

City Hall
100 Queen Street West
East Tower, 4th floor
Toronto, Ontario M5H 2N2

Tel: 416-392-3551
Paul.R.Johnson@toronto.ca
www.toronto.ca

December 19, 2025

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

To: Public Input Coordinator

Thank you for the opportunity to provide feedback on proposed boundaries for the regional consolidation of Ontario's Conservation Authorities (CAs) through the [Environmental Registry of Ontario posting #025-1257](#).

For decades, the City of Toronto has worked closely with the Toronto and Region Conservation Authority (TRCA) which is internationally renowned for its exceptional, highly skilled, outstanding work conserving Toronto's natural areas and protecting the City's people and property from natural hazards. The City of Toronto looks forward to continuing the mutually beneficial relationship with TRCA (or its successor organization).

Toronto recognizes the province's interest in exploring efficiencies across a range of sectors. The following comments reflect Staff's response to the proposals and discussion questions in ERO 025-1257, as well as legislative changes included in Bill 68 *Plan to Protect Ontario Act (Budget Measures)*. City Council's request to the Government of Ontario related to the amalgamation of CAs is included in Appendix 2.

1. Governance

Context: Currently, CAs are governed by boards of directors comprised of municipally elected officials or appointees. This board composition ensures direct accountability to local taxpayers and residents, and responsiveness to local priorities.

Bill 68, *Plan to Protect Ontario Act (Budget Measures)* introduced a new Provincial agency, the Ontario Provincial Conservation Agency (OPCA). The OPCA is intended to uphold the duties, functions and responsibilities under the *Conservation Authorities Act*, provide centralized leadership, efficient governance, strategic direction, and oversight of Ontario's CAs through provincial appointees.

Impact: Staff are concerned that the proposed changes may dilute local decision-making, duplicate decision making between CA Boards and the OPCA, and weaken the established link between local funding and local service delivery. Both the OPCA and newly established regional CA Boards risk creating a disconnect between regional/Provincial decision-making and local/unique geographic and environmental characteristics across distinct watersheds.

In the case of the TRCA where the geographic boundaries are not proposed to shift, a new Provincial oversight agency risks a dilution of local decision making compared to the current TRCA Board/governance model which includes significant City representation.

Recommendation 1: Include a majority municipal representation on the board of the newly established OPCA.

Recommendation 2: Expand the list of considerations for the Lieutenant Governor in Council in appointing members of the board of directors, to include: their knowledge and expertise in watershed management, natural hazard management, water resource systems, natural heritage systems, conservation and land management.

Recommendation 3: Regional CA boards should maintain their municipal appointment process, adjusted to account for expanded jurisdictions.

2. Scope of Work

Context: In addition to its role in watershed management, the TRCA delivers a range of value-added services to the City of Toronto. The TRCA's existing scope of work, policy framework and service level standards should act as guide for new regional CAs as they look to strengthen their capacity, influence and impact.

The ERO posting notes the Province's intention to maintain service continuity in relation to CA's mandatory programs and services (e.g. plan review on natural hazards, flood forecasting, etc). Beyond these mandatory programs and services, the City of Toronto relies on the TRCA to provide a range of fee for service roles that require specialized knowledge and expertise. The TRCA is a reliable partner in delivering watershed plans, capital infrastructure improvements, conservation and restoration projects, along with their flood and hazard control projects and roles.

New regional CAs will expand the geographic scope of neighbouring CAs that currently collaborate with the TRCA to deliver Source Water Protection Plans. The Credit Valley CA and the Central Lake Ontario CA coordinate to deliver the Source Protection Plan under the *Clean Water Act*.

Impact: New initiatives, tools and resources developed by the OPCA and new regional CAs may not meet the same standard levels TRCA has routinely provided to the City of Toronto. Efforts to standardize policies, tools and service delivery must aim to elevate standards for municipalities and ensure no decrease in services in the City of Toronto.

Cross boundary coordination and collaboration amongst neighbouring CAs may become more difficult as geographic scopes are expanded and resources are shared. This could impact the delivery of the Source Protection Plan for the City of Toronto.

Recommendation 4: The Province should work closely with the TRCA to align directions for new regional CAs with TRCA's existing policies (The Living City Policies, Clean Water Act), customer service standards, fees, processes and staffing.

Recommendation 5: Specific provisions for local expertise must be maintained within new regional CAs.

- Each regional CA should maintain the following in each watershed: staff with local expertise, watershed-specific data/monitoring programs and field studies, local offices, land acquisition programs, and adequate resources for implementing any new provincial-standards.
- Regional consolidation risks the reduction or loss of local scientific understanding, creating likely inefficiencies in reviews, permitting and planning exercises as local hazard dynamics vary greatly across diverse watersheds within a given region.
- Planning authorities across the Province may benefit from the services and expertise provided by CAs, including the application of a watershed lens to inform land use planning decisions.

Recommendation 7: Cross jurisdictional coordination amongst new regional CAs must consider the Source Protection Plan in place across the Credit Valley - Toronto and Regional - Central Lake Ontario Source Protection Plan area.

3. Funding

Context: The current CA funding model relies on municipal levies and self-generated revenue with the Province of Ontario contributing approximately 5% or less to operating budgets. Municipal fiscal pressures are significant, and funding allocated to CA projects and work are needed to maintain existing service levels. The funding for the OPCA is not yet known, and the Province has indicated they will explore options for cost recovery from CAs.

Impact: The establishment of the OPCA may increase financial strain on CAs if provincial funding and fees for services are not adequate to sustain operations. The City is not in a position to absorb increased project costs or delays as a result of changes to the funding and governance structures of CAs.

Recommendation 8: Provincial funding must be the sole source for costs associated with the transition to this new framework, including the establishment of regional CAs and the OPCA.

Recommendation 9: This initiative and the operations of the OPCA must remain cost neutral to municipalities following the transition and implementation of a new regional CA framework.

- As the OPCA establishes revenue sources (e.g. fees for services, and cost recovery from CAs), these should be offset by direct savings from existing CA services.

4. Legislative and Regulatory Implications

Context: Municipal bylaws and other regulatory tools referencing “TRCA” will need to be revised or may no longer be feasible in the new proposed arrangement/governance approach. There are historic master agreements between TRCA and the City that will need to be amended.

In 2022, Bill 23, the *More Home Built Faster Act* narrowed the scope for CAs and removed their ability to provide certain technical advisory services related to development applications and environmental assessments as it related to natural heritage impacts. This resulted in the need for the City to recreate and replace the peer review service previously provided by the TRCA at a significant additional financial cost.

Impact: This initiative introduces a level of uncertainty for the City as to what happens to the lands currently managed by the City for the TRCA, and all the agreements currently in place between the two parties.

There is also an opportunity to review the regulations under the *Conservation Authorities Act* to examine opportunities for regional CAs to re-engage in natural heritage review on behalf of planning authorities through a fee for service model.

Recommendation 11: TRCA should maintain its current name to avoid confusion and added expenses associated with this administrative change, as no geographic change is proposed.

Recommendation 12: Any future legislative and regulatory reviews should include a revision to the *Conservation Authorities Act* and O/Reg 596/22 to allow regional CAs to review and comment on applications made under the *Planning Act* and *Environmental Assessment Act* as it relates to impacts on natural heritage and the conservation of land.

- This change would streamline the review of development applications, reintroducing procedural and cost efficiencies by allowing a consistent implementation of natural hazard and natural heritage policies across a watershed.

Thank you for taking the time to consider Staff’s response to the proposals and discussion questions in ERO 025-1257. We look forward to ongoing discussions regarding future legislation and implementing regulations on this issue. Should you have any questions regarding the City’s submission or would like to arrange a meeting with City staff, please contact Corwin Cambray, Director, Strategic Initiatives, Policy & Analysis Section (Corwin.Cambray@toronto.ca).

Regards



Paul Johnson
City Manager

CC: Sarah Harrison, Deputy Minister of Environment, Conservation & Parks
Chloe Stuart, Assistant Deputy Minister, Land & Water Division
Lou Di Gironimo, General Manager, Toronto Water
Jason Thorne, Chief Planner and Executive Director, City Planning
James Nowlan, Executive Director, Environment, Climate and Forestry
Matt Keliher, General Manager, Solid Waste Management Services
Jennifer Graham Harkness, Chief Engineer and Executive Director, Engineering and Construction Services
Ashley Curtis, General Manager, Transportation Services
Terry Ricketts, General Manager, Parks and Recreation
Wendy Walberg, City Solicitor
Jeff Cantos, Senior Manager, Intergovernmental and Agency Relations, City Manager's Office
John MacKenzie, Chief Executive Officer, Toronto and Region Conservation Authority

Appendix 1: Toronto's Relationship with Kettle Creek Conservation Authority

Appendix 2: [IE26.17 – Opposition to the Amalgamation of Conservation Authorities](#)

Appendix 1: Toronto's Relationship with Kettle Creek Conservation Authority

The City owns and operates the Green Lane Landfill in Southwold township and works closely with the Kettle Creek Conservation Authority (KCCA) at this site.

- KCCA, like many other CAs, has a range inputs stakeholders and area-specific conditions that inform their actions and decisions which could be difficult to manage effectively without direct and local oversight. The existence of Green Lane Landfill in this watershed is a prime example of a unique feature.
- Long-term staff at KCCA ensures continuity and historical knowledge is carried into reviews of site information, relevant regulations, and planning for Green Lane Landfill.
- Amalgamation of multiple CAs across the Province would diminish this strong , site-specific knowledge and increase the risk for loss of understanding of how current practices were developed.
- The mutually beneficial relationship that currently exists between Green Lane Landfill and KCCA is at risk with an amalgamation in that the ease of contacting a CA representative with questions, data/report sharing, or information updates will be lost.
- Input from KCCA on the design and monitoring decisions at Green Lane Landfill have been invaluable over the nearly four decades that the landfill has been in existence.
- Recent cuts to Provincial CA budgets have already diminished their resources and programs; further edits to their capabilities puts environmental protections and their work with local stakeholders in further jeopardy.
- Province should consult with local and impacted municipalities to understand the local impact or loss resulting from amalgamation of CAs.
- CA participation provides transparency and public trust. Without their involvement, Green Lane Landfill's environmental decisions will be perceived as less rigorous, which may lead to increased community opposition, escalating Ministry of Environment Conservation and Parks scrutiny, and potentially triggering audits or appeals.

Appendix 2: E26.17 – Opposition to the Amalgamation of Conservation Authorities

Item - 2025.IE26.17

Tracking Status

- [City Council](#) adopted this item on December 16, 17 and 18, 2025 without amendments.
- This item was considered by [Infrastructure and Environment Committee](#) on December 4, 2025 and was adopted with amendments. It will be considered by City Council on December 16, 17 and 18, 2025.

IE26.17 - Opposition to the Amalgamation of Conservation Authorities

Decision Type: ACTION

Status: Adopted

Wards: All

Caution: Preliminary decisions are shown below. Any decisions should not be considered final until the meeting is complete, and the decisions for this meeting have been confirmed.

City Council Decision

City Council on December 16 and 17, 2025, adopted the following:

1. City Council advise the government of Ontario that it strongly opposes the proposed forced amalgamation of Conservation Authorities as outlined in Environmental Registry of Ontario 025-1257.
2. City Council request the City Manager, in consultation with the Executive Director, Energy, Climate and Forestry to prepare an Environmental Registry of Ontario submission to the Province outlining concerns and participate in any future consultations on this or related proposals.
3. City Council request the Government of Ontario to:
 - a. maintain the current watershed-based governance model that ensures local accountability, and Engage in meaningful consultation with municipalities to address any specific provincial concerns regarding efficiency without dismantling local governance and environmental protection;

- b. keep Toronto and Region Conservation Authority's watershed boundaries and governance structure which services over 5 million residents in the Greater Toronto Area intact;
 - c. abandon the proposed costly re-naming of Toronto and Region Conservation Authority to Central Lake Ontario Regional Conservation Authority;
 - d. ensure that all costs of the new Ontario Provincial Conservation Agency and transition to the proposed regional consolidation of Ontario's conservation authorities be entirely borne by the Province;
 - e. properly fund Conservation Authorities instead of creating a new costly Provincial Agency that is enabled to makes decision for and recover costs from Conservation Authorities' which are funded by municipalities such as the City of Toronto; and
 - f. repeal clauses in Bill 68, Schedule 3 which enables the new Provincial Agency to recover costs from conservation authorities in future legislative updates.
4. City Council request the City Clerk to forward this item to the Premier of Ontario, the Minister of the Environment, Conservation and Parks, the Minister of Municipal Affairs and Housing, all Toronto Members of Provincial Parliament, the Association of Municipalities of Ontario, and the Toronto Region Conservation Authority.

Background Information (Committee)

(November 27, 2025) Letter from Councillor Dianne Saxe on Opposition to the Amalgamation of Conservation Authorities

<https://www.toronto.ca/legdocs/mmis/2025/ie/bqrd/backgroundfile-260792.pdf>

Communications (Committee)

(December 3, 2025) E-mail from Karen Yukich (IE.Supp)

(December 4, 2025) E-mail from Nicole Corrado (IE.Supp)