

December 22, 2025

Minister of the Environment, Conservation and Parks  
Public Input Coordinator - Conservation and Source Protection Branch  
300 Water Street North tower, 5th floor  
Peterborough, ON  
K9J 3C7

**RE: Response to ERO Posting #025-1257: Proposed Consolidation of Ontario's 36 Conservation Authorities into Seven Regional Authorities and Establishment of the Ontario Provincial Conservation Agency**

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The City of Brampton appreciates the opportunity to provide comments on the Province's proposed consolidation of Conservation Authorities (CAs) and establishment of the Ontario Provincial Conservation Agency (OPCA). The City recognizes and appreciates the Province's efforts to improve efficiency, transparency, and more consistent policies and standards on a range of matters, such as permitting and environmental protections governance, while protecting public health, natural heritage, and watersheds. The proposed Regional CA model could offer benefits such as access to shared expertise and resources, consistent policies across municipalities, and more integrated cross-regional planning for natural hazards and conservation.

Brampton is currently served by Credit Valley Conservation (CVC) and Toronto and Region Conservation Authority (TRCA), reflecting the natural boundaries of Credit River, Fletchers Creek, Etobicoke Creek, Humber River and Mimico Creek watersheds. These watersheds underpin local floodplain management, stormwater planning, and ecological restoration efforts.

**Brampton does not support the amalgamation of CVC with other CAs into a new 'Western Lake Ontario CA' and does not support the renaming of TRCA to 'Central Lake Ontario Regional CA'. The City strongly suggests maintaining CVC and TRCA as standalone Regional CAs with intact watershed boundaries, retaining locally specialized expertise, and safeguarding existing partnerships and performance standards. Brampton is concerned regarding the Province's proposed CA restructuring and loss of municipal influence, local expertise, service disruptions, administrative complexity, and financial burdens. Brampton opposes any use of municipal levy funds for amalgamation and rebranding costs and costs associated with OPCA and stresses that these should be fully provincially funded. Brampton urges detailed financial, operational, and legal assessments of the CA amalgamation and requests phased multi-year transition plans. Brampton requests clear breakdown of efficiency metrics and transparent KPIs that the Province hopes to achieve**

**before any structural changes are implemented to CAs. We emphasize that modernization should first leverage existing regional and CA networks and collaborative capacity building programs before starting any structural changes.**

On October 31, 2025, the Province of Ontario announced its proposal to consolidate the existing 36 locally based CAs into seven regionally based authorities and to establish a new oversight agency, the OPCA. Through the Environmental Registry of Ontario (ERO) posting #025-1257, the Ministry of the Environment, Conservation and Parks (MECP) is consulting on:

- Proposed geographical boundaries for each Regional Conservation Authority;
- The criteria used to determine regional consolidation, including watershed alignment, municipal relationships, technical capacity, and service continuity; and
- Potential changes to governance, accountability, and funding structures that may affect participating municipalities.

**Provided below are the City's detailed comments regarding select elements of the draft regulation:**

- Province's proposal contradicts the Province's stated objective of reducing administrative duplication and simplifying accountability. After a potential CA consolidation, Brampton would continue to be served by two CAs, however, one would become a much larger and more complex Regional CA (Western Lake Ontario CA). This outcome introduces greater, not reduced complexity for Brampton, while also diminishing municipal influence over governance, service delivery, funding prioritization, and watershed decision-making.
- Brampton does not support the use of municipal and local levy funds to pay for any aspect of CA amalgamation, renaming of CAs to Regional CAs, or the creation and operation of the Ontario Provincial Conservation Authority (OPCA) including any chargebacks - these costs must be fully funded by the Province, including any transition and administrative activities.
- Brampton values the Province's commitment to municipal governance of Regional CAs but remains concerned that the Ontario Provincial Conservation Authority (OPCA) could override local CVC (or Western Lake Ontario CA) and TRCA governance, reducing Brampton's influence over watershed decisions.
- Brampton does not support the amalgamation of CVC with another CA. Brampton strongly recommends that CVC be established as its own standalone Regional Conservation Authority. CVC, being the second largest CA in Ontario, is a highly efficient conservation authority that has a strong reputation with Brampton and our partners for delivering critical services in a streamlined and efficient manner. CVC is not a barrier to development application reviews and building homes and is extremely responsive to matters related to natural hazard and water resource management (99 per cent compliance with permit timelines and an average permit decision time of 11 days). Brampton is the second-largest municipal levy contributor (35.5% of Peel's CVC levy in

2024) meaning Brampton taxpayers already invest heavily in CVC's work and deserve a dedicated, locally focused authority that keeps their dollars supporting Brampton's own watershed priorities rather than being diluted across a larger Regional CA. CVC provides specialized expertise on Brampton's unique watershed conditions and local anomalies, including presence of headwater systems with unique groundwater interfacing and hydrogeology, drainage and sedimentation concerns with stormwater management unique to local clay soils, unique legacy flood and watercourse infrastructure, erosion hotspots, and urban heat islands along tributaries. We do not support the potential of a Regional CA (encompassing CVC) that will not be suited to understand and address local matters and may deprioritize pressing Brampton issues.

- The proposed Regional CA boundaries for Western Lake Ontario CA are extremely large and complex. This creates risks of watershed fragmentation, misalignment with natural hydrological units, and potential restructuring of established watershed systems. The proposed jurisdictions, including other Regional CAs, also intersect and split existing Source Water Protection Regions, for example, the current Credit Valley-Toronto and Region-Central Lake Ontario (CTC) Source Protection Region, which includes Brampton, would be divided among three new proposed Regional CAs. These changes introduce potential risk to the protection of hazard lands and drinking water sources, and they threaten continuity of core services during a multi-year transition.
- Brampton supports the province's proposal to keep TRCA's watershed boundaries intact. However, Brampton does not support the re-naming of TRCA to "Central Lake Ontario Regional Conservation Agency" as rebranding would divert resources away from watershed management and hazard mitigation, create administrative burden, reduce longstanding public trust, and create unnecessary confusion.
- Brampton currently maintains strong, coordinated working relationships with both CVC and TRCA, including regular coordination on development reviews, flood mitigation, restoration, capital projects delivery and partnership-based grants. City staff also participate annually in evaluating CA-led initiatives through the Peel Climate Change Performance Measurement System. These established relationships and continuous feedback loops deliver efficient, responsive, and locally focused service that is critically important as Brampton continues to grow.
- Brampton strongly recommends that the Province conduct detailed financial, operational and legal assessments of the proposed consolidation, undertaken by the Province and developed in close collaboration with Brampton, TRCA, CVC, and Peel Region *before* any decisions are finalized or legislative amendments are advanced. Without this analysis, the true implications of consolidation cannot be fully understood.
- In addition, modernization efforts should begin by leveraging existing CA networks and shared expertise, such as Conservation Ontario and the Sustainable Technologies Evaluation Program (STEP), which already provide opportunities for region and province wide collaboration, technical capacity building and access to pooled knowledge.

Improving efficiency through these established systems should occur *before* considering wide-spread and structural consolidation.

- Brampton asks the Province to clearly articulate what specific efficiencies the proposed consolidation is expected to generate and what key performance indicators (KPIs) will be used to measure success. Transparent, outcome-based KPIs such as permitting timelines, hazard response, watershed plan implementation, natural hazard protection, service consistency, and client service standards are essential for municipalities to understand whether restructuring delivers improvements or creates new administrative burdens.
- Brampton reiterates the importance of maintaining the specialized watershed-based expertise of both CVC and TRCA and the continuity of watershed plans such as the Etobicoke Creek and Credit River Watershed Plans. These plans are rooted in local science, community input, and alignment with Brampton's Official Plan, natural heritage protection, climate adaptation, and hazard mitigation priorities.
- As part of the Province's proposal, with significantly expanded boundaries, governance structures, and competing regional priorities, Brampton is concerned about ineffective use of local levy funds, increased administrative burden, slower project delivery, and reduced access to specialized, place-based expertise that is currently foundational to effective planning, climate resilience, and hazard management.
- Brampton expects full consultation throughout any activities related to the CA transition and must retain equitable influence over governance, funding decisions, program prioritization, and service delivery. A phased, multi-year transition plan, developed jointly with municipalities, is essential to safeguard service levels, retain local technical staff, protect watershed and source water protection boundaries, and ensure Brampton's needs are not overshadowed within a much larger regional structure.

Thank you for the opportunity to comment on the new regulations. Brampton has also provided responses to select MECP consultation questions, included as an attachment to this letter. Brampton supports the Province's goals of improving CA efficiency and oversight and emphasizes that success depends on retaining local expertise, watershed integrity, municipal influence, and community engagement. We look forward to learning more and supporting this transition.

Yours truly,



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## **Attachment 1: Response to MECP Consultation Questions**

### ***What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?***

- Conducting detailed assessments of financial and operational implications of the proposed consolidation led by the Province and engagement with Brampton, TRCA, CVC and Peel Region before making any decisions or further legislative amendments is strongly recommended.
- Modernization should begin by leveraging existing CA networks with decades of pooled knowledge and expertise (e.g., Conservation Ontario, Sustainable Technologies Evaluation Program) to improve efficiency, consistency and technical capacity before considering consolidation.
- Retaining established CA names (CVC, TRCA) will help maintain public trust and continuity during large scale changes.
- Maintaining existing Service Level of Agreements (SLAs) between City and CAs
- If consolidation proceeds, existing watershed systems and their upstream–downstream relationships must remain intact to avoid disruption to hydrological planning, flood mitigation, restoration work, and major infrastructure projects. A successful transition to Regional CAs must prioritize integrity of watersheds as distinct natural systems, as well as operational continuity. For Brampton, this means keeping hydrologically connected systems such as the Credit River, Etobicoke Creek, and Humber River watersheds intact within the same, watershed management policy, governance, and service framework.
- Governance of any new Regional CA must ensure Brampton retains meaningful representation, reflecting our population size, hazard exposure, and role in regional growth.
- Maintaining local CA staff expertise pool and knowledge base, particularly those who understand Brampton’s unique place-based risks, vulnerabilities and opportunities, is essential to ensure uninterrupted technical support and service delivery.
- A phased transition plan would also support a successful transition with clear timelines, roles and responsibilities.

### ***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?***

- To protect service consistency and local accountability, Brampton does not support amalgamating CVC with other CAs and supports retaining TRCA's current governance structure.
- Any Regional CA board should include a mix of elected municipal representatives and technical experts, with weighted voting tied to watershed area and municipal financial contributions to ensure Brampton's interests are fairly represented.
- Staggered board terms should be used to maintain institutional knowledge while incorporating new perspectives.
- To prevent Brampton's watershed needs from being diluted in a larger multi-watershed authority, watershed-specific advisory committees should be established for systems such as the Credit River, Etobicoke Creek, and Humber River.

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

- Brampton does not support the use of municipal and local levy funds to pay for any aspect of CA amalgamation, renaming of CAs to Regional CAs, or the creation and operation of the Ontario Provincial Conservation Authority (OPCA) including any chargebacks - these costs must be fully funded by the Province, including any transition or administrative activities.
- If amalgamation proceeds, budgets must be developed collaboratively with all affected municipalities through open consultations, published timelines, and publicly accessible reporting of expenditures and outcomes, supported by modern digital tools for enhanced transparency.
- To protect Brampton's service levels, Brampton's municipal and local levy contributions should be ring-fenced for watershed-specific work within Brampton, such as flood mitigation, erosion control, and natural heritage restoration.
- Stipulations should be put in place for when new regional projects/ program/policy changes are proposed by any new Regional CAs, that assessments should be conducted evaluating effects on and appropriately prioritizing Brampton's natural heritage system, flood protection efforts, and climate adaptation efforts.

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

- Ensure transparent communication between the Province, other CAs, municipalities, community groups, and residents to help maintain trust, minimize disruptions and ensure progress continues to be made on key Brampton priorities.

- Preserve and expand partnerships with indigenous partners and Brampton-based stewardship and conservation groups who have deep local knowledge and boots on the ground.
- Continue public engagement via diverse set of activities such as town halls, online forums, and volunteer stewardship river cleanups and habitat restoration so community members can can participate meaningfully in stewardship and local decision-making.
- Continue to provide timely access to ecological and hydrological data to enable public participation in flood management and environmental stewardship.
- Retain educational, outdoor and conservation leadership programming for schools, youth, landowners, and residents to sustain community awareness and involvement of local watersheds and preserve a strong culture of stewardship rooted in local identity.