

November 26, 2025

Re: Bill 68 - Proposed New Ontario Provincial Conservation Agency and ERO #025-1257

Adelaide Metcalfe

Bluewater

Central Huron

Huron East

Lambton Shores

Lucan Biddulph

Middlesex Centre

North Middlesex

Perth South

South Huron

Warwick

West Perth

On October 31, 2025, the Ministry of the Environment, Conservation and Parks (MECP) circulated a media release "Ontario Creating New Conservation Authority Agency to Improve Service Delivery and Protect Communities".

On November 6, 2025, Bill 68, Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2) introduced changes to the Conservation Authorities Act enabling the creation of the Ontario Provincial Conservation Agency (OPCA). As proposed, the OPCA will be tasked with the streamlining and standardization of more consistent service delivery by setting provincewide standards and supporting those standards through improved tools, platforms and resources. The OPCA would be further tasked with overseeing the consolidation of the 36 Conservation Authorities (CAs), into 7 Regional Conservation Authorities.

On Friday, November 7th, the MECP posted Environmental Registry Notice No. 025-1257 ("Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities"), the ERO posting remains open for public comment for a total of 45 days until December 22, 2025 at 11:59 p.m.

Under this proposal, the Ausable Bayfield Conservation Authority (ABCA) would be merged into a new proposed "Huron-Superior Regional Conservation Authority" together with the Maitland Valley CA, Saugeen Valley CA, Grey Sauble CA, Nottawasaga Valley CA, Lake Simcoe Region CA and the Lakehead Region CA (Thunder Bay), which will include 80 municipalities across the proposed region.

The ABCA (formerly the Ausable River Conservation Authority) was the first CA created almost 80 years ago by local municipalities, to provide local management of water, soils and natural environments within its rural watershed.

Watershed-based management, which is the founding principal of CA boundaries, is recognized internationally as the most effective means of balancing environmental, economic, and societal needs across the landscape. The watershed model is most



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effective when implemented at a scale that is reflective of the local landscape and economic drivers. Watershed management, supported by strong local governance, breaks down boundaries, and provides a framework to work collaboratively to meet the needs of the community, and the environment. This framework, and strong local governance and support has led to 80 years of effective, and efficient watershed management.

The ABCA recognizes and supports the province's desired outcome of improved consistency and modernized digital permitting processes, aligned with its goals and objectives for cutting red tape and getting more homes built faster, and safely. However, as an alternative to the proposed large-scale regional consolidation, the ABCA encourages the Province to achieve their goals and objectives by building on the proven strengths and relationships of local CAs and its umbrella organization, Conservation Ontario.

The current framework provides the opportunity to share resources, improve consistency and modernization across the province, without the potential costs associated with amalgamating the 36 CAs into 7 regions. The ABCA encourages a more geographically coherent, cost-effective and locally accountable alternative through engagement with directly affected municipalities and CAs across Southwestern Ontario before finalizing any consolidation boundaries.

Further, any modernization of CAs through tools and consolidation should be supported with Provincial funding. In recent years, the average annual funding from the Province to ABCA's annual operations amounts to 1% of our total budget. Member municipalities fund approximately 30% of ABCA's budget. The remainder of our budget is funded primarily through partnerships and self generated revenue.

The ABCA Board of Directors, consisting of 9 Members who represent 12 municipalities, have unanimously expressed concern regarding effective local representation if CAs are amalgamated into larger regions. Under the current framework, our member municipalities have direct input into our local programs and services. The programs are delivered efficiently and effectively by knowledgeable staff in partnership with the community to meet our local environmental, economical and societal needs.

There is a significant amount of uncertainty with this proposal. To date, very few details regarding planned governance structure, local input, representation, budgeting, and CA assets have been shared. The ABCA is one of many CAs that has a supporting, charitable foundation, and clarity is needed around the future relationships with their partner CAs.

The ABCA Board of Directors encourages the MECP undertake a fulsome consultation process with both CAs, as well as municipalities before any decisions and changes are made as a result of the Province's proposal.

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Attached is a resolution passed by the ABCA Board of Directors at their meeting held on November 20, 2025. The ABCA also encourages all partners to review the posting <u>ERO #025-1257 Proposed boundaries for the regional consolidation of Ontario's Conservation Authorities</u>, and submit comments well in advance of the closing date of December 22, 2025.

For further information, please contact me by email through our office at info@abca.ca.

Sincerely,

AUSABLE BAYFIELD CONSERVATION AUTHORITY

Ray Chartrand

Hay Chartrand

Chair

Encl.: ABCA Board Resolution #BD 80/25, November 20, 2025

Cc: The Honourable Todd McCarthy, Minister of the Environment, Conservation

and Parks

The Conservation Authorities Office, Ministry of the Environment,

Conservation and Parks

Hassan Bassit, Ontario's Chief Conservation Executive

Local Members of Provincial Parliament: The Honourable Lisa Thompson, Huron-Bruce, Minister of Rural Affairs; Steve Pinsonneault, Lambton-Kent-

Middlesex; Matthew Rae, Perth-Wellington

Local Members of Parliament: Ben Lobb, Huron-Bruce; Lianne Rood,

Middlesex-London; John Nater, Perth-Wellington

Local Municipalities and Counties

The Association of Municipalities of Ontario, and the Rural Ontario Municipal

Association

The Ausable Bayfield Conservation Foundation

Conservation Ontario and All Conservation Authorities in Ontario

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AUSABLE BAYFIELD CONSERVATION AUTHORITY RESOLUTION #BD 80/25, November 20, 2025

Moved by Wayne Shipley Seconded by David Jewitt

WHEREAS the Ausable Bayfield Conservation Authority (ABCA) Board of Directors 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

WHEREAS consistent policies, and resources across the existing Conservation Authorities boundaries could be achieved through direction and tools such as technical guidelines provided by the Ministry of the Environment, Conservation and Parks; or Conservation Ontario; and

WHEREAS Conservation Authorities are locally based, grassroots organizations formed by municipal governments in response to the challenges posed by a changing landscape; especially, the increased exposure to flooding and erosion hazards and the resulting risks to lives and property. In the case of ABCA, this vision has proved a successful model for 80 years; and

WHEREAS the ABCA, with the guidance and support of our 12 Member Municipalities, demonstrates fiscal prudence in conservation delivery, ensuring stable growth through stable funding. ABCA has successfully leveraged funding to support programs and services that are locally important and are driven by community engagement through ABCA's Conservation Strategy and the Watershed Based Resource Management Strategy; and

WHEREAS Conservation Authorities across the Province operate efficiently by working in close partnership with approximately eight Member Municipalities for every one conservation authority. This structure enables resources to be directed toward on-the-ground initiatives that advance our mandate while addressing local community needs, achieving an effective balance in scale, management and service delivery; and

WHEREAS plans to regionalize conservation authorities through consolidation would dilute local accountability and municipal partnership and is contrary to the basic principle that decisions are best made closest to the communities they affect. Effective representation by municipal partners remains core to the success of conservation authorities. The ABCA, while not unique among conservation authorities in this respect, is effective in working with our community to support sustainable development, and keeping communities safe; and

WHEREAS being front-line means being responsive and accountable to the community by delivering the services that are essential and valued to the best interest of the community. The

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front line of provincial priorities on housing, the economy, infrastructure, and climate resilience are in the decisions between municipalities working together to address issues around floodplain (and hazard) protection and resilient upland and landscape management. Further, ABCA staff and Board Members are responsive and accountable to the needs of the watershed community, while meeting or exceeding provincial service standards, and are reachable through publicly available contact information. Local governance and direction combined with local service provision allows ABCA to continue to be responsive to our community; and

WHEREAS consolidation will result in substantial transition costs, not the least of which is time. In all facets, that would divert resources from front-line service delivery and delay desired outcomes. Further, the loss of local watershed knowledge and community relationships will add greater uncertainty, loss of trust, and delay for our watershed residents. This includes the agricultural community, businesses, builders, developers, and our municipal partners that seek timely and effective local advice, which is provided through local preconsultation; and

WHEREAS a proposed regional watershed would create a geographically vast and administratively complex organization when joining northern municipalities with those that are rural, such as ABCA, where agriculture is the main economic driver. The differences are distinguishable between the Lake Superior and Georgian Bay watersheds to those in Southwestern Ontario on the shores of Lake Huron. The ABCA serves Southwestern Ontario agricultural communities facing vastly different geographies, climate, and infrastructure realities which would be ill-served by a broad regional administrative structure. This would be considerably worse if local offices do not remain available and accountable to its membership, partners and the communities they serve.

THEREFORE, BE IT RESOLVED:

THAT the Ausable Bayfield Conservation Authority Board of Directors does not support the proposed "Huron-Superior Regional Conservation Authority" boundary configuration as outlined in Environmental Registry Notice 025-1257; and

FURTHER THAT meaningful modernization can occur within the current watershed-based governance framework; and

FURTHER THAT the ABCA Board endorses further provincial evaluation of a more focused specific model as a geographically coherent, cost-effective and locally accountable alternative that advances the government's priorities of efficiency, red-tape reduction and timely home construction; and

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FURTHER THAT the Board asks that the Ministry of the Environment, Conservation and Parks engage directly with affected municipalities and conservation authorities across Southwestern Ontario through a working group before finalizing any consolidation boundaries or legislative amendments; and

FURTHER THAT a forthcoming ERO response at the approval of the ABCA Board be forwarded to the Environmental Registry of Ontario consultations; and

FURTHER THAT a letter from the Chair containing this resolution, and ERO response, be forwarded to:

- the Minister of the Environment, Conservation and Parks and his Opposition critics,
- the Ministry of the Environment, Conservation and Parks (CA Office),
- Ontario's Chief Conservation Executive,
- local Members of Provincial Parliament,
- local Members of Parliament,
- Local Municipalities and Counties,
- The Association of Municipalities of Ontario, and the Rural Ontario Municipal Association,
- · Ausable Bayfield Conservation Foundation, and
- Conservation Ontario and all Conservation Authorities in Ontario.

Carried.