

December 22, 2025

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON
K9J 3C7

Submitted via website and ca.office@ontario.ca

Dear Public Input Coordinator,

RE: ERO #025-1257 & ORR #25-MECP023: Proposed boundaries for the regional consolidation of Ontario's conservation authorities

The Ontario Federation of Agriculture is dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with on issues, legislation and regulations that would impact the sustainability and growth of our farm businesses. OFA appreciates this opportunity to provide input on this consultation **ERO #025-1257 and ORR #25-MECP023: Proposed boundaries for the regional consolidation of Ontario's conservation authorities.**

Farmers are significant contributors to Ontario's economy and are deeply invested in ensuring consistency, reducing costs and enabling the timely construction and maintenance of critical infrastructure in their communities. As stewards of the land, air and water, reliant upon the natural environment, farmers are also invested in safeguarding the environment.

We appreciate the government's acknowledgement of the concerns Ontario's farmers have expressed regarding Conservation Authorities (CAs), including the unpredictable and inconsistent conditions they sometimes create for agricultural operations. We are supportive of the government's objectives to transform the CA system in ways to reduce duplication, free-up resources, and better align CA activities with provincial priorities related to housing, infrastructure, the economy and climate resilience – recognizing that agriculture is a critical contributor to both Ontario's economy and climate resilience. To help meet these objectives while ensuring continued responsiveness to landowners, we offer the following suggestions.

Essential Requirements for CAs from an Agricultural Perspective

Regardless of the structure or size of a CA, there are critical components / services that are necessary for the agricultural community.

1. Consistency and transparency of policies, standards, processes, services, permit requirements and fees:

Farmers continue to experience significant variability in service delivery, policies, processes, and treatment across Ontario. To improve fairness, predictability, and efficiency, we recommend:

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- Standardize when permits are required, processes for permitting, service delivery timelines, and establishing uniform or clearly defined fee ranges.
 - Eliminating duplicative permit requirements. OFA is supportive of a one-window approach to permitting, whereby a landowner can review permitting requirements, submit applications and receive all necessary approvals, from a single entity. It is that single entity who would be responsible for ensuring approvals are obtained from all of the necessary authorities. This will lead to a reduction in unintentional non-compliance: A single responsible entity would prevent situations where farmers unknowingly fall out of compliance due to misleading guidance provided by municipalities. This is not advocating for CAs to be removed as commenting agencies where they provide relevant information.

2. Representation in decision making:

With the majority of OFA's 38,000 farm families operating within one or more CA jurisdictions, agriculture brings a distinct perspective to the practical intersection between farm operation and CA regulatory frameworks. We were pleased the government recognized this by mandating agricultural representation on CA Boards through previous amendments to the *Conservation Authorities Act*. As geographic boundaries expand, the number of agricultural representatives must also increase. Because CA jurisdiction is inherently tied to land and water – not population – new governance structures should reflect land-use realities. Ensuring proportional representation based on land use (Agricultural, Rural, Urban and First Nations) with meaningful agricultural involvement, is essential. Proportional representation based on land use could help ensure that smaller, rural municipalities have an appropriate voice that reflects both governance influence and financial impact. Similarly, it is primarily the agricultural and rural landowners who will be impacted by CA decisions, and therefore, they must have a significant voice for decision making. We look forward to participating in future discussions regarding CA Board structure and financing.

3. Maintain Local Agricultural Knowledge and Capacity

The strongest relationships between farmers and CAs have developed where CA staff possesses both technical expertise (hydrological modelling, soil management, and erosion control) and an understanding of agricultural operations and practices. This knowledge has supported stewardship initiatives, effective drainage projects, and appropriate farm expansions. Any revised CA structure must retain and continue to build this agricultural expertise, along with a commitment to collaborate with the sector in ways that support its economic contributions while consistently protecting people and property.

Boundaries of Regional Conservation Authorities

With respect to the proposed boundaries of the Regional Conservation Authorities, OFA has significant concerns with the very large geographic areas encompassed within each of the proposed seven Regional CAs. Hydrogeology, soils, landscapes, and agricultural systems can vary widely within each of these large Regions. For example, the distance from Lambton Shores to Thunder Bay is approximately 1,500 km—an estimated 16-hour drive—illustrating the sheer vastness of these proposed jurisdictions. Such expansive boundaries will make it challenging to maintain meaningful community relationships and ensure that local agricultural needs are

understood and reflected in decision-making. Soil types, agricultural sectors (e.g. crop, livestock, greenhouse), and stewardship priorities can differ substantially across these areas.

We believe creating 19 Regional CAs based on the Source Protection Regional (SPR) structure would better preserve a watershed-based approach while offering more geographically coherent boundaries and stronger local accountability than a system of only seven Regions. At the same time, it still has the potential to meet the government's goals of consolidation by supporting more consistent permitting, technical standards, and service levels.

Ontario has 19 Source Protection Regions (SPRs) and a total of 38 Source Protection Areas (SPAs) established under the Clean Water Act, 2006, with SPAs being watershed-based areas grouped into SPRs to protect municipal drinking water sources, covering nearly all of the province's population. Establishment of the SPRs was determined through both science-based watershed principles, and practical governance factors. We believe these remain a valid basis for consolidating Conservation Authorities.

An SPR-based structure may also promote a more equitable distribution of resources across Conservation Authorities, leading to greater consistency in available services and the quality of service delivery. Overall, following the SPR structure maintains local representation, responsiveness, and efficiency while ensuring decision-making benefits from local knowledge and meaningful community involvement.

Creation of a Provincial Ontario Conservation Authority (OPCA)

OFA has concerns regarding the OPCA model, recognizing that there are limited details at this time. It is proposed that this body will ensure faster, more consistent permitting, oversight and best practices, supported by a single digital permitting platform, and updated floodplain mapping. It is essential that the OPCA has agricultural representation on its Board of Directors, ideally nominated by the agricultural community for appointment.

While not opposed to a single permitting platform, we would like assurances that there will be opportunities for permit applicants to receive assistance from knowledgeable CA staff with completing permit applications and ensuring that relevant local information is considered. This permitting system must not be so complicated that farmers require a paid consultant to assist with applications. It is also important to recognize that the language and measurements used in agriculture are often different than other industries and as such, permit applications must use terminology that is relevant to farmers. This is an area where agricultural representatives on the OPCA, as well as continued engagement with the agricultural sector can lead to success.

The OPCA model will not inherently resolve existing issues farmers may have with CAs, such as the inappropriate classification of areas as wetlands where they do not meet the provincial definitions. The OPCA system should have an appeals or dispute resolution process in place that will not be costly to the landowner and deal with issues in a timely manner.

Agricultural communities experience a wide range of relationships with existing CAs, from strained to highly positive and collaborative. OPCA is well positioned to work with the agricultural

community to identify the best practices that have contributed to these successful partnerships and provide guidance on how to replicate them in areas that have not yet benefitted from such constructive relationships.

Summary of Key Comments:

Essential Requirements for CAs from an Agricultural Perspective:

- Consistency and transparency of policies, standards, processes, services, permit requirements and fees.
- CA Boards of Directors: Consider proportional representation based on land use (Agricultural, Rural, Urban) and includes dedicated agricultural representatives.
- Maintain Local Agricultural Knowledge and Capacity.

Boundaries of Regional Conservation Authorities:

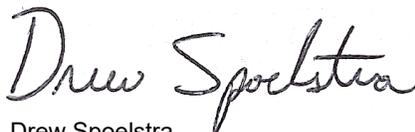
- Creation of 19 Regional CAs based on the existing Source Protection Regional structure / boundaries.

Creation of a Provincial Ontario Conservation Authority (OPCA):

- Agricultural representation on the OPCA Board.
- Ease of permitting system that will not require a consultant for permit applications and assistance from local, knowledgeable CA staff.
- Role in identifying the best practices that have contributed to successful partnerships between CAs and the local agricultural community and provide guidance on how to replicate them in areas that have not yet benefitted from such constructive relationships.

OFA appreciates the opportunity to contribute to this important consultation and welcomes further engagement as the proposal advances. Agricultural stakeholders are well positioned to support a modernized Conservation Authority system and look forward to meaningful engagements throughout this process.

Sincerely,



Drew Spoelstra
President

cc: Hon. Todd J. McCarthy, Minister of the Environment, Conservation and Parks
Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness
Hon. Lisa M. Thompson, Minister of Rural Affairs
OFA Board of Directors

This submission has been approved by the OFA Board of Directors and will be posted to OFA's website:
<https://ofa.on.ca/resources/>

