



December 2, 2025

Clerks' Office and Members of Municipal Council
City of Guelph
1 Carden Street
Guelph ON N1H 3A1

Re: Bill 68: *Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2)* and the Proposed consolidating the 36 Conservation Authorities

Dear Grand River watershed Municipal Councils,

On October 31, 2025, the Province of Ontario announced its intention to create a new provincial agency, the Ontario Provincial Conservation Agency (OPCA) to provide leadership and coordination across Ontario's 36 Conservation Authorities. These changes have now been enacted through Bill 68: *Plan to Protect Ontario Act (Budget Measures), 2025 (No. 2)*, which has received Royal Assent. As a result, the Conservation Authorities Act has been amended to formally establish the OPCA. Under this new framework, the OPCA will oversee governance, strategic planning, performance standards, and centralized permitting for all Conservation Authorities, led by a provincially appointed board.

On November 7, the Province also proposed consolidating the 36 Conservation Authorities into seven large regional authorities. While this proposal aims to address capacity gaps and improve consistency, it also poses several risks, including the potential loss of local priorities, watershed-specific expertise, and meaningful municipal input. Larger regional structures will distance decision-making from the local context, partnerships, and on-the-ground knowledge that have long supported effective watershed management. Their scale also raises concerns that diverse watershed needs may be overshadowed, local priorities diluted, and long-standing municipal relationships weakened. The Grand River Conservation Authority (GRCA) encourages municipalities to submit comments to the Environmental Registry of Ontario (ERO) before the December 22, 2025 deadline.

The Province has indicated that these reforms aim to address long-standing challenges in the current system, including inconsistent capacity, outdated processes, and variability in permitting and service delivery. The GRCA acknowledges these challenges and supports efforts to improve consistency, efficiency, and technical capacity across Ontario.

On Friday, November 28, the GRCA Board of Directors met to formalize the organization's comments to the Province regarding both the creation of the new provincial agency and the proposed consolidation of the 36 Conservation Authorities into regional bodies. These comments reflect the GRCA's key concerns and recommended path forward.

The GRCA has identified several critical considerations to support a successful transition:

1. Scale of the Proposed Regional Model

The proposed regions are significantly larger than current watershed-based frameworks. This expansion of the proposed size could create new challenges, such as distance from local

issues, slower decision-making, and difficulty maintaining local relationships; therefore, finding a balanced approach is essential. Smaller, regionally focused watershed models, such as the current Source Protection Regions, are proven regional models that demonstrate how a balanced governance structure can achieve consistency and efficiency without sacrificing local responsiveness. By operating within manageable geographic areas, such as the Source Protection Regions, CAs can ensure that services are tailored to the unique environmental, social and economic characteristics of each watershed, while still benefiting from shared resources and standardized processes

2. Protection of Local Knowledge, Assets, and Investments

The GRCA maintains significant watershed-specific infrastructure, reserves, and land assets built through decades of watershed investment. Key concerns include the potential redistribution of well-developed GRCA reserves to support capital needs in other watersheds that have not made comparable investments, and the risk that the GRCA's mature and efficient infrastructure maintenance program could be weakened if resources become centralized or redirected. Clear assurances are required to ensure these resources remain dedicated to the watershed communities they were intended to serve.

3. Governance, Accountability, and Municipal Representation

The GRCA Board has significant concerns about the governance structure of the OPCA. The agency will report to a provincial ministry and be governed entirely by provincially appointed board members. At the same time, conservation authorities, and therefore municipalities, will be required to fund all or a portion of the agency's operations through the existing levy/apportionment process. This means that municipalities may ultimately contribute all or a significant share of OPCA's budget without having any meaningful role in shaping its governance, priorities, or strategic direction.

Additional clarity is also needed regarding the governance responsibilities of the new Regional Conservation Authority Boards. A strong Regional Conservation Authority Board must balance local accountability, fair representation, and operational efficiencies.

The GRCA supports modernization of the Conservation Authorities system but recommends a right-sized regional model more closely aligned with existing Source Protection Regions. This approach would advance provincial objectives for consistency and efficiency while preserving the strengths of watershed-based decision-making, municipal collaboration, and local responsiveness.

The GRCA Board has requested that this background information be shared with watershed municipalities along with a request for your support for the GRCA's concerns and proposed alternate model. A sample resolution for your consideration for submission is as follows:

"WHEREAS the Government of Ontario recently approved Bill 68, which establishes the Ontario Provincial Conservation Agency;

AND WHEREAS the Government of Ontario is proposing the consolidation of the province's 36 conservation authorities into seven regional conservation authorities, including the Grand River Conservation Authority (GRCA), which will be amalgamated amongst eight current authorities to become part of the Lake Erie Regional Conservation Authority (LERCA);

AND WHEREAS the 38 municipalities within the GRCA watershed boundaries today and the 81 municipalities that are proposed to make up the LERCA in 2027 will be levied to fund both the regional conservation authority as well as the provincial conservation agency;

AND WHEREAS the new organizations will result in the degradation of local governance, local fiscal accountability, local service delivery, local environmental focus and unprecedented funding by local municipalities of both a large regional authority and a provincial agency;

AND WHEREAS the GRCA Board of Directors has responded to Bill 68 and the proposal for Conservation Authorities consolidation with a constructive and thoughtful alternative that retains local governance, local service delivery, local environmental focus and local fiscal accountability while responding constructively to the Government of Ontario's concerns about accountability, planning and responsiveness;

NOW THEREFORE BE IT RESOLVED THAT the Minister of Environment, Conservation and Parks and the Chief Conservation Executive meet GRCA representatives to review the GRCA alternative proposal to Conservation Authorities consolidation;

AND THAT the Minister and the Chief Conservation Executive seriously consider the GRCA proposal for conservation authorities as it enunciates a path forward that will address the Government's concerns most democratically and productively;

AND THAT this motion be circulated to the Premier of Ontario, Minister of Environment, Conservation & Parks, Chief Conservation Executive and local Members of Provincial Parliament for their information and action, where appropriate."

The GRCA will continue to monitor the implementation of Bill 68 and the ERO proposal and will keep municipalities informed as additional details become available. The GRCA has already submitted its formal comments to the Province based on the Board-approved positions summarized above. A copy of the GRCA's comprehensive response to the ERO posting is attached for your reference.

If you have questions or would like a presentation to Council, please reach out to Samantha Lawson, CAO, at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "John Challinor II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Challinor II, Chair
Grand River Conservation Authority