

Public Works

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December 17, 2025

Public Input Coordinator
Ministry of the Environment, Conservation and Parks
Conservation and Source Protection Branch
300 Water Street North Tower, 5th floor
Peterborough, ON
K9J 3C7

Re: Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO 025-1257)

To Whom It May Concern:

Peel Region appreciates the opportunity to comment on the proposed creation of the Ontario Provincial Conservation Agency and consolidation of Ontario's 36 conservation authorities (CAs) into seven regional CAs, as part of Bill 68 Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2). Peel Region generally supports efforts to streamline processes to move projects faster and provide one-window access to services.

PEEL REGION COMMENTS ON THE PROPOSAL

Please note that the comments below have been provided by Peel Council and staff and have been endorsed by Regional Council.

- Peel supports efforts to standardize CA fee structures across Ontario, and notes that consistent fees across all conservation authorities are viewed as a positive step.
- Peel Region opposes the proposed amalgamation of Credit Valley Conservation (CVC) with Halton, Hamilton, and Niagara Peninsula Conservation Authorities to form the Western Lake Ontario Regional Conservation Authority. CVC is already a large and highly efficient conservation authority, that has a strong reputation for delivering services in a streamlined and efficient manner that is not a barrier to building homes. CVC has the capacity and capability to be a standalone regional conservation authority.
- The large watershed areas represented in the proposed regional conservation authorities encompasses many municipalities. There are concerns about having representatives from other municipal jurisdictions involved in governing Peel Region's conservation lands when there is strong confidence in the delivery services of the conservation authorities in Peel Region, such as CVC.
- The proposed amalgamation provides the potential for enhanced economies of scale that would enable access to and standardization of modernized technology for permitting, measuring and monitoring across the Province. It also enables a broader technical and knowledge transfer to address challenging or complex permit

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applications and other CA services (e.g., watershed plans). However, the cost to amalgamate CVC with the other CAs and integrate administrative systems, staffing, and new technical resources has not been provided, and these costs may be borne by the municipalities.

- As Toronto and Region Conservation Authority's (TRCA's) jurisdictional area has not changed and based on the Region's request that CVC continue as its own regional CA, these CAs should maintain their existing names to avoid unnecessary rebranding expenditures.
- There is the risk to the loss of continuity and service disruption during the transition period, with the potential to impact the protection of hazard lands and of drinking water sources. The proposed regional CAs' jurisdictions intersect and divide existing source water protection regions. For example, the current CTC Source Water Protection Area, which includes Peel, is now split between three different regional CAs. How this will be addressed has not been indicated.
- The province has indicated that the local role of the CAs will not be changed and that existing local CA offices will be maintained as a central point for the public to access services in their community. While maintaining local access to staff and staff knowledge of the local watershed is encouraged, this could lead to the risk of duplication of administration costs between the region and local CA levels.
- While streamlining the permitting process is encouraged and supported, it is important to ensure that the quality of the permit reviews remains intact. Future risks to the natural environment and impacts on the quality, sustainability and reliability of existing and new drinking water sources must be assessed and protected. Safeguards and controls for development in hazard areas need to be maintained and the continuity of current flood protection continued.
- The watershed areas represented in the proposed regional CAs, the number of municipalities encompassed, and the urban/rural/agricultural landscape represented by some of the proposed regions, is quite vast and varied. It will be essential that permit approvals' timelines be maintained on this larger delivery scale.
- CA services such as permits, hazard and flood protection, watershed planning and project priorities that are delivered under mandatory and non-mandatory programs and services agreements, should continue to be delivered in consultation with the respective funding municipality. Regional CAs may still need to require internal teams to deliver services to each of the representing municipalities.

Peel Region respectfully requests that the Ministry consider the Region's comments provided herein to inform its decisions on the approach. Should the proposal advance, Peel Region looks forward to participating in the consultation providing further input on the regional CA boundaries, financial implications as a key funder of CAs in Peel and ensuring health and safety of residents remains paramount throughout any transition.

I would be pleased to provide any clarifications or additional comments on these matters.
Thank you for your time and consideration of Peel Region's comments.

Yours Respectfully,



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