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VIA ERO: 025-1257

Township of Puslinch  
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December 19, 2025

RE: 9.4.2 Report COR-2025-066 Reporting Out Update

The Council of the Township of Puslinch appreciates the opportunity to comment on ERO Posting 025-1257 regarding the proposed restructuring of Ontario's Conservation Authorities (CAs) into seven regional entities under a new Ontario Provincial Conservation Agency. As a rural municipality that has long relied on watershed-based conservation governance, Puslinch has significant concerns about the implications of this restructuring for local accountability, funding fairness, and service delivery.

Municipalities currently fund a substantial portion of Conservation Authority operations. The proposal shifts governance and oversight to the Province but does not clarify how municipal levies or cost-sharing or the distribution of existing reserves will be determined under the new model. If Conservation Authorities are to operate under provincial direction, it is neither appropriate nor equitable for municipalities, particularly small rural ones with constrained tax bases, to continue bearing major financial responsibility without corresponding authority over priorities or decision-making. Without clarity on the future levy structure, municipalities cannot assess the impact of this proposal or plan responsibly.

Council is also concerned that consolidating 36 CAs into seven large regional bodies will diminish meaningful representation for rural communities. Rural watershed issues differ fundamentally from those in large urban centres, and it is unclear how local needs, land-use conditions, and environmental realities will be reflected within regional governance structures. Municipalities may have limited ability to influence decisions that directly affect natural hazard management, source water protection, or rural land-use issues within their boundaries.



Local Conservation Authorities have built decades of watershed specific expertise, with deep knowledge of hydrology, groundwater systems, natural hazards, and rural land-use patterns. Consolidation risks reducing local staffing, eliminating local offices, and weakening the responsiveness that municipalities rely upon for permitting, enforcement, monitoring, and stewardship programming. Larger regional bodies may struggle to provide timely and context-specific services and may erode local knowledge that is essential to informed decision making.

The Township is further concerned that the proposal weakens direct accountability. Under the current model, municipal representatives sitting on CA boards are accountable to their councils and residents for levy decisions and program priorities. Under a provincially governed structure, that clear accountability link becomes far more distant. The Province has not explained how local input will be incorporated, how local priorities will be weighed, or how rural municipalities will be assured a meaningful voice in decisions that affect their residents and natural systems. Finally, the proposal lacks detail on transition costs, the consolidation of policies and systems, long term service levels, and future financial obligations for municipalities. Before any restructuring proceeds, municipalities require a transparent transition plan that addresses staffing, administrative integration, and impacts on frontline service delivery.

For these reasons, the Township of Puslinch recommends that the Province first clarify the future municipal levy model; guarantee meaningful representation for rural municipalities; protect local watershed expertise and local service delivery capacity; preserve flexibility for watershed specific decision making; and undertake robust consultation with all affected municipalities. The Township also requests that the Province develop and release a detailed transition plan, including financial impacts and timelines, before any structural changes are implemented.

Further, the Township notes that the Grand River Conservation Authority, Conservation Halton, and Hamilton Conservation Authority have each submitted comments on ERO 025-1257 expressing significant concern with the proposed regional consolidation of conservation authorities.

Collectively, the conservation authorities advise that the Province's stated objectives of improved consistency, efficiency, and permitting performance can be achieved without large-scale amalgamation. They recommend alternative approaches including province-wide service standards, centralized digital permitting platform and expanded shared services, while maintaining watershed based, locally governed conservation authorities.



The submissions further caution that the proposed regional model would dilute municipal representation, reduce effectiveness of local watershed knowledge, and create substantial transition costs and operational disruption, potentially diverting resources away from core responsibilities such as flood management, permitting, and stewardship. The conservation authorities also emphasize the importance of meaningful consultation with municipalities and indigenous communities prior to implementing structural changes, and recommend that the Province pause implementation of the proposed boundary changes to allow for collaborative development of modernization measures that strengthen, rather than destabilize, the existing conversation authority system.

The comments submitted by Grand River Conservation Authority, Conservation Halton, and Hamilton Conservation Authority are directly relevant to the Township of Puslinch because the Township relies on watershed-based conversation authority review, permitting, and floodplain management to support land use planning, infrastructure protection, and public safety. The proposed regional consolidation in ERO 025-1257 could reduce local municipal representation and decision making, increase administrative distance between the Township and its conversation authority partners, and create transition related delays that would affect development review, hazard management, and environmental stewardship within Puslinch. The conservation authorities' shared recommendation to pursue modernization, shared services, and consistent provincial standards without amalgamation aligns with the Township's interest in maintaining timely, locally informed planning decisions while achieving efficiency and consistency in provincial oversight. Maintaining effective, locally informed conversation authority engagement is essential to the Township's ability to implement the County of Wellington's Official Plan and to meet its obligations under the Provincial Policy Statement, particularly with respect to natural heritage protection, natural hazards, watershed planning and directing development away from areas of flood risk.

Until such clarity and assurances are provided on all areas of concern, the Council of the Township of Puslinch does not support the restructuring as proposed. Council thanks the Province for considering the perspectives of rural municipalities and would welcome ongoing dialogue to ensure that efficiency gains do not come at the cost of accountability, watershed stewardship, or fairness for local governments.



Sincerely,

Justine Brotherston  
Municipal Clerk