



Office of the Mayor
The Corporation of the Town of Aylmer
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December 19, 2025

Ministry of the Environment, Conservation and Parks

Re: Town of Aylmer Comments ERO 025-1257 Respecting Proposed Boundaries for Regional Consolidation of Ontario's Conservation Authorities

The Town of Aylmer is in agreement with the comments and submissions made to the Ministry by the Catfish Creek Conservation Authority, attached to this letter. In addition the Town would make the following comments upon the proposal:

1. The proposed boundary consolidation can be anticipated to significantly increase costs to local municipalities for the provision of services due to the following.
 - a) The newly created regional authority is likely to result in higher staff salaries than are currently paid by the many small authorities.
 - b) A large organization is unlikely to reduce staffing levels but will create a need for higher levels of professional expertise along with additional layers of management that do not exist at many small authorities.
 - c) Standardization of assets, amenities and equipment in camping and recreation areas is likely to lead to significant capital cost increases that are in excess of what is commonly advanced in small rural conservation authorities.
 - d) Local affordability is unlikely to be a key mandate of a new regional authority given that changes in representation are likely to minimize small communities.

2. Regionalization can be anticipated to hinder local economic investment. The Town of Aylmer enjoys a high level of responsiveness from the Catfish Creek Conservation Authority and the development community enjoys working with a reasonable authority for the issuance of permits. Additional bureaucracy and delays in permit issuance can be anticipated if a regional authority is established.

Respectfully the Town of Aylmer request that the Ministry undertake more due diligence and consultation to assure that the proposed change will not have a negative impact upon municipal levies or upon permit issuance requirements or timelines.

Thank you for your consideration,

Jack Couckuyt
Mayor of the Town of Aylmer
a.g.



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Re: Resolution (Bill 68 and ERO Posting 025-1257)

On October 31, 2025, the Ministry of Environment, Conservation and Parks (MECP) released a media statement titled “Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities,” announcing the Province’s intention to establish a new, board-governed Ontario Provincial Conservation Agency “[Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities | Ontario Newsroom](#)”. This new agency is expected to provide leadership, governance, and strategic oversight to all Conservation Authorities (CAs) across Ontario. The announcement was made without prior consultation with Conservation Authorities—including the Catfish Creek Conservation Authority (CCCA)—or with the watershed experts, municipal partners, and staff who possess decades of local, on-the-ground knowledge. For a watershed the size of Catfish Creek, which relies heavily on close local partnerships, this absence of engagement raises significant concerns about transparency and informed decision-making.

Shortly after this announcement, on November 6, 2025, the government introduced Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2) “[Bill 68, Plan to Protect Ontario Act \(Budget Measures\), 2025 \(No. 2\) - Legislative Assembly of Ontario](#)”. The bill passed First Reading and is expected to move quickly through the Legislature, with enactment anticipated in early December 2025. Schedule 3 of Bill 68 proposes amendments to the Conservation Authorities Act to formally create the Ontario Provincial Conservation Agency, outlining its objects, governance structure, and funding model. For a smaller watershed authority like CCCA, these proposed changes represent substantial structural and operational shifts, the impacts of which have not yet been fully articulated by the Province.

On November 7, 2025, the MECP posted Environmental Registry of Ontario (ERO) posting #025-1257, Proposed boundaries for the regional consolidation of Ontario’s Conservation Authorities, with a public commenting period running to December 22, 2025 “[Proposed boundaries for the regional consolidation of Ontario’s conservation authorities | Environmental Registry of Ontario](#)”. This proposal reduces Ontario’s 36 Conservation Authorities to seven large regional entities. As a watershed-based agency, CCCA’s jurisdiction is defined by ecological and hydrological boundaries rather than municipal borders. The proposed regional map places Catfish Creek into an extremely large regional authority where watershed conditions, community needs, development pressures, and local priorities differ substantially from those of neighbouring watersheds. The geographic scale of this proposed region surpasses what is practical for meaningful representation of Catfish Creek’s specific watershed characteristics.

The consolidation proposal carries potentially significant implications for municipalities, residents, and partner organizations within the Catfish Creek watershed. No evidence-based analysis has been provided by the Province to justify the transition to such large regional entities, nor has a detailed rationale been offered for establishing a separate provincial oversight agency to replace functions historically carried out by a Ministry. The dissolution of 36 Conservation Authorities—including Catfish Creek—and the creation of shared provincial systems for finance, HR, IT, and administration would create substantial costs and added layers of complexity. Instead of streamlining service delivery, this approach may fragment existing networks and delay local decision-making.

The absence of meaningful consultation is especially concerning. If the Province intends to proceed transparently, then all existing Conservation Authorities, including Catfish Creek—should be fully engaged before legislation advances to Second and Third readings. At present, consultation is limited to the boundary-setting ERO posting. This leaves numerous critical questions unanswered. These include the funding model for the proposed Ontario Provincial Conservation Agency; the governance model for the new regional CAs and whether Catfish Creek’s municipalities will have adequate local representation; the feasibility of merging diverse watershed policies into a “one-size-fits-all” framework; and the risks associated with centralizing programs that are currently tailored to local watershed conditions, needs, and funding capacities.

Significant human-resource and organizational concerns also remain unresolved, including how staff redeployment will occur across large geographic distances; how charitable foundations that support individual conservation authorities will be affected; how dissolution may impact foundations’ status under the Income Tax Act; and how locally owned assets—such as conservation areas, infrastructure, and other capital holdings—will be transferred or managed under a regional model. For Catfish Creek, which manages a unique suite of natural areas and infrastructure on behalf of its partner municipalities, these uncertainties pose real operational risks.

Under the proposed regional structure, Catfish Creek would join an amalgamated entity encompassing numerous municipalities—far too many for any one watershed to maintain meaningful influence. This stands in contrast to CCCA’s current governance model, which ensures strong local representation and accountability to its participating municipalities. The proposed system risks creating an unwieldy regional board disconnected from the day-to-day realities of the Catfish Creek watershed, and it may dilute the ability of local municipal councils and residents to shape watershed priorities.

As the Province advances its consolidation plan, Catfish Creek Conservation Authority encourages the government to commit to full and meaningful consultation with municipalities regarding both the funding of the new Agency and the establishment of new regional conservation authorities. CCCA emphasizes the need to preserve a strong local voice accountable to watershed residents; maintain local expertise capable of delivering programming rooted in local conditions; retain accessible local offices;

provide clarity regarding the future of charitable foundations; and transparently disclose the anticipated costs of amalgamation. These measures are essential to safeguarding the long-standing, community-based watershed management model that has served the Catfish Creek region effectively for decades.

Attached to this correspondence is a resolution passed by the CCCA Board of Directors at a meeting held November 27, 2025.

Sincerely,



Morgaine Griffin
Chairperson
Catfish Creek Conservation Authority



Dusty Underhill
General Manager/ Secretary Treasurer
Catfish Creek Conservation Authority

Attached: CCCA Recommendation Resolution

CC: The Honourable Todd McCarthy, Minister of the Environment, Conservation and Parks
Rob Flack, MPP (Elgin, Middlesex, London); Ernie Hardeman MPP (Oxford);
Local Municipal Councils
Chief Todd Cornelius, Oneida Nation
Association of Municipalities of Ontario
Conservation Ontario
Conservation Authorities in Ontario
Local environmental groups and other stakeholders

Moved By: Paul Buchner

Seconded By: Arthur Oslach

WHEREAS the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 (“Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities”), proposing to reduce Ontario’s 36 conservation authorities to 7 regional entities as part of a broader restructuring that would create a new Ontario Provincial Conservation Agency to provide centralized oversight and direction under the *Conservation Authorities Act*; and

WHEREAS under this proposal, the Catfish Creek Conservation Authority (CCCA) would be merged into a new “Lake Erie Regional Conservation Authority” together with the:

- Lower Thames Valley CA
- St. Clair Region CA
- Upper Thames River CA
- Kettle Creek CA
- Essex Region CA
- Long Point Region CA
- Grand River CA

forming a single organization stretching from Windsor, Essex County and Pelee Island, through north of Waterloo region; and

WHEREAS the Board acknowledges and supports the Province’s goals of improved efficiency, consistency and fiscal prudence in conservation delivery, but finds that the proposed “Lake Erie Region” configuration would:

1. Create a geographically vast and administratively complex entity, joining northern, rural and fast-growing southern municipalities throughout the province with little shared watershed connection or economic alignment;
2. Dilute local accountability and municipal partnership, contrary to the principle that decisions are best made closest to the communities they affect;

3. Generate substantial transition costs, including human-resources integration, governance restructuring, IT migration and policy harmonization, that would divert resources from front-line service delivery and delay measurable outcomes, contrary to the Province's own business-planning principles of value for money, cost containment and service continuity; and,
4. Risk greater uncertainty and delay for builders, developers and farmers, as local permitting offices and staff familiar with site conditions are replaced by distant regional structures, making it harder for applicants to obtain timely local advice, resolve issues or expedite housing and infrastructure approvals that support the Province's "Get It Done" agenda; and

WHEREAS the CCCA has already undertaken significant modernization work aligned with provincial objectives, including:

- implementation of a digital permitting and inspection system that has reduced turnaround times;
- improvements in transparency and client communication;
- data and network systems, including security and redundancy
- numerous internal reviews to identify opportunities for cost savings and efficiencies
- conversion of redundant support and non-mandatory positions to front-line mandatory service positions
- demonstrating that meaningful modernization can occur within the current watershed-based governance framework; and

WHEREAS the Board further recognizes that the Catfish Creek Conservation Authority serves Southwestern Ontario communities facing vastly different climatic, hydrological and infrastructure realities, which would be ill-served by a larger overarching administrative structure extending over 300 kilometers to townships north of the Kitchener-Waterloo Guelph area;

THEREFORE BE IT RESOLVED THAT:

The Board of Directors does not support the proposed "Lake Erie Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257; and

The Board instead endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative

that advances the government's priorities of efficiency, red-tape reduction and timely housing delivery; and

The Board requests that the Ministry engage directly with affected municipalities and conservation authorities across Southwestern Ontario most specifically, the municipalities within the Catfish Creek administrative area before finalizing any consolidation boundaries or legislative amendments; and

That this resolution, with a letter from the Chair, be forwarded to the Environmental Registry of Ontario consultations and to:

the Minister of the Environment, Conservation and Parks and his Opposition critics;

- local Members of Provincial Parliament;
- local Municipal Councils
- the Association of Municipalities of Ontario and Conservation Ontario;
- local First Nations
- local environmental groups and other stakeholders, and
- all Conservation Authorities in Ontario

CARRIED

*Mission Statement: "To communicate and deliver resource management services and programs
In order to achieve social and ecological harmony for the watershed"*

