

December 22, 2025

Hon. Todd J. McCarthy  
Minister of the Environment, Conservation and Parks

Mr. Hassaan Basit  
Chief Conservation Executive

c/o Public Input Coordinator  
MECP Conservation and Source Protection Branch  
300 Water Street, North Tower, 5th Floor  
Peterborough, ON K9J 3C7

**Re: Bill 68 and Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities (ERO #025-1257)**

Dear Minister McCarthy and Mr. Basit:

Forests Canada appreciates the opportunity to provide input on the proposed consolidation of Ontario's Conservation Authorities (CAs) into Regional Conservation Authorities (RCAs) under Bill 68.

From seed to survival to sustainability, Forests Canada is a national charity that has built the infrastructure, partnerships, and delivery capacity needed to conserve, restore, and grow Canada's forests in support of healthy ecosystems, resilient communities, and long-term environmental outcomes. Over the past two decades, Forests Canada (formerly Forests Ontario) has worked in partnership with Conservation Authorities across Ontario to plant more than 25 million trees, primarily on private lands. These efforts have delivered measurable benefits for flood mitigation, erosion control, source water protection, biodiversity, and climate resilience.

Forests Canada acknowledges the Province's goals of modernization, consistent service delivery, enhanced efficiency, and effective regional natural hazard management. At the same time, we emphasize that any consolidation framework must maintain the local expertise, relationships, and operational capacity that have made Conservation Authorities trusted and effective partners in watershed management and ecological restoration.

**Considerations Regarding the Proposed Regional Consolidation**

Forests Canada works with many Conservation Authorities to plant close to one million trees annually in Ontario, leveraging federal and provincial funding, corporate partnerships, foundations, and individual donations. These locally delivered initiatives enhance environmental resilience, support hundreds of jobs

across the restoration supply chain, and bring external investment into local economies, demonstrating the ecological, social, and economic value of strong local conservation programs.

Forests Canada's experience working with nearly all Conservation Authorities across Ontario demonstrates that local and regional expertise is essential for successful program delivery, particularly in engaging landowners and supporting participation in tree planting and stewardship of private lands. Our tree planting initiatives rely on trusted, long-standing relationships with private landowners, communities, and municipalities—relationships that Conservation Authorities have built over many years. Local presence is essential for building trust, particularly in Southern Ontario where most land is privately owned and successful restoration depends on long-standing relationships with landowners. Significant changes or reductions in local capacity could disrupt these relationships, making them difficult to maintain or re-establish across large regional jurisdictions.

### **Scale of Regional Consolidation**

The proposed consolidation from 36 CAs to 7 RCAs represents a significant structural change. While consolidation may offer benefits in sharing expertise and achieving operational efficiencies, the scale of change could negatively affect local capacity and, ultimately, ecological integrity. Consolidation of this scale will lose the local connection which is why CAs were formed in the first place.

Large RCA boundaries across multiple watersheds could increase operational and travel costs, reduce responsiveness to local conditions, and disrupt the consistent delivery of local programs. Many CAs have established local outreach and landowner engagement programs built on trust, familiarity, and strong community presence, all of which could be affected by extensive restructuring and rebranding. Larger jurisdictions also could face challenges in delivering consistent restoration programming across diverse landscapes, maintaining effective landowner engagement, and addressing region-specific ecological and community priorities. Additionally, larger regions may increase the cost of restoration efforts and reduce affordability for landowners in participating in essential programs.

If implemented successfully, a less drastic consolidation may enhance access to technical expertise and equipment in historically underserved regions. For example, merging smaller authorities could expand tree planting and restoration initiatives in areas where programs were previously limited or non-existent. These benefits, however, will only be realized if tree planting and local watershed initiatives continue to be supported under the restructured boundaries.

### **Recommendations:**

- Reconsider the current scale of restructuring and increase the number of proposed RCAs. Use a balanced approach, such as consolidating and potentially merging CAs that share watershed conditions and boundaries, to support regional perspectives while achieving operational efficiencies.

- Ensure that RCAs retain local offices, staff, and operational capacity to continue delivering services and programs within each watershed and support local initiatives and existing partnerships.

### **Stakeholder Engagement and Transition Planning**

The proposed changes will require clear, coordinated, and proactive communication. CAs have built decades of trust with communities, municipalities, and landowners, and any disruption without consistent messaging and careful transition planning risks a decline in participation in conservation and restoration programs.

Early and meaningful engagement with CAs and delivery partners is essential to understand regional impacts, manage change effectively, and ensure continuity of service delivery throughout the transition. Also, maintaining strong local delivery capacity will be particularly important in southern Ontario, where forest restoration depends on trusted relationships, local knowledge, and accessible points of contact for private landowners.

Although tree planting is not a legislated mandate, it is integral to achieving flood mitigation, erosion control, source water protection, and biodiversity objectives – core outcomes of both CAs and the Government of Ontario. Forest restoration strengthens watershed resilience, reduces downstream risks, and supports long-term ecological health, particularly in regions facing development pressures and climate-related impacts. Private land makes up a significant part of southern Ontario, and when considering a landscape level approach to flood reduction and watershed management, these natural areas play an important role in the mosaic of the landscape.

Recommendations:

- Reconsider the timeline and proposed consolidation to allow for sufficient engagement with existing CAs and partners across the landscape. Engage CAs and delivery partners early to support effective transition planning and continuity of programs and services.
- Maintain tree planting and ecological restoration as recognized components of conservation work, either within core mandates or through dedicated funding mechanisms.
- Focus resources, both time and money, on changes that improve services across the landscape.

### **Key Factors to Support a Successful Transition**

Forests Canada believes that a successful transition to any regional model should ensure continuity of local programs and services, including tree planting, private land stewardship, and watershed restoration initiatives. It is essential to retain experienced local staff who have knowledge of watershed conditions and restoration priorities. Equally important is maintaining support for existing partnerships with delivery organizations, municipalities, Indigenous communities, and private landowners, as many of these relationships directly enable on-the-ground projects and local employment. Without clear transition planning, disruptions could result in service gaps, reduced participation, and missed opportunities to restore and enhance Ontario's natural landscapes.

Forests Canada respectfully encourages the Province to ensure that any consolidation framework protects local expertise, maintains strong delivery capacity, and preserves the partnerships that support successful conservation outcomes. We value our long-standing collaborations with CAs and support efforts to strengthen watershed management across Ontario.

With an established and unparalleled restoration infrastructure in Ontario going back decades, we greatly appreciate the opportunity to contribute to this consultation.

Sincerely,

A handwritten signature in black ink, appearing to read 'JK', followed by a long horizontal flourish.

Jessica Kaknevcivius  
CEO  
Forests Canada