

December 17, 2025

Public Input Coordinator,  
Conservation and Source Protection Branch  
Ministry of the Environment, Conservation and Parks  
300 Water Street North tower, 5th floor  
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**Re: [ERO #025-1257](#) – Proposed boundaries for the regional consolidation of Ontario’s conservation authorities**

We, the 94 undersigned organizations, urge you not to proceed with the amalgamation of Ontario’s 36 conservation authorities into seven regional conservation authorities as described in [ERO #025-1257](#) and the other changes under [Schedule 3 of Bill 68](#). These proposed changes are the latest in a series of changes that have systematically undermined the independence and decision-making power of conservation authorities to the detriment of community flood resilience, water quality and natural ecosystems in the parts of the province they serve.

Conservation authorities were established as a direct response to [rising concerns about flooding and erosion](#), including the incredible harm caused by Hurricane Hazel in 1954. Unique to Ontario, they holistically regulate development and deliver conservation initiatives at a watershed scale for the benefit of people and the environment. Central to their establishment was the recognition that conservation authorities [must embody local needs and be led by local voices](#).

The proposed amalgamation completely contradicts this principle by concentrating decision-making power in the hands of the province rather than local experts. Specifically, the legislative changes contained within [Bill 68](#) allow the Minister of Environment, Conservation and Parks to impose directions regarding the new regional conservation authorities’ governance, programs or services.

Even if decision-making processes for the seven proposed regional conservation authorities were allowed to proceed independently, the proposed boundaries are far too sprawling to enable locally relevant decision-making. For example, the proposed Lake Erie Regional Conservation Authority would combine eight formerly independent conservation authorities into one regional authority responsible for serving 81 municipalities with different local contexts and decision-makers. Furthermore, combining Lakehead Region Conservation Authority on the north shore of Lake Superior with authorities south of Lake Huron ignores the completely different ecology, hydrology and climates of these regions. It is unclear from the proposal and legislative amendments how this consolidation can possibly accelerate decision-making when the amalgamated authorities will need to serve dozens of municipalities with unique local needs and spanning watersheds with distinctly different environmental conditions.

The proposed amalgamation and enabling legislation also foster conditions for decision-makers to be far less connected to the communities they are meant to be serving. In doing so, it becomes far more likely that incredibly important local knowledge will be excluded from key decisions, leaving communities more exposed to the impacts of flooding and broader environmental losses. With flooding being the [costliest natural hazard in Ontario](#) and expected to become an [even greater threat](#) in the coming years, this is a change communities cannot afford.

In addition to the devastating impact the proposed amalgamation could have on community flood resilience, there is no indication that these changes would effectively lead to more housing being built. For instance, while the [Housing Affordability Task Force report](#) outlines 55 expert recommendations on how the province can improve access to housing in Ontario, conservation authorities are never mentioned as a barrier.

Furthermore, the process for proposing this amalgamation and the creation of a centralized agency has been marred by a lack of transparency. ERO #025-1257 does not make any mention of legislative changes passed as part of Bill 68 to create the new centralized oversight agency, leaving no clear pathway for public consultation on these changes. This undermines the [Environmental Bill of Rights](#), which is meant to ensure all Ontarians have meaningful opportunities to comment on decisions affecting the natural environment.

For these reasons, we urge you not to proceed with the proposed amalgamation, which would ultimately undermine conservation authorities' ability to protect communities from floods and natural hazards. Rather, conservation authorities should be meaningfully supported and empowered to do their jobs efficiently and effectively so that people across Ontario can continue to benefit from flood resilient communities, clean water and a healthy natural environment.

Sincerely,

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