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December 19, 2025

The Honourable Todd J. McCarthy  
Minister of the Environment, Conservation and Parks  
Ministry of Environment, Conservation and Parks  
5th Floor, 777 Bay St.  
Toronto, ON M7A 2J3

**Re: Comments Regarding Proposed Consolidation of Conservation Authorities and  
Creation of Ontario Provincial Conservation Agency (ERO Posting 025-1257)**

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Dear Minister McCarthy,

At their meeting on November 27, 2025, the Board of Directors of the Rideau Valley Conservation Authority reviewed and discussed the proposed consolidation of Ontario's conservation authorities and the creation of the Ontario Provincial Conservation Agency. Following their discussion, the Board unanimously passed a resolution endorsing RVCA Staff Report 01-251127 and directing the Chair to submit a letter to the province reflecting the comments, concerns and directions outlined in the report.

**General Comments**

The RVCA concurs that the challenges facing Ontario continue to increase in complexity from climate change, population growth and the pace of development, and we welcome changes that are intended to strengthen the capacity, influence and impact of CAs in providing vital watershed management, in safeguarding people and property from flooding, and in being transparent and accountable in the delivery of permitting, programs, and services to Ontario's communities. And while we also agree that with better tools and resources, and central enablement and support, CAs could operate with greater consistency and transparency, and deliver improved services to municipalities and permit applicants, we differ on the most effective way to achieve this outcome.

The RVCA recommends that the province achieve its desired outcomes without amalgamating CAs. Clear provincial directives, consolidation of administrative services and shared staffing can all achieve consistency, modernized systems, better performance and standardized customer service, without the cost, disruption and potential drawbacks of amalgamation. These arrangements can also continue to be refined to ensure constant improvement, whereas amalgamation cannot be undone if unintended consequences arise.

**Proudly working in partnership  
with our 18 watershed municipalities**

Athens, Augusta, Beckwith, Central Frontenac, Clarence-Rockland,  
Drummond/North Elmsley, Elizabethtown-Kitley, Merrickville-Wolford, Montague,  
North Dundas, North Grenville, Ottawa, Perth, Rideau Lakes, Smiths Falls, South Frontenac, Tay Valley, Westport

Below are two tables that summarize areas of concern and comment as well as recommended direction to the province on how to proceed regarding the creation of the Ontario Provincial Conservation Agency (Table 1) and the proposed consolidation of CAs (Table 2).

Table 1: Creation of Ontario Provincial Conservation Agency
<p><b>Funding of Agency</b></p> <ul style="list-style-type: none"> <li>The creation of a new provincial agency would be an added financial cost for the province, and if the Agency recovers costs from CAs as proposed, it will put additional pressure on the municipal levy which local municipalities cannot afford.</li> </ul>
<p><b>Role of Agency</b></p> <ul style="list-style-type: none"> <li>While CA Boards of Directors will retain governance over CAs, the scope and meaningfulness of their role may be diminished by the role and authority of the Agency. CA Boards must retain full governance responsibilities over CAs, including program oversight, budgeting and staffing.</li> <li>The scope of the Agency should be limited to Category 1 programs which are those mandated by the province and include natural hazard and source protection programs. The Agency should not oversee Category 2 programs which are delivered on behalf of municipalities or Category 3 programs which are created by individual Boards to address local watershed issues and needs. The delivery of local programs and services should continue to be led by CAs.</li> </ul>
<p><b>Need for Agency</b></p> <ul style="list-style-type: none"> <li>The province can already direct any aspect of CA operations and programs through the MECP and MNRF using legislation, regulations, technical rules, guidance, policies and other tools.</li> <li>Between 2020 and 2023, the Minister of Environment, Conservation and Parks also convened a multi-stakeholder working group to work collaboratively with MECP and MNRF to develop regulatory amendments that addressed provincial priorities. The working group had representation from municipalities, CAs, Conservation Ontario, agriculture and developers.</li> </ul>
<p><b>Recommended Direction</b></p> <ul style="list-style-type: none"> <li>The province should continue to oversee CAs through the MECP with support from a multi-stakeholder working group to help implement provincial priorities</li> <li>If the province creates a new Agency to oversee conservation authorities             <ul style="list-style-type: none"> <li>It should be fully funded by the province with no cost recovery from CAs</li> <li>It should work collaboratively with municipalities, CAs and other key stakeholders to ensure changes are constructive, achieve desired outcomes and do not erode local municipal governance of CAs</li> <li>It should also ensure its Board of Directors includes municipal and CA/CO representation from urban and rural communities as well as from different geographical areas of the province</li> </ul> </li> </ul>

**Table 2: Regional Consolidation of Conservation Authorities**

**Watershed Services**

- CAs are organized along watershed boundaries and not municipal boundaries to enable them to address natural hazards and resource issues within the drainage basin that is being impacted or causing it. Each watershed is unique in its hydrology, geology, topography and land use, meaning the issues and challenges it faces are also unique. Managing five watersheds together as one region would therefore be complex because the watersheds are distinct in their characteristics and needs.
- Staff also develop specialized knowledge and understanding of their watershed which guides their work whether its flood forecasting and warning, hazard mapping, operating flood control infrastructure, monitoring watershed conditions, or designing restoration and stewardship projects. This critical local knowledge and understanding would need to be preserved if CAs are consolidated to ensure effective program delivery. The consolidation of CAs would also not result in the complete harmonization of programs and services within regions because needs and priorities will continue to vary from one watershed to the next.

**Customer Service**

- CAs are very responsive and accessible to partners, clients and the public providing a high level of personalized customer service. People can call, email or meet with staff and staff are highly visible in the watershed, meeting people onsite, attending events, presenting to groups and councils or interacting with visitors at our conservation areas. Since most staff deliver conservation programs and frontline service, they develop relationships with local partners and a deep understanding of local communities, groups and people. Partners and clients, including municipalities, developers, farmers and lake associations, are also used to having direct access to senior staff, including the General Manager.
- Concerns have been raised that if CAs are consolidated, this level of customer service, access to staff and relationship building would not be feasible or sustainable given the geographic size of the proposed region and the number of clients the regional CA would have to serve

**Municipal Boards**

- The RVCA has 18 member municipalities, all of whom have a seat on its Board of Directors (with Ottawa having 5 seats). The Board functions efficiently and effectively with just eight to nine meetings a year.
- The proposed St. Lawrence Regional Conservation Authority would have 46 municipalities, so not all municipalities would be represented on the new Board. Under the current model, seats are allocated based on population which would favour larger urban centres like Ottawa, Kingston and Cornwall while marginalizing the significant number of smaller rural municipalities in Eastern Ontario. However, despite size or how seats are allocated, each municipality's voice and influence would be diluted within a regional CA
- Regional Boards would also not be as attune and responsive to local watershed issues and community concerns.

## **Finances**

- If consolidation proceeds, it would be important that regional CAs remain independent corporations to ensure that all CA assets remain under CA control and ownership including land holdings, buildings and financial reserves. It is important that the province has stipulated that no CA assets would be transferred to the Agency or province as part of the proposed changes.
- Questions have also been raised about how budgets would be developed within regional CAs as the levy capacity of municipalities varies from watershed to watershed and programs are different between CAs based on the needs and tax base of each local watershed. Larger municipalities may not support levy dollars being spent on programs or capital projects outside the watershed they benefit from or are impacted by. For example, Ottawa pays 91% of RVCA's municipal levy, but it benefits from all programs and services as it is the downstream receiver in the watershed.

## **Cost**

- The province stated that one reason it is proposing consolidation of CAs is to reduce duplicative corporate functions and costs. Many CAs, especially in Eastern Ontario, have very lean corporate services, sometimes relying on the services of member municipalities or neighbouring CAs. This means consolidation may not result in duplication or savings, and a larger organization may even result in higher administrative needs. Most CAs are also very flat organizations with little middle management and working senior managers. This allows the maximum amount of resources to go to frontline service. In a larger organization with numerous office locations, there could be a need for more management or full-time managers who are not also delivering frontline service. Operating a larger regional CA could also result in additional costs as staff would be serving the needs of a larger area and the Board would likely require committees to serve the needs of five watersheds and 46 municipalities.
- CAs already save on procurement costs by acquiring insurance, benefits, GIS software and some training through Conservation Ontario which results in significant savings each year. Eastern CAs also partner on procurement when possible, to save money on data, training, equipment and other services. The RVCA also jointly delivers programs with, or on behalf of, neighbouring CAs to save on staffing resources, including tree planting, rural clean water grants, septic permitting and septic reinspection.

## **Permitting**

- The province stated that another reason it is proposing to consolidate CAs is permitting, indicating that CAs have different policies, customer service standards, fees, processes and staffing and technical capacity leading to unpredictable and inconsistent turnaround times for approvals.
- In 2019, CAs voluntarily adopted permit timelines developed by CO and publicly report on their performance annually. In 2024, the province legislated a permit decision deadline of 90 days, but CAs retained their service standard of 30 days for minor works. Last year the RVCA approved 99% of complete applications and issued 97% of permits within service standard timelines.
- The RVCA, MVCA and SNC have also had a consistent fee schedule for planning and permitting for well over a decade to ensure equity across municipalities. However, consistent fees across the province would result in higher fees outside the GTA as their fees are higher than other regions.
- In 2024, RVCA also updated its development review policies to be more consistent with SNC and MVCA and we have longstanding reciprocal staff sharing arrangements with MVCA and SNC that are used as needed to ensure no interruption in service for development review files and no permit delays.

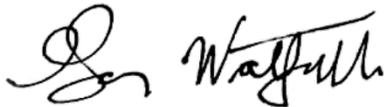
## Recommended Direction

- The challenges the province is trying to address through the regional consolidation of CAs can be achieved with 36 CAs:
  - The province could implement a standardized policy, service standards and centralized system to ensure reliable and consistent permitting across all CAs.
  - The province could require staff sharing amongst CAs where it is needed to balance and enhance technical expertise and capacity, improving service and program delivery and ensuring service continuity.
  - The province could lead or support centralized procurement, training, digital strategies, shared services and strategic investments across CAs to reduce administrative duplication and discrepancies in tools, technology and data management.
- If there are still CAs who cannot achieve provincial standards and desired outcomes, then strategic and targeted consolidation of those CAs could be considered.
- If the province decides to proceed with the regional consolidation of all CAs:
  - A cost-benefit analysis should be completed to ensure it will result in sufficient cost savings and to determine the optimal size and boundaries of regional CAs to maximize benefits while minimizing impacts.
  - Transition funding would be required from the province to ensure the cost of consolidation is not born by member municipalities.
  - One region should be consolidated first where the need is greatest, to ensure the model is successful before it is rolled out province wide.

Thank you for the opportunity to comment and for your consideration of RVCA's remarks, concerns and recommended directions. We also appreciated the opportunity to participate in a Regional Engagement Session and thank you for hosting one in Ottawa. As conservation authorities only exist where local municipalities have chosen to form, govern and fund them, we also ask that any transformative changes to CAs, including consolidation, only be undertaken following extensive consultation with our member municipalities.

Should you require any further information please do not hesitate to contact me at [gwaterfield@perth.ca](mailto:gwaterfield@perth.ca) or 613-485-9169.

Sincerely,



Gary Waterfield, Chair

cc:

- Members of Provincial Parliament in the Rideau Watershed
- Hassaan Basit, Chief Conservation Executive
- Association of Municipalities of Ontario (AMO)
- Rural Ontario Municipal Association (ROMA)
- Watershed Municipalities
- Neighbouring Conservation Authorities