



December 19, 2025

MECP Conservation and Source Protection Branch

Sent via online comments: ERO #25-1257 Proposed boundaries for regional consolidations of Ontario Conservation Authorities

RE: Amalgamation of Conservation Authorities - Bill 68

The Township of Malahide appreciates the Province's efforts to strengthen governance, accountability, and service delivery across Ontario's conservation authorities through Bill 68, *Plan to Protect Ontario Act (Budget Measures), 2025*. We recognize the Government's objective of improving consistency, efficiency, and oversight while ensuring conservation authorities remain focused on core watershed protection, natural hazard management, and source water protection mandates.

At its December 4, 2025, meeting, Malahide Council considered and supported correspondence from both the Catfish Creek Conservation Authority and the Kettle Creek Conservation Authority, which currently serve the Township. The observations below are offered in that context and are intended to support provincial goals while identifying practical considerations from a municipal perspective.

ROLE OF CONSERVATION AUTHORITIES AND LOCAL CONTEXT

Our observation

Conservation authorities play a critical role in protecting watersheds, managing flood and erosion risks, and delivering essential environmental programs that directly affect municipal infrastructure, land use planning, emergency management, and public safety. Their effectiveness has historically been rooted in watershed-based governance and strong local knowledge.

Potential unintended consequence

Consolidating conservation authorities into larger regional entities may dilute watershed-specific expertise and reduce responsiveness to local conditions. For municipalities such as Malahide, characterized by agricultural land use, rural drainage systems, and localized flooding and erosion risks, decisions made farther from the watershed context may be less timely or less tailored to local needs. We unfortunately speak on this note from concrete evidence and a negative experience with the Thames Valley District School Board, ever since regional consolidation in 1998.

Malahide Township's suggestion

If consolidation proceeds, the Province should ensure that watershed-based expertise is preserved within any new governance model and that local operational knowledge remains embedded in decision-

making structures affecting municipal lands and infrastructure. We ought to be guided by the lessons learned (good and bad) in previous consolidations in various ministries over the years (e.g. Bill 104, Fewer School Boards Act, 1997).

GOVERNANCE, ACCOUNTABILITY, AND MUNICIPAL ENGAGEMENT

Our observation

Bill 68 seeks to improve governance consistency and oversight across conservation authorities, an objective shared by municipalities.

Potential unintended consequence

Larger consolidated authorities may reduce transparency and limit municipal access to decision-makers, weakening collaboration and timely issue resolution.

Malahide Township's suggestion

Consolidated governance models should include clearly defined mechanisms for municipal input, escalation of watershed-specific concerns, and continued accountability to participating municipalities.

SERVICE DELIVERY, RESPONSE TIMES, AND RISK MANAGEMENT

Our observation

Municipalities depend on conservation authorities for timely permitting, technical review, and hazard response related to development, infrastructure, and emergency events.

Potential unintended consequence

Expanded service areas may strain staffing capacity, increase response times, and affect public safety, infrastructure protection, and development approval timelines.

Malahide Township's suggestion

Implementation planning should include service-level expectations and resourcing strategies that maintain response times and operational effectiveness before consolidation takes effect.

FINANCIAL AND MUNICIPAL IMPACTS

Our observation

Municipalities fund conservation authorities and rely on predictable levy structures to support annual budgeting and long-term financial planning.

Potential unintended consequence

Amalgamation may introduce transitional costs or levy redistribution that does not reflect watershed-specific risk profiles or service demands, creating financial uncertainty for municipalities.

Malahide Township's suggestion

The Province should provide clear, advance information regarding financial impacts and levy implications, ensuring that costs remain appropriately aligned with watershed-based service delivery.

In closing, the Township of Malahide supports the Province's intent to improve the effectiveness and accountability of Ontario's conservation authority system. We respectfully urge that any restructuring under Bill 68 preserve local expertise, watershed-based decision-making, and municipal responsiveness essential to environmental stewardship and public safety.

We welcome continued dialogue with the Province, conservation authorities, and municipal partners as implementation progresses.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Giguère', with a long, sweeping horizontal stroke extending to the right.

Dominique Giguère
Mayor, Township of Malahide