

December 16, 2025

Province of Ontario

Attention: Hassaan Basit, Chief Conservation Executive

Reference: Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities

We understand that the Ontario government will soon introduce legislation to create the Ontario Provincial Conservation Agency (OPCA) with the aim of improving the Province's conservation authority system to help build homes and infrastructure projects faster, while strengthening the vital role conservation authorities play in managing watersheds and protecting communities from floods and natural hazards.

It is intended that the OPCA will provide centralized leadership, efficient governance, strategic direction and oversight of all conservation authorities. The agency will free-up resources for front-line conservation and ensure faster, more consistent and transparent permitting, while supporting conservation authorities in their core mandate of managing watersheds and protecting people and property from natural hazards in an efficient and consistent manner. We understand that the agency will be tasked with leading key modernization projects including:

- developing a single digital permitting platform to provide a faster, more predictable approvals process and improved customer service
- streamlining and standardizing service delivery by setting clear, Province wide performance standards and support their consistent application by conservation authorities with centralized data and updated floodplain mapping
- overseeing the implementation of a regional, watershed-based consolidation of conservation authorities

We further understand that the Province is considering the consolidation of the current 36 conservation authorities (CAs) into a total of 7 regional conservation authorities (RCAs) due to concerns around unnecessary duplication and the intention of providing more consistent service delivery through efficient resource and information sharing.

We appreciate the Province's efforts to improve the current system, and we are very supportive of finding ways to better support the conservation authorities, however, we have significant concerns regarding the amalgamation and consolidation of the CAs within the GGH area. Before proceeding with consolidation of CAs, we strongly encourage the Province to fully evaluate

whether modernization and efficiency goals could be achieved through enhanced provincial coordination, integration, and standardizations issued through the OPCA. We fear that the process of amalgamation will lead to very costly and poorly timed impacts on our industry as we've seen in other circumstances, most notably with the dissolution of the Region of Peel.

Currently, there are very highly functioning CAs within the GTA such as the Credit Valley Conservation Authority (CVC), which we've successfully worked with over many years on many of our projects. We believe that the Province can use them as an example of how other CAs should operate. The CVC delivers 99 percent compliance within permit timelines, having an average permit decision time of 11 days which they do through the use of modern digital permitting, robust hazard mapping, strong technical guidelines, transparent budgeting and governance, and effective municipal partnerships. We believe that with the proposed amalgamation of the CAs there is a risk of disrupting the efficient and well-functioning system through the introduction of administrative complexity and unnecessary oversight. On the contrary, we believe that CA's like the CVC can be used as a models for best practices on expertise, systems, and processes which can be used to improve efficiency and consistency across the Province. We do not feel that the Province should consider the amalgamation of any of the larger CAs within the GTHA (such as CVC, TRCA, Conservation Halton, LSRCA, CLOCA), however we do acknowledge that this may be appropriate in other areas of the Province, specifically within more rural jurisdictions.

We would request that over the next several months, the Province establish an industry working group and engage in constructive consultation with the CAs, BILD, and other industry stakeholders to explore best practices and process improvements across all CAs. The Province recently implemented a similar process with the Ontario Energy Board (OEB) where a technical advisory group (Capacity Allocation Model Advisory Group) was established, which led to positive impacts for the industry. We believe this would be the right path forward to help implement best practices and avoid any legal, financial, and system risk associated with the proposed amalgamation of the CAs.

Yours truly,



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