



A Healthy Watershed for Everyone

## VIA EMAIL

December 11, 2025

Public Input Coordinator  
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### **Re: Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities (ERO 025-1257)**

Thank you for the opportunity to comment on the proposed boundaries for regionalizing Ontario's conservation authorities. The Hamilton Region Conservation Authority (HCA) has reviewed Environmental Registry Posting 025-1257 and the proposal to consolidate Ontario's 36 conservation authorities into seven regional entities, including the creation of a "Western Lake Ontario Regional Conservation Authority" that would incorporate HCA along with Niagara Peninsula CA, Halton Region CA, and Credit Valley CA.

HCA does not support the proposed regional consolidation and believes it is not required to achieve the Province's stated objectives, which can be fully met within the existing conservation authority framework through strengthened provincial standards, clear expectations, and targeted modernization. The proposal does not recognize what makes conservation authorities unique:

- We are built on local watershed boundaries, not administrative regions.
- Our services rely on local relationships, local knowledge, and locally responsive governance.

Conservation authorities work because they are local, and responsive. Large-scale consolidation would diminish that strength. Additionally:

- Conservation authorities are established on watershed boundaries so frontline programs reflect local conditions.
- The HCA has a track record of positive working relationships with our member municipalities, the development industry, watershed businesses and residents.
- Conservation Ontario working with conservation authorities have already developed standards and guidelines that promote consistency while respecting local watershed needs.

- The Government has already modernized the Conservation Authorities Act to streamline operations, focus on core mandate, and improve permit review performance — including prescribed timelines in legislation related to permit reviews, which the HCA and, conservation authorities more broadly have met.
- The proposed centralized permitting system can be implemented without amalgamation.
- The Province already holds the legislative authority needed to implement the consistency, transparency, and modernization that it seeks.

Amalgamation would create unnecessary bureaucracy, impose transition costs, and fragment established relationships with local municipalities, landowners, and partners. It would also risk undermining specialized local operations such as HCA’s marina or Halton’s ski hill—services that require specialized equipment and trained staff and cannot simply be absorbed and redistributed. HCA’s work is supported by a strong brand, a well-performing Foundation, and a successful annual membership pass program, all of which rely on local trust and identity. For these reasons, the HCA Board has passed a formal motion stating its opposition to the proposed “Western Lake Ontario Regional Conservation Authority”. A copy of the Board motion has been attached to this response. Notwithstanding our strong opposition, we offer comments to the five ERO questions 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?***

HCA does not believe regional consolidation is the appropriate solution to the challenges identified by the Province. The Environmental Registry posting highlights issues such as inconsistent service delivery, outdated or fragmented systems, administrative duplication, and uneven accountability; none of these require amalgamation to resolve, as Ontario already has the legislative tools, regulatory framework, provincial standards, and the Ontario Provincial Conservation Agency to address them within the existing conservation authority structure.

For example:

- Inconsistent service delivery can be addressed through clear provincial standards, directives, and Conservation Ontario guidelines; HCA is already meeting provincial permit timelines and has modernized its planning and permitting processes.
- Outdated and fragmented systems can be resolved by implementing a centralized provincial permitting platform and shared technical systems without merging conservation authorities, as anticipated through the Province’s proposed online permitting portal.
- Administrative duplication can be reduced through shared services, provincial coordination, and standardized directives, again without restructuring.
- Accountability can be strengthened through transparent performance reporting requirements and OPCA oversight.

If the Province proceeds with consolidation regardless, the following factors are essential to

minimize disruption and protect public interest:

- Maintain uninterrupted delivery of core watershed services such as flood forecasting, emergency response, enforcement, and permitting, with explicit safeguards so that transition work does not compromise public safety performance.
- Preserve each conservation authority as a distinct watershed-based operating division so that local knowledge, municipal relationships, and watershed-specific conditions remain central to decision-making.
- Protect trusted local brands, programs, and revenue sources, including HCA's membership pass program and HCA Foundation fundraising, which depend on local identity and community trust.
- Ensure staff retention and continuity of expertise so that institutional knowledge and technical capacity are not lost in a large regional structure.
- Provide early, clear, and ongoing communication with municipalities, Indigenous partners, landowners, and the public, with mechanisms for meaningful local input into any transition plans.

Given the proposed Western Lake Ontario Regional Conservation Authority would encompass multiple conservation authorities, dozens of municipalities, and a large and diverse population along the Greater Toronto–Hamilton–Niagara corridor, the risk of diluted local voice and complex, multi-layered governance is significant. To manage this, the Province would need to:

- Establish right-sized governance and management structures that keep watershed divisions visible and operating.
- Provide a realistic, phased transition timeline.
- Fully fund transition costs, including IT and data integration, HR harmonization, communications, legal work, and asset and liability assessment, so that municipalities are not asked to underwrite restructuring they did not request.

If regionalization is pursued, Source Protection Regions— which already reflect hydrologic realities and long-standing municipal partnerships —offer a more logical, functional, and right-sized regional framework than the proposed Western Lake Ontario configuration. Source Protection boundaries were developed under the *Clean Water Act, 2006* and align with natural hydrological systems and these boundaries directly reflect water management and protection functions already core to conservation authorities and builds on existing partnerships. They also maintain more familiar boundaries for municipalities and the public.

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

HCA does not believe regional consolidation is required to achieve the opportunities described in the ERO posting. The potential benefits often attributed to amalgamation — such as better digital tools, modernized systems, stronger technical capacity, and more consistent standards — can all be achieved through existing provincial authority, recent legislative amendments, and coordinated support through the Ontario Provincial Conservation Agency.

As noted, realizing these opportunities does not require regional consolidation of conservation authorities. They depend instead on:

- Provincial investment in shared technology, hazard mapping, and data systems.
- Clear and consistent provincial standards.
- Leveraging high-performing conservation authorities as models and partners to support others.

Regional consolidation would introduce administrative complexity, substantial transition costs, and loss of local focus, without evidence that it would deliver better outcomes than targeted modernization within the existing framework. The Province's modernization goals can be fully met through strengthened standards, shared tools, and enhanced coordination, not amalgamation.

***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?***

HCA does not support regional consolidation and emphasizes that the proposed Western Lake Ontario configuration will create governance challenges rather than solving them. With the large number of participating municipalities (approaching 30) and watershed communities, it will be extremely difficult to design a board that is both manageable in size and genuinely reflective of local needs.

If the Province proceeds regardless, governance at any regional conservation authority level must protect local voice, municipal accountability, and watershed identity by:

- Consider using existing Source Protection Regions as the basis for any regional boundaries, as these are scientifically grounded, hydrologically coherent, and aligned with municipal networks that already collaborate on drinking water protection.
- Establishing a board that is functional in size (for example, under approximately 20 members) and structured to provide a clear and fair representation across the area
- Ensuring strong, meaningful municipal representation by retaining municipal appointment authority.
- Preserving local authority for municipally funded or donor-funded programs so that decisions tied to local investments remain with the watershed division and its municipal partners.
- Establishing watershed-level advisory committees with clear roles in advising on local priorities and, where appropriate, delegated decision-making for local programs and services.

The governance framework must also clearly define the scope and limits of the Ontario Provincial Conservation Agency's directive powers, including which decisions are reserved for a regional CA board, what direction the OPCA may issue, and how appeals or dispute resolution mechanisms will operate. Without these safeguards, there is a real risk of centralizing authority at the provincial level in ways that diminish municipal accountability,

reduce transparency, and undermine local confidence in watershed management.

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

HCA does not believe consolidation is required to enhance budget transparency or municipal involvement. Transparent, consultative budgeting can be fully achieved today through regulation, standardized reporting, provincial guidelines, and OPCA oversight, all within the existing conservation authority framework.

If a regional model is imposed, a transparent and consultative budgeting process would require:

- Maintaining meaningful local representation directly in the budget process so that each watershed division has clear input and influence, and local priorities drive levy discussions.
- Respecting local special levies/funding and 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 cannot be redirected without municipal consent.
- Using a clear, standardized regional budget framework in which each watershed division develops its own budget in alignment with local municipalities, and these are then consolidated at the regional level for transparency and oversight.
- Ensuring full disclosure and due diligence on assets, liabilities, capital obligations/asset management for all participating conservation authorities before any apportionment or levy model is adopted.

In a regional model, it is important to protect the perspectives of rural, agricultural, and small municipalities within expanded regional boundaries, ensure that local program priorities such as stewardship, monitoring, and rural water quality programs continue to be addressed, and deliver consistent, predictable, and accountable decision-making across the whole jurisdiction.

HCA also notes concerns regarding conservation authority funding (and thereby, municipal funding) of the Ontario Provincial Conservation Agency without corresponding municipal representation or oversight, underscoring the need for strong local input and transparent budgeting at both the regional CA level and the provincial agency level.

Finally, the full costs of transition—including IT and data integration, HR and labour relations, capital rationalization, branding, and legal work—must be funded by the Province, not downloaded to municipalities or supported at the expense of ongoing watershed programs.

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

Strong community relationships do not require amalgamation, and in many cases consolidation would weaken them. The Province's goals around stronger communication and engagement

can be advanced immediately through consistent provincial guidance, modernized standards, and local conservation authority practices.

If a regional model is imposed, maintaining and strengthening relationships with local communities and stakeholders would require:

- Maintaining each watershed as a distinct operating division, with local offices, field staff, and leadership that understand local conditions and remain accessible to residents, municipalities, and local First Nations.
- Preserving existing local brands and community-based fundraising, including HCA's brand, membership pass program, stewardship volunteers, and HCA Foundation, all of which are rooted in local identity and trust and cannot simply be replicated at a regional scale.
- Using Source Protection Areas and existing municipal-watershed partnerships as the foundation for local engagement, recognizing that these boundaries reflect communities that are already working together.
- Providing consistent, accessible points of contact for residents, businesses, and partners so that local clients know who to call and where to go for permitting, stewardship support, and day-to-day service.
- Supporting local fundraising and stewardship initiatives, which depend on visible local projects and recognizable local organizations rather than broad regional concepts.

In addition, any regional framework must safeguard continuity and performance of emergency and hazard services—such as flood and erosion forecasting, warning, and response—so that restructuring does not introduce gaps or delays that could put people and property at risk. Conservation authority-owned lands and greenspaces, including the 11,744 acres entrusted to HCA, are also central to local recreation, health, and quality of life; decisions on their use must remain grounded in local priorities rather than distant regional or provincial considerations.

Additionally, the HCA Board of Directors passed the following motion at the December 4, 2025 Board meeting:

**BD12, 3565**      **MOVED BY: Susan Fielding**  
**SECONDED BY: Elise Copps**

**THAT the Board of Directors approve the Motion regarding Bill 68/ERO**

**WHEREAS** Bill 68 (Schedule 3) proposes the creation of the Ontario Provincial Conservation Agency whose objects include overseeing conservation authorities and the transition to a regional watershed-based framework for conservation authorities in Ontario with municipal cost contribution yet to be defined; and

**WHEREAS** the Ministry of the Environment, Conservation and Parks has posted Environmental Registry Notice No. 025-1257 (“Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities”),

proposing to reduce Ontario's 36 conservation authorities to 7 regional entities as part of a broader restructuring; and

**WHEREAS** under this proposal, the Hamilton Region Conservation Authority (HCA) would be consolidated into a new "Western Lake Ontario Regional Conservation Authority" together with the Niagara Peninsula CA, Halton Region CA and Credit Valley CA, forming a single organization extending along the western Lake Ontario shoreline from Niagara through Halton and Peel, encompassing urban and rural watershed that support the Greater Toronto-Hamilton corridor; and

**WHEREAS** the Province already has the authority to establish overarching legislation, regulations and standards through the Conservation Authorities Act and the Ministry of Environment, Conservation and Parks; and

**WHEREAS** Conservation Authorities in partnership with their member municipalities have for decades tailored programs and services to local watershed and community needs; and

**WHEREAS** HCA's municipalities currently provide 35% of total HCA budget funding, while the province of Ontario provides less than 1%; and

**WHEREAS** the HCA has already undertaken significant modernization work aligned with provincial objectives, including Information Technology / Information Management, and leveraging technology to streamline planning and permit review processes processing 94% of major permits within the provincial time period in 2024; and

**WHEREAS** conservation authorities collectively own and manage thousands of acres of lands - including 11,744 acres within HCA - entrusted to them as a legacy for long-term protection, stewardship and public benefit, with the expectation that such lands would be cared for by locally governed conservation authorities.

**THEREFORE BE IT RESOLVED:**

**THAT** the Board of Directors does not support the proposed "Western Lake Ontario Regional Conservation Authority" boundary configuration outlined in Environmental Registry Notice 025-1257 as the proposal lacks sufficient justification, would significantly diminish local governance, and fails to recognize the effectiveness and efficiencies already achieved within existing watershed-based models; and

**THAT** the Board affirms that large-scale regional consolidation is unnecessary, would introduce substantial transition costs, and would divert resources away from frontline watershed programs. The Board further asserts that restructuring at this scale would erode local decision-making,

weaken municipal accountability, and disrupt long-standing community partnerships that are central to delivering responsive watershed management; and

**THAT** the Board urges the Province to strengthen centralized standards, resources, and communication rather than undertaking broad structural amalgamation and to provide **sustainable, predictable provincial funding** across conservation authorities—particularly where gaps exist—to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years; and

**THAT** the Board requests that the Ministry engage meaningfully and collaboratively with affected municipalities, conservation authorities, and local First Nations before advancing any consolidation, to ensure that any changes reflect both local needs and the practical realities of implementation; and

**THAT** the Board believes that the Province’s proposed new online permitting portal can be implemented within the existing conservation authority framework without requiring structural amalgamation; and

**THAT** this resolution be included as part of the HCA submission to the Environmental Registry of Ontario and forwarded to the City of Hamilton, the Township of Puslinch, and all Conservation Authorities in Ontario.

**CARRIED**

Sincerely,



Brad Clark, Chair  
Hamilton Conservation Authority



Lisa Burnside, CAO  
Hamilton Conservation Authority

Cc:

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