

## **Submission to the Environmental Registry of Ontario**

### **ERO Posting: Proposed Regional Consolidation of Conservation Authorities**

**Submitted by: South Nation Conservation (SNC)**

**December 22, 2025**

---

#### **1. Introduction and Overall Position**

South Nation Conservation (SNC) appreciates the opportunity to provide comments on the Province's proposal to restructure Ontario's Conservation Authority system through large-scale regional consolidation overseen by a new provincial agency.

This proposal represents the most significant change to Ontario's environmental management framework in over 80 years. While SNC supports efforts to modernize services, improve efficiency, and strengthen coordination, we are deeply concerned that the current proposal lacks transparency, evidence, and sufficient consideration of local governance, rural representation, watershed science, and municipal accountability.

Consolidation at this scale and speed creates a high risk to service continuity. Organizational capacity would be diverted to managing the consolidation process, rather than supporting provincial priorities, legislated responsibilities, and local programs. The compressed timelines increase the risk of staff attrition in critical public-safety roles and will impose significant financial costs on local ratepayers.

Conservation Authorities were created as locally governed, watershed-based institutions, established by municipalities, funded primarily by municipalities, and accountable to municipalities. Any reform must preserve this foundational model. Structural consolidation that removes local decision-making authority—without a return to meaningful provincial funding—would fundamentally undermine the effectiveness, accountability, and public trust that Conservation Authorities have built over generations.

---

#### **2. Lack of Transparency and Evidence Undermines the Proposal**

SNC has serious concerns regarding the limited transparency accompanying the proposed restructuring.

Municipalities and Indigenous communities received minimal advance notice, and the ERO posting does not clearly reference the legislative amendments contained in Bill 68 (Schedule 3) that would enable consolidation. This limits the ability of municipalities, stakeholders, donors, and the public to fully understand or assess the implications of the proposal.

No cost-benefit analysis, transition plan, or evidence-based justification has been provided. Notably, the Province's Housing Affordability Task Force Report does not identify Conservation Authorities as a barrier to housing or economic development.

SNC consistently delivers strong performance outcomes:

- 98% of regulatory permits are issued within provincial timelines
- 100% of planning reviews are completed within municipal timelines

- 100% of sewage system permits under Part 8 of the Ontario Building Code are issued on time, with an average review period of 9 days

These results demonstrate that Conservation Authorities already support timely, sustainable development and do not support the premise that structural consolidation is required to improve outcomes.

Past provincial changes—such as removing Conservation Authorities’ ability to provide natural heritage and hydrogeological services—have already demonstrated unintended consequences for rural municipalities who needed to hire their own consultants, forcing higher costs, longer timelines, and reduced local knowledge. These outcomes underscore the need for careful, evidence-based reform.

---

### **3. Watershed-Based Management, Local Expertise, and Effective Permitting**

Watershed-based management depends on strong local expertise. Natural hazards, erosion processes, drainage systems, groundwater conditions, and land-use pressures vary significantly across Ontario and require place-based knowledge to manage safely and effectively.

The Ontario Superior Court has affirmed, in the context of municipal permitting under the *Building Code Act*, that decision-makers must understand the character of their community and local conditions. This principle applies equally to Conservation Authority permitting, where decisions directly affect public safety, property protection, and environmental risk.

Eastern Ontario includes highly sensitive conditions such as:

- Leda clay plains and retrogressive landslide zones
- High phosphorous loads and an established Phosphorous Credit Trading Program
- Flood-prone river systems and flat landscapes
- Highly variable groundwater conditions

These realities cannot be effectively managed through distant, centralized decision-making.

SNC is one of the oldest and geographically largest Conservation Authorities in Ontario and has undergone multiple jurisdictional expansions over the past decade—at the request of municipalities—including extensions to the St. Lawrence River and Ottawa River systems. These expansions reflect municipal confidence in the Conservation Authority model and a desire for shared, locally delivered services.

SNC also demonstrates effective shared-service delivery through programs such as the Ontario Building Code Part 8 Sewage System Program, delivered on behalf of 16 municipalities with specialized staff, high-quality service, and no direct cost to municipalities. This model illustrates how shared expertise can improve efficiency without removing local governance.

---

#### **4. Provincial Funding Concerns**

When Conservation Authorities were created, the Province and municipalities were equal partners, each contributing approximately 50% of operating funding. Provincial support has since declined to approximately 3% of current operations.

Municipalities have continued to invest because the work protects people, property, drinking water, and local economies. South Nation Conservation is a partner of choice for its member municipalities.

The Province now proposes to:

- Eliminate Conservation Authorities without municipal consent
- Redirect municipal funding to provincially controlled agencies
- Centralize environmental decision-making without restoring funding

This represents provincial control without provincial investment. Unlike health or education restructurings—where services are provincially funded—environmental management has been consistently downloaded to municipalities. Municipal funding must not be redirected to support new bureaucracies and municipalities should be able to decide the future of their Conservation Authority and jurisdictional boundaries.

Future funding of the new Ontario Provincial Conservation Agency should be clarified to ensure that the Province fully funds this new agency without contributions from local rate payers.

---

#### **5. Local Governance, Municipal Oversight, and Rural Representation**

The proposed consolidation risks marginalizing rural communities within extremely large regions—comparable in size to small European countries.

Representation under regional models would be driven by municipal levy contributions, meaning urban centres could dominate decision-making despite the fact that:

- The majority of the land base is rural.
- Rural municipalities rely most heavily on Conservation Authority services and staff expertise.
- Conservation Authorities function as the primary environmental staff extension for small municipalities.

Current governance models demonstrate a strong balance between urban and rural funding and decision-making, where a single urban centre (Ottawa) already contributes most of the local funding while achieving consensus with rural municipalities. Large regional boards with multiple urban centres and over 40 rural municipalities would make it extremely difficult to maintain equitable rural representation and local accountability.

While consolidation may offer future benefits in service coordination, the proposed size of the regions would be incredibly difficult to manage operationally. It already takes several hours to drive through these areas and consolidation of that size would risk marginalizing rural communities.

Amalgamations or regional consolidations should only occur where supported by member municipalities to ensure continued local decision-making and financial accountability.

---

## 6. Protecting Category 3 Services Supported by Municipalities: Place-Based Stewardship

Many essential Conservation Authority services are municipally supported Category 3 programs, including:

- Agricultural stewardship and drainage support
- Tree planting, forest, and woodlot management
- Cost-share water quality improvement projects on private land
- Environmental education and outreach

These services reflect local priorities and deliver measurable environmental and economic benefits. Structural consolidation risks weakening or eliminating these locally supported programs as they are not uniformly offered in other jurisdictions. Opportunities to protect and strengthen these programs should be considered.

Agricultural stewardship programs depend on trust, local relationships, and deep understanding of soils, drainage systems, and farm operations. Conservation Authorities work closely with drainage superintendents, farmers, and municipalities to deliver coordinated solutions. Agricultural organizations also have close working relationships with SNC where programs are jointly developed, and landowner stewardship projects are implemented through peer-to-peer farm networks.

Replacing these community-based partnerships with centralized administration risks undermining farm viability, environmental protection, and rural resilience.

---

## 7. Bilingual Services and Cultural Identity

SNC is the only bilingual Conservation Authority in Southern Ontario, serving municipalities designated under the *French Language Services Act*. Respecting French-language rights is both a legal obligation and a core cultural value.

Any restructuring must guarantee full bilingual capacity without downloading additional costs or administrative burdens onto municipalities. Larger regional structures risk weakening service quality, responsiveness, and cultural representation.

---

## 8. Donor Lands and Community Stewardship Must Be Respected

SNC manages over 13,000 acres of conservation land, much of it donated by residents and farm families with the expectation of permanent local stewardship.

These lands are subject to:

- Donor intent and charitable trust obligations
- Conservation easements and municipal agreements
- Legal and tax requirements

Transferring these lands to a new agency could undermine donor trust, violate legal obligations, and damage long-standing community partnerships. Conservation lands were built by communities and must remain locally stewarded.

---

## 9. Modernization Can Proceed Without Structural Amalgamation

SNC already demonstrates that consistency, efficiency, and coordinated service delivery can be achieved without dissolving local Conservation Authorities.

Across Eastern Ontario, SNC participates in strong regional partnerships that align policies, share expertise, and deliver services seamlessly across municipal boundaries. The Ottawa Conservation Authority Partners (SNC, RVCA, and MVCA) coordinate land use planning reviews, watershed monitoring, and the joint delivery of stewardship programs such as tree planting and water quality improvement projects. SNC administers City of Ottawa programs on behalf of the conservation partners and coordinates regional initiatives such as the Eastern Ontario Farm Stewardship Collaborative. SNC also maintains shared service delivery models with neighbouring authorities, including with the Raisin Region Conservation Authority for drinking water source protection and community programs.

These collaborations extend to natural hazard management. Along the Lower Ottawa River, the Ottawa CA partners work closely with the Ottawa River Secretariat and affected municipalities to monitor river conditions, share data, and deliver coordinated flood forecasting and communications. This model demonstrates that effective, science-based watershed management already occurs across jurisdictions, without the disruption, cost, and risk associated with structural amalgamation.

SNC supports modernization initiatives that strengthen the system while preserving local governance, including:

- A provincial online permitting portal to improve transparency and customer service
- Updated and evidence-based natural hazard policies
- Shared-service models for technology, information management, and corporate services
- The use of service corporations or regional shared-service hubs to support back-end efficiencies

Shared services or service corporations can deliver many of the outcomes the Province seeks through consolidation, while avoiding its risks. These models:

- Reduce administrative duplication while protecting frontline capacity
- Build technical and corporate capacity for smaller Conservation Authorities
- Are scalable, reversible, and easier to refine over time
- Provide greater organizational stability and reduce the risk of staff attrition
- Preserve the local knowledge, responsiveness, and accountability of existing field staff

In contrast, full amalgamation is irreversible and carries significant transition risk. Once local governance structures, staffing models, and community relationships are dismantled, they cannot easily be rebuilt if unintended consequences arise.

Modernization can — and should — proceed within Ontario's existing watershed-based framework. Structural amalgamation is not required to achieve consistency or improved service delivery and would weaken the municipal relationships and local expertise that underpin effective environmental management.

---

## 10. Conclusion and Recommendations

SNC urges the Province to pause the proposed consolidation and engage in meaningful, evidence-based consultation with municipalities, Conservation Authorities, Indigenous communities, agricultural partners, and other stakeholders.

The challenges facing Ontario — climate change, population growth, development pressure, and increasingly complex natural hazards — require stronger Conservation Authorities, not the dismantling of institutions that communities have relied on for nearly eight decades.

With the passage of Bill 68 and the creation of the Ontario Provincial Conservation Agency (OPCA), it is essential that the Province clearly define the role, scope, governance, and funding of this new body. Any new provincial agency must be:

- Fully funded by the Province, with no cost recovery from municipal levies.
- Designed to support, not override, municipal governance of Conservation Authorities.
- Governed with balanced representation from urban and rural municipalities, agriculture, and Conservation Authorities, with geographic diversity across Ontario.
- Work collaboratively with partners and stakeholders to ensure changes are constructive and achieve desired outcomes.

SNC recommends that the Province:

- Restore meaningful and sustained provincial funding aligned with provincial priorities
- Advance modernization through shared services, service corporations, and centralized tools rather than amalgamation
- Respect municipal authority to establish, modify, or dissolve Conservation Authority boundaries
- Protect adequate rural and agricultural representation in all governance models
- Maintain the principles of Integrated Watershed Management
- Protect bilingual services, donor lands, and Category 3 municipal programs
- Ensure reforms are transparent, evidence-based, and collaborative
- Provide sufficient transition timelines and provincial funding to protect existing service delivery
- Consider a focused role for the OPCA in permit appeals and hearings, rather than operational control
- If consolidation is deemed necessary, pursue targeted, voluntary, and incentivized approaches, supported by provincial funding

Environmental management works best when decisions are made close to the land, the people, and the communities they serve. Conservation Authorities exist because municipalities chose to create, govern, and fund them — and that foundational principle must continue to guide reform.

With the right commitment, collaboration, and provincial investment, this moment can strengthen Ontario's conservation system rather than destabilize it — building on what already works, respecting local governance, and ensuring communities remain protected in the face of growing environmental risk.