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Subject: Feedback on the Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

Submitted By: The Town of Erin

Date: December 22, 2025

To the Ministry of the Environment, Conservation and Parks:

The Town of Erin Task Force is pleased to provide comments regarding the proposed regional consolidation of Ontario's conservation authorities (CAs). Our feedback reflects the review and comments of Town staff and Council based on the information provided in the consultation documents. The Town of Erin would continue to be in two CAs, the Western Lake Ontario Region and the Lake Erie Region under the proposed consolidation.

While we recognize the Provincial goal of achieving efficiencies and reducing red tape, the Town of Erin has identified significant concerns regarding the governance, operational effectiveness, and transitional costs associated with the proposed boundaries. Our detailed feedback and proposed solutions are outlined below.

1. General Concerns

Dilution of Local Municipal Voice Our primary concern is that local municipal needs and priorities will be lost within the proposed larger structures.

- **Western Lake Ontario Region:** The Town of Erin is currently a small entity within the Credit Valley Conservation Authority (CVCA) as configured with the Region of Peel. The proposal to merge this with the Regions of Halton and Niagara, plus the City of Hamilton, effectively ensures that our voice will disappear entirely.
- **Lake Erie Region:** Similarly, within the Grand River Conservation Authority (GRCA), we are currently one of 38 municipalities. Under the proposed regional model, we would be lumped in with 81 municipalities. In such a massive configuration, the specific voice and needs of a small municipality like Erin will be lost among the myriads of demands arising from larger urban centers.

Operational Efficiency vs. Reality We question the validity of the projected efficiencies:

- **Staffing:** Unless there are substantial cuts to current CA functions within each watershed, employee structures will have to remain largely as they are to maintain service levels. Rationalization of administrative staff will yield only marginal economies and may come at the cost of supervisory effectiveness.
- **Bureaucracy:** The creation of an umbrella organization, the Ontario Provincial Conservation Agency (OPCA), to oversee the seven regional authorities adds a layer of bureaucracy that risks negating any cost efficiencies achieved by the amalgamations.
- **Permitting:** Centralizing the permit process is attractive in theory but ignores the reality that local permits require local site inspections. The time and effort for these inspections cannot be centralized. Furthermore, given the volume of permits across the province, there will be little rationalization achieved in the clerical area of the permitting process.

Transitional Financial Burden Transitioning to this new model will incur exponentially rising costs, from aligning disparate IT systems to managing complex HR developments. Local municipalities already shoulder the lion's share of CA costs through regular and special levies; the local tax base cannot support these large transitional expenditures. Additionally, the learning curve for staff accepting new responsibilities will likely reduce efficiencies during the critical transition period.

2. Possible Solutions and Alternatives

We propose the following alternatives to achieve the Province's goals of efficiency and red tape reduction without the risks of full amalgamation:

- **Standardization over Consolidation:** Efficiencies can be achieved by introducing uniformity in regulations and processes among CAs across the province. Extending "cloud permit" systems to those CAs not currently using them would allow builders to respond more quickly and benefit housing goals.
- **Targeted Consolidation (Source Water):** We agree that Source Water Protection is often multi-jurisdictional and broader-based than a single CA. Consolidation in this specific area makes sense.
- **Centralized Mobile Teams:** For ongoing projects like Flood Plain Mapping, a core provincial team could move from CA to CA. This would achieve consistent results, eliminate duplication, and allow individual CAs to focus on permitting. A single-focus provincial effort would also reduce risks and provide better hazard warnings for severe storm activity.
- **Agricultural Realignment:** Examine current CA involvement with agricultural enterprises. Where appropriate, transfer these efforts to provincial agencies

like OMAFRA. This would allow CAs to focus strictly on housing and core mandates.

3. Implementation Recommendations

If the Province proceeds with the proposed consolidation, the following recommendations are vital to protect municipal interests:

1. **Provincial Funding of Transition:** It must be recognized that municipalities are not in a position to fund the large transitional costs of a new system. The Province must fully fund the transition.
2. **Governance Structure:** A meaningful governance structure must be established for smaller municipalities. The Province must clarify how 81 municipalities in the revised Lake Erie RCA can be individually represented without the board becoming unwieldy.
3. **Revisiting Financing Ratios:** With a diminished role in governance for municipal partners in these larger configurations, the Province should revisit the financing ratio. If our voice is reduced, the financial burden on the municipality should be reduced as well.
4. **Transition Plan:** Develop and publish a well-thought-out transitional plan that clearly sets out expectations around staffing, service levels, employee impacts, and cost implications for municipal partners.
5. **OPCA Relationship:** Clearly define the relationship between regional CAs and the OPCA body. The OPCA should address broad operational needs, but effective management of local issues suffers from long-distance decision-making.

We appreciate the opportunity to provide this feedback and urge the Ministry to consider the unique challenges this proposal presents for the Town of Erin.

Sincerely,

Mayor Michael Dehn

Michael Dehn

Mayor, Town of Erin

On behalf of **The Town of Erin Task Force** engaged to provide feedback on the Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities