



December 19, 2025

Ministry of the Environment, Conservation and Parks
Conservation and Source Protection Branch
300 Water St, North Tower, 5th Floor
Peterborough ON K9J 3C7

Attn: Public Input Coordinator:

Re: Maitland Valley Conservation Authority Submission to ERO 025-1257 Consultation
(proposed Regional Consolidation of Conservation Authorities)

I am writing in response to the Environmental Registry posting ERO 025-1257: Proposed boundaries for the regional consolidation of Ontario's conservation authorities.

The Maitland Valley Conservation Authority has reviewed the proposal for consolidation. Our response to the proposal is attached to this letter.

We look forward to working with the Ministry of Environment, Conservation and Parks on a revised proposal for modernizing conservation authorities.

We encourage the Ministry to work collaboratively with conservation authorities, municipalities and other stakeholders to identify an approach that will result in healthy and sustainable watersheds for the people of Ontario.

Sincerely,

A handwritten signature in black ink that reads "Ed McGugan".

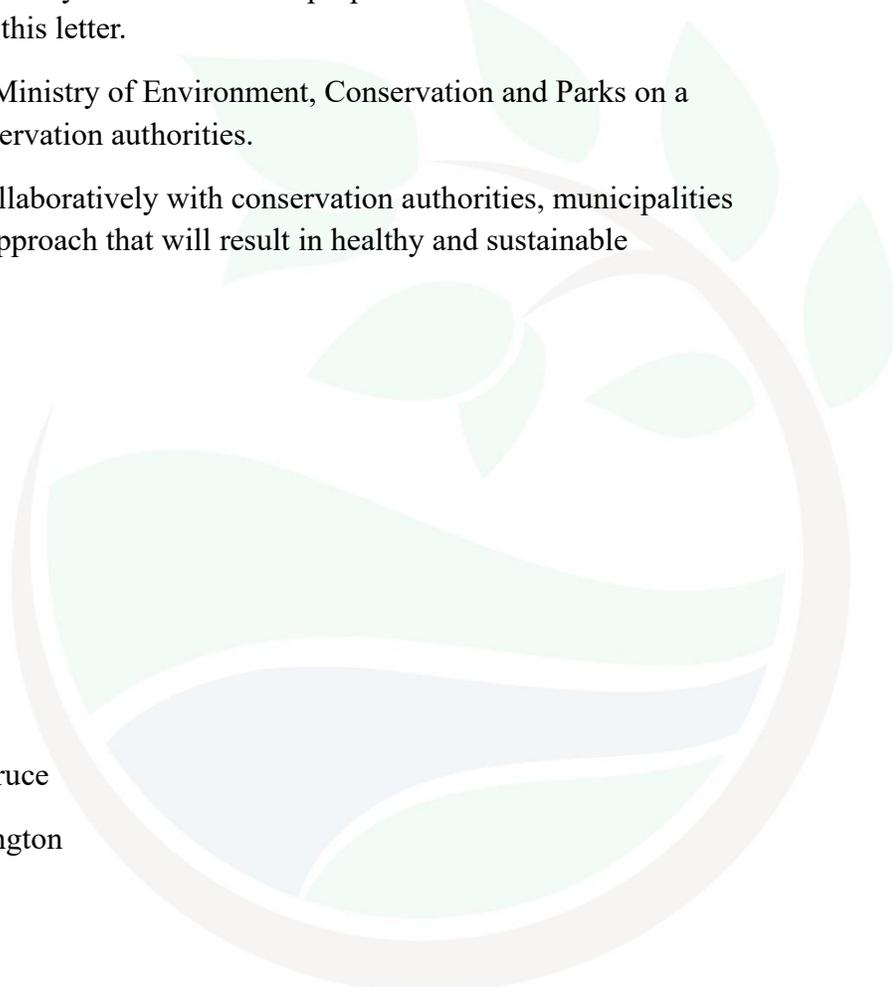
Ed McGugan

Chair

cc: Conservation Ontario

cc: Lisa Thompson, MPP for Huron Bruce

cc: Mathew Rae, MPP for Perth Wellington



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MECP ERO Discussion Questions - MVCA

Response

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

No business case has been developed so there are no details to indicate that there would be **any** advantage to the conservation authorities, or the Province. Experience indicates that amalgamation would:

1. Cost more than the current system to operate.
2. Based on response times from other provincial agencies (MTO, MECP), the customer service response time would likely degenerate from the current days to months.
3. The transition costs are likely to be very high based upon the experience of municipal amalgamations.
4. Adding a whole new agency (Ontario Conservation Agency) looks like adding a whole new, thick layer of red tape.
5. The Ministry of Health requires Health Units to prepare a business case if they are interested in amalgamating. If the business case does not show that there will be an improvement in services and that it will not create efficiencies, then the Ministry will not approve the amalgamation.

Therefore, the key factor for success would be to **not** amalgamate.

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

Business experience indicates that there *might* be some efficiencies gained by reducing redundancies and duplication of administrative roles and tasks. However, large increases in organisation size generally yield a loss in efficiency and effectiveness. Again, the Province will not know if there will be opportunities or benefits until a thorough business case analysis has been undertaken with the Conservation Authorities as active partners in the process.

Therefore, any theoretical benefits are unlikely to be realized in any meaningful manner.

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 municipal representative appointment process?

A basic tenant of taxpayer representation and fiduciary responsibility is that if a municipality is sending tax payer dollars to the Regional Conservation Authority (RCA), then it must have a representative on the Board of the RCA.

Therefore, this is another reason for not proceeding with conservation amalgamation.

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

The budgeting process will naturally become opaque and independent of voters as the Conservation Authorities become much larger.

It is important to remember that municipalities provide the majority of the operational funding for Conservation Authorities, so they need to continue to be directly involved in the budgeting process.

The budgeting process is tied directly to the Programs and Services Agreement that the Province requires Conservation Authorities to enter into with their municipalities. And those municipalities decide which programs they need in their watershed.

Therefore, the taxpayer and voter, would lose the transparency and the consultative aspect of the budgeting process.

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

Those close relationships already exist. Amalgamation would severely weaken them. Especially as there are Members already on the local CA Boards. The calculus is very straightforward. Amalgamation into Regional CAs will weaken and degrade all those relationships.

The collaboration model already in use in the Healthy Lake Huron project (HLH) is much superior to amalgamation. HLH has partners ranging from the Federal and Provincial governments to Counties, Health Units, conservation authorities and community groups. It is already working. At a far lower cost. And at much less risk to the provincial government as everyone is working together and sharing the workload and responsibility.

Therefore, we should strengthen the existing system and improve it by tasking the existing Ministry of Environment Conservation and Parks to co-ordinate regulations, service standards, and funding across the province by working collaboratively with Conservation Authorities to improve the health and safety of watersheds in Ontario.