



December 19, 2025

Re: Proposed Consolidation of Ontario Conservation Authorities

Dear Minister,

On behalf of the Municipality of Brockton, Council appreciates the opportunity to provide comments regarding the Province of Ontario's proposed consolidation of Conservation Authorities (CAs) into larger Regional Conservation Authorities (RCAs).

The Municipality recognizes and supports the Province's objectives of improving consistency, efficiency, and accountability in watershed management. Conservation Authorities play a vital role in environmental protection, natural hazard management, land-use planning, recreation, stewardship, and community well-being. Given this importance, it is essential that any restructuring preserves local responsiveness, accountability, and service delivery—particularly for rural and agricultural communities.

The Municipality of Brockton lies within two watershed jurisdictions, served by the Saugeen Valley Conservation Authority (SVCA) and the Grey Sauble Conservation Authority (GSCA). Under the proposed framework, Brockton would become part of the Huron-Superior Regional Conservation Authority (HSRCA). The proposed HSRCA would encompass a vast geographic area spanning more than 23,000 square kilometres and approximately 80 municipalities, including large urban centres as well as rural and agricultural communities.

Council is concerned that consolidating rural-focused Conservation Authorities into large, urban-dominated regional entities risks diluting rural representation and diminishing attention to agricultural impacts, farmland erosion, rural infrastructure, and locally tailored watershed priorities. Rural Conservation Authorities provide essential services that support tourism, recreation, education, stewardship, and community identity—services that are critical to rural quality of life and local economies. The Municipality requests assurance that these programs will remain protected and adequately resourced under any new governance structure.

The scale and composition of the proposed HSRCA also raise significant concerns regarding service delivery, governance, and operational effectiveness. The inclusion of geographically distant jurisdictions, such as the Lakehead Region Conservation Authority, as well as more urbanized Conservation Authorities, may impair the ability to respond effectively to local rural needs and weaken long-standing working relationships between municipalities and Conservation Authority staff.

Rather than a single, expansive Regional Conservation Authority, the Municipality encourages the Province to consider smaller, sub-regional Conservation Authorities or catchment-based groupings that reflect similar watershed characteristics and development patterns. For example, a Lake Huron Shoreline Regional Conservation Authority—grouping Ausable Bayfield, Maitland Valley, Saugeen Valley, and appropriate rural portions of Grey Sauble—would better preserve local relevance while still advancing Provincial objectives.

Governance and representation are also key concerns. Larger RCA Boards may be unable to provide equitable representation for all municipalities, particularly smaller rural communities. Without guaranteed rural representation, local decision-making, municipal accountability, and agricultural perspectives may be significantly weakened. The Municipality strongly urges the Province to establish governance structures that ensure equitable representation for rural municipalities and a strong voice for agriculture, potentially through sub-regional boards aligned with watershed areas.



Council is further concerned about the future management of Conservation Authority assets. Many lands and properties held by SVCA and GSCA were donated by local residents or funded through local taxpayer investment, with the expectation of long-term stewardship by locally governed authorities. The Municipality respectfully requests that existing assets—including land trusts, infrastructure, financial reserves, and real property—be preserved under local control and managed in accordance with the intent of the original donors and contributing municipalities.

Finally, the Municipality notes that municipalities currently provide the majority of Conservation Authority funding, while Provincial contributions remain limited. To date, a detailed business case outlining anticipated cost savings, administrative efficiencies, and service impacts has not been provided. Council seeks assurance that the proposed RCA model will not result in increased municipal costs, unnecessary bureaucracy, reduced service levels, or barriers to access—particularly for rural residents with limited broadband connectivity.

In summary, the Municipality of Brockton respectfully requests that the Province:

- Provide a detailed business case outlining cost savings, efficiencies, and service impacts of the proposed RCA model;
- Ensure the new structure does not increase municipal funding burdens or bureaucracy;
- Establish governance structures that guarantee equitable rural and agricultural representation;
- Clearly define RCA Board structures;
- Consider sub-regional Conservation Authorities based on smaller, similar watershed groupings;
- Retain local expertise and watershed-specific knowledge;
- Coordinate RCA budgeting with municipal finance staff;
- Clarify the management of donated land trusts and local assets; and
- Preserve existing SVCA and GSCA assets under local control.

The Municipality appreciates the opportunity to comment on this important initiative and looks forward to continued dialogue with the Province to ensure that Conservation Authority restructuring supports effective watershed management while respecting the unique needs of rural and agricultural communities.

Yours sincerely,

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