

December 21, 2025

**Ontario Trails Council Comments to the ERO regarding the proposal for a one conservation agency for Ontario.**

Whereas, the government is proposing this for the following reasons and purposes:

Ontario is creating one new provincial conservation agency, the [Ontario Provincial Conservation Agency \(OPCA\)](#), to consolidate the existing 36 local conservation authorities into seven regional bodies. This is a proposed change intended to streamline the system for things like permitting and flood risk management. As of late 2025, the province has introduced legislation to establish the OPCA and will be holding public consultations before the new structure is fully implemented.

Current and proposed structure

- Current: 36 individual conservation authorities, each with its own policies and standards.
- Proposed: A single, centralized Ontario Provincial Conservation Agency (OPCA) that will oversee seven regional conservation authorities across the province.

Goals of the change

- To create a more unified and consistent system for conservation across Ontario.
- To streamline permitting processes and reduce delays.
- To provide more consistent support for flood risk management and community safety.
- To improve data management and evidence-based decision-making.

## **QUESTIONS**

### **Geography**

- How were the seven regions defined—watershed science, municipal boundaries, political considerations, or service-delivery patterns?
- Who was consulted in determining the regions?
- Which municipalities, Indigenous communities, conservation authorities, or sector groups (including trail organizations) were consulted in creating the boundaries?
- What criteria or rationale guided which existing CA jurisdictions were grouped together?
- Is there a maximum size (geographic or population-based) for a region to ensure effective service delivery?
- Will the each ‘new region’ have sub regions?

### **Financial**

- Will the overall budget for 36 CA's be applied across the 7?
- If funding is aggregated and divided into 7, is there a risk of budget reductions in practice?
- If there are 7 does this imply that the budget will drop from 100% at 36 to 19.444% at 7?
- What formula will determine funding allocations to each of the seven regions? (Watershed size, population, risk exposure, infrastructure needs?) OTC requests transparency on this formula before implementation.
- In the event that there are damage or flooding control costs in excess of the available funds how will these funds be moved between the 7?
- In the event that pressures increase on the 7 how will new funds be secured and then allocated within the 7?

## **Regulatory**

- What current inconsistencies will be eliminated? Can we build on this?
- What is inconsistent today about flood forecasting or hazard regulation? And, what will improve by reducing the number of offices involved?
- What disunification in function will be removed through unification?
- How exactly will permitting be streamlined?
- Where are there current delays? Why do they exist? What about the 7 regions will improve efficiencies?
- It would seem that there is more of a local response in 36 CA's, more would allow for more local awareness - how will this be sustained through a reduced local presence?
- If 36 handles "X" number of problems, how is 7 going to handle the same level of X?
- How will this centralization improve efficiency when centralized systems even in a regional form, usually lead to inefficiency? What controls will be in place to ensure this doesn't happen?
- If I am in Ariss and currently I go to Cambridge for answers (more local) how am I going to be as effectively helped out of a regional office in Brantford? (less local)
- What is inconsistent about flood or risk management now?
- What will be made more consistent and more risk management effective through fewer CA offices?
- What policies or legal framework exists that will ensure there will be collaboration and cooperation amongst the 7 regions?

## **Data Management**

- Can data not already be shared across 36 CA's? It is the internet age if data can't already be shared across 36, why can it be better shared across 7 regions?
- Intuitively more, 36 offices, should mean more evidence based decision making as there are more local insights and local data being gathered? 7 is 80% fewer offices, therefore less nodes of evidence gathering?

- Can you provide examples of non-evidentially based CA decision making over the last 10 years?

### **Trails Impacts**

- What assurance does the trail community have that this new body will provide resources to trail development? In a consistent fashion to issues pan regional support for trails that run between regions?
- What assurance does the trail community have that resources will be allocated to trail operation issues? In a consistent fashion across regional boundaries?
- Will the OPCA commit resources to maintenance, signage, liability management, and stewardship for trail networks?
- Will the OPCA respond to the Ontario Trails strategy? Follow the Ontario Trails Act 2016?
- Will the OPCA support local public trail groups, trail plans and provide assurances to access to 27 trail activities?

### **Summation**

While we recognize that regional amalgamation may offer potential efficiencies, we are concerned that the unique ecological character of individual watersheds — and the local knowledge that guides their stewardship — may be diminished within a larger regional administrative structure.

We believe that individual staff and board members of each current Conservation Authority have demonstrated a strong understanding of the specific terrain, hydrology, environmental pressures, and community needs within the current watershed.

To date we believe this local expertise has proven essential for protecting the integrity of trails and natural areas that are central to each region's identity and recreation culture.

To support a successful transition, we strongly recommend that the Province ensure:

***1. Watershed-based representation within any new regional governance model.***

Local watersheds differ significantly across the province, and board structures must reflect these differences. We encourage the Province to explore guaranteed watershed-specific seats on consolidated CA boards so that local voices and ecological nuances remain visible in decision-making.

***2. Protection of local decision-making capacity.***

Any consolidation should explicitly preserve mechanisms for communities and partner organizations to engage directly with staff who understand our area's unique geography and trail systems. Without this, there is a risk that smaller watersheds and rural communities will lose influence within larger regional mandates.

***3. Transparent, watershed-specific budgeting.***

We are concerned that local trail maintenance, ecological monitoring, and stewardship support could be deprioritized if budgets are pooled across larger territories. We would support requirements for clear watershed-level budget lines, public reporting, and equitable minimum allocations to ensure that smaller regions are not overshadowed.

***4. Strategic Funding Allocation Opportunity***

We believe this provides an opportunity in each case for the larger catchment to provide consistency across each region to a greater degree than what is achieved in trails now.

Currently many smaller CA's cannot sustain their trails relative to the marketing push Regional Tourism Organizations pursue, as well as what the Destination Ontario and the private sector promotes. This additional marketing stimulates traffic that creates additional operating strain as many of the current smaller regions in the 36, prove to be the most popular.

Regional improved economies of scale, at 7, should allow for greater resourcing across the area of each region to facilitate greater funds, which we would like to see to applied to trails in need of resourcing.

**Closing Comment**

As an organization working all over Ontario, at ground level with volunteers, landowners, and recreation groups, Ontario Trails Council have seen first hand how important strong relationships and local responsiveness are to trail management AND environmental stewardship.

Any new structure should strengthen — not weaken — the collaborative approach that has made EACH Conservation Authority such a valuable partner to local trails.

We appreciate the opportunity to provide input.

We hope the Province will prioritize governance and budgeting models that protect watershed distinctiveness, maintain genuine local representation, and ensure that smaller conservation areas continue to receive the staff support needed to sustain safe, ecologically responsible public trails.

Sincerely,



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