

# ERO Comment on Proposal 025-1257: Consolidation of Conservation Authorities

I am submitting this comment in response to ERO posting 025-1257 regarding the proposed consolidation of Ontario's 36 conservation authorities (CAs) into seven regional bodies. After reviewing the proposal and statements from multiple conservation authorities, municipalities, and community organizations, I have significant concerns about the environmental, operational, financial, and governance impacts of this restructuring.

The proposal lacks evidence that consolidation will improve watershed management, and it introduces substantial risks that have not been addressed.

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## 1. Loss of Local Watershed Knowledge and Expertise

Conservation authorities were intentionally created along watershed boundaries to reflect the unique hydrological, ecological, and geographic conditions of each region. Their effectiveness depends on long-standing local expertise, including:

- Floodplain behaviour
- Erosion patterns
- Wetland function
- Species-at-risk habitat
- Local land-use pressures
- Relationships with municipalities, landowners, and Indigenous communities

Statements from multiple CAs (Hamilton, Cataraqui, Upper Thames, and others) emphasize that this knowledge **cannot be replicated at a regional scale**. The proposal does not explain how large regional authorities will maintain the same level of site-specific understanding required for accurate permitting, flood forecasting, restoration planning, and emergency response.

## 2. Operational Scale Is Unworkable

Several proposed regions span extremely large geographic areas, in some cases hundreds of kilometres. This creates major operational challenges:

- Staff would be responsible for vastly different ecosystems, climates, and land-use pressures.
- Travel times alone would reduce efficiency and responsiveness.
- Local monitoring stations and fieldwork would be harder to maintain.

These concerns have been raised publicly by multiple CAs and municipalities. The proposal does not address how such large regions can function effectively.

## 3. Risk of Service Disruption During Transition

Merging 36 organizations into seven will require major changes to:

- IT systems
- HR structures
- Flood forecasting networks
- Watershed monitoring programs
- Land management and enforcement
- Communications and public access

Authorities warn that this transition could disrupt essential services, including emergency response, at a time when climate-driven hazards are increasing. The proposal does not include a transition plan or risk assessment.

## 4. No Cost–Benefit Analysis or Evidence of Efficiency Gains

The proposal asserts that consolidation will “reduce duplication” and “free up resources,” but provides no supporting analysis. Conservation authorities and municipalities note that:

- Mergers typically increase administrative costs in the short and medium term.
- Larger organizations often require more layers of management.
- Standardization can reduce flexibility and responsiveness.

Without a detailed financial assessment, the claimed benefits remain unsubstantiated.

## 5. Loss of Local Governance, Accountability, and Representation

Municipalities across Ontario (including Hamilton, Haldimand, and others) have expressed concern that consolidation will:

- Reduce local representation on CA boards
- Weaken accountability to local taxpayers
- Shift decision-making to distant regional bodies
- Prioritize larger urban centres over smaller communities

Local governance is a core principle of the Conservation Authorities Act. The proposal does not explain how this principle will be preserved.

## 6. Local Funding May Be Redirected Away from the Communities that provide It

Many CAs warn that municipal levy dollars currently stay within the watershed they are intended to protect. Under consolidation:

- Local funds may be redistributed across a much larger region
- Municipalities may lose control over how their contributions are used
- Smaller communities may subsidize larger ones

This is a major concern for municipal partners and taxpayers.

## 7. Donor Lands and Trust Agreements at Risk

Conservation authorities collectively manage thousands of hectares of land donated or entrusted with the expectation of **local stewardship**. Many of these lands have:

- Legal agreements
- Conservation easements
- Donor conditions
- Local volunteer stewardship groups

Amalgamation could violate donor intent and undermine public trust. The proposal does not address how these agreements will be honoured.

## 8. Weakening of Local Partnerships and Community Engagement

CAs rely on long-standing relationships with:

- Municipal planners
- Local farmers
- Indigenous communities
- Volunteer groups
- Conservation foundations
- Local schools and community organizations

These partnerships are built on proximity and trust. Regionalization risks weakening or severing these relationships, reducing the effectiveness of stewardship programs, education initiatives, and community-based restoration.

## 9. Misalignment With Watershed-Based Management Principles

Ontario's CA model is internationally recognized because it aligns governance with natural watershed boundaries. The proposed regional groupings:

- Do not consistently follow watershed logic
- Combine watersheds with very different characteristics
- Risk fragmenting or diluting watershed-specific management

The proposal does not explain how watershed-based decision-making will be preserved.

## 10. Potential for Reduced Environmental Protection Standards

Environmental organizations and CA staff warn that:

- Standardization across large regions may lead to "lowest common denominator" policies
- Local conditions requiring higher standards may be overlooked
- Pressure to accelerate development approvals may weaken environmental safeguards

This is a significant risk given Ontario's increasing climate-related hazards.

## 11. Concerns About Centralization of Power

The proposal includes the creation of a new provincial oversight agency. Several authorities and municipalities have expressed concern that:

- Centralized oversight may reduce local autonomy
- Decision-making may become more political and less science-based
- Local priorities may be overshadowed by provincial development objectives

This raises governance and transparency concerns.

## 12. Timing and Consultation Issues

Authorities note that:

- The proposal was released near the 80th anniversary of the Conservation Authorities Act
- The consultation focuses on **how** to merge, not **whether** to merge
- The timeline appears rushed and misaligned with long-term planning cycles

This undermines the legitimacy of the consultation process.

## 13. Existing Regional Models Already Work Without Full Amalgamation

Ontario already has a successful regional coordination model through **Source Protection Regions**, which:

- Are watershed-based
- Coordinate across multiple CAs
- Maintain local implementation
- Avoid the disruption of full amalgamation

This demonstrates that regional coordination does not require dismantling existing authorities.

## Conclusion

The proposed consolidation presents significant risks to watershed protection, climate resilience, local accountability, and environmental stewardship. The benefits described in the proposal are not supported by evidence, and the potential negative impacts are substantial.

I recommend that the Ministry:

1. Maintain the current conservation authority structure, or
2. Conduct a detailed, evidence-based assessment of alternatives that preserve local expertise, watershed-based governance, and community accountability.

Thank you for the opportunity to comment on this proposal.

## References/Sources:

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