



MOHAWKS OF THE BAY OF QUINTE

KENHTÈ:KE KANYEN'KEHÁ:KA

*TYENDINAGA MOHAWK COUNCIL,
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December 15, 2025

The Honourable Doug Ford
Premier of Ontario
Legislative Building Queen's Park
Toronto, ON M7A 1A1
Email: premier@ontario.ca

Subject: Environmental Registry Notice No. 025-1257 (Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities)

Dear Premier Ford,

I am writing to express the concerns and opinions of the Mohawks of the Bay of Quinte (MBQ) on the proposed consolidation of Ontario's Conservation Authorities, as outlined in the Environmental Registry Notice No. 025-1257. MBQ has a number of concerns regarding this matter, including the apparent lack of direct communication to bring our Nation's attention to this matter that will directly impact our traditional territory and citizens. This letter should not be misconstrued as any sort of consultation with the Mohawks of the Bay of Quinte, rather, it is a reminder that Ontario's duty to consult with our people on matters concerning our rights and territories have not been fulfilled.

As stated in a previous letter to your office regarding environmental protection laws, our traditional territory extends to vast areas of Ontario and our citizens reside all across Canada and the province of Ontario, and therefore stand to be impacted by the amendments proposed. For this reason, the concerns expressed in this letter capture potential threats to Tyendinaga Mohawk Territory, our traditional territory, and any other territories in the province upon which our members are resident. Protection of the land is our sacred duty and one that we do not take lightly. Without a healthy environment, the chances of future generations being prosperous, are greatly diminished.

Concerns regarding Ontario methods

MBQ has no record of any notification from the Ministry of the Environment, Conservation and Parks, nor the Premier's Office on this matter. As stewards of these lands, as inherent rights holders, and as holders of rights recognized by Canada, we deplore the Government of Ontario's systematic introduction of new bills that directly impact First Nations and their territories without proper consultation, as obligated by law.

This pattern established by your government of proposing amendments to laws risking environmental protections to accelerate development, is being viewed in its larger context and is understood by MBQ as a strategy to push through legislative amendments for the benefit of large corporations. It begs the

question: who is really coming to you “hat in hand”? You should note that this systematic approach to remove red-tape under the guise of “efficiency” for the profit of big corporations does not go unnoticed and it is not an approach that MBQ stands behind.

The way in which the Government of Ontario has systematically introduced new bills to remove critical processes and protections is an obvious tactic to overburden organizations, municipalities, and First Nations with repeated responses to the province’s vague proposals. While we are not opposed to discussing possible improvements to efficiency in provincial and municipal processes, and are certainly not opposed to discussing development projects that could benefit Ontario residents, including MBQ citizens, we take issue with your government’s methods to push development in this province. To truly “protect Ontario”, strategies for development should be deliberate, methodical, and collaborative, taking into account the long-term impacts on Ontarians and the Indigenous Nations whose territories make up your province.

Concerns regarding Amalgamation

It is evident that the proposed changes to the *Conservation Authorities Act* have the potential, both individually and collectively, to cause serious adverse impacts on the environment, human health, and our right as Indigenous peoples to the stewardship of our lands. As a Nation that relies heavily on our relationship with our local Conservation Authorities to help protect the lands, waters, and animal life within our territories, we are concerned that the proposed changes will lead to a lack of regional expertise and appropriate caretaking. We are also concerned the proposed changes will create more bureaucracy with a heavier caseload, leading to projects being pushed through without proper oversight. The proposed changes outlined in the ERO lack the detail that would give MBQ the reassurance that the lands currently protected by their assigned conservation authorities would continue to be managed and conserved in an appropriate manner following the proposed consolidation. While we appreciate that the province’s proposed changes are purportedly to address duplicity and efficiency, there is a reason the current structure, systems, and processes are in place, and that is for the protection of the environment and residents of this province.

Since Ontario’s proposal fails to clearly outline the ways in which the proposed amalgamations will result in efficiency, we are concerned that the proposed amalgamations would in reality:

1. Create a geographically vast and administratively complex entity, joining various jurisdictions that have little shared watershed connection or economic alignment. Quinte Conservation who currently have local oversight over our nearest watershed will be joined with six other Conservation Authorities that will encompass an area from Oshawa to Napanee and north to Bancroft. The vastness and diversity of the proposed encompassed waterbodies will make common oversight infeasible and inadequate. Not to mention, it eliminates part of our watershed connected to the Bay of Quinte from the proposed jurisdiction by splitting the bay into two different regional Conservation Authorities which will affect the consistency for one waterbody;
2. Dilute or eliminate local accountability and partnerships between municipalities and First Nations, contrary to the principle that decisions are best made closest to the communities they

serve. MBQ currently has a strong relationship with Quinte Conservation, they have been willing to share local expertise on protection and mitigation measures that our community implements alongside our neighbouring municipalities for the protection of our shared resources. We sit on the Source Protection Committee, Water Soldier Working Group, the Bay of Quinte Restoration Council, and the Phragmites Working Groups – all of which heavily rely on Quinte Conservation. Additionally, given our lack of resource, we rely on Quinte Conservation to carry out the local critical, consistent, and efficient monitoring required to maintain the health of our water, wildlife, and environment and share all required information with us as requested;

3. Generate substantial transition expenses – including Human Resources, governance restructuring, IT migration and policy harmonization – that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province’s own business planning principle of “value for money, cost containment and service continuity”; and
4. Risk greater uncertainty and delay for developers, builders and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it more difficult for applicants to obtain timely local advice, resolve condition issues or expedite housing and infrastructure approvals that support your government’s “Build Faster” agenda;
5. Put up barriers to local collaboration on environmental response and support that MBQ relies on with its limited resources; and,
6. Dilute regional expertise, impacting coordinated responses and planning, resulting in delayed emergency response, duplicate or inconsistent response and caretaking, and oversight on projects that may impact multiple jurisdictions.

Concerns regarding the Environment

Permitting and approval processes are crucial in assessing the potential negative environmental impact of a project, and the process requires essential education to ensure projects are carried out with minimal impact. Without the current permitting and approval processes or provincial oversight, there could be an increase in environmental negligence and non-compliances. The proposals eliminate vital safeguards that have been put in place over the years in recognition of their necessity for environmental and human health safety.

This is of grave concern to our community as we have hundreds of endangered species living within our territory. Additionally, our territory is situated on the Bay of Quinte where many of our people rely on the quality of its waters for drinking water, hunting and consuming fish as we have been doing for centuries.

Mohawks of the Bay of Quinte would like to note that the proposals are likely to have direct and indirect negative effects on our traditional and treaty rights through potential negative environmental impacts that would put our food for sustenance and water resources at risk.

Concluding Remarks

We stand with the Quinte Conservation Authority and the Municipality of the City of Belleville (among other conservation authorities and municipalities) in their disapproval of the proposed “*Eastern Lake Ontario Regional Conservation Authority*” boundary configuration in Environmental Registry Notice 025-1257. We oppose the proposed regional consolidation of Ontario’s conservation authorities and the risk it poses to MBQ’s strong relationship with Quinte Conservation.

We strongly encourage the Ministry of the Environment, Conservation and Parks to collaborate with conservation authorities across the province to seek input in the evaluation of a more focused, specific model as a geographically coherent, cost effective, and locally accountable alternative that advances the province’s priorities of efficiency, red-tape reduction, and timely housing delivery. MBQ strongly recommends that First Nations also be invited to join in this process and that robust engagement with municipalities, conservation authorities, and First Nations take place before finalizing any consolidation boundaries and legislative amendments.

Again, I will reiterate that these legislative changes proposed by your government and the methods with which your government is pushing through these changes, challenges the boundaries of the democratic process and rule of law, two systems meant to protect everyday citizens. Once again, I will remind your government that you have a duty to consult First Nations, including MBQ, on issues that will impact our people and our lands.

It may not be a priority of the Government of Ontario to preserve the environment for future generations, but this is a value we as Kanyen’kehá:ka live by. We are the true investors in the future because we understand that if there is no healthy environment, then there is no future. There is a great opportunity for our governments to work together and collaborate on protecting the people while also protecting the environment.

Sincerely,



R. Donald Maracle, Chief
Mohawks of the Bay of Quinte

Cc: The Honourable Todd McCarthy, Minister of the Environment, Conservation and Parks, todd.mccarthy@pc.ola.org
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