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**December 17, 2025**

**Proposed boundaries for the regional consolidation of Ontario’s Conservation Authorities (ERO#025-1257)**

**Ganaraska Region Conservation Authority Submission**

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The Ganaraska Region Conservation Authority (GRCA) has reviewed the Province of Ontario’s proposal to amend the *Conservation Authorities Act* and consolidate Ontario’s 36 Conservation Authorities into seven regional bodies overseen by a new provincial agency (ERO Posting #025-1257). The GRCA does not support consolidation.

This proposal represents the most significant change to Ontario’s environmental management system in 80 years.

Historically, the Province funded up to 50% of Conservation Authority operations; today, provincial support has fallen to less than 2%, leaving municipalities to fund the majority of the operations. GRCA is concerned that the proposed restructuring would shift governance away from the municipalities who created and fund Conservation Authorities, resulting in a significant loss of local decision-making, community accountability, and rural representation.

While GRCA supports provincial goals to improve consistency and modernize digital permitting, these objectives can be achieved without removing local governance or amalgamating watershed agencies into large provincial structures.

**Summary of GRCA’s Position**

The Ganaraska Region Conservation Authority (GRCA) does not support consolidation for the following reasons.

1. Consistent policies, and resources across the existing conservation authority boundaries can be achieved without structural consolidation through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks; or Conservation Ontario.
2. Conservation authorities are locally based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks to lives and property. GRCA has been supported by its seven municipalities, this vision has proven a successful model for nearly 80 years.
3. There has been no cost-benefit analysis prepared by the province demonstrating the fact that if consolidation were to take place, there would be a cost benefit. Furthermore, conservation authorities and municipalities were not consulted about the proposed consolidation.

## **Key Factors for Not Supporting Consolidation**

Several key factors have been identified for not supporting the proposed consolidation.

### **1. The Approach to the Proposed Changes Lacks Transparency – GRCA Supports Timely Approvals for the Development of Resilient Communities**

GRCA is concerned about the limited information provided to support the restructuring proposal. Municipalities and Indigenous communities received minimal advance notice, no cost-benefit analysis or transition plan has been released, and the proposal offers no clarity on how land transfers, municipal service agreements, risk management offices, or emergency response roles would function. As the primary funders of Conservation Authorities, municipalities must be properly consulted and engaged in any proposed changes to the existing system.

The ERO posting also does not reference Bill 68 (Schedule 3) — the legislation enabling consolidation — making it difficult for the public to understand the full scope of changes. The proposed changes were introduced within an omnibus bill without the benefit of a standalone legislative process that would allow for comprehensive public input, stakeholder consultation, or sufficient scrutiny regarding their long-term environmental, financial, and public safety implications.

Despite claims of inefficiency, GRCA issues over 99% of permits within provincial timelines, and provincial reports. It is important to note that the Province's Housing Affordability Task Force Report, does not identify Conservation Authorities as barriers to housing or development.

GRCA plays an essential role in helping municipalities meet their development targets: 100% of planning reviews and development-related screenings are completed within municipal timelines, and GRCA staff work directly with municipal planners, developers, and property owners to resolve issues early, reduce delays, and support local economic growth.

In 2023, the Province removed Conservation Authorities' ability to provide natural heritage reviews and hydrogeological services for municipalities. This change has not worked for rural Ontario, forcing municipalities to hire private consultants at higher cost, with longer timelines, and with less local knowledge — undermining the coordinated, affordable service model that previously supported rural development.

### **2. Rationale for Consolidation has not been Justified**

GRCA has built relationships with municipal partners to address their needs and provide quality service. GRCA currently serves 7 municipalities in whole or in part with a population of 190,470. Under the proposed regional model there are 48

municipalities and a population which is 6.5 times or 1,250,000. With an increase in service area there will be a decrease in efficiency of service delivery.

The Province imposed timelines are being met for development applications. Furthermore, GRCA staff always answer the telephone. Callers get a senior staff person to speak to when inquiring. GRCA staff offer that any applicant may have a meeting with staff via an online platform within one week of any submission to get initial comments. GRCA staff have worked hard to build trust with our community, such that they have a local expert that they can deal with when contacting the Authority about their inquiry or application.

GRCA staff are experts in many fields in addition to planning and permitting. These staff include a GIS department that updates mapping quickly (often within a day or two) and uses cutting-edge technology. GRCA staff have effectively managed the Ganaraska Forest which continues to benefit our watershed as a flood prevention measure as well as being an extremely popular recreational attraction. GRCA staff monitor watershed conditions and provide flood notifications and recommendations. GRCA staff undertake in-house floodplain mapping that is cost-effective for our municipal partners and allows staff to update the watershed models and mapping on a regular basis. The GRCA, in partner with member municipalities offer a diversity of stewardship programs to engage watershed residents in watershed protection and restoration. Furthermore, GRCA has been and continues to be a fiscally responsible organization.

GRCA has a history of effectively and efficiently sharing staff with other Conservation Authorities to ensure required staff resources are available in all program areas.

### **3. Cost Efficiencies have not been Identified**

The Province is establishing the Ontario Provincial Conservation Agency (OPCA). The Province may provide funding for the establishment of the OPCA for the first couple of years however it has not been stated how the OPCA will be funded in future years. It is anticipated the funding will come from municipalities. This results in municipalities contributing to all or a significant share of the OPCA's budget without having any meaningful role in shaping its governance, its priorities, or its strategic direction. The OPCA would require significant resources while local watershed advisory boards would still be needed to guide priorities and provide oversight.

The province has not developed a business case to support the proposed changes. GRCA believes these changes will not improve services and create efficiencies. The cost of consolidation has not been provided, and it has not been established who will pay for these costs. As a local organization, GRCA is responsive to community needs.

Municipalities, landowners, and community partners drive the services and priorities of the organization. If the OPCA is going to provide strategic direction to Conservation Authorities, and Conservation Authorities are consolidated into seven regional Conservation Authorities, then this would mean less municipal input on service priorities.

GRCA is deeply concerned about whether the needs of rural communities and the agricultural sector will be adequately recognized and prioritized in this consolidation, particularly since the lead Conservation Authority is expected to be an urban one in each region.

A core priority for GRCA is reducing the risk of loss of life and community damage caused by flooding and erosion. We are responsible for approving development in or near natural hazard areas, ensuring that new construction and additions are not at risk from flooding or erosion in floodplains or along the Lake Ontario shoreline. GRCA has a proven track record of effectively approving development consistent with applicable legislation and guidelines as well as ensuring that existing development downstream is not further impacted from development activities upstream. The GRCA and our community are particularly aware of flooding impacts as a result of the 1980 storm that affected the Ganaraska River causing considerable damage in Port Hope. GRCA's contributions to hazard management continue to result in significant benefits including safety of residents, a reduction in damage to property and cost-savings to residents, our municipalities and the province thereby ensuring our communities remain safe and resilient from the impacts of natural hazards.

The GRCA permitting process is efficient and consistent— in 2024, the average time to process all types of permits was just 5.7 days. From start to finish, our staff work closely with landowners, emphasizing customer service and helping them identify safe building locations outside hazardous areas. Will the proposed digital permitting platform be able to match our turnaround times and maintain this high level of customer experience? Additionally, what will the costs be for developing and maintaining this platform? The average time for reviewing and issuing permits by all Conservation Authorities is 12.5 business days.

### **ERO Discussion Questions and Answers**

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

Political and staff support from key partners, specifically, municipalities, is key to the ongoing success of conservation authorities in Ontario. GRCA watershed municipalities do not support the proposed regional consolidation for many reasons including loss of local service delivery, expertise and in-house capacity for environmental and technical services provided by conservation authorities. The scale of the regional consolidation may be too large to preserve successful watershed management functions so any new

model must be grounded in the fundamentals of watershed management with an ability to introduce collaboration and flexibility, both in the proposed approach and the timelines for implementation. This will be critical to ensure that the transition does not introduce unnecessary processes, added bureaucracy, or uncertainty.

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

Consistent standards and policies are a potential benefit of regional consolidations. That said, the same consistency can exist if consolidations do not occur. Conservation Ontario can assist in standardizing program delivery and policies for the conservation authorities to follow. Conservation Authorities already pool resources and share technical expertise in a collaborative manner.

**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?**

With regards to the suggested governance model at the regional level, a 12-to-18-member Board of Directors is a manageable size that is effective. Given this number of representatives, it would be very difficult to appoint members and still have the expectation of adequately representing the interests of 48 municipalities. These changes will cause some municipalities to lack representation at the regional conservation authority level. One potential solution to avoid entirely disenfranchising many municipalities is to create a tiered governance structure whereby regional conservation authorities are authorized to establish subregional watershed councils to more effectively represent local watershed issues and interests. These councils could be given the responsibility of appointing representatives to the Regional Conservation Authority Board.

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

Within the regional conservation authority there will be various priorities and budget pressures among the 48 municipalities, which will make budget deliberations very difficult, and the process may seem inequitable to some municipalities. As suggested in the previous point, subregional watershed councils could be created within the proposed regional conservation authority and could continue to follow a modified version of the existing budgeting process. The proposed subregional budgets and apportionments could then be proposed to the regional conservation authority for final approval. The regional conservation authority could have the authority to approve the budgets or amend and approve the budgets. This would allow for the continuation of a familiar budgeting process within a new structure. Another key factor to consider during the transition to consolidation is protecting watershed reserves,

infrastructure, and land assets. Many watershed municipalities and conservation authorities are concerned how locally funded reserves, land assets, and long-term capital programs will be treated within a consolidated structure.

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

For the regional conservation authorities to maintain and strengthen relationships with local communities, existing local offices should be maintained and remain visible within the community. This will also result in watershed-specific expertise remaining locally and accessible to the residents. The implementation of sub-regional watershed councils described above would ensure continued presence of a local voice in priority setting and decision-making. In addition, subregional offices must be maintained to ensure conservation authorities remain responsive to local needs. This includes not only offices, but includes brand identity, infrastructure, programming, and staffing. Attempts should be made to maintain the existing names of local conservation authorities in the naming of subregional watershed councils as they represent a rich legacy of serving their local communities and the names often have indigenous origins (i.e. Ganaraska, Nottawasaga, Otonabee, Quinte, Mississippi, Mattagami, Crowe, etc.).

### **Alternative Amalgamation**

GRCA does not support the proposed regional consolidations and believes the best, most effective and cost efficient option is to remain as the 36 conservation authorities. However, there may be merit in exploring alternative amalgamations.

### **Board of Directors Resolution**

#### **GRCA 50/25**

**MOVED BY:** Joan Stover

**SECONDED BY:** Miriam Mutton

**WHEREAS** the Ganaraska Region Conservation Authority Board of Directors acknowledges and supports the Province's goals of improved efficiency of watershed management, through the implementation of digital applications and permitting system, consistent policies, flood standards, fees, and technology; and

**WHEREAS** consistent policies, and resources across the existing conservation authority boundaries could be achieved without structural consolidation through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks; or Conservation Ontario; and

**WHEREAS** conservation authorities are locally based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks

to lives and property. In the case of GRCA, supported by its 7 municipalities, this vision has proven a successful model for nearly 80 years; and

**WHEREAS** the GRCA, with the guidance and support of our 7 member municipalities, demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. GRCA has successfully leveraged funding to support programs and services that are locally important and are driven by community engagement through GRCA's Conservation Land Strategy and the Watershed Based Resource Management Strategy; and

**WHEREAS** GRCA consistently meets or exceeds provincial service standards, and participates in staff-sharing initiatives with neighbouring conservation authorities that already deliver many of the efficiencies the Province seeks; and

**WHEREAS** plans to regionalize conservation authorities through consolidation would dilute local accountability and municipal partnership and is contrary to the basic principle that decisions are best made closest to the communities they affect. Effective representation by municipal partners remains core to the success of conservation authorities. The GRCA, while not unique among conservation authorities in this respect, is effective in working with our community to support sustainable development, and keeping communities safe; and

**WHEREAS** being front-line means being responsive and accountable to the community by delivering the services that are essential and valued to the best interest of the community. The front line of provincial priorities on housing, the economy, infrastructure, and climate resilience are in the decisions between municipalities working together to address issues around floodplain (and hazard) protection and resilient upland and landscape management. Further, staff and Board are responsive and accountable to the needs of the watershed community, while meeting or exceeding provincial service standards. The staff and Board are reachable through publicly available contact information. Local governance and direction combined with local service provision allows GRCA to continue to be responsive to our community; and

**WHEREAS** consolidation will result in substantial transition costs, not the least of which is time. In all facets, that would divert resources from front-line service delivery and delay desired outcomes. Further, the loss of local watershed knowledge and community relationships will add greater uncertainty, loss of trust, and delay for our watershed residents. This includes the agricultural community, businesses, builders, developers, and our municipal partners that seek timely and effective local advice, which is provided through local pre-consultation; and

**WHEREAS** a proposed regional watershed would create a geographically vast and administratively complex organization when joining the seven conservation authorities as proposed in eastern Lake Ontario. This would be considerably worse if local offices do

not remain available and accountable to its membership, partners and the communities they serve.

**THEREFORE BE IT RESOLVED:**

**THAT** the Ganaraska Region Conservation Authority Board of Directors does not support the proposed “Eastern Lake Ontario Regional Conservation Authority” boundary configuration as outlined in Environmental Registry Notice 025-1257; and

**FURTHER THAT** meaningful modernization can occur within the current watershed-based governance framework; and

**FURTHER THAT** the GRCA Board 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 home construction; and

**FURTHER THAT** the Board asks that the Ministry of the Environment, Conservation and Parks engage directly with affected municipalities and conservation authorities across Eastern Lake Ontario through a working group; and

**FURTHER THAT** the Board of Directors direct staff to make a submission to the Environmental Registry of Ontario consultations asking the Province to pause any consolidation until more consultation can take place ; and

**FURTHER THAT** a letter from the Chair containing this resolution, be forwarded to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics; and
- the Ministry of the Environment, Conservation and Parks (CA Office); and
- Ontario’s Chief Conservation Executive, Hassaan Basit; and
- Local Member of Provincial Parliament David Piccini, Northumberland – Peterborough South and
- All local watershed municipalities, all municipalities in Ontario, and Counties within GRCA ‘s watershed.

**CARRIED UNANIMOUSLY.**

Thank you for the opportunity to review and provide comments on the proposed boundaries for the regional consolidation of Ontario’s conservation authorities (ERO#025-1257).