September 10, 2026

Public Input Coordinator
MECP Conservation and Source Protection Branch
300 Water Street North Tower, 5th Floor
Peterborough, ON
K9J 3C7

Re: Conservation Ontario's comments on "Consultation on Proposed Governance Regulations for Regional Conservation Authorities and the Ontario Provincial Conservation Agency" (ERO#026-0740)

Conservation Ontario is the member organization for Ontario's Conservation Authorities (CAs). Conservation Ontario's submission is informed by engagement with CA leadership and staff, elected officials, and CA board members. These comments do not limit comments submitted individually by CAs on this proposal.

1. Adding an additional ineligibility criterion for Ontario Provincial Conservation Agency board membership

Conservation Ontario supports the ineligibility criteria for appointment to OPCA's board of directors outlined in subsection 35.6(2) of the *Conservation Authorities Act (CA Act)*. As proposed, a new regulation would introduce additional ineligible people/groups, including: registered lobbyists under Ontario's *Lobbyist Registration Act*; current members of a CA; or individuals currently employed as an officer or senior staff member of a CA.

Conservation Ontario supports an additional criterion, and recommends the following:

- ***Providing any individual or group involved in litigation against an authority is ineligible to serve on the OPCA Board.***

In addition to the proposed ineligibility criteria, Conservation Ontario recognizes that the *CA Act* establishes a process for OPCA to recover costs and expenses by apportioning those costs to Authorities. This process means that CAs, and therefore, municipalities, may ultimately contribute to OPCA's budget without a direct role in shaping its governance or strategic direction.

Conservation Ontario recommends municipal representation on the OPCA board to provide financial accountability, transparency, and long-term alignment of provincial direction with local needs.

2. Proposed regulation setting out the method for determining the number of members appointed to Regional Conservation Authorities

Conservation Ontario supports the Province's effort to develop a consistent, standardized, allocation formula for appointments to Regional CA (RCA) boards to enable manageable board sizes for effective governance and decision-making.

The proposed Tiered Allocation Formula (formula) establishes a process where the number of members appointed to an RCA board is based on each participating municipality's share of the RCA's total population. Participating municipalities are entitled to one member, with an upper limit of four members. The Province provided supplemental information with the current proposal, showing the number of members to be appointed to RCAs by participating municipalities.

- ***Conservation Ontario is aware errors, omissions, and questions regarding this information have been shared by CAs directly with the Province. We recommend that these issues be considered, corrected, and updated where appropriate. Conservation Ontario is pleased to assist upon request.***

In addition to the proposed formula, participating municipalities may enter into agreement to determine the number of members each may appoint to an RCA board. As proposed, the formula must be used for initial appointments to RCA boards in advance of the transition date. Conservation Ontario notes that 11 CAs currently use municipal agreements to determine membership on CA boards.

Conservation Ontario is supportive of the proposal to allow participating municipalities to enter into agreements to determine the number of members appointed to RCAs. This approach provides greater flexibility for RCA boards to ensure representation is appropriately balanced, supported by municipal capacity for participation, and reflective of diverse municipal perspectives.

- ***Conservation Ontario recommends the proposal be amended to allow participating municipalities to enter into agreements regarding the number of members appointed to the RCA board for initial <u>and</u> subsequent appointments.***

3. Maintaining Local Watershed Connections through bodies such as Watershed Councils

Using the proposed formula, the number of appointments to CA boards is reduced by **over half** of the current total appointments, representing a significant reduction in perspectives guiding watershed decision-making across Ontario.

Support for and success of watershed-based programs and services must be responsive to local needs, priorities, challenges, and opportunities. "On-the-ground" service levels require efforts to adequately capture, consider, and incorporate local perspectives, avoid service disruptions, and maintain strong relationships.

- ***Watershed Councils, if implemented effectively, enable important consideration of local perspectives.***
- ***Additional frameworks are advisable to support this objective. Conservation Ontario welcomes the opportunity to discuss these matters and explore opportunities to support watershed governance in Ontario.***
- ***Conservation Ontario recommends establishing a special Working Group tasked with supporting the issues and maintenance of predecessor CA agreements for programs and services along with funding considerations.***

Thank you for the opportunity to review and provide comments on the "Consultation on Proposed Governance Regulations for Regional Conservation Authorities and the Ontario Provincial Conservation Agency" (ERO#026-0740). Conservation Ontario represents the interests of its members and remains committed to partnership with the Province to achieve effective, modernized, outcomes for local conservation.

Sincerely,

Angela M. Coleman

Angela M. Coleman
Chief Administrative Officer | General Manager

c.c: Conservation Authority CAOs/GMs