

REPORT

CENTRAL LAKE ONTARIO CONSERVATION AUTHORITY

DATE: December 16, 2025
FILE: ACAF54
S.R.: 5962-25
TO: Chair and Members, CLOCA Board of Directors
FROM: Chris Darling, Chief Administrative Officer
SUBJECT: **Bill 68 Amendments to the Conservation Authorities Act and an ERO notice proposing the consolidation Ontario's 36 conservation authorities into regional conservation authorities.**

APPROVED BY C.A.O. 

Purpose:

The purpose of this report is to provide the Board of Directors with an overview of the changes to the Conservation Authorities Act contained as a result of Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 and a proposal posted on the Environmental Registry of Ontario (ERO 025-1257) to consolidate conservation authorities.

Background:

Bill 68- Schedule 3

On November 6, 2025, the province introduced Bill 68, Plan to Protect Ontario Act (Budget Measures) which includes Schedule 3 amending the Conservation Authorities Act to establish a Provincial Conservation Agency and outline its objects, responsibilities and functions such that the new Agency would now govern conservation authorities, have power to issue directions and collect fees from conservation authorities to cover its expenses. Bill 68 received Royal Assent on November 27, 2025.

The following provides a summary of the changes to the Conservation Authorities Act:

- Establishment of an Ontario Provincial Conservation Agency (OPCA) with the following objects:
 - 1) Oversee the governance of authorities and other aspects of authorities such as their operations, including the programs and services they provide, to further the purposes of the Act.
 - 2) Oversee the transition to a regional watershed-based framework for authorities in Ontario.
 - 3) Promote consistent policies, standards and fees for programs and services provided by authorities.
 - 4) Assess and report on the effectiveness of authorities in furthering the conservation, restoration, development and management of natural resources in watersheds in Ontario, including outcomes related to the implementation of their programs and services.
 - 5) Oversee and evaluate the financial performance of authorities to ensure their long-term operational and capital financial sustainability, including the financial sustainability of their programs and services.
 - 6) Guide and evaluate the strategic planning by authorities to ensure it aligns with provincial objectives.
 - 7) Support the development and implementation of a standardized and centralized system for processing applications for permits issued by authorities.
 - 8) Lead the development and implementation of digital strategies and shared services to support the operations of authorities, including their programs and services.
 - 9) Support strategic investment in programs and services provided by authorities, including leveraging funding available to Ontario and authorities.
 - 10) Advise the Government of Ontario in respect of the programs and services authorities provide under the Act and any matters related to the objects of the Agency.
 - 11) Any other objects prescribed by regulation.

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- The Agency will consist of at least five and not more than 12 Board members appointed by the Lieutenant Governor in Council who shall form the board of directors of the Agency and the agency will be staffed.
- Where the Minister considers it to be in the public interest to do so, the Minister may issue directions to the Agency.
- The Agency may issue directions and/or guidelines to one or more authorities, to address matters such as service standards, information technology, procurement, budgeting, asset management plans and strategic planning.
- The Minister may provide funding to the Agency and Agency may establish and require the payment of fees related to the performance of its duties and the exercise of its powers under this Act.
- For the purpose of recovering the costs and expenses the Agency incurs, the Agency may determine the amounts of the costs and expenses that the authorities collectively owe to the Agency and apportion those amounts to the authorities.

Environmental Registry of Ontario (ERO 025-1257)

On November 7, 2025, the Province posted a proposal on the ERO (ERO 025-1257) seeking feedback on proposed boundaries and criteria for the regional consolidation of Ontario's 36 CAs (see link <https://ero.ontario.ca/notice/025-1257>)

The deadline for comments is Dec 22, 2025. The proposal would consolidate the 36 conservation authorities into 7 regional conservation authorities. The posting includes a map depicting the boundaries of the proposed regional conservation authorities refer to attachment 1 and 2. CLOCA would be consolidated into an Eastern Lake Ontario Regional Conservation Authority which is a consolidation of the following seven conservation authorities: • Central Lake Ontario CA • Kawartha Region CA • Otonabee Region CA • Ganaraska Region CA • Lower Trent Region CA • Crowe Valley CA • Quinte Region CA.

Municipalities that would fall within the proposed Eastern Lake Ontario Regional Conservation Authority include: City of Belleville, City of Kawartha Lakes, City of Oshawa, City of Peterborough, City of Pickering, City of Quinte West, Prince Edward County, Municipality of Brighton, Municipality of Centre Hastings, Municipality of Clarington, Municipality of Hastings Highlands, Municipality of highlands East, • Municipality of Marmora and Lake, Municipality of Port Hope, Municipality of Trent Hills, Municipality of Trent Lakes, Municipality of Tweed, Town of Ajax, Town of Cobourg, Town of Deseronto, Town of Greater Napanee, Town of Whitby, Township of Addington Highlands, Township of Alnwick/Haldimand, Township of Asphodel-Norwood, Township of Brock, Township of Cavan Monagha, Township of Central Frontenac, Township of Cramahe, Township of Douro-Dummer, Township of Faraday, Township of Hamilton, Township of Havelock-Belmont-Methuen, Township of Limerick, Township of Loyalist, Township of Madoc, Township of North Frontenac, Township of North Kawartha, Township of Otonabee-South Monaghan, Township of Scugog, Township of Selwyn, Township of South Frontenac, Township of Stirling-Rawdon, Township of Stone Mills, Township of Tudor and Cashel, Township of Tyendinaga, Township of Uxbridge, and the Township of Wollaston.

The Province used the following criteria for determining the proposed boundaries for regional conservation authorities:

- Maintaining watershed-based jurisdictions – Aligning with natural hydrological boundaries to support effective flood and water management, consistent with drinking water Source Protection Areas and Regions.
- Relationships between conservation authorities and municipalities – Reducing administrative duplication and overlap for municipalities and conservation authorities to simplify accountability and strengthen local partnerships.
- Balancing expertise and capacity across conservation authorities – Enhancing technical skills and resources across conservation authorities to improve service and program delivery.
- Service Continuity – Ensuring uninterrupted delivery of local conservation authority programs – including flood forecasting and warning, permitting, and source water protection – through and after consolidation.

The ERO notice lists the following discussion questions to assist in receiving feedback:

- What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?
- What opportunities or benefits may come from a regional conservation authority framework?
- Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?
- Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?
- How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

Consolidation is not intended to be initiated until after municipal elections in October 2026; existing board members would continue to serve until the expiration of their terms next year.

Analysis and Comments

The Province indicates that the new OPCA and the proposed consolidation is required to modernize conservation authorities and achieve consistent standards and service delivery, increase technical capacity, update data systems and avoid duplication. Conservation Ontario, CLOCA and other conservation authorities have made significant progress on modernization. For example, we deliver timely development approvals achieving 100% compliance with permit timelines, use state-of-the-art modern digital permitting system, have robust hazard mapping, developed current technical guidelines and policies, apply transparent budgeting and governance and deliver watershed management programs and services that respond to the needs of our local community.

The proposed consolidation into seven regional conservation authorities would merge a large geographic area with drastically different watershed characteristics, municipal planning priorities, flood infrastructure profiles, ecological conditions, and development pressures under a single agency. The proposed consolidation raises many concerns including:

- Loss of local autonomy, accountability, engagement and transparency
- Loss of local governance
- Fair and equitable governance representation
- Loss of effective and efficient decision making
- Loss of effective local customer service
- Shift in governance from local based to large regional and provincial based.
- Loss of financial reserves for local priorities
- The need to retain independent corporations to ensure no loss of donated land assets
- Financial cost of consolidation transition
- Complexity of managing seven watersheds with distinct and unique characteristics and needs
- Loss of local technical capacity through dispersal
- Weakening well-functioning systems through administrative complexity and diluted oversight
- Significant operational disruptions, impacting our ability to provide timely decisions

Rationale for Pausing Proposed Consolidation

CLOCA recognizes the importance of modernization and supports efforts to enhance both efficiency and environmental protection across the province. A system that delivers services more consistently, transparently, and predictably will benefit municipalities, developers, and communities alike, particularly as Ontario continues to grow and climate-related risks intensify. The creation of the OPCA aims to provide centralized leadership, efficient governance, and strategic direction for all conservation authorities. OPCA can help ensure faster, more consistent permitting and provide the oversight needed to align conservation authorities with modern standards and best practices.

The objects of the OPCA address the same objects of consolidation such that, if the OPCA is successful in achieving its goals the need for consolidation is either diminished or eliminated. Further, the OPCA can achieve the goals of consolidation without the risk of destabilization and disruption of service that can result in counter productivity. As a result, it is recommended that the proposal for consolidation be paused until the first term of the OPCA has been completed. Following the first term, a needs assessment for consolidation should be revisited.

The proposed consolidation would create a large watershed management unit consisting of different watershed characteristics, municipal planning priorities, and development pressures under a single agency and risks outcomes that are counter productive to the province's objectives. Consideration should be given to alternative consolidation models that could deliver better outcomes such as:

- the consolidation on a smaller more effective scale and size such as consolidation of two neighboring conservation authorities having similar watershed conditions. This would still result in efficiencies and capacity building but would limit service disruptions and maintain local autonomy and relationships.
- consolidation of only those conservation authorities that don't have the capacity to undertake critical natural hazard management programs
- consolidation of one or two conservation authorities as a case study prior to implementing consolidation province wide
- using a voluntary consolidation process like the public health unit consolidation process that involved an expert panel to examine challenges and make recommendations regarding organizational structure, governance and integration

Consideration of consolidation should be paused to allow for meaningful engagement and a cost-benefit analysis of alternative consolidation models.

Consolidation of such a large scale will bring many logistical and administrative challenges disruptions such as:

- harmonizing accounting and financial systems, human resource policies, and health and safety practices and policies
- different IT systems, and integrating them requires careful assessment and planning and often upgrades to IT infrastructure, all of which takes time and financial resources
- transfer of assets that have conditions attached in favour of local conservation authorities

These challenges will result in significant disruptions that will take staff resources away from the delivery of critical of natural hazard and heritage management responsibilities. Consolidation should be paused to ensure that these challenges are addressed prior to consolidation.

Responses to Questions posed in ERO Posting 025-1257

The ERO notice proposing the consolidation contains 5 specific questions relating to the transition into regional conservation authorities, governance considerations, and approaches to ensure strong relationships with municipalities and communities within the new structure. The responses to the questions contained in **Attachment 3** are based on a number of fundamental principles of effective watershed management such as:

- Local municipal representation and local watershed scale decision-making are essential to effective natural hazard management and local accountability
- Local governance, autonomy, accountability and local relationships
- Partnership with local municipal partners, the development community, and landowners with timely, reliable service
- Enhancing the economic, environmental, and community health of the watershed
- Providing meaningful opportunities for people to connect with nature
- Effective and adaptable organizations that meet the demands of a rapidly growing region.

Should the government decide to proceed with consolidation, the ERO responses contained in **Attachment 3** provide recommendations aimed at mitigating the identified risks and concerns.

RECOMMENDATIONS:

WHEREAS the Province of Ontario has posted Environmental Registry of Ontario (ERO) Posting #025-1257 proposing the consolidation of Ontario's 36 Conservation Authorities into 7 Regional Conservation Authorities;

WHEREAS the proposed Eastern Lake Ontario Regional Conservation Authority would consolidate Central Lake Ontario with Kawartha Region, Otonabee Region, Ganaraska Region, Lower Trent Region, Crowe Valley CA, Quinte Region Conservation Authority's, resulting in significant changes to governance, service delivery, financial structures, land management, and municipal oversight;

WHEREAS the proposed consolidation raises substantial concerns and risks related to local decision-making authority, municipal representation, transition funding, asset ownership, service disruption and the protection of local programs;

WHEREAS there is a need for meaningful consultation and engagement with stakeholders to address identified concerns and risks of the proposed consolidation;

WHEREAS the objects of the Ontario Provincial Conservation Agency (OPCA) can accomplish the same goals and objectives of consolidation of conservation authorities without service disruption and interference that will come with consolidation;

WHEREAS there is a need to undertake a full cost-benefit analysis of alternative consolidation models;

THEREFORE, BE IT RESOLVED THAT the CLOCA Board of Directors requests the Province of Ontario to pause any decision to consolidate conservation authorities to allow:

- the OPCA to completed it first 3-year term and a subsequent assessment of the need for consolidation***
- for meaningful engagement needed to address the concerns and risks of the proposed consolidation***
- for the review of alternative consolidation models and processes that would result in better outcomes***

THAT the commentary in Staff Report #5962-25 and Attachment 3 be endorsed and submitted to the Province of Ontario as CLOCA's comments regarding Environmental Registry Posting 025-1257;

THAT the resolution be forwarded to all municipalities within CLOCAs watershed;

Attach. 1 Map of proposed consolidation

2 Map of proposed Eastern Lake Ontario Regional Conservation Authority

3 Response to ERO Notice 025-1257

Attachment 3 Responses to Questions posed in ERO Posting 025-1257

What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?

- Consideration of consolidation should be paused to allow for a measured approach with meaningful engagement. Engagement should include
 - a cost benefit analysis of alternative consolidation models that could have better outcomes such as:
 - the consolidation on a smaller more effective scale and size of two neighboring conservation authorities having similar watershed conditions, such as CLOCA and Ganaraska Region Conservation Authority. This would still result in efficiencies and capacity building but would limit service disruptions and maintain local autonomy and relationships.
 - consolidation of only those conservation authorities that don't have the capacity to undertake critical natural hazard management programs
 - consolidation of one or two conservation authorities as a case study prior to implementing consolidation province wide
 - using a voluntary consolidation process similar to the public health unit consolidation process that involved an expert panel to examine challenges and make recommendations regarding organizational structure, governance and integration.
 - Establishment of regional conservation authority service corporations that could be separate not-for-profit corporations which could provide regional wide corporate service functions such as finance, IT, and HR support.
- Maintain local governance, autonomy, accountability and local relationships by:
 - maintaining existing conservation authority administration offices staff to ensure accessibility, effective customer service and continuity, local science-based decision-making, deep knowledge of local properties, issues and preservation of staff relationships with local municipalities and stakeholders.
 - Retaining the responsibility for planning advice (development planning) and regulation administration, including permit decisions with staff in local administration offices and local boards where local expertise exists, and informed decisions can be made.
 - maintaining local watershed boards that would provide advice and recommendations to regional boards on matters related to budgeting, and the provision of program and services that meet the needs of the local community, including oversight of local development planning and regulation matters
- Province must fund all costs associated with consolidation. The cost of implementing consolidation not be financed by diverting funding away from the implementation of critical watershed management programs and services.
- The OPCA must provide:
 - a transition plan that includes guidance from experts having experience in consolidations.
 - a communication plan that provides information to all stakeholders on the transition process and any changes in governance and responsibilities
- Consideration must be given to protecting watershed reserves and land assets. Protective measures are required to ensure that conservation authority resources and assets are maintained as intended, such as land donations that include an agreement that the property will remain in the ownership of the current named conservation authority. The Conservation

Authorities Act should include a reference that the current entities (i.e. Central Lake Ontario Conservation Authority) are continued under the new name of the consolidated conservation authority.

- The *Conservation Authorities Act* should be amended to remove the provision allowing for the dissolution of conservation authorities. The proposed changes may not be well received by some municipalities and consolidation must not result in a loss of the important watershed management services.
- Restore conservation ability to provide land use planning natural heritage technical advice to municipal partners based on a willing municipality model. This will support faster development approvals.
- Ensure consolidation transition timing aligns with the necessary budgeting consultations between conservation authorities and municipalities.
- The OPCA has the ability to levy funding from conservation authorities. Levying conservation authorities should only occur once financial savings have been realized from the work achieved by the OPCA and the levy amount should not exceed the financial savings. The OPCA should also be accountable to the conservation authority by reporting annually on outcomes of the levy support.

What opportunities or benefits may come from a regional conservation authority framework?

NOTE: The following benefits can be achieved through OCA objects as well.

- Improved capacity of smaller conservation authorities that lack sufficient capacity to effectively carry out mandated programs. However, consolidation risks weakening well-functioning systems through administrative complexity and diluted oversight. Increasing capacity of smaller conservation authorities must not come at the cost of diminishing capacity of other conservation authorities.
- Greater consistency in policies, standards, fees and service delivery levels (OPCA can also address this). However, the object of achieving consistency must recognize the needs for some variability to address the diversity in watershed characteristics.
- Consolidation of IT systems, GIS data bases could result in economies of scale and faster and more informed decision. Implementation of universal permitting content management /GIS platform can modernize service delivery. CLOCA has developed a Conservation Authority Content Management System that is currently being used by a number of conservation authorities and could be further developed and deployed.
- Well-functioning conservation authorities have the technical knowledge and methodologies that can be leveraged across the regional conservation authorities to elevate Integrated Watershed Management programs and services in smaller conservation authority jurisdictions. This could result in more robust/consistent publicly accessible data sets across the province and reduce the development communities' reliance on high-cost consultant generated information. However, increasing capacity of smaller conservation authorities must not come at the cost of diminishing capacity of other well-functioning conservation authorities.
- With a more consistent approach to integrated watershed management being employed across the province, conservation authorities would be best positioned to role out provincially funded conservation programs to implement high-value conservation projects that align with provincial interests (for example, increasing access to the Wetland Conservation Partnership Program and

the Species Conservation Fund). This would reduce the time spent by CAs competing for available funding and instead focusing on generating significant results in faster timelines. Prioritizing CAs for this existing provincial funding would effectively increase RCA operation budgets at no additional cost to the province.

Do you have suggestions for how governance could be structured at the regional conservation authority level, including suggestions around board size, make-up and the municipal representative appointment process?

- Board membership size needs to be small enough to allow for effective deliberation and decision-making. Currently the seven conservation authorities included in the proposed eastern consolidation have a total of 85 Board Members – far too many to effectively govern.
- A tiered governance structure should be implemented. Maintenance of a local boards is needed to ensure local accountability and relationships at a manageable and reasonable scale for efficient and effective representation and administration. The local board could include a higher percentage of non-elected officials than what is currently prescribed in the *CA ACT* and be responsible for providing advice and recommendations to a regional board on matters related to budgeting, and the provision of program and services that meet the needs of the local community, including oversight of local development planning and regulation matters. This tiered system would support greater consistency, centralized leadership, economies of scale, while enabling strong, local governance that facilitates effective and efficient watershed management.
- In such a tiered structure, consideration should be given to a regional board made up of the Chairs from the various local boards (with an appointed alternate). Consideration should be given to the allowance of one or two additional Board Members to ensure representation is commensurate with funding obligations. The regional board would be responsible for budget approval, Corporate Strategic Planning, S. 28 hearings, Corporate Services, CAO staffing decisions, policy and guidance approval, and overall governance authority.
- Maintain local municipal service agreements so that locally funded initiatives—such as land acquisition, land management, trail maintenance, restoration projects, or capital works remain under local control and not be redirected without municipal consent.
- To ensure continuity and retention of institutional knowledge of large consolidation organization, the *Conservation Authorities Act* should be amended to allow for Chairs of a regional board to set for a 2- year term with an option of another additional 2-years.

Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?

- Maintain local boards so that they can provide budgetary advice to a regional board on local watershed management needs.
- Consideration should be given to establishing upper-tier municipalities as participating municipalities under the *Conservation Authorities Act*.

- Maintain current process of transparent draft budget preparation and consultation with participating municipalities including a 5-year budget forecast.
- Requirements for annual report to be circulated to member municipalities

How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders

- Maintain existing conservation authority local boards and administrative offices to ensure community access, community connection, the application of local staff expertise, effective customer service and preservation of existing relations with local communities and stakeholders. Maintaining this form of local administration and accountability will ensure that CAs can remain nimble to address local needs quickly and effectively.
- Maintain conservation authority staff and program and service delivery at current local conservation authority offices. Local staffing resources have expert knowledge needed to make informed decisions and have important relationships with municipal staff, private landowners and local NGOs that must be maintained to ensure efficient and effective service. This approach also ensures that locally collected data is better leveraged at the local level by those most familiar with the local watersheds.
- Require conservation authorities to prepare annual reports outlining accomplishments, measurable outcomes and workplans and to share this documentation to all stakeholders.
- Local staffing resources have developed meaningful relationships with First Nations and Indigenous People in their local geographies. Maintaining local offices and staffing will allow for continued relationship building with First Nations and Indigenous Peoples under a consolidated framework.