

The purpose of this submission is to provide the feedback of the Nottawasaga Valley Conservation Authority (NVCA) Board of Directors to the ERO. This is in addition to the letter sent from the NVCA Board of Directors by email to Minister McCarthy, dated December 4, 2025.

The NVCA is comprised of 18-member municipalities. While each Board member represents their individual municipality, they come together as the NVCA Board of Directors to speak collectively on matters related to the Authority. The positions expressed by the NVCA as a whole may differ from those of individual municipalities; this does not negate or diminish either perspective, but reflects the distinct strengths, roles, and responsibilities of both.

This is an important initiative that deserves careful consideration and meaningful consultation. These decisions will have a major influence on how programs, projects, and priorities move forward at both the local and regional levels. Thoughtful engagement and collaboration are key to ensuring changes are proportionate to the problems they are meant to address.

Should the government decide to proceed with the ERO Proposal, we request further evaluation of models that are more geographically coherent, cost-effective, and locally accountable alternative to advance the government's priorities of efficiency, red-tape reduction and timely housing delivery.

Alternative models for evaluation:

- **Focus on efficiencies, modernizing, and standardizing - existing boundaries should be maintained (for 3 yrs):** address the province's goals through the Ontario Provincial Conservation Agency using the existing CA structure. This significantly advances the government's priorities of efficiency, red-tape reduction, and timely housing delivery while being geographically coherent, supports pay-for-say, and is locally accountable. This model also allows time for proper consultation on where consolidation makes sense.
- **Federated model** that balances local autonomy with shared governance and resources across regions.
 - Governance:
 - Federated regional board: A representative body composed of delegates from each CA to funding mechanisms, policy, strategic priorities, joint programs, and shared services (GIS, IT, data management, legal, HR, training, reporting)

- Local board: pay-for-say representation, operational leadership of programs specific to local watersheds (e.g. flood management, stewardship, education)
- Central secretariat/administration: Housed at the Regional board level to support governance, shared services, evaluation/reporting, and to liaise with Agency.
- Benefits:
 - Advances govt priorities: Reduced duplication of services, harmonized performance standards and policies, scalable without losing local engagement/accountability.
 - Local Decision-Making: Each Conservation Authority (CA) retains control over programs tailored to its watershed.
 - Shared Standards & Frameworks: A central/regional body sets standards for fees, regulation mapping, reporting, compliance, etc.
 - Collaborative Resource Pooling: Authorities share expertise, technology, and funding for large-scale projects.
- **Amalgamate if necessary but not necessarily amalgamate**: Identify where amalgamation and increased resource sharing would be most beneficial, by implementing a Key Performance Indicators (KPI) and business case evaluation of existing CAs. These CAs amalgamate into the regional model first, allowing evaluation and exploration of service enhancements, challenges and opportunities through greater regionalization.
- **Right-sized regions**: While the NVCA does not believe the consolidated is needed to achieve the province's stated objectives, there may be situations where this makes business sense and is necessary. If the province is set on consolidation of all CAs, thought should be given to consolidate those conservation authorities with contiguous watersheds, for example draining to Georgian Bay/N. Lake Huron (SVCA, GSCA, and NVCA) and South Lake Huron (ABCA and MVCA) while maintaining the Lake Simcoe Region CA as distinct entity in recognition of its unique legislative framework and having Lakehead Region CA form the Northwestern Ontario Regional Conservation Authority

ERO Questions and Responses

1. What do you see as Key Factors to support a successful transition and outcome of the regional CA consolidation?

The NVCA believes that the Provincial outcomes identified can be met through regulatory and policy changes including establishment of the Agency, that do not require disruptive system wide overhaul and that further exploration of these would be of value.

Regional CA boundaries

Support from key partners/funders, specifically municipalities, is key to the ongoing success of CAs in Ontario. NVCA is concerned that the scale of the proposed regional consolidation is too large to preserve successful watershed management in Ontario.

Conservation authorities must be grounded in the fundamentals that ensure effective watershed management, which include:

- protecting life and reducing property damage from flooding and erosion
- supporting municipal partners, the development community, and landowners with timely, reliable service
- maintaining service levels, networks, and local knowledge in rural Ontario to meet and balance the demands of a largely rural landscape with a potentially dominant urban area (north end of the GTA brought in as part of the LSRCA)
- enhancing the economic, environmental, and community health of the watershed
- providing meaningful opportunities for people to connect with nature
- empowered to act locally, without needing to seek approvals from a centralized provincial agency to ensure timely and responsive decisions.

If the province proceeds with a regional conservation authority approach as proposed, the following matters need to be considered.

- Prioritize changes where the business case and KPI improvements demonstrate justification for such changes.
- Maintain local staff and staff relationships at CAs throughout the province. Successful transition will depend on clarity about what stays local and what becomes regional. This is especially true in rural CAs like NVCA.
- Maintain organizational charitable status
- Ensure municipal agreements are protected.
 - Maintain agreements with local clubs or volunteer organizations as partners to maintain recreational and operational programs with local CAs.

- Maintain municipal partnerships with the new model regarding funding applications or joint projects which serve a specific local need (e.g. Cat 2)
- Recognize local and regional differences between CAs and adapt programming and staffing accordingly.
- Continue to offer local programs and service delivery beyond those that are provincially legislated.
- Clearly communicate what the sustainable funding model is both throughout the transition period and ongoing thereafter.
- Development of a fee structure that is responsive and reflective to the region (ex. Parking, event, permits, planning, etc.).
- Develop mechanisms to deliver consistent, secure, and equitable funding to ensure consistency in delivery and performance across all CAs.

With these points in mind, the province may wish to consider

A pause or a longer implementation timeline

That the Province consider achieving modernization goals through the establishment of the Agency in collaboration with the current 36 CA corporations using existing legislative and regulatory powers, technological solutions, key performance indicator reporting, etc. Should, after at least 3 years, if this approach is not making sufficient progress to address concerns, then launch meaningful, transparent consultation on consolidating CAs.

Slowing the pace of consolidation would permit the province to monitor the impact of recent changes while ensuring future changes are rolled out in a measured and predictable fashion. A longer implementation timeline allows time to fully address: board governance and appointment frameworks; funding mechanisms, allocations & reserve structures; and service continuity matters. Phasing standards, guidelines, and directives across all CAs, before any consolidation (should consolidation be required at all), offers greater stability and predictability.

Amalgamate, if necessary, but not necessarily amalgamate

By implementing a KPI evaluation of existing CAs, it might be possible to identify where amalgamation and increased resource sharing may be most beneficial. These CA amalgamations present an opportunity to explore service enhancements, challenges and opportunities through greater regionalisation. Assuming justified, these benefits could then be phased in through broader amalgamation. This would allow for an evidence-based approach to transition, without system-wide risk and potential costly errors that would be difficult to reverse.

Phased in transition approach and clear communication

There needs to be a clear transition plan to reduce the risk of service disruptions during the transition process that is developed in collaboration with Conservation Ontario (CO), member municipalities and CAs. This plan must provide a detailed roadmap that clearly outlines timelines, milestones, and phasing. During the transition phase, the province will need to clearly identify roles and responsibilities during the “in-between” period that recognizes and factors in the complexity of merging eight CAs into one Huron-Superior regional CA; this will take time as processes, software, governance, visual identity, and staffing will all need time to adjust to this change.

During organizational consolidation, staff retention is a critical issue that significantly impacts the success of integration. Key challenges include cultural misalignment, job redundancy, changes in leadership, lack of communication, and disruption to routine ways of delivering programs and services. To address these issues, regular communication from the Province to CA staff with a focus on employee engagement and support is required. Retaining staff and preserving local watershed knowledge is critical to the success of the new regional CAs. This knowledge is rooted in a deep understanding of historic and current land uses, cultural connections to watersheds, and the community values, needs, municipal and stewardship priorities that shape local decision-making.

Protecting existing CA reserves, land assets, and infrastructure

Many watershed municipalities and the NVCA are concerned that locally funded reserves, land assets, and long-term capital programs will be compromised under the proposed Regional Conservation Authority (RCA) structure. The current proposal dissolves existing CAs and transfers all reserves, land holdings, and infrastructure to the new Regional CA corporation without clear safeguards, creating a material risk that assets built over decades through local investment could be diverted to broader regional priorities.

Without safeguards, municipal and the public trust could be eroded due to a perception of a lack of transparency and accountability in how local reserves, land holdings, and infrastructures are managed, and a heightened risk of breaching donor restrictions and municipal agreements that were established to ensure local benefit. This lack of clarity is already having a real-time impact as donors are hesitant to contribute due to unknowns regarding future ownership. These gaps could undermine confidence in the governance and integrity of the new regional CA structure. To address this the province should consider legislative changes to require binding transition and asset protection agreements between the new RCA and originating CAs.

2. What opportunities or benefits may come from a regional conservation authority framework?

The NVCA believes that the Provincial outcomes identified can be met through regulatory and policy changes that do not require disruptive system wide overhaul and that further exploration of these would be of value.

Consolidation offers the potential for **a more equitable distribution of resources**, enabling smaller or rural municipalities access to specialized expertise that may have been constrained by local budgets or staffing limitations. Achieving this balance requires careful attention to governance and funding principles. A key challenge lies in ensuring the largest financial contributors do not disproportionately drive priorities, while smaller, rural municipalities continue to feel heard, supported, prioritized, and represented. Without safeguards, there is an inequity risk where urban municipalities dominate or see limited local benefit to themselves which creates inequity. To mitigate this, a federated governance model should be adopted – one that guarantees meaningful participation from all municipalities and reflects diverse regional priorities. Complementing this structure with subregional offices that keep operational decision-making connected to local needs, ensuring that consolidation strengthens collaboration without eroding fairness, representation, or autonomy.

Despite these challenges, a regional model can **support strong local representation and responsiveness** when designed thoughtfully. Consolidating too many areas into one very large authority can create new challenges, such as distance from local issues, slower decision-making, and difficulty maintaining community/industry relationships; therefore, finding a balanced approach is essential. Size is a very important consideration.

Harmonizing permitting and planning policies and fee structures is not just about efficiency – it's about fairness and predictability. A top down provincially directed approach may not be well supported. Rather, collaborative harmonization gives municipalities and stakeholders a real voice in shaping standards that work for everyone. While harmonization brings efficiencies and stabilities, flexibility must remain at the core, especially for critical issues like flood management, where local geography and risk demand local knowledge and a tailored response. Clear service expectations, such as defined response times, local points of contact, and accessible public information, ensures that a larger agency stays responsive and connected to communities. Consistent, yet flexible to watershed realities, permitting requirements, fees, and timelines creates confidence for municipalities, developers, and the public, enabling better planning and reducing costly delays. By using its (proposed) authority to set directives that reinforce these principles, the provincial Agency can deliver both predictability and clarity. This approach strengthens customer

service because staff operate with common tools and guidance, while subregional offices remain scaled to support meaningful local engagement and decisions. Ultimately, planning and permitting harmonization done right means watershed communities receive equal support without sacrificing the flexibility needed to address unique local challenges.

The establishment of the Agency creates a significant opportunity to **modernize service delivery while ensuring fairness** across all Conservation Authorities. By centralizing permitting systems, GIS platforms, mapping services, KPIs & reporting, and public portals under the Agency with sustainable funding, every CA—regardless of size or funding—gains access to high-quality tools and expertise. Smaller CAs that currently struggle with outdated mapping or limited technical capacity would benefit from shared resources, reducing inequities and improving service consistency. Centralized supports also streamline processes for municipalities, developers, and the public, making permitting faster, clearer, and more predictable. However, success will depend on a sustainable funding model. The infrastructure and technical supports required to deliver these services are not inexpensive, and without predictable, long-term provincial investment, the benefits of modernization and equalization cannot be fully realized. A well-designed funding framework ensures that efficiencies are achieved without compromising service quality or creating new inequities. Ultimately, this approach combines efficiency with equity, freeing local staff to focus on community engagement and site-specific needs while the Agency provides the backbone of modern, standardized services.

The regional model supports a **shared services administrative framework** where subject matter experts deliver specialized internal functions such as HR, IM/IT, data management, finance, procurement, etc. Consolidating these roles allows for more consistent attention to organizational requirements, including compliance with health and safety legislation, and risk management practices. Within a federated governance structure, these shared services would operate at the regional level, ensuring efficiency and consistency, while sub-regional offices focus on operational delivery and local implementation. This approach maintains the benefits of centralized expertise without losing the flexibility needed to respond to community-specific needs.

Caveat: These improvements could be achieved—at a lower cost and with less disruption—through provincial direction to the existing 36 CAs, without consolidation. In this scenario, the Agency would still house and manage centralized supports such as permitting systems, GIS platforms, KPIs, and standardized public portals, while the current CA structure remains intact with centralized shared services under contract to CAs at an appropriate regional scale. This approach offers modernization benefits without the structural changes and costs that full consolidation would require.

3. Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?

The NVCA believes that the Provincial outcomes identified can be met through regulatory and policy changes including establishment of the Agency, that do not require disruptive system wide overhaul and that further exploration of these would be of value.

To maintain the confidence of municipal decision makers, funders, and the taxpayers they serve, CA governance models must be appropriately accountable.

- Deliver consistent, predictable, and accountable decisions across the regional jurisdiction.
- The principle of “pay-for-say” should be reflected in the design of new Regional CAs, as it is today.
- Protect the voices of small, rural, and agricultural municipalities.
- Ensure local priorities continue to be addressed.
- The proposed catchment area of the proposed consolidated Huron-Superior RCA combines more than 80 municipalities, joining rural areas in central and northern Ontario with the Greater Toronto Area, this approach risks stretching oversight and “pay-for-say” beyond what is workable and undermining confidence in the governance of Regional CAs.
- To avoid concentration of influence, no single municipality should be able to dominate board decisions.
- The new Board should contain elected officials only, representative of the region. Shorter board terms could be introduced to promote shared leadership, especially in cases where several municipalities are represented through a single grouped seat.
 - Municipalities grouped into regional groups based on existing CA boundaries (and possibly linked to sub-regional governance structures).
- The Board would retain independent responsibility for the budget, hearings, staffing decisions, policy approval, and overall governance authority, ensuring that while the Board operates within a regional framework, it is not subject to direct control by the Provincial Agency, preserving local accountability and decision-making autonomy. If the Provincial Agency holds significant authority over regional conservation authorities, boards risk losing meaningful decision-making power and local accountability. This makes it far less likely that qualified individuals will be willing to serve on regional boards, as the scope for meaningful decision-making and local accountability would be substantially constrained. Clear articulation of roles and authorities will be essential to avoid undermining board capacity, local engagement, and accountability.

An option is a governance structure that reflects a **federated model** balancing regional consistency with local representation and accountability. This approach ensures that decision-making is collaborative, transparent, and responsive to diverse municipal interests while maintaining alignment with provincial directions and standards. This federated model respects municipal autonomy while creating a unified regional approach to conservation, it promotes collaboration across jurisdictions, reduces duplication, and ensures that decisions reflect both local needs and broader watershed priorities.

- Regional board: A representative body composed of delegates from each CA (sub-regional office) to direct funding mechanisms, policy, strategic priorities, joint programs, and shared services (GIS, IT, data management, legal, HR, training, reporting)
- Local board: pay-for-say representation, operational leadership of programs specific to local watersheds (e.g. flood management, stewardship, education)
- Central secretariat/administration: Housed at the Regional board level to support governance, shared services, evaluation/reporting, and to liaise with Agency.

Benefits:

- Advances govt priorities: Reduced duplication of services, harmonized performance standards and policies, scalable without losing local engagement/accountability.
- Local Decision-Making: Each Conservation Authority (CA) retains control over programs tailored to its watershed.
- Shared Standards & Frameworks: A Agency or regional body sets standards for fees, regulation mapping, reporting, compliance, etc.
- Collaborative Resource Pooling: Authorities share expertise, technology, and funding for large-scale projects with appropriate safeguards in place

4. Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

The NVCA believes that the Provincial outcomes identified can be met through regulatory and policy changes including establishment of the Agency, that do not require disruptive system wide overhaul and that further exploration of these would be of value.

The province needs to implement a sustainable funding model for the Agency that **does not** direct levy from regional CAs, CAs, regions, or municipalities.

A transparent municipal apportionment formula based on criteria such as assessment value, population, and portion of watershed area located within municipalities is currently used and could be used moving forward. Where portions of municipalities are in different conservation authority jurisdictions, consideration could be given to geo-referencing property tax assessment roll numbers so that the apportionment calculation is based on current value assessment (CVA) in a watershed rather than the percentage of geographical area applied to the municipality's total CVA.

Similar to how CAs manage this now, budget documents should be public, easy to understand, and shared early to align with municipal budget cycles. Multiple engagement options—such as council presentations, virtual workshops, written feedback, and one-on-one briefings—ensure fair participation for all municipalities. Reporting back on input, publishing accessible annual business plans, financial reports & performance indicators, and clearly distinguishing costs and revenues for Categories 1, 2, and 3 programs reinforce transparency and accountability.

5. How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

The NVCA believes that the Provincial outcomes identified can be met through regulatory and policy changes including establishment of the Agency, that do not require disruptive system wide overhaul and that further exploration of these would be of value.

The size of each regional authority is critical: if the conservation authority becomes too large, municipalities risk being under-represented, and their specialized watershed needs, such as agricultural programs/issues, localized flooding concerns, or unique outdoor experiences and priorities, can become diluted within a large administrative structure. Municipalities want assurance that scaling up will not cause their distinct issues to be overshadowed by larger population centres or to become a lesser priority due to the increased diversity of issues and competing interests that will inevitably exist within a much larger jurisdiction. A balanced, right-sized regional framework preserves this visibility and ensures that local concerns remain central to decision making. Key considerations include the ability to:

- Successful transition will depend on clarity about what stays local and what becomes regional. Maintaining watershed offices, expertise in local issues and knowledge, ability to maintain on the ground presence, and consistent points of contact ensures that residents, businesses, farmers, and municipalities can easily

access staff who understand their watershed's specific conditions and community priorities.

- Ensure municipal agreements are protected.
- Maintain agreements with local clubs or volunteer organizations to help maintain both recreational and operational roles in partnership with CA staff.
- Partner with municipalities on funding applications or joint projects which serve a local need.
- Recognize local and regional differences between CAs and adapt programming and staffing accordingly.
- Continue to offer local programs and service delivery beyond those that are provincially legislated.

Many smaller or rural municipalities do not have in-house capacity to perform watershed planning or other environmental services that are undertaken by CAs. This includes review of development applications that involve environmental considerations and municipal environmental projects. For example, smaller municipalities often rely on the expertise of the local CA where land use planning matters intersect with questions related to the natural environment. Identify municipalities that rely on the services of CAs in this specific way to ensure that these relationships can be maintained within the new, proposed structure. We encourage collaboration with the Province, Association of Municipalities of Ontario (AMO), municipalities, and CAs to identify current risks and new opportunities. That the Province evaluates and considers programs and approvals that can be done faster and more efficiently at the local level, on a fee for service basis.