

December 8, 2025



MECP Conservation and Source Protection Branch  
Ministry of the Environment, Conservation, and Parks  
Via ERO website and email to [ca.office@ontario.ca](mailto:ca.office@ontario.ca), with  
copies to key members of Cabinet and others

**RE: ERO 025-1257**

**Proposed boundaries for the regional consolidation of Ontario's conservation authorities**

Ontario Headwaters Institute, an Ontario corporation with charitable status that promotes watershed security - healthy and resilient watersheds that protect regional ecological integrity, social wellbeing, and economic vitality - urges the government to withdraw this listing and make an 18-month commitment to develop a Green Paper on the Future of Watershed Management in Ontario, with extensive consultation.

Even if the government decides to proceed with the actions outlined in 025-1257, a Green Paper on the Future of Watershed Management in Ontario should still be launched in order to inform the direction of the Provincial Conservation Agency, the on-going roles of conservation authorities, other serious and fragmented challenges with watershed management in areas without conservation authorities, and how to enable municipalities to better deliver on their responsibilities to protect water.

The reasons for our position are legion, per the analysis found below.

In addition, our analysis forms the basis for solutions to address both the uncertainties in 025-1257 and Schedule 3 of Bill 68, which amended the Conservation Authorities Act, as well as the broader gaps in watershed management across Ontario that amplify the need for the proposed Green Paper.

Key concepts that we suggest be discussed in the Green Paper include that Ontario:

- 1) Develop guidelines for watershed health similar to those in "How Much Habitat is Enough" and require the implementation of restoration plans where goals are not met;
- 2) Harmonize watershed management policies to the highest standard of protection, ensuring the provision of appropriate resources;
- 3) Establish triggers and identify agency leads for action when monitoring identifies unacceptable results, such as when Provincial Water Quality Objectives are exceeded;
- 4) Integrate land use and watershed planning at the municipal level; and,
- 5) Mandate a lead agency to enlarge or create new Greenbelt-style core and corridor natural heritage and agricultural areas as a counter-balance to the extensive land conversion that continues to occur across South-central Ontario and that could help implement nature-based solutions to address the climate and biodiversity crises.

We urge you to look beyond the current focus of consolidating conservation authorities by committing to a Green Paper on the Future of Watershed Management in Ontario in order to better protect our watersheds - for current and future generations.

Sincerely,

*Andrew McCammon*  
Executive Director

**Water is Life.  
Let's act like it.**

## **OHI Analysis on the Regional Consolidation of Ontario's Conservation Authorities**

### Introduction

The OHI is deeply concerned about this posting and its sister initiative to amend the Conservation Authorities Act per Schedule 3 of Bill 68, recently given royal ascent.

Specific concern expressed below include:

- Shortcomings that create a potentially deleterious impact on the effectiveness and accountability of the local expertise where watershed management is implemented in jurisdictions covered by conservation authorities; and,
- Silence on the twin needs to address both watershed management in areas without conservation authorities and regarding municipal responsibility to protect and improve our waters.

We are also disturbed about the dilution of the democratic process, per the report of the Auditor General, which in this case substituted the normal process of fulsome standing committee hearings and public consultation on the draft bill with limited consultation on 025-1257, during which time Bill 68 received royal ascent, before any concerns about the Bill and the ERO posting might benefit from fulsome consideration.

We therefore strongly believe that 025-1257 should be withdrawn and that, even if the government decides to proceed with the actions outlined in this listing, the government should still commit to an 18-month process to develop and hold widespread discussions on a Green Paper on the Future of Watershed Management in Ontario.

In particular, we stress that the proposed Green Paper and our suggested items for consideration in it represent solutions to this ill-conceived consolidation, and that we and many of our colleagues stand ready to help the province move forward on a revitalized future for watershed management in Ontario.

### Short-comings of the Amendments to the Conservation Authorities Act and ERO 025-1257

The amendments to the CA Act and the content in 025-1257, seeking to consolidate the established local expertise and responsiveness of how watershed management is implemented in jurisdictions covered by conservation with authorities with a centralized provincial agency is un-necessary, vague, and potentially deleterious to Ontario's watershed security.

It is unnecessary as CA policies can be easily harmonized, as we have suggested numerous times since 2018.

It is vague as the amendments to the Conservation Authorities Act enable the minister to do whatever they wish to expedite housing, without much detail. This vagueness renders the questions in 025-1257 both obtuse and lacking the context needed to provide meaningful comments.

Indeed, previous changes in the role of conservation authorities and the overall vagueness of the proposed consolidation lead us to pose the following extremely pertinent questions:

- Will the Provincial Conservation Agency harmonize policies to the highest or the lowest standard?
- Will the Agency be granted powers synonymous with Minister's Zoning Orders? and,
- Will the Agency be given powers to expropriate CA lands and sell them?

In addition, we ask and answer the following question:

“What would be an appropriate budget to ensure the smooth running of the Provincial Conservation Agency and deliver collective measures to deliver watershed security in Ontario, embracing cumulative monitoring and needed remedial actions, municipal engagement and source protection”?

While we oppose the creation of the Agency, we suggest up to \$260 million over seven years: \$10 million over two years to identify and plan remediation needs, and the balance over five years to implement them.

Finally, we consider the proposed Agency deleterious to Ontario’s watershed security. The OHI has great confidence in our conservation authorities, which have provided world-leading expertise and programs since before World War II, following the disaster of Hurricane Hazel, and through the explosive and continuing growth of Ontario’s population and urbanization for over 80 years.

Rather than transform them into a sub-entity to the proposed, centralized agency, they need expanded mandates and powers to pursue a multi-generational commitment to protect our water and natural heritage while reducing environmental risks and their cost, and they would be logical stewards to identify and implement nature-based solutions to address the climate and biodiversity crises.

### Watershed Management Outside of Conservation Authorities

ERO posting 025-1257 states, at the start of its second paragraph, that the “current system of 36 separate conservation authorities is fragmented”. Unfortunately, that is not even the tip of the iceberg.

In addition to the 36 conservation authorities, each with varying key policies, Ontario has six other watershed management frameworks, just in South-central Ontario. This includes areas where water is under the jurisdiction of:

- The Ministry of Natural Resources;
- The Greenbelt Plan;
- The Lake Simcoe Protection Plan;
- The Severn Sound Environmental Association;
- The Waterloo Protected Countryside Plan; and,
- The District Municipality of Muskoka and its emerging Integrated Watershed Management Plan.

To add insult to injury, some areas are under the jurisdiction of as many as four of the above plans.

In addition:

- There are no provincial goals for watershed health similar to “How Much Habitat is Enough”;
- The Provincial Water Quality Objectives have no triggers for action when monitoring results exceed safe levels;
- Ontario has archived the provincial wetland strategy while making only weak commitments to the Biodiversity Strategy; and,
- While ERO 025-1257 re-iterates commitments to Source Protection, Ontario has still not addressed unincorporated but populated rural areas such as cottage clusters, hamlets, villages, and strip development, nor identified risks such as cruise ships and the disposal of human remains.

Regardless, the simple reality is that some areas’ watersheds, regional biodiversity, economic stability, and water quality are being better protected than others, and “fragmentation” has not even begun to be addressed.

## Myopia on Municipalities

In spite of years of efforts to facilitate the Housing Action Plan by weakening a broad range of environmental safeguards and expanding urban boundaries even over the objections of municipalities that prefer intensification, the Province has essentially marched in place with respect to municipal responsibilities on watershed management.

The simplest and most egregious aspect of this is the purposeful neglect of the Province to not elevate the wording from s 4.2.1 of the Provincial Planning Statement in to a requirement: “using the watershed as the ecologically meaningful scale for integrated and long-term planning”.

Instead, lip-service is played to this policy commitment. For example, only an estimated 80 – 100 of Ontario’s 444 municipalities have site alteration bylaws, which protect against altered stream flow, flooding, and habitat loss.

Meanwhile, Ontario has never finalized 013-1817, Watershed planning guidance, “to help municipalities in implementing provincial direction related to watershed and sub-watershed planning”.

The stakes are high, as, Ontario’s municipal infrastructure deficit is estimated at \$52 billion, of which \$5.3 billion is for potable water and \$7.3 billion is for waste water management, each of which potentially increase risks to public health, watershed security, and economic loss.

Rather than address the municipal role in watershed management, the Province has abolished regional planning and, more recently, Green Development Standards and even green roofs, reducing cross-watershed protection and innovation for sustainable development.

Clearly, Ontario needs to integrate land use and municipal planning at the municipal level, for which the local knowledge and expertise of conservation authorities would be invaluable.

In addition, the OHI perceives a need for municipalities and relevant agencies should work together to enlarge or create new Greenbelt-style core and corridor natural heritage and agricultural areas as a counter-balance to the extensive land conversion now taking place across South-central Ontario.

These additional special planning areas could constitute a multi-generational commitment to protect our water, natural heritage, and food security while reducing environmental risks and their cost. They would also be logical locations to implement nature-based solutions to address the climate and biodiversity crises.

## Conclusion and Suggested Solutions

The proposed creation of a Provincial Conservation Agency and the consolidation of conservation authorities is ill-conceived and vague, has not had appropriate consultation, is damaging to the expertise and responsiveness of the existing conservation authorities to local realities and relationships, and ignores the broader need to harmonize watershed management across Ontario for future generations.

The OHI considers that 025-1257 should be withdrawn or, if approved, its implementation must be delayed for 18 months for the development of and extensive consultation on a Green Paper on the Future of Watershed Management in Ontario.

Key concepts that we suggest be discussed in the proposed Green Paper include that Ontario:

- 1.) Develop guidelines for watershed health, similar to those in “How Much Habitat is Enough” and require the implementation of restoration plans where goals are not met;
- 2.) Harmonize watershed management policies to the highest standard of protection, ensuring the provision of appropriate resources;
- 3.) Establish triggers and identify agency leads for action when monitoring identifies unacceptable results, such as when Provincial Water Quality Objectives are exceeded;
- 4.) Integrate land use and watershed planning at the municipal level; and,
- 5.) Mandate a lead agency to enlarge or create new Greenbelt-style core and corridor natural heritage and agricultural areas as a counter-balance to the extensive land conversion that continues to occur across South-central Ontario and that could help implement nature-based solutions to address the climate and biodiversity crises.

Please feel free to contact the undersigned at your convenience for further discussion.

Sincerely,

Andrew McCammon  
Executive Director