

19 December 2025

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

Re: Proposed boundaries for the regional consolidation of Ontario's conservation authorities (ERO 025-1257)

To the Public Input Coordinator:

Thank you for the opportunity to comment on the proposed consolidation of Ontario's Conservation Authorities. I do so in my capacity as President and Senior Scientist of [Wildlife Conservation Society Canada](https://www.wildlifeconservation.org/), with expertise in wildlife ecology, watershed health, land-use impacts, and the governance of natural systems. My perspective is informed by decades of applied research and policy engagement at the intersection of biodiversity conservation, climate risk, and evidence-based decision-making.

Ontario's proposal to consolidate its Conservation Authorities into a small number of regional entities, as outlined in this Notice, represents a fundamental restructuring of Ontario's watershed-based governance model. The Notice frames this move as a response to inefficiency, inconsistency, and administrative duplication. However, when assessed against the documented performance of Conservation Authorities, the legislative and regulatory tools already available to the province, and their historical purpose, the efficiency rationale does not withstand scrutiny. Instead, the proposal appears to reflect a governance choice to centralize authority over land-use and development decision-making, reducing the influence of locally governed, watershed-based institutions whose role has been to introduce independent, evidence-based risk considerations into land-use and development decisions.

Why Conservation Authorities Were Designed the Way They Were

Conservation Authorities were created in the mid-20th century in response to widespread watershed degradation and the devastating consequences of poorly-planned development, most visibly demonstrated by catastrophic flooding events. The Conservation Authorities Act deliberately embedded decision-making at the watershed scale, recognizing that hydrology, erosion, flood risk, and ecosystem function do not align with municipal or political boundaries.

This design choice reflected an early understanding that piecemeal approvals and siloed governance produce cumulative impacts that only become visible once damage is irreversible. Conservation Authorities were therefore tasked not only with flood control, but with maintaining and restoring the ecological integrity of entire watersheds. That mandate remains acutely relevant today, as climate change combined with piecemeal development and

intensification of agriculture accelerates extreme weather events and biodiversity loss undermines the resilience of natural systems.

Far from being relics of a bygone era, Conservation Authorities represent one of Ontario's few governance models explicitly designed to integrate land-use planning, hazard management, and ecosystem health at a scale that matches how nature actually works.

The Efficiency Argument Is Not Supported by Evidence

The provincial case for consolidation rests on claims of improved efficiency, consistency, and predictability. Yet no publicly available business case demonstrates that amalgamation is necessary to achieve these goals, or that it would outperform targeted modernization within the existing framework.

Performance data from across the Conservation Authority system show that many authorities already deliver timely, consistent permitting and hazard review services, often exceeding provincially prescribed timelines. In some cases, permit turnaround times are measured in days, not weeks. These outcomes are being achieved through locally embedded expertise, established relationships with municipalities and landowners, and intimate knowledge of watershed-specific conditions.

Importantly, the province already possesses extensive legislative and regulatory authority under the *Conservation Authorities Act*, as amended in recent years, to address the very issues cited as justification for consolidation. These amendments explicitly empower the province to prescribe mandatory programs and services, set province-wide performance standards and timelines, issue binding regulations and ministerial directions, and standardize permitting and technical requirements across Conservation Authorities. The Act also enables centralized tools, including province-wide digital permitting systems, shared data and mapping platforms, and coordinated technical guidance. These mechanisms allow the province to achieve consistency, predictability, and modernization within the existing watershed-based governance model, and several have already been implemented or are actively being advanced. In this context, it remains unclear what additional problem structural amalgamation is intended to solve.

Structural Consolidation Introduces Unassessed Costs and Risks

Structural consolidation, by contrast, introduces significant transition costs and operational risks that have not been acknowledged, let alone assessed. Large-scale amalgamation would require the integration of information technology systems, harmonization of human resources and labour agreements, restructuring of governance and decision-making processes, reconciliation of assets and liabilities, and resolution of legal and contractual obligations across multiple organizations. It would also necessitate rebranding and physical changes across extensive geographies, including signage, public-facing materials, digital assets, and wayfinding on conservation lands, all of which represent real and avoidable expenditures.

Each of these elements entails substantial financial cost, implementation time, and disruption to ongoing services. To date, no cost estimates, funding commitments, or transition plans have been made public, nor has it been clarified whether these costs would be borne by the province

or downloaded to municipalities. Claims of efficiency gains in the absence of a transparent cost-benefit analysis do not constitute evidence-based policy. They are assumptions presented as outcomes.

Local Governance Is a Core Strength, Not an Inefficiency

Conservation Authorities operate through long-term partnerships between municipalities and the province, with municipalities providing the majority of operational funding. This funding structure reflects the reality that watershed services are delivered locally and respond to local priorities, risks, and conditions.

Regional consolidation would inevitably (and likely dramatically) dilute municipal influence and local accountability, replacing them with larger, more distant governance structures. As regional boundaries expand, the risk increases that decision-making becomes less responsive to local flood hazards, erosion risks, agriculture needs, and community priorities, particularly in rural areas.

Watershed-based governance works precisely because it is local, place-based, and accountable to the communities most directly affected by land-use decisions. Removing that proximity in the name of efficiency ignores decades of institutional learning about what actually delivers public safety and environmental protection.

What Is Really Being Centralized

If efficiency and consistency can be achieved without amalgamation, it is reasonable to ask why consolidation is being pursued at all by Ontario at this time. The answer becomes clearer when viewed through the lens of land-use and development decision-making.

Over the past several years, provincial policy direction and legislative changes have increasingly treated Conservation Authorities as regulatory obstacles to be managed rather than as public-interest institutions to be strengthened. This shift is evident in repeated efforts to narrow their mandate, impose prescriptive timelines on permitting, reframe their review functions as sources of delay, and prioritize expedited development approvals in areas where flood, erosion, and wetland risks are well established. As a result, Conservation Authorities' evidence-based role in evaluating development proposals in floodplains, wetlands, and other hazard-prone areas has, at times, come into direct conflict with growth pressures and acceleration-focused planning objectives, particularly where expedited approvals are prioritized.

The proposed restructuring described in this Notice coincides with a series of legislative and regulatory changes over the past five years, including amendments to the Conservation Authorities Act beginning in 2020 and, most recently, the publication this week of rules under the *Special Economic Zones Act, 2025*. Together, these measures expand provincial authority to standardize, streamline, or bypass existing planning and environmental review processes in the interest of expedited development.

When independent, evidence-based decision-making becomes inconvenient, restructuring governance can be an effective way to neutralize it. In this context, Conservation Authorities, municipalities, and watershed communities can reasonably be expected to question whether

structural consolidation is being proposed to resolve an operational problem, or to reallocate decision-making authority away from local and watershed-based governance.

The Risks Ontario Is Taking

Weakening watershed-based governance at a time of escalating climate and biodiversity crises is a high-risk strategy. Conservation Authorities were put in place to prevent precisely the kind of cumulative, incremental damage that results from fragmented approvals and short-term decision-making. They are one of the few institutions designed to integrate flood risk, ecosystem health, and land-use planning in a coherent way.

The real policy choice facing Ontario is not whether to modernize Conservation Authorities, but how. Modernization grounded in evidence would focus on strengthening standards, investing in shared tools, supporting under-resourced authorities, and reinforcing the watershed-based model that has protected communities for generations.

Restructuring without evidence does not solve inefficiency. It shifts control. And in doing so, it risks undermining the very safeguards that protect Ontarians from flooding, erosion, and the long-term consequences of degraded natural systems.

For these reasons, I join many others in urging the province to reconsider whether structural consolidation is the appropriate response to the challenges identified in this Notice. Ontario already possesses the legislative tools and institutional capacity needed to strengthen consistency, performance, and modernization across Conservation Authorities without dismantling watershed-based governance. A more constructive path forward would build on this foundation, working collaboratively with Conservation Authorities, municipalities, and watershed communities to enhance effectiveness while preserving the independence and local accountability that have long been central to protecting people, property, and ecosystems across the province.

I would welcome the opportunity for further discussion on these issues.

Yours sincerely,



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