

Grand River Conservation Authority

Report number: GM-11-25-104

Date: November 28, 2025

To: Membership of the Grand River Conservation Authority

Subject: Environmental Registry Posting 025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Recommendation:

THAT Report Number GM-11-25-104 Environmental Registry Posting 025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities be received as information.

Summary:

On October 31, 2025, Ontario announced its intent to modernize the Conservation Authorities system, including the introduction of Bill 68 to create the Ontario Provincial Conservation Agency (OPCA), a new provincial body intended to strengthen coordination and oversight. Shortly afterward, the Province released a proposal to consolidate Ontario's 36 Conservation Authorities into seven larger regional bodies. Under this proposal, the Grand River Conservation Authority (GRCA) would become part of the Lake Erie Regional Conservation Authority, an area covering approximately 25,000 km² and 81 municipalities. The Environmental Registry posting invites feedback on proposed boundaries, governance structures, transition processes, and approaches to maintaining strong municipal and community relationships throughout the transition.

The GRCA Board recognizes the value in modernizing the current system and supports efforts to enhance consistency, improve permitting, modernize technical standards, and strengthen coordination across Ontario. A more cohesive framework has the potential to address long-standing capacity gaps and provide clearer expectations for municipalities, the development sector, and the public. However, the Board remains concerned that the scale of the proposed regional consolidation may be too large to preserve the strengths that have historically made watershed management successful in Ontario. Effective watershed governance relies on strong connections to local needs, priorities, and knowledge, which in turn guide natural hazard management, shape infrastructure decisions, and strengthen watershed health, stewardship programs, and community partnerships. A region spanning 81 municipalities risks weakening local accountability, distancing decision-making from watershed-specific realities, and diluting the local focus that is foundational to effective watershed management. Moreover, if municipalities are expected to continue funding conservation authority operations, including the new regional structures and potentially the OPCA, municipalities will require a strong governance model that ensures meaningful municipal input, influence, and direction on watershed issues.

The GRCA further notes that consolidation at this scale could impact long-standing watershed investments, including approximately \$1 billion in flood management infrastructure and 50,000 acres of conservation lands that have been managed in alignment with watershed priorities for decades. Maintaining the direct link between funding, local decision-making, and watershed needs is essential to sustaining this work.

The Board believes the Province's modernization goals can still be achieved more effectively through a refined, right-sized regional model aligned with the scale of existing Source Protection

Regions. Such an approach would strengthen province-wide consistency and capacity while preserving meaningful municipal involvement and ensuring that watershed management continues to be guided by the local priorities, expertise, and partnerships that have long supported effective conservation across Ontario.

Report:

On October 31, 2025, the Province of Ontario issued a news release announcing its intent to create a new provincial agency to provide leadership and coordination for Ontario's 36 Conservation Authorities. The stated aim of the agency is to improve consistency, accountability, and efficiency across the conservation authorities system, particularly in the areas of permitting, planning, and watershed management.

On November 6, the Province introduced Bill 68: *Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2)*. Schedule 3 of the Bill proposes amendments to the *Conservation Authorities Act* that would enable the establishment of the Ontario Provincial Conservation Agency (OPCA). Under the proposed framework, the OPCA would oversee the governance framework of the new regional conservation authorities, exercise authority over their operations, and recover costs and expenses through apportionment to those authorities. The agency would also be responsible for assessing, reporting on, and providing direction regarding regional finances, strategic planning, performance standards, and centralized permitting, as well as advising the provincial government on the progress of regional authorities. Governance of the OPCA would rest with a provincially appointed board of 5 to 12 members. Bill 68 has passed First Reading and is currently in its Second Reading, with Royal Assent anticipated in short order.

On November 7, the Ministry of the Environment, Conservation and Parks (MECP) posted a proposal on the Environmental Registry of Ontario (ERO) seeking feedback on proposed boundaries and criteria to consolidate Ontario's 36 Conservation Authorities into seven regional conservation authorities, organized primarily along watershed boundaries. The Grand River Conservation Authority (GRCA) is proposed to be included in the Lake Erie Regional Conservation Authority. This Regional Conservation Authority will consolidate the following conservation authorities: Essex Region, Lower Thames, St. Clair Region, Upper Thames River, Kettle Creek, Catfish Creek, Long Point Region, and the Grand River. The area of this Regional Conservation Authority is approximately 25,000km² and includes 81 municipalities; no upper-tier municipalities are listed. The posting also contains five consultation 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 ERO posting is open for public comment until December 22, 2025.

The Chair and the CAO have attended meetings with provincial staff and the Minister of the Environment, Conservation and Parks (MECP) to discuss the proposed OPCA and the associated ERO posting. The Chair and the CAO also participated in a recent special meeting of the Conservation Ontario Council on Schedule 3 of Bill 68 and the ERO posting to gain a clearer understanding of the perspectives and approaches of other conservation authorities and Conservation Ontario. The Province hosted a webinar for Conservation Authorities to highlight key components of the ERO proposal and answer questions. In addition, the GRCA's Conservation Authorities Act Ad-hoc Committee met to review the proposed legislative amendments and the ERO posting and provided direction to staff in preparing the comments outlined below.

ERO Questions and Responses

1. What do you see as Key Factors to support a successful transition and outcome of the regional conservation authorities consolidation?

A new regional conservation authority must be grounded in the fundamentals that ensure effective watershed management, which include:

- protecting life and reducing property damage from flooding and erosion;
- supporting 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; and,
- continually evolving as an organization to meet the demands of a rapidly growing region

Maintaining this clear, locally informed focus will be essential for the success of any new regional conservation authority. The following suggestions are some considerations to support a successful transition:

- I. Development of a Transition Plan: There needs to be a clear, phased transition plan to help avoid any service disruptions during the transition process. This plan must provide a detailed roadmap that clearly outlines timelines, milestones, and phasing. During this transition phase, the province will need to clearly identify roles and responsibilities during the “in-between” period when multiple similar but distinct organizations are merging. Communication of this plan must also be shared with regional watershed municipalities and other interest holders, such as the development/homebuilders' sectors, the agricultural sector, and other groups that require approvals or receive deliverables from various programs and services. This level of planning is essential because the proposed boundaries represent major watershed restructuring and the merging of multiple complex organizations, which requires coordinated efforts that cannot be rushed. A longer implementation timeline would ensure that these issues are fully considered and addressed. In addition, phasing in the required standards, guidelines, and directives across all conservation authorities before consolidation could provide greater stability. This phased approach would avoid multiple significant changes occurring at the same time, reduce the risk of disruptions to program delivery, and create conditions for a more effective and successful consolidation process.
- II. Retention of Local Knowledge and Staff Expertise: Retaining staff and preserving local watershed knowledge is critical to the success of the new regional conservation authorities. This knowledge is rooted in a deep understanding of historic and current land uses, cultural connections to watersheds, and the community values, needs, and stewardship priorities that shape local decision-making. Effective watershed management depends on integrated expertise in hydrology/hydraulics, natural hazards, ecology, creating connections to the watershed features and planning, as well as familiarity with the unique conditions of each sub-watershed. Conservation authorities depend on strong, established partnerships with a wide range of local groups and interest holders, including municipalities, community and stewardship organizations, private landowners, farmers, and the development industry, to deliver their programs and services effectively and address new or emerging watershed challenges. These partnerships are crucial for navigating complex regulatory frameworks, accessing funding programs, and advancing projects that provide both environmental and economic benefits. Preserving this network, and the staff who hold this knowledge, is vital during consolidation, as experienced personnel carry the institutional memory and trust that communities depend on. Staff retention ensures continuity, protects decades of cultivated relationships, and supports a smooth transition that maintains both service quality and community confidence in the new regional authority.
- III. Comprehensive Communication Strategy: A clear and well-coordinated communication strategy will be essential to support the transition from individual watershed-based

authorities to larger regional conservation authorities. This strategy must provide timely and accessible information on the new regional boundaries, updated points of contact, any changes to permitting or operational processes, and how municipal relationships and responsibilities will function throughout the transition period. Its success will depend on province-wide, consistent messaging that reinforces shared objectives while also incorporating region-specific details and local implementation examples to maintain familiarity and trust. Early outreach to municipalities, Indigenous communities, landowners, agricultural groups, developers, and other key interest holders will help set expectations and reduce uncertainty. A variety of communication tools, such as dedicated transition webpages, FAQs, newsletters, continued access to the province's interactive boundary maps, direct email briefings, and social media updates, can ensure information is accessible and tailored to different audiences. Personalized engagement, including town halls, small-group stakeholder meetings, and one-on-one conversations with municipal representatives, will provide opportunities to address region-specific questions and reinforce local connections. Establishing clear escalation pathways, contact lists, and creating a transition-specific regional service desk will further support clarity. Together, these measures will help create a consistent, transparent, and responsive communication approach that builds confidence and supports a smooth transition to the new regional watershed model.

Another key factor to consider during the transition to amalgamation is protecting watershed reserves, infrastructure, and land assets. Many watershed municipalities and the GRCA are concerned about how their locally funded reserves, land assets, and long-term capital programs will be treated within an amalgamated structure. Strong assurances are needed to ensure that assets built over decades through local investment are not diverted to support unrelated regional priorities.

The GRCA owns approximately \$1 billion in floodplain infrastructure, supported by an efficient maintenance and capital renewal program and healthy reserves intentionally built to support lifecycle and risk-management needs. In addition, the GRCA owns approximately 50,000 acres of land, including conservation areas, ecological lands, water management properties, and other lands, each acquired and managed in accordance with long-standing watershed-specific priorities.

In an amalgamation or consolidation into a larger regional entity, strong protective measures are required to ensure that the GRCA's resources and assets are maintained in ways that continue to support long-standing watershed priorities. Key concerns include the potential redistribution of well-developed GRCA reserves to support capital needs in other watersheds that have not made comparable investments, and the risk that the GRCA's mature and efficient infrastructure maintenance program could be weakened if resources become centralized or redirected. GRCA watershed municipalities have emphasized that the GRCA's 50,000 acres of land must receive the same level of stewardship attention as existing infrastructure and financial reserves, including the protection of passive recreation trails that hold significant local value. Long-standing conservation and land management priorities, along with the community benefits provided by these local trails, must remain stable under any regional model. Protective measures must also ensure that resources for flood protection, capital renewal, and land management remain dedicated to the watershed where they originated, and that high-performing programs are not required to subsidize deferred maintenance in less-resourced areas. Additional concerns relate to the possibility that reduced local decision-making authority could limit the ability of municipalities and the GRCA to safeguard the intent and priorities attached to these important assets. These concerns can be mitigated by establishing clear financial and reserve-protection policies, maintaining watershed-level tracking of revenues and expenditures, creating transparent and equitable capital prioritization frameworks, preserving local advisory roles through watershed-based committees, and ensuring that land,

infrastructure, and reserve management practices respect existing infrastructure needs, stewardship commitments, and long-standing community investments.

A further consideration is the amalgamation of organizations with separate supporting foundations; in such cases, ensuring the integrity of fundraising is critical. Donors often prefer to support initiatives at the watershed or community scale, where the impacts of their contributions are visible and tied to local priorities. A regionalized model risks diluting this connection, potentially affecting donor engagement and revenue. To maintain donor confidence, an amalgamated structure must include mechanisms to preserve watershed-based fundraising and reporting, and publicly acknowledge donors in ways that reflect the specific locations/projects they choose to support rather than treating all contributions as part of a single regional fund.

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

Consolidating conservation authorities into a regional framework can create more consistent permitting practices, technical standards, and service levels across municipalities, reducing the variation that currently exists between the 36 agencies. A unified structure also supports stronger alignment with provincial expectations through shared permitting systems, common GIS platforms, and standardized public portals that modernize service delivery and improve accessibility.

Consolidation can also lead to a more equitable distribution of resources, giving smaller or rural municipalities access to specialized expertise that may have been limited by local budgets or staffing. Larger organizations are generally better positioned to secure federal or provincial funding for broader, high-impact projects.

The administrative framework in place at larger organizations also provides an opportunity for efficiency, as they have subject matter experts who perform dedicated internal service roles. These roles can be leveraged in consolidation to provide dedicated attention to organizational compliance, such as health and safety legislation, and risk management.

The size of each regional unit is a very important consideration. Consolidating too many areas into one very large authority can create new challenges, such as distance from local issues, slower decision-making, and difficulty maintaining community relationships; therefore, finding a balanced approach is essential. A regional model can still support strong local representation and responsiveness when designed thoughtfully. Municipal priorities can be maintained through governance structures that include voices from all participating municipalities, supported by sub-regional offices and advisory committees that keep decision-making connected to local needs. Harmonizing policies and fee structures can be done collaboratively, providing opportunities for municipalities and interest-holder groups to help shape fair and consistent standards for the region. Setting clear service expectations, such as defined response times, local points of contact, and accessible public information, helps to ensure that a larger agency remains responsive and reliable.

Greater consistency across policies, standards, and processes also creates a more stable operating environment for municipalities, developers, and the public. When expectations are predictable (clear permitting requirements, uniform fees, and consistent timelines), people can plan with more confidence. By using its (proposed) authority to create directives that support these elements, the OPCA can further reinforce this predictability and clarity. This stability strengthens customer service because staff use the same tools and guidance across the region, reducing confusion and delays. Ultimately, consistent service delivery helps ensure that watershed communities receive the same level of support regardless of their size or location, provided the regional units are scaled in a way that supports both efficiency and meaningful local engagement.

3. 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?

A successful governance model for the new regional conservation authorities must balance local accountability, fair representation, and operational efficiency. In regions with very large numbers of municipalities, such as the proposed Lake Erie Regional Conservation Authority, which would include at least 81 municipalities, a one-member-per-municipality board is unrealistic and would make strategic decision-making extremely difficult. A streamlined, revised Board of Directors is therefore essential.

A revised Board structure should be small enough to function strategically while still representing the diversity of the watershed. A board of approximately 25–30 members, similar to the Board of Directors for the GRCA, could achieve this balance if seats are allocated proportionally by population and geography and with regard to financial contribution. To avoid concentration of influence, no single municipality should be able to dominate board decisions. The new Board should contain elected officials only. Shorter board terms could be introduced to promote shared leadership, especially in cases where several municipalities are represented through a single grouped seat. At the regional level, the Board would retain independent responsibility for the budget, hearings, staffing decisions, policy approval, and overall governance authority.

To maintain strong local accountability while keeping the main board streamlined, the governance model should incorporate a clear subcommittee and advisory structure. Local Watershed Advisory Committees could be established for each major watershed or sub-basin (e.g., Grand, Thames, St.Clair, etc), composed of municipal councillors and/or citizen appointees. These committees would provide advice for local context on program policy, advise on watershed-level programs and services, and offer input on budget priorities. Additional advisory committees at either regional or watershed scale could be created based on local needs, such as agricultural advisory groups or home-builder liaison committees. Given the presence of approximately seven First Nations within the proposed regional area, an Indigenous Advisory Circle would support meaningful engagement and ensure that Indigenous perspectives are incorporated respectfully and consistently into decision-making.

Under a consolidated Conservation Authority framework, the governance model should:

- Maintain a small, strategic, and efficient board.
- Ensure strong local and watershed-specific input through subcommittees and grouped representation.
- Provide fair, transparent representation across the jurisdiction.
- Protect the voices of rural, agricultural, and small municipalities.
- Ensure that local program priorities (e.g., Wastewater Optimization, Rural Water Quality Programs, etc.) continue to be addressed.
- Deliver consistent, predictable, and accountable decision-making across the jurisdiction.

This structure supports efficiency and coordination while preserving meaningful local input. It helps ensure that the new conservation authority can operate effectively at a larger scale without compromising its responsiveness to the communities it serves.

The relationship between the Regional Conservation Authority Board and the OPCA is not clearly defined in the proposed model, and this lack of clarity may have significant implications for governance effectiveness. If the OPCA operates as a highly centralized umbrella board with substantial authority over regional conservation authorities, the independence and responsibility traditionally held by regional boards could be greatly reduced. A diminished governance role would make it far less likely that qualified individuals (both municipal representatives and, if permitted, citizen appointees) would be willing to serve on regional boards, as the scope for meaningful decision-making and local accountability would be substantially constrained. Clear

articulation of roles and authorities will be essential to avoid undermining board capacity, local engagement, and accountability.

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

A transparent and consultative budgeting process for a larger regional conservation authority requires a clear, consistent, and accessible approach that supports all participating municipalities, regardless of size or capacity. Establishing a standardized multi-year budget framework can improve predictability and help municipalities plan their own budgets effectively.

A transparent apportionment formula based on criteria such as assessment value, population, and portion of watershed area located within municipalities is currently used and could be used moving forward. Where portions of municipalities are in different conservation authority jurisdictions, consideration could be given to geo-referencing property tax assessment roll numbers so that the apportionment calculation is based on current value assessment (CVA) in a watershed rather than the percentage of geographical area applied to the municipality's total CVA.

To maintain meaningful local input within a large region, a Municipal Budget Advisory Committee could be established as a sub-committee of the Regional Board, and could include membership from the local watershed advisory committees, including both rural and urban municipality representation. Additionally, sub-regional or watershed-based consultation meetings could be held to ensure that local priorities and capital needs are considered in budgeting decisions. Budget documents should be publicly available, written in clear language, and shared/consulted on early enough to align with municipal budget cycles. Offering multiple engagement opportunities, for example, presenting at councils when requested, providing virtual workshop sessions, soliciting written feedback, and conducting one-on-one briefings, ensures that any municipality, regardless of size and location, can participate fairly in the process. Finally, reporting back on municipal input, producing accessible annual financial reports, and clearly and consistently distinguishing between Category 1, 2, and 3 program and service costs, revenues, and grant funding all reinforce transparency and accountability.

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

Regional conservation authorities can maintain and strengthen relationships with local communities and interest-holders by staying deeply connected at the local municipal level, even as they operate on a broader scale. The size of each regional authority is critical: if the conservation authority becomes too large, municipalities risk being under-represented, and their specialized watershed needs, such as agricultural programs/issues, drinking water management, localized flooding concerns, or unique outdoor experiences and priorities, can become diluted within a large administrative structure. Municipalities want assurance that scaling up will not cause their distinct issues to be overshadowed by larger population centres or to become a lesser priority due to the increased diversity of issues and competing interests that will inevitably exist within a much larger jurisdiction. A balanced, right-sized regional framework preserves this visibility and ensures that local concerns remain central to decision-making.

Maintaining watershed offices, expertise in local issues and knowledge, ability to maintain on the ground presence, and consistent points of contact ensures that residents, businesses, farmers, and municipalities can easily access staff who understand their watershed's specific conditions and community priorities. With the proposed size of regional conservation authorities, establishing local watershed-specific advisory committees ensures that decisions are grounded in local knowledge and that specialized concerns are effectively addressed.

Finally, ensuring service delivery remains responsive, through timely permitting, accessible staff, and clear pathways for raising concerns, helps communities feel heard and supported during and after the transition to a regional model. A thoughtfully sized regional authority can achieve the benefits of consolidation while still preserving the visibility, voice, and specialized needs of every watershed and municipality.

Additional Comments

The GRCA is providing additional comments on the proposed OPCA and offering an alternative regional consolidation model that we believe will effectively address the Province's concerns while preserving strong local engagement and watershed-focused decision-making.

Modernizing Conservation Authorities While Preserving Local Responsiveness

The Board recognizes and respects the Province's concerns regarding the current state of Conservation Authorities. Over time, the conservation authority system has become fragmented, with varying levels of capacity, outdated processes, and inconsistencies in service delivery. Individual conservation authorities also face significant disparities in size and resources, with some lacking access to modern tools, technology, and technical expertise needed to deliver certain programs and services effectively, as well as the capacity to support evidence-based decision-making. We acknowledge that these capacity gaps mean some conservation authorities face challenges in sustainably delivering the full range of programs and services expected of them. Modernization is needed, and there is clear value in creating a permitting system that is further streamlined, more transparent and predictable, and better able to support economic growth, reduce delays, and protect watershed communities. Likewise, reducing duplication, adopting consistent standards, and leveraging shared technology and internal services are sensible and necessary steps toward strengthening Ontario's overall watershed management framework. From this perspective, consolidation can help address real issues by improving coordination, enhancing efficiency, and enabling more reliable service delivery across the province.

At the same time, the GRCA Board has significant concerns that the proposed regional model is too large in scale to be effective. While consolidation can help address capacity challenges, overly expansive regions risk weakening the very principles that have made watershed-based management successful. The Grand River watershed is a notable example. Established in 1934, the Grand River Conservation Commission, one of the founding organizations of today's GRCA, has long demonstrated that effective watershed management relies on strong collaboration with municipal partners and on programs designed to meet watershed-specific needs and issues. This locally grounded approach has allowed decisions to be informed by practical, locally based knowledge and supported by strong, responsive relationships with the municipalities and communities most directly affected. For example, the Grand River watershed has a network of flood-management infrastructure, including multipurpose reservoirs, dikes, and flood-control berms. These structures form an integrated system operated and maintained through close collaboration between the GRCA and watershed municipalities. Sustaining this partnership is essential to ensuring the effective operation and upkeep of flood-management infrastructure, as well as protecting lives and reducing property damage caused by flooding and erosion. A regional structure that is too broad may unintentionally distance decision-making from this essential local context. It can also reduce meaningful municipal participation, which is vital to maintaining public trust and effective environmental stewardship across Ontario.

Smaller, regionally focused watershed models, such as the current Source Protection Regions, are a proven regional watershed model and demonstrate how a balanced governance structure can achieve consistency and efficiency without sacrificing local responsiveness. This scale aligns well with having one effective governance board over multiple organizations, science-based watershed boundaries, and support for coordinated planning among municipalities. It also helps maintain decision-making at a scale where local knowledge and community involvement

remain strong and effective, while accounting for the need for grouped CAs to share and manage technical resources. The current number of Source Protection Regions in Ontario is 19. By operating within manageable geographic areas, they ensure that services are tailored to the unique environmental, social, and economic characteristics of each watershed, while still benefiting from shared resources and standardized processes.

In summary, the GRCA Board agrees that modernization is needed and that consolidation, when appropriately scaled, can address real capacity and consistency issues. However, a balanced approach that enhances efficiency without eroding local engagement is essential. A refined model aligned with the scale and logic of existing source water protection regions would better meet provincial objectives while preserving the strengths of Ontario's long-standing watershed-based planning and management system. Consideration could also be given at this stage to whether a Provincial Agency would be required to support and implement this model.

Assessing the OPCA: Benefits, Risks, and the Importance of Local Oversight

The GRCA Board recognizes the Province's intention in establishing the Ontario Provincial Conservation Agency (OPCA) to modernize the conservation authority system in a way that supports timely development and local infrastructure projects, while strengthening the essential role conservation authorities play in managing watersheds and protecting communities from floods and other natural hazards. These goals are both important and necessary. 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 GRCA Board agrees that modernization is needed and supports efforts to enhance both efficiency and environmental protection across the province.

The creation of the OPCA aims to provide centralized leadership, efficient governance, and strategic direction for all conservation authorities. In principle, this offers several clear advantages: a coordinated provincial body can help ensure faster, more consistent permitting and provide the oversight needed to align conservation authorities with modern standards and best practices. By strengthening core watershed management functions and focusing on natural hazard protection, the OPCA has the potential to reinforce the foundational mandate of conservation authorities. This direction is appropriate, as communities across Ontario depend on timely, science-based decisions to address increasing flood risks, aging infrastructure, and complex development pressures.

The OPCA will also lead several key modernization initiatives, including developing a single digital permitting platform, standardizing service delivery through province-wide performance expectations, and supporting updated floodplain mapping to ensure decisions are grounded in the best available data. These initiatives have the potential to significantly improve customer service, reduce delays, and enhance consistency across the province. Likewise, centralized data systems and modern tools can help staff make better, evidence-based decisions. Streamlining processes and reducing duplication are logical steps toward a more efficient and reliable permitting system.

The agency will also oversee the implementation of a regional, watershed-based consolidation of conservation authorities. The GRCA Board understands the rationale for consolidation, addressing disparities in size and capacity, modernizing outdated processes, and ensuring that all conservation authorities can meet provincial expectations. With stronger tools, shared technology, and enhanced technical resources, many of the conservation authorities will indeed be better positioned to deliver high-quality services. Ensuring that updated maps, hydrologic modelling, and modern data platforms are available across Ontario is essential support to help provide consistent natural hazard management.

The GRCA Board is concerned about the proposed governance structure of the OPCA. As currently designed, the agency will report to a provincial ministry and be governed entirely by

provincially appointed board members. At the same time, conservation authorities, and therefore municipalities, will be required to fund all or a portion of the agency's operations through existing levy/apportionment processes. This means that municipalities may ultimately contribute 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. For municipalities that rely heavily on conservation authority guidance for land-use planning, hazard management, infrastructure development, and emergency response, this creates a disconnect between financial responsibility and decision-making influence.

Not only would this be a precedent-setting method for funding a provincial agency, it also establishes a system in which municipalities help fund a provincial agency but have no formal avenue to participate in its oversight, which raises significant concerns about accountability, responsiveness, and the long-term alignment of provincial direction with local needs. The scale of the proposed regional conservation authority consolidation model amplifies these concerns. Larger regional conservation authorities risk limiting opportunities for local input and reducing the nuanced, watershed-specific decision-making that has historically made conservation authorities effective.

The GRCA Board acknowledges the Province's desire for greater consistency, efficiency, and alignment across conservation authorities and supports these goals. This could be achieved under the current model through additional regulations and verifying compliance at all conservation authorities, or it could be achieved through the actions of the new agency. Regardless, modernization efforts must maintain a strong connection to local priorities, local expertise, and municipal perspectives. Achieving the right balance between centralized oversight and meaningful local involvement will be key to ensuring the OPCA strengthens watershed management across Ontario while preserving the collaborative principles that have long underpinned successful conservation work in the province.

Conclusion

In conclusion, the GRCA Board supports the Province's goal of modernizing Ontario's conservation authority system and acknowledges the value of enhancing consistency, efficiency, and technical capacity throughout the province. The Board has emphasized the importance of a thoughtful, well-planned transition, the preservation of local knowledge and municipal relationships, and the need for a governance model that ensures accountability to the municipalities that will both rely on and will continue to fund the new system. While consolidation offers meaningful opportunities, the scale of the proposed regional structure and the governance framework of the OPCA present risks that could weaken local responsiveness and watershed-based decision-making. A more balanced, right-sized regional model, grounded in strong municipal involvement and science-based watershed boundaries, would better achieve the Province's objectives while maintaining the strengths, partnerships, and community trust that have defined conservation authority work in Ontario for decades.

Financial Implications:

Not applicable.

Other Department Considerations:

Not applicable.

Submitted by:

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