



## **ERO 025-1257: Proposed Boundaries for the regional consolidation of Ontario's Conservation Authorities**

The Willow Beach Field Naturalists (WBFN) wish to express our sincere concern related to ERO 025-1257 and request that the provincial government reconsider proceeding with the proposed boundaries for the consolidation of Ontario's Conservation Authorities for the following reasons:

1. Oversight by the proposed OPCA will seriously erode the ability to focus on local priorities.
2. The changes are unnecessary to achieve the stated objectives that include standardized permitting and processes.
3. The scale of the consolidation presents an unacceptable risk to the delivery of effective locally focused conservation services.
4. The consolidation will result in the dilution of resources allocated to the protection of natural heritage.

We also feel that the legislative changes proposed for Bill 68 will further undermine the effective operation of the Conservation Authorities. The WBFN supports opportunities to modernize and improve the function of Conservation Authorities; however, the significance of the proposed changes requires further evaluation and direct consultation with affected stakeholders.

**Willow Beach Field Naturalists:** ([Willow Beach Field Naturalists – Northumberland's Nature Club](#))

The Willow Beach Field Naturalists (WBFN) is a non-profit organization founded in 1953 that currently has over 200 members. The WBFN has over 500 followers on Facebook and 230 on Instagram. Our mission is to foster the appreciation, enjoyment, and conservation of nature throughout Northumberland County. The WBFN offers a wide range of activities that are open to the public and include nature outings and meetings that feature guest speakers on a variety of subjects. The WBFN also supports conservation initiatives in Northumberland County, working with other local conservation groups and agencies to advance the conservation of natural heritage in the county.

We are especially proud of the establishment of the Joint Working Group Wesleyville – a committee formed in 2019 by the WBFN and the Northumberland Land Trust. The JWGW works in partnership with the corporate landowners (Ontario Power Generation, Hydro One, Cameco Corp) conducting volunteer wildlife surveys and advancing conservation initiatives for these unique and valuable lands. The value of the JWGW is recognized by



Ontario Power Generation with the inclusion of the JWGW in the stakeholder consultation process for the OPG Wesleyville Project.

The following details the concerns of the WBFN regarding ERO 025-1257 (and associated legislative changes to Bill 68).

### **1. Creation of the Ontario Provincial Conservation Agency (OPCA)**

The intent of the proposed OPCA is to provide centralized leadership, efficient governance, strategic direction, and oversight. Bill 68, is not specifically mentioned by the government in the ERO posting, also has significant impact on the implementation of this proposal. The proposal fails to provide details on the make-up of the OPCA and the process for appointments.

The OPCA's objectives to "*ensure alignment with provincial objectives*" and support a "*standardized/centralize system for permits*" are unnecessary and can effectively be achieved through technical directive(s) by the MECP. Further, under Bill 68, the OPCA would be accountable to the Minister and cannot provide direction to the regional Conservation Authorities without the approval of the Minister. This leaves the conservation and protection of local natural heritage values vulnerable to competing provincial-level priorities.

### **2. ELORCA: Regional Consolidation of Conservation Authorities in Northumberland County**

The WBFN has historically had excellent relationships with the current Conservation Authorities that cover Northumberland County. We support the Ganaraska Region Conservation Authority Resolution 50/25 along with the concerns expressed by the neighbouring Conservation Authorities such as Lower Trent Conservation Authority.

The proposal would consolidate the seven CA's in Northumberland County into a single *Eastern Lake Ontario Regional Conservation Authority (ELORCA)*. This will increase the number of participating municipalities to 48 and create an area almost three times the size of Prince Edward Island. This creates serious challenges for effective delivery of local services and protection of natural heritage areas. It also disregards the achievements of the CA's in the sharing of managerial positions, technical skills, and resources as well as partnerships and leveraging of funding support from local sources.



### 3. Impact on the WBFN Membership and the Public

The WBFN actively engages the public in the appreciation of the Natural Heritage values of Northumberland County. We feel that the proposal will seriously impact the protections of conservation lands and natural areas enjoyed by the WBFN and the public in general. These changes will also reduce the accessibility to valued resources for the conservation programs that are supported by the existing CA's. The uncertainty around the retention of offices and facilities along with the transition, costs, and impact on staffing will cause significant disruptions and put these programs at risk.

In summary, the WBFN recommends serious reconsideration of this proposal and requests that the province engage in further direct consultation with affected municipalities and other stakeholders to achieve mutually beneficial outcomes.

A handwritten signature in black ink, appearing to read "Matt Mai".

President  
Willow Beach Field Naturalists

CC

Hon. Todd J. McCarthy (Durham) – Ministry of Environment, Conservation, and Parks  
[Todd.mccarthy@pc.ola.org](mailto:Todd.mccarthy@pc.ola.org)

Hon. David Piccini (Northumberland)-  
[David.piccini@pc.ola.org](mailto:David.piccini@pc.ola.org)

Linda Laliberte – Ganaraska Region Conservation Authority  
[llaliberte@grca.on.ca](mailto:llaliberte@grca.on.ca)