up the Board for the first three years of its existence, however after the first three years all funding for the Board will be provided by municipalities. We are concerned that municipalities will yet again be burdened by more additional costs, in an environment where so many costs have already been downloaded to local municipalities.

#### **4) Centralized decision making and less local knowledge**

The proposal calls for the formation of a centralized Ontario Provincial Conservation Authority Board to provide oversight of the proposed 7 regional CAs. The board will be made up of members appointed by the Lieutenant Governor in Council and will oversee the governance of conservation authorities and many other aspects of their operations, including the programs and services they provide. Oversight of The Board will be provided by the Province through the MECP. The Town is concerned about the centralization of authority at the provincial level as it will ultimately isolate decision-making power at the top. The proposed structure will encourage top-down decision making, provide less flexibility and capacity to address on-the-ground needs, and will hamper the ability of local units, who often have the most relevant information about specific local situations, to make context-specific decisions. This top-down structure will also hinder the overall organization's ability to respond to local needs, challenges, and opportunities.

With the consolidation of CAs, how will municipality specific, on-the-ground issues get addressed? Many of these issues often require nimble action and fast response from both CA and municipality staff with localized knowledge of our area. The Town is concerned that such time sensitive issues will not be efficiently addressed under a regionalized CA model.

#### **5) Impact on Local Offices, Programs, Conservation Lands**

The Town would like to see local Conservation Authorities and staffing levels retained for the long-term. All existing local Conservation Authority programs and agreements should be continued, and the preservation, protection, and expansion of existing Conservation Authority lands should be made a priority. The local

offices, programs and conservation lands that existing CAs maintain play a significant role in the high quality of life Orangeville residents are fortunate to enjoy, and the preservation and expansion of these lands and programs for ecological value and local community use are of utmost importance the Town.

Thank you for the opportunity to comment on the proposed changes to Conservation Authorities Act under Bill 68, and the proposed plan to consolidate Ontario's 36 Conservation Authorities (CAs) into regional Conservation Authorities. We trust that these comments will be fully integrated into the government decision-making process and hope to be involved in further discussions on these important issues.