

December 19, 2025

By E-mail

Hon. Todd McCarthy MPP
Minister of the Environment, Conservation and Parks
College Park, 5th Floor, 777 Bay Street
Toronto, ON M7A 2J3

RE: Kawartha Conservation Board Submission on the Proposed Regional Consolidation of Conservation Authorities, ERO Notice #025-1257

Dear Minister McCarthy,

On behalf of the Kawartha Conservation Board of Directors, we are writing to share the Board's perspective on Environmental Registry of Ontario Posting #025-1257, informed by discussions at its meetings on November 27 and December 18, 2025. The Board recognizes the Province's objectives under Bill 68, to strengthen oversight, consistency, and modernization across conservation authorities through the Ontario Provincial Conservation Agency and the proposed transition toward a regional watershed-based framework.

The proposed consolidation model includes the creation of an Eastern Lake Ontario Regional Conservation Authority, which would result in the consolidation of Kawartha Conservation with several neighbouring conservation authorities and would represent a significant change to governance structures, service delivery models, financial frameworks, land management responsibilities, and municipal oversight.

We support the Province's generally stated objectives, including the use of digital permitting systems, consistent policies and standards, and enhanced use of technology. Kawartha Conservation already demonstrates strong performance in these areas, including meeting or exceeding provincial service standards, participating in staff-sharing initiatives, operating within a fully digital permitting environment, and advancing digital transformation—reflecting many of the efficiencies sought through the provincial initiative.

Substantial concerns and risks have been identified with the proposed consolidation or amalgamation, particularly with respect to the loss of local decision-making authority, reduced municipal representation, uncertainty around transition funding, asset ownership considerations, potential service disruption, and impacts on locally delivered programs. The scale of the proposed Eastern Lake Ontario region raises additional challenges related to maintaining effective community relationships and ensuring services remain responsive to local watershed conditions.

The importance of meaningful consultation and engagement with municipalities, conservation authorities, and stakeholders prior to any decisions being finalized cannot be understated. In particular, the Board notes that many of the Province's desired outcomes—such as improved consistency, efficiency, and modernization—can be advanced through the existing watershed-based governance framework, supported by the Ontario Provincial Conservation Agency (OPCA), without the disruption and destabilization inherent in large-scale structural consolidation, and counter to the Province's goals of advancing the housing priority, streamlining service, and reducing red tape.

Similarly, the importance of effective, ongoing two-way communication between conservation authorities and the OPCA is critical as the Agency initiates and fulfills its evolving mandate. Regular dialogue, shared implementation guidance, and collaborative problem-solving would support consistent interpretation of provincial direction, reduce implementation risks, and ensure that operational experience and local watershed knowledge inform policy development and modernization efforts.

A transparent, comprehensive cost-benefit analysis of alternative approaches should be undertaken as a first step to inform decision-making in any transition model that may be contemplated in the future. Where any transition is determined to be beneficial, it should be supported by a clearly defined and phased transition plan. Full provincial financial support is critical for any mandatory transition efforts to ensure continuity of programs and services and to avoid disruption to municipalities and communities.

Accordingly, we urge the Province to consider the benefits of a measured “pause” of the consolidation proposal put forward to allow the OPCA to complete its initial three-year term, undertake meaningful engagement with conservation authorities, and assess the urgency and necessity of consolidation or amalgamation of conservation authorities through an evidence-based approach. This would include clearly identifying issues, providing effective communication and feedback to conservation authorities to address any issues and if necessary, consider alternative models that would more effectively advance provincial priorities related to efficiency, red-tape reduction, and timely housing delivery.

Attached is a resolution passed by the Kawartha Conservation Board of Directors at their meeting held on December 18, 2025, and our detailed comments regarding ERO Notice #025-1257. For further information, please feel free to contact the undersigned.

Sincerely,

Pat Warren
Chair

Mark Majchrowski
Chief Administrative Officer

Enclosures: Kawartha Conservation Board Resolution #157/25, December 18, 2025
Kawartha Conservation ERO #025-1257 Submission Comments

- cc. *The Conservation Authorities Office, Ministry of the Environment, Conservation and Parks*
Hassaan Basit, Ontario's Chief Conservation Executive
Peter Tabuns, MPP, Critic, Environment, Conservation and Parks
Local Members of Provincial Parliament:
Laurie Scott, Haliburton-Kawartha Lakes-Brock
Dave Smith, Peterborough-Kawartha
Local Watershed Municipalities
The Association of Municipalities of Ontario, and the Rural Ontario Municipal Association
Conservation Ontario and all Conservation Authorities in Ontario

KAWARTHA CONSERVATION BOARD OF DIRECTORS MEETING #10/25 (DECEMBER 18, 2025)

RESOLUTION #157/25

MOVED BY: MARK DOBLE

SECONDED BY: TRACY RICHARDSON

RECOGNIZING THAT, the Province of Ontario has posted Environmental Registry of Ontario (ERO) Posting #025-1257 proposing the consolidation of Ontario's 36 Conservation Authorities into 7 Regional Conservation Authorities; AND,

RECOGNIZING THAT, the proposed Eastern Lake Ontario Regional Conservation Authority would consolidate Kawartha Conservation with Central Lake Ontario, Otonabee, Ganaraska, Lower Trent, Crowe Valley, and Quinte Region Conservation Authorities, resulting in significant changes to governance, service delivery, financial structures, land management, and municipal oversight; AND,

RECOGNIZING THAT, the Kawartha Conservation Board acknowledges and supports the Province's goals of improved efficiency of watershed management, through the implementation of digital applications and permitting system, consistent policies, flood standards, fees, and technology; AND,

CONSIDERING THAT, Kawartha Conservation consistently meets or exceeds provincial service standards, participates in staff-sharing initiatives with neighbouring conservation authorities, regularly reports on performance, are engaged in a fully digital permit application framework, and are engaged in digital transformation activities, mirroring many of the efficiencies the Province seeks; AND,

CONSIDERING THAT, the proposed consolidation raises substantial concerns and risks related to local decision-making authority, municipal representation, transition funding, asset ownership, service disruption and the protection of local programs; AND,

CONSIDERING THAT, there is a need for meaningful consultation and engagement with stakeholders to address identified concerns and risks of the proposed consolidation or amalgamation; AND,

CONSIDERING THAT, there is a need to undertake a full cost-benefit analysis of any consolidation or amalgamation models or alternatives; AND,

CONSIDERING THAT, the objects of the Ontario Provincial Conservation Agency (OPCA) can accomplish the same goals and objectives without consolidation of conservation authorities and without the service disruption and interference that would come with amalgamation; AND,

CONSIDERING THAT, meaningful modernization can occur within the current watershed-based governance framework;

THEREFORE, BE IT RESOLVED THAT, the Kawartha Conservation Board does not support the proposed "Eastern Lake Ontario Regional Conservation Authority" boundary configuration as outlined in Environmental Registry Notice 025-1257; AND

THAT, the Kawartha Conservation Board of Directors requests the Province of Ontario to pause any decision to consolidate or amalgamate conservation authorities to allow:

- the OPCA to complete its first 3-year term and a subsequent assessment of the need for consolidation
- for meaningful engagement needed to address the concerns and risks of the proposed consolidation
- for the review of alternative models and processes that would result in better outcomes that advances the government's priorities of efficiency, red-tape reduction and timely home construction, AND;

THAT, the commentary provided for in the staff report be endorsed and submitted to the Province of Ontario as Kawartha Conservation's comments regarding Environmental Registry Posting 025-1257, AND;

THAT, the resolution be forwarded to:

- Minister of the Environment, Conservation and Parks and his Opposition critics
- Ministry of the Environment, Conservation and Parks (CA Office);
- Ontario's Chief Conservation Executive, Hassaan Basit;
- Local Members of Provincial Parliament
- Conservation Ontario
- all municipalities within Kawartha Conservation's watershed and conservation authority municipalities.

Recorded Vote:

| Municipality | Name | Governance Role | Vote Decision |
|----------------------------------------------|-------------------|--------------------|---------------|
| Township of Cavan-Monaghan | Byrne, Gerry | Director | Yes |
| City of Kawartha Lakes | Doble, Mark | Director | Yes |
| Municipality of Trent Lakes | Franzen, Peter | Director | Yes |
| Region of Durham, Township of Brock | Pettingill, Cria | Director | Yes |
| Region of Durham, Municipality of Clarington | Rang, Lloyd | Director | Absent |
| City of Kawartha Lakes | Richardson, Tracy | Director | Yes |
| Region of Durham, Township of Scugog | Rock, Robert | Director | Absent |
| Region of Durham, Township of Scugog | Wright, Harold | Vice-Chair | Yes |
| City of Kawartha Lakes | Warren, Pat | Chair | Yes |

UNANIMOUSLY CARRIED (*of members present*)

Kawartha Conservation ERO #025-1257 Submission Comments

(December 19, 2025):

The following submission outlines Kawartha Conservation's comments in response to Environmental Registry of Ontario Posting #025-1257, which seeks input on the proposed regional consolidation of conservation authorities. These comments are informed by discussions of the Kawartha Conservation Board of Directors and reflect both governance oversight and operational experience delivering conservation authority programs and services at the watershed scale.

Kawartha Conservation recognizes the Province's objectives of improving consistency, efficiency, and modernization across the conservation authorities. The comments below are intended to be constructive and informed by local accountability and operational experience, to assist the Province in evaluating transition models that achieve these objectives while maintaining effective governance, accountable service delivery, fiscal prudence, and strong municipal partnerships.

The responses that follow are structured to directly address the questions posed in the ERO posting and focus on practical considerations related to the proposed transition of the conservation authority framework.

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

Evidence-based decision-making before implementation

- The Province's objectives related to consistency, efficiency, and speed of service can be advanced immediately within the existing 36 conservation authority framework through provincially led standards, shared tools, staff collaboration, and digital permitting systems. These measures should be implemented and evaluated first, allowing for work processes to be aligned, performance to be determined and testing of the assumption that efficiencies are to be gained through consolidation.
- Decisions regarding any potential structural change must be informed by a rigorous cost-benefit analysis (transition and steady-state), consistent with standard public-sector business practice. This analysis must meaningfully involve municipalities and conservation authorities, who understand both the operational realities and local service impacts. Structural change should not proceed where substantive, demonstrable gains cannot be clearly established.
- Where challenges or inefficiencies are identified, alternative approaches—such as shared services, regional collaboration agreements, or targeted functional integration—should be explored and exhausted before any consideration of consolidation.

Stable provincial transition funding and clear “who pays” rules

- Any provincially directed modernization initiatives must be accompanied by stable, multi-year provincial funding to avoid cost pressures being downloaded onto municipalities and ratepayers.
- Clear and transparent rules regarding “who pays” are essential. New provincial initiatives, including those associated with the Ontario Provincial Conservation Agency (OPCA), should not introduce additional financial burdens during periods of transition or change.

Service-continuity

- Protecting uninterrupted delivery of natural hazard management, permitting, planning, and environmental services must be a foundational consideration. Demonstrated service improvements through the implementation of standards and standardization objects of the OPCA should precede any structural change.
- The uncertainty associated with major structural reform presents a significant risk to workforce stability, recruitment, and retention. Disruption to experienced staff undermines the Province’s objectives related to efficiency, timeliness, and service quality.
- Any change initiative must explicitly prioritize continuity of service, institutional knowledge, and organizational capacity.

A “local by design” operating model

- Municipal support and confidence are critical to success in the conservation authority model. Without strong municipal buy-in, risks include fiscal uncertainty, reduced effectiveness, and erosion of accountability. Maintaining strong local governance relationships is critical to the success of conservation authorities.
- Ontario’s watersheds and conservation authority jurisdictions are geographically large and diverse. Effective service delivery requires local offices, local staff, and locally informed decision-making. Centralized models are not well-suited to regions that require extensive travel and have variable watershed conditions.
- It is imperative to have local offices and local people to facilitate effective programs and services. This is key for the delivery of natural hazard programming, permitting and planning for the community as well as other services provided, where people can physically interact with local staff who know the area and can provide informed answers.
- Preserving place-based knowledge through local watershed teams and advisory structures with real influence is essential to maintaining service quality and public trust.
- Meaningful engagement with communities, municipalities and conservation authorities should occur at the watershed scale to ensure local conditions, risks, and priorities are understood and reflected in any provincial initiatives.

Standards first, consolidation second

- If consistency and performance improvement are the primary objectives, the Province should first finalize, fund, and implement provincial service standards, consistent policies, shared digital platforms, and performance metrics.
- The direction-making authorities outlined in Bill 68—covering standards, IT, procurement, training, asset management, and strategic planning—provide ample tools to achieve consistency without requiring consolidation.
- Only after these measures are fully implemented and evaluated should any further structural changes be contemplated, and only where clear, incremental value can be demonstrated.

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

Potential benefits of partnering and sharing staff between conservation authorities include:

- Improved access to specialized expertise (e.g., hydrogeology, geomorphology, legal and complex planning files) through shared service arrangements and voluntary staff mobilization during peak demand periods such as floods, major development cycles or significant weather events impacting properties.
- Efficiencies through shared corporate services (IT licensing, fleet, insurance, purchasing).
- Enhanced regional-scale scientific collaboration for broader watershed analysis, climate resilience planning, and cumulative effects assessment—while recognizing the importance of strong local-scale science and community-specific knowledge.

It is important to note that many of these benefits already occur today through voluntary inter-authority collaboration. We have shared staff historically with other authorities related to specialized IT, engineering and ecology on a long-term basis, and partner with other conservation authorities on a variety of geographically scalable projects (regional to local community) where it makes demonstrable sense to do so (e.g. planning, engineering, hydrogeological, IT and Risk Management Official expertise). The sharing of staff would be made easier through templated agreements. Any proposed changes must therefore demonstrate clear net new benefits beyond what can already be achieved through shared services and supported standards.

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?

Any governance framework must:

- preserve strong local representation for municipalities and taxpayers,
- remain strategically effective, and
- maintain equitable representation

Models that significantly dilute local voice or create excessively large, symbolic boards risk being cumbersome and ineffective. Governance approaches should prioritize clarity of roles, accountability, and meaningful municipal participation.

Where broader coordination is required, networked governance models—retaining strong local boards with defined roles while enabling strategic coordination—may offer a more balanced and effective approach than full consolidation.

Consideration should be given to Indigenous participation in governance structures.

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

Clear, standardized budget reporting

- Annual budget documents should continue to clearly identify program and service costs, capital needs, asset management requirements, and service outcomes in a consistent and comparable format.

Separation of funding streams

- The budget presentation should clearly distinguish:
 - provincially-directed costs (Agency directions)
 - provincial supports for programs and services
 - municipal supports for programs and services
 - locally delivered programs and capital works.

Guardrails to protect local priorities

- Policies must ensure that locally funded priorities and assets cannot be reallocated without municipal agreement, protecting investments made by municipalities in their own communities.

Predictable and local consultation

- Budget consultation processes must be structured, timely, and aligned with municipal budget cycles, including multi-year forecasts (e.g. 3 or 5 year) to support municipal financial planning and stability.

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

Keep local presence real

- Maintain local offices, local staff, and local contact points for programs and services. These points of contact are essential to effective service delivery and community trust.

Protect watershed identity and place-based knowledge

- Through consistency measures, a “one system, many watersheds” model will emerge with the OPCA efforts for standardization. A tangible sense of place must be identifiable to a community or municipality, with actions or plans tied to that same space.
- While standardization allows for greater consistency, flexibility must remain to address local conditions and support positive innovations for specific contexts. It is this creativity and customer service-oriented outlook that conservation authorities are known and appreciated for.

Strengthen transparency and accountability locally

- Communications, reporting, and performance measures should be clearly tied to local communities and watersheds, enabling municipalities and residents to understand outcomes that affect them directly

Additional Comments:

Support tied to Guidance

At this time, the principal gap in direction relates to the timely identification, interpretation, and resourcing of common provincial standards. Many of the Province’s stated objectives—such as uniformity, improved service delivery, and consistent application of standards—can be meaningfully advanced within the existing conservation authority framework, provided that these standards are finalized, clearly articulated, and adequately supported for administration by the Agency.

While significant legislative changes have been introduced in recent years, provincial guidance and implementation support would assist conservation authorities in achieving consistent interpretation and application across jurisdictions. Strengthened communication, transitional guidance, and shared tools would reduce variability in processes and outcomes, addressing many of the challenges put forward.

Focusing the OPCA's first term on common tools, standards, and guidelines would deliver the greatest gains toward the Province's objectives of consistency and housing delivery. Allowing conservation authorities time to implement these measures and meet defined targets is more effective than undertaking structural change simultaneously. A 3-year focus on these efforts, aligned with the OPCA's first term, would support effective implementation and evidence-based assessment.

Development of Guidelines, Policies and other Resource materials

To ensure that provincially developed policies, guidelines, and implementation tools remain scientifically sound and locally relevant, their development would benefit from structured consultation with conservation authorities, municipalities and other stakeholders that possess detailed, place-based knowledge of these systems. Early and ongoing engagement in the determination of such materials would help ensure that provincial direction is practical, evidence-based, and responsive to local hydrologic, geomorphic, and land-use conditions, thereby supporting consistent application while avoiding unintended regional or community-level impacts.

Boundary Alignment Considerations

It is recommended that conservation authority boundaries be aligned, to the greatest extent possible, with the best science available for delineating watershed boundaries to avoid duplicative administrative layers. Advancements in technology have enabled more defensible watershed-based frameworks and would help reduce administrative duplication, support coherent watershed management, and enhance consistency in planning, implementation, and oversight.

Governmental Transparency

The OPCA should be accountable to the public as well as to stakeholders that are responsible for funding their operation. Transparency measures identified in the Conservation Authorities Act for current conservation authority governance should be mirrored by the OPCA (public meetings, agendas, minutes, membership, etc.). Similarly, financial transparency to conservation authorities as a financial stakeholder in the OPCA is needed, tied to annual reporting on outcomes of the levy support. Representation on the OPCA board, particularly if apportionment provisions are enacted would represent an open, transparent and accountable governance model.