

December 19, 2025

Hon. Todd McCarthy
Minister of the Environment, Conservation and Parks
777 Bay Street, 5th Floor
Toronto, ON M7A 2J3

Minister McCarthy

Re. County of Dufferin Response to the Ministry of the Environment, Conservation and Parks Proposed Regional Consolidation of Conservation Authorities.

On behalf of the County of Dufferin, staff is pleased to provide written comments pertaining to the Ministry of the Environment, Conservation and Parks ('MECP') proposed regional consolidation of conservation authorities. It is our belief that the following comments will assist the MECP in understanding rural perspectives on the proposed changes, as well as the potential implications of the regional consolidation of conservation authorities on smaller, rural-based municipalities.

The County of Dufferin appreciates the Province of Ontario's desire to create more streamlined and consistent standards and processes for conservation authorities. Dufferin County understands that the current absence of procedural consistency between conservation authorities has created an unpredictable and challenging environment for landowners, applicants, and municipalities. In a time when the development of new housing is of immense importance, it is critical that the procedural framework for development remains consistent and unencumbered by red-tape.

Through Dufferin County's review of ERO # 025-1257 it has become clear that the Province believes that to create more procedural consistency in conservation authorities the most appropriate path forward is the regionalization of conservation authorities. Specifically, this regionalization will consist of consolidating the 36 existing conservation authorities into seven (7) regional bodies. While the County of Dufferin can appreciate the Province's utilization of this approach, it does bring forth several points of concern that are further explored below.

At a fundamental level, conservation authorities have a duty to conserve and restore critical natural resources within watersheds from human activity, as well as protect citizens from the many hazards that come from those critical watersheds. This duty is consistently fulfilled by conservation authority staff that have a comprehensive knowledge on the local area in which they work and through strong relationships with local municipalities and applicants. What is of significant concern for Dufferin County is through this regionalization many municipalities will lose connections with conservation

authority staff that have an understanding on local contexts and who have built strong relationships with municipalities and applicants in their current jurisdiction. The removal of conservation authority staff with strong local knowledge and connections with municipalities will likely only create additional challenges, and, in turn, delays in the development approval process. Given that, the County of Dufferin would strongly recommend that should the Province proceed forward with the regionalization approach, all current conservation authority remain within their current jurisdiction as a means to create a more harmonious transition.

Small, rural-based municipalities consistently strive to have their voices and opinions heard on conservation authority boards throughout Ontario. The challenges experienced by rural-based municipalities differ greatly from those experienced in Ontario's large, fast-growing municipalities; however, those challenges are no less important to address. Currently municipalities have 36 conservation authority boards to which they can be an appointed member, which allows for a wide array of municipal representation. Though the proposed consolidation of conservation authorities, the number of conservation authority boards municipalities can be an appointed member of is reduced from 36 to seven (7). This, in the opinion of Dufferin County, brings forth notable concern regarding appropriate municipal representation, especially for smaller, rural-based municipalities. For Dufferin County in particular, our County is located within the headwaters of several conservation authorities and, as such, any changes to the headwaters in the County will likely have significant implications to those municipalities located in the downstream areas. By reducing the number of conservation authorities to seven (7) there is a strong likelihood that critical knowledge on changes or impacts to the headwaters, which would normally be brought forth by Dufferin County representatives, will now be lost. This likelihood is solely because of the now reduced opportunity for the presence of Dufferin County representatives on conservation authority boards. To ensure that all municipalities, specifically that of Dufferin County, have the opportunity to have representation on at least one of the seven (7) proposed regional conservation authorities, we suggest that the each board consists of a minimum number of seats to allow for each municipality within the conservation authority jurisdiction to have an appointed member.

While Dufferin County can also appreciate the Province's willingness to eliminate the duplication of conservation authority services, the current regionalization approach does not achieve that in the County of Dufferin. The Town of Mono, for instance, is currently under the jurisdiction of three (3) conservation authorities – Credit Valley, Nottawasaga Valley, and Toronto and Region. Through the newly proposed conservation authority structure, the Town of Mono now falls under the jurisdiction of four (4) regional conservation authorities. Similar to that, the Township of Amaranth, which currently contains two (2) conservation authorities, will be under the authority of three (3) conservation bodies as part of the proposed regional structure. Though this increase does not occur for all municipalities in Dufferin County, those that do experience those increases now face a



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situation whereby there is increased oversight, but less opportunity for being a voice on the governing bodies as a result of the limited amount of conservation authorities present. It is our opinion that should the Province proceed forward with the regionalization of conservation authorities, then a reduction in the number of conservation authorities present in Dufferin County should also occur.

In consolidating the conservation authorities into seven (7) distinct regional authorities, it is our understanding that this will create greater consistency in the technical tools and resources being utilized across all conservation authorities. Currently the types of tools and methodologies being used differs between conservation authorities to which Dufferin County agrees could likely lead to confusion amongst applicants and landowners for how applications are reviewed. It is our concern, however, that the consolidation of conservation authorities may lead to instances whereby more restrictive and environmentally-centric tools and methods can be omitted for ones less stringent, but more supportive of growth and development. In circling back to an earlier comment, it is the conservation authorities duty to conserve and restore critical natural resources within watersheds from human activity. That being said, it is our hope that tools and methodologies offering greater protection to Ontario's watersheds, as well as the natural resources located within those watersheds, are the ones that become the standard for the seven (7) regional conservation authorities. Dufferin County recommends that the Province implement a provision in any future Bill or Regulation that mandates the utilization of tools, technology, and methodologies that offer the greatest protection to the environment and natural heritage features.

The County of Dufferin appreciates the opportunity to provide comments on the proposed regional consolidation of Ontario's conservation authorities. We also want to reiterate our appreciation to the Province of Ontario, but specifically the MECP, in their work establishing consistent developmental frameworks in Ontario that are beneficial for all parties. It is our hope that the comments provided above will assist the MECP in refining the current approach for the regionalization of conservation authorities in Ontario, especially as it relates to small, rural-based municipalities.

Respectfully submitted,

A handwritten signature in black ink that reads 'LM'.

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