

This submission is made **in opposition to** the proposed boundaries for consolidated Conservation Authorities, and in strong opposition to ongoing changes being made to Conservation Authorities under Bill 68 without any public consultation.

Setting individuals and communities up for higher costs

Local expertise and relationships – exactly what current Conservation Authorities have built over the past decades - are key to better prevention of damage from climate-related storms and flooding. Prevention, in turn, is key to managing the cost of damage from flooding and heavier-intensity storms. Those costs are increasingly obvious across the province and the country; they're borne heavily by municipalities and individuals, and they include loss of homes, businesses, farmland, and infrastructure, as well as the cost for emergency services and health care.

A steadily-increasing amount of data means we're learning more about how [the economic cost of poor preparation](#) for the changes we know are coming. Studies are also revealing [best practices for prevention and resilience](#), all of which involve local expertise combined with access to updated technology and opportunities for collaboration, including learning from other countries. This is the direction we should be taking, not replacing what's working with an undeveloped plan that is focused solely on skipping steps in approval processes that were intentionally built to conserve the ecosystems on which we depend for life, and in so doing, to conserve our financial health as well.

Any proposed changes should at least include detailed analysis showing clear cost savings and service improvements expected to be realized from the proposed consolidation, as well as possibilities available through consolidating services in alternative ways.

Ignoring public voices

The changes already made unilaterally under Bill 68, along with the proposed boundary restructuring, further erode community awareness and involvement in strengthening and building our resilience, at exactly the time when we most need to be involved. The changes remove access to expert knowledge and experience and impede local decision-making capacity by locally-elected representatives.

A provincially-appointed board and fewer, larger conservation authorities cannot provide the crucial local knowledge and relationships that have been built over decades and have saved communities across the province from the economic and social costs of flooding and poor development decisions. Those gains will be lost through consolidation, even if the province's aim is to improve efficiencies. Bigger, in this case, is not better.

A larger regional structure will by design change the services and programs offered locally, tailored to and valued by residents because they reflect the unique needs and situations of the watershed. What is the plan for equitably consolidating resources and distributing them over the larger area? What about the properties entrusted specifically to each conservation authority for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities?

It's an affront to democratic principles and processes to push through omnibus legislation without the opportunity for public input or comment. This continues to be the provincial government's modus operandi and it contravenes their stated commitment to representing the public.

Not needed

As the provincial government already has the authority to set consistent provincial standards, it is a waste of taxpayer funds to dismantle a system that is working and replace it with one for which costs and accountability to the public are not yet defined.

As a resident within the Upper Thames River Conservation Authority (UTRCA), I'm familiar with the UTRCA's work and I'm aware that in 2024, 99% of permit applications were completed within the provincial guidelines. It's not clear how the proposed consolidation and provincially-appointed board can improve on that. In fact, imposing a new model with larger regions and less local representation is far more likely to lead to less support, longer wait-times and a bumpier process for everyone involved, including developers and planners.

Request: Cancel proposed consolidation

Based on the above, and many additional points that could be put forward had more time been allowed for public consultation, I request the provincial government cancel the proposed consolidation of conservation authorities and instead enter into proper consultation with municipalities, local conservation authorities, and the public to determine effective pathways to build economic and environmental resilience appropriate for each community.