

Report To: Board of Directors

Subject: Draft Comments Pertaining to ERO #025-1257 Regarding Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

Report No: FA-59-25

Date: December 5, 2025

Recommendation:

THAT Report No. FA-59-25 RE: Draft Comments Pertaining to ERO #025-1257 Regarding Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities **BE RECEIVED;**

AND THAT the draft submission for Niagara Peninsula Conservation Authority (NPCA) Comments on ERO #025-1257, as appended, **BE APPROVED;**

AND THAT a copy of the final submission for NPCA Comments on ERO #025-1257 be forwarded to Niagara Region, the lower-tier municipalities within Niagara Region, City of Hamilton, Haldimand County, Mississaugas of the Credit First Nation, Six Nations on the Grand River, Niagara Peninsula Source Protection Committee, Association of Municipalities of Ontario (AMO), Conservation Ontario, and all Conservation Authorities in Ontario.

Purpose:

The purpose of this report is to seek direction from the NPCA Board of Directors regarding draft comments prepared in relation to [ERO #025-1257](#). The deadline for submitting comments on the ERO posting is December 22, 2025. NPCA's draft comment submission is included in Appendix I.

Background:

On October 31, 2025, the Ontario provincial government announced a proposal for a provincial agency to lead the implementation of a new conservation authorities framework. The Ministry of Environment, Conservation and Parks (MECP) [news release](#) states that the proposed legislation to create the Ontario Provincial Conservation Agency (OPCA) aims to improve the province's conservation authority system to help get shovels in the ground faster

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on homes and other local infrastructure projects, while strengthening the vital role Conservation Authorities (CAs) play in managing watersheds and protecting communities from floods and natural hazards.

On November 6, 2025, [Bill 68](#), *Plan to Protect Ontario Act (Budget Measures), 2025 (No.2)* was introduced in the Ontario Legislature, which under Schedule 3 includes proposed amendments to the *Conservation Authorities Act* to establish OPCA. Bill 68 received Royal Assent on November 27, 2025.

The proposed OPCA aims to provide centralized leadership, efficient governance, strategic direction and oversight of Ontario's CAs. The OPCA is intended to:

- Streamline and standardize service delivery by setting clear, province-wide performance standards;
- Support the consistent application of provincial standards for assessing, managing and mitigating flood risks across Ontario, including managing centralized data, updated floodplain mapping and overseeing improved maintenance of CA-managed infrastructure like dams, to manage flood and other natural hazards;
- Develop a single, digital permitting platform to provide a faster, more predictable approvals process and improved customer service, while maintaining high environmental standards;
- Develop clear performance goals of CAs to report on annually to support continuous improvements; and
- Oversee the implementation of a regional watershed-based consolidation of CAs, following consultation with the public, municipalities, and other partners including Indigenous communities.

Further, on November 7, 2025, the Province posted a policy proposal to consolidate Ontario's 36 CAs into seven Regional Conservation Authorities (RCAs) on the ERO and is seeking feedback on proposed boundaries and the criteria applied to inform the proposed boundaries.

Under this proposal, NPCA would fall under the Western Lake Ontario RCA, along with Hamilton Conservation Authority (HCA), Conservation Halton (CH) and Credit Valley Conservation (CVC). The boundaries of the Western Lake Ontario RCA extend along the western Lake Ontario shoreline from Niagara through Halton and Peel, encompassing urban and rural watersheds that support the Greater Toronto-Hamilton corridor. The RCA is primarily based on the western portion of the Northern Lake Ontario and Niagara River Secondary Watershed.

According to the [ERO #025-1257 supplemental document](#), no changes are proposed to the overall extent of CA jurisdiction within the province, and under consolidation the new RCAs would remain independent organizations operating with municipal governance and

oversight, in accordance with requirements under the *Conservation Authorities Act*, as administered by MECP.

The implementation of the regional consolidation of CAs would be overseen by OPCA. This oversight role would include coordinating the transition process with involvement from CAs, municipalities, Indigenous communities, and interested parties to ensure minimal disruptions. The Ministry will provide further details on timelines, engagement opportunities, and transition supports at a future date. It is anticipated that the current CA Boards will complete their current terms at the end of 2026 and the transition process with the new RCA Boards would begin late 2026 to early 2027.

As part of the 45-day ERO consultation period, the Provincial Chief Conservation Executive and MECP staff arranged several information sessions. Staff from the 36 CAs were invited to attend an online information session on November 18, and a similar session was arranged for municipal partners. CAO/Secretary-Treasurer Lee-Yates and Board Chair Metcalfe attended an in-person engagement session with CAs and municipal staff from the Greater Toronto and Hamilton Area (GTHA) and surrounding area on December 1, and an online engagement session on December 2 that included CA and municipal staff from the proposed Western Lake Ontario RCA. Member Clark also attended the December 2 session representing both NPCA and HCA.

MECP Minister McCarthy and Chief Conservation Executive Mr. Basit were present at all engagement sessions. NPCA staff is appreciative of the opportunity to participate in discussions with the Minister, Chief Conservation Executive, and MECP staff and provide constructive input to ensure that any future framework continues to address the unique needs of our watersheds and achieves an effective balance between watershed protection and housing goals.

Discussion:

The criteria the province applied for determining the proposed boundaries for regional conservation authorities are:

1. **Maintaining watershed-based jurisdictions** – aligning with natural hydrological boundaries to support effective flood and water management, consistent with drinking water Source Protection Areas and Regions
2. **Relationships between conservation authorities and municipalities** – reducing administrative duplication and overlap for municipalities and conservation authorities to simplify accountability and strengthen local partnerships
3. **Balancing expertise and capacity across conservation authorities** – enhancing technical skills and resources across conservation authorities to improve service and program delivery

4. **Service continuity** – ensuring uninterrupted delivery of local conservation authority programs – including flood forecasting and warning, permitting, and source water protection – through and after consolidation

As noted, under the proposal the NPCA would form part of the Western Lake Ontario RCA, along with HCA, CH and CVC. The proposed Western Lake Ontario RCA would also include the Niagara Peninsula Source Protection Area, Halton-Hamilton Source Protection Region and Credit Valley Source Protection Area (which belongs to the Credit Valley – Toronto and Region – Central Lake Ontario Source Protection Region).

Through ERO #025-1257, the province is seeking feedback on the following discussion questions to inform the planning for the future state of CAs:

1. What do you see as key factors to support a successful transition and outcome of regional conservation authority consolidation?
2. What opportunities or benefits may come from a regional conservation authority framework?
3. 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?
4. Do you have suggestions on how to maintain a transparent and consultative budgeting process across member municipalities within a regional conservation authority?
5. How can regional conservation authorities maintain and strengthen relationships with local communities and stakeholders?

While the NPCA supports the proposed provincial investments in technology, standardization and modernization, the proposed RCA framework would create complexities and risk local municipal representation and decision-making, local expertise and delivery of programs and services. Considering the proposed criteria and boundaries for the RCAs and the uncertainties and risks associated with the proposal, the NPCA does not support the proposed RCA framework.

Key concerns with the provincial proposal as noted in the draft ERO comment submission in Appendix 1 include:

- While it is understood that OPCA and the proposed RCAs are intended to help get shovels in the ground faster on homes and other local infrastructure projects while strengthening the vital role CAs play in managing watersheds and protecting communities from floods and natural hazards, CAs have not benefited from reviewing any assessments or analyses that have determined the need to restructure Ontario's current CA framework.
- Currently, NPCA is meeting provincial government set timelines for issuing development permits 96% of the time and continue to coordinate with municipal

partners and developers while taking a solutions-focused approach to improving service delivery. We have invested in a permit management system, CityView, and will soon launch an online portal for permit submissions and tracking. We have also been investing in creating new and updated floodplain mapping as well as maintaining our online regulation mapping and open data portal. For NPCA, it would be more beneficial to have clearer goals and guidelines that are evidence-based to drive further modernization and streamlining than restructure the CA framework. With the current CA framework in place, OPCA could provide added value by coordinating future enhancements across the CAs.

- The proposed Western Lake Ontario RCA would cover approximately 490,000 ha of land and a population of nearly two million people. For the Western Lake Ontario RCA, going from the current combined oversight of 53 Board representatives to anything less will be challenging and risks losing diverse voices at the table. It is difficult to understand how the RCA Board would result in more efficient decision-making with less costs incurred by funding municipalities. Further, the functional separation from local communities risks the 70-80 years of relationships and trust that have been built up in each CA watershed.
- Each CA is an independent corporate entity that manages its own budgets, expenditures, reserves, infrastructure and landholdings. Further, each CA within the proposed Western Lake Ontario RCA has its own Foundation, which are also independent corporate entities with the focused mandates of raising funds for the projects and programs of their CAs. The process to consolidate assets and liabilities of the four CAs and their Foundations would be complex and lengthy. A cost-benefit analysis and legal review of such a merger should be completed before any consideration of implementing an RCA framework.
- Operating and Capital Budgets to deliver watershed programs and services are established based on the performance of self-generated revenues. Should the provincial government move forward with an RCA framework, any self-generated revenues, municipal levies, and financial assets must be committed to the jurisdiction from which they were collected.
- NPCA is concerned that the proposed RCA framework will result in increased costs incurred by the RCAs and their municipal funding partners. The OPCA funding model allows a provincial agency to charge back fees to RCAs for providing support services to implement agency directives and can cost apportion operating costs to RCAs. Before the OPCA is established, a cost-benefit analysis should be undertaken to demonstrate that there will be no increased costs incurred by CAs and their funding municipalities and specify the value-added services of the Agency.
- NPCA's ability to generate additional revenues or increase dependence on municipal levies to cover costs incurred resulting from the transition to an RCA framework will

be very limited and resources would be diverted away from front-line natural hazard and watershed management programs that support local communities.

- It is recommended that the province immediately reassess the s. 39 natural hazard transfer payments to provide sustainable, predictable provincial funding across conservation authorities—particularly where gaps exist—to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years.
- With the additional administrative oversight of the OPCA, RCA Boards representing larger and more diverse communities and potentially complex budgeting processes, there is a serious concern that our dedicated expert staff will be unable to deliver the same quality of programs and services that our communities expect. The NPCA recommends that the province pause any further implementation of OPCA and consideration of an RCA framework, and instead assess the use of legislative, regulatory, and incentive tools that are already available to achieve the desired standardization and modernization of CAs.
- Should the Province decide to move forward with the RCA framework, it will be imperative that existing staff complements be maintained and RCAs have the ability to fill roles that will enable the continuation of current programs and services to ensure continuity of front-line services without disruption, including commitments under agreements with our member municipalities. It is worth noting that the NPCA is a unionized work environment. The Collective Agreement between the NPCA and OPSEU Local 212 expires at the end of 2025 and bargaining is expected to begin in the Spring of 2026.

Internal Engagement Feedback

A questionnaire with 10 questions, including the five provided in ERO #025-1257 was conducted with NPCA staff to gather feedback across the organization. Staff had the opportunity to submit their responses anonymously online or provide input in team meetings. Through these internal engagement initiatives, staff collectively provided 53 pages of input. A thematic analysis was conducted to support the development of the proposed comments, resulting in 19 themes identified to provide constructive feedback for each question posed in the ERO posting. The thematic analysis is summarized as part of the draft ERO submission in Appendix 1.

Overall, there was a significant emphasis on the importance of preserving localized institutional knowledge and municipal decision-making. There is notable support for standardization of process improvements and software utilization and a strong desire for engagement on the co-development of transition frameworks.

Throughout this engagement initiative, staff reinforced NPCA's commitment to continuous improvement and have demonstrated deep consideration for the implications to the communities they serve.

External Engagement Feedback

Staff have connected with Indigenous partners (Mississaugas of the Credit First Nation, Six Nations of the Grand River, and Niagara Region Métis Council) to inform them of the provincial proposal and how we will continue to work together during any transition process. NPCA was provided comments prepared by MCFN staff, dated Dec. 1, 2025, and we agree with and support their comments and concerns. The MCFN comment letter is included in Appendix 2.

NPCA has shared information with watershed municipalities related to the proposal and offered to meet with staff to discuss potential implications. Internal meetings with municipal staff have been scheduled when requested. Further, a presentation to the Town of Niagara-on-the-Lake was provided on December 2, a delegation is scheduled for an upcoming Town of Lincoln Council meeting on December 15, and staff are requesting a delegation at the December 11 Niagara Region Council meeting

The CAOs and General Managers of all 36 CAs continue to meet through Conservation Ontario's coordinated efforts. Further, the CAOs for NPCA, HCA, CH and CVC have continued to meet during the consultation process.

Financial Implications:

While there are no financial implications associated with providing comments on the ERO posting, preliminary assessment of financial implications has been identified and included in the proposed comments for consideration.

Any consolidation of the NPCA with other CAs would require closer examination to determine financial implications with respect to items such as operating and capital budgets, asset management, salaries and benefits, changes to fee schedules, and cost apportionment to the OPCA.

Although not mentioned as part of the proposed regional consolidation of CAs, many CAs, including the NPCA, have a Foundation. Any consolidation of NPCA with other CAs will need to examine financial and governance implications for the Niagara Peninsula Conservation Foundation.

Links to Policy/Strategic Plan:

Goal 4.1 Strengthen government relations toward collective outcomes and impact

Related Reports and Appendices:

Appendix 1: Niagara Peninsula Conservation Authority (NPCA) Comments on ERO #025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities

Appendix 2: Mississaugas of the Credit First Nation Comments on the Proposed Regional Consolidation of Conservation Authorities; Letter dated December 1, 2025

Report No. FA-56-25 RE: Proposed Amendments the *Conservation Authorities Act* to establish the Ontario Provincial Conservation Agency, and Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities

Authored by:

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December 5, 2025

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RE: Niagara Peninsula Conservation Authority (NPCA) Comments on ERO #025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities

Thank you for the opportunity to provide comments on the proposed boundaries and criteria for the regional consolidation of Ontario’s Conservation Authorities (CAs). On Nov. 27, 2025, Bill 68, *Plan to Protect Ontario Act (Budget Measures), 2025 (No.2)* received Royal Assent and the amendments to the *Conservation Authorities Act* allow for the establishment of the Ontario Provincial Conservation Agency (OPCA). It is our understanding the OPCA is intended to:

- Streamline and standardize service delivery by setting clear, province-wide performance standards;
- Support the consistent application of provincial standards for assessing, managing and mitigating flood risks across Ontario, including managing centralized data, updated floodplain mapping and overseeing improved maintenance of CA-managed infrastructure like dams, to manage flood and other natural hazards;
- Develop a single, digital permitting platform to provide a faster, more predictable approvals process and improved customer service, while maintaining high environmental standards;
- Develop clear performance goals of CAs to report on annually to support continuous improvements; and
- Oversee the implementation of a regional watershed-based consolidation of CAs, following consultation with the public, municipalities, and other partners including Indigenous communities.

Further, on November 7, 2025, the Province posted a policy proposal to consolidate Ontario’s 36 CAs into seven Regional Conservation Authorities (RCAs) on the Environmental Registry of Ontario (ERO) and is seeking feedback on proposed boundaries and the criteria applied to inform the proposed boundaries, with a deadline of December 22, 2025. The seven proposed RCAs are Lake Erie RCA, Huron-Superior RCA, Western Lake Ontario RCA, Central Lake Ontario RCA, Eastern Lake Ontario RCA, St. Lawrence RCA, and Northeastern Ontario RCA.

Under this proposal, NPCA would fall under the Western Lake Ontario RCA, along with Hamilton Conservation Authority (HCA), Conservation Halton (CH) and Credit Valley Conservation (CVC). The boundaries of the Western Lake Ontario RCA extend along the western Lake Ontario shoreline from Niagara through Halton and Peel, encompassing urban and rural watersheds that support the Greater Toronto-Hamilton corridor. The RCA is primarily based on the western portion of the Northern Lake Ontario and Niagara River Secondary Watershed.

The proposed Western Lake Ontario RCA would also include the Niagara Peninsula Source Protection Area, Halton-Hamilton Source Protection Region and Credit Valley Source Protection Area (which belongs to the Credit Valley – Toronto and Region – Central Lake Ontario Source Protection Region).

NPCA staff and Board of Directors appreciate the engagement sessions organized by Todd McCarthy, Minister of Environment, Conservation and Parks, Hassaan Basit, Chief Conservation Executive, and MECP staff to provide further information on the provincial proposal and role of OPCA. NPCA senior leadership has engaged with NPCA and municipal staff and reached out to Indigenous partners (Mississaugas of the Credit First Nation (MCFN), Six Nations of the Grand River, and Niagara Region Métis Council) to inform them of the provincial proposal and how we may continue to work together during any transition process. NPCA was circulated comments prepared by MCFN staff, dated Dec. 1, 2025, and we agree with and support their comments and concerns.

While we support the proposed provincial investments in technology, standardization and modernization, the proposed RCA framework would create complexities and risks to local municipal representation and decision-making, local expertise, and delivery of programs and services. Given the proposed criteria and boundaries for the RCAs and the uncertainties and risks associated with the proposal, the NPCA does not support the proposed RCA framework. Comments and concerns related to the proposal are highlighted below. Detailed responses to the questions included in the ERO posting are provided in Appendix I. NPCA Board of Directors Resolution FA-XXX-2025 is appended as Appendix II.

Justification for a Regional Conservation Authority Framework

While it is understood that OPCA and the proposed RCA framework are intended to help get shovels in the ground faster on building homes and other local infrastructure projects while strengthening the vital role CAs play in managing watersheds and protecting communities from floods and natural hazards, CAs have not benefited from reviewing any assessments or analyses that have determined the need to restructure Ontario's current CA framework. With the various amendments to the *Conservation Authorities Act* and the standardization of regulated areas and development permit requirements through *Ontario Regulation 41/24*, CAs have been responsive to implement legislative changes and improve policies and processes through a coordinated approach.

For the NPCA and stemming from the 2018 Auditor General of Ontario report of the NPCA, we have undertaken tremendous work over the last several years to improve our governance, operations, policies and processes to strengthen the delivery of programs and services. NPCA has implemented all 20 recommendations within the Auditor General report and is focused on continuous improvements through updating planning and permitting policies, updating corporate policies, developing new guiding strategies, enhancing procedures, and implementing other modernization initiatives, including investments in software and data management. We have set an example for how CAs can implement best management practices and we remain committed to improving the delivery of our programs and services for the health and well-being of our local watersheds and communities.

Currently, NPCA is meeting provincial government set timelines for issuing development permits 96% of the time and continues to coordinate with municipal partners and developers while taking a solutions-focused approach to improving service delivery. We have invested in a permit management system, CityView, and will soon launch an online portal for permit submissions and tracking. We have also been investing in creating new and updated floodplain mapping as well as maintaining our online regulation mapping and open data

portal. For NPCA, it would be more beneficial to have clearer goals and guidelines that are evidence-based to drive further modernization and streamlining than restructure the CA framework. With the current CA framework in place, OPCA could provide added value by coordinating future enhancements across the CAs.

Governance of Regional Conservation Authorities

The proposed Western Lake Ontario RCA would cover approximately 490,000 ha of land and a population of nearly two million people. The new regional watershed-based boundaries would include portions of five upper-tier municipalities (Niagara, Halton, Peel, Dufferin and Wellington), three single-tier municipalities (Hamilton, Haldimand, and Toronto), and 25 lower-tier municipalities. Currently, the four governing Boards of Directors include a total of 53 members. While all four CAs offer similar watershed-based programs and services, they are scaled to unique local community needs and watershed management objectives.

The Niagara Peninsula watershed alone spans over 242,000 ha of land, includes 15 municipalities with approximately 480,000 residents. The watershed encompasses approximately 90 km of the Lake Erie shoreline, approximately 50 km of the Lake Ontario shoreline, the Niagara River, portions of the Niagara Escarpment, and the northernmost range of the Carolinian Life Zone. The Welland Canal supports cargo shipping between Lake Ontario and Lake Erie, bypassing the Niagara Escarpment and Niagara Falls.

There are nearly 5,000 km of watercourses in NPCA's watershed jurisdiction that are part of three major drainage basins: Lake Ontario, Lake Erie, and the Niagara River. Numerous streams, rivers, and creeks, such as Twelve Mile Creek and Twenty Mile Creek, flow into Lake Ontario, while the Welland River and other tributaries drain into the Niagara River, a critical waterway connecting the two Great Lakes. The Lake Erie basin includes the southern portion of the watershed, with its own network of smaller streams and wetlands. Together, these interconnected water systems form the hydrological foundation of NPCA's jurisdiction.

In general comparison to the three other CAs within the proposed Western Lake Ontario RCA, the NPCA has the largest watershed jurisdiction with the least number of staff, and smallest operating budget. In terms of land holdings, NPCA and CVC have a similar size of CA-owned lands, followed by CH and then HCA with the largest land holdings. With the two Great Lakes Shorelines, the NPCA jurisdiction represents the largest length of coastal shorelines and communities.

For the Western Lake Ontario RCA, going from the current combined oversight of 53 Board representatives to anything less will be challenging and risks losing diverse voices at the table. It is difficult to understand how the RCA Board would result in more efficient decision-making with less costs incurred by funding municipalities. Further, the functional separation from local communities risks the 70-80 years of relationships and trust that have been built up in each CA watershed.

Consolidation of Assets and Liabilities

Each CA is an independent corporate entity that manages its own budgets, expenditures, reserves, infrastructure and landholdings. Further, each CA within the proposed Western Lake Ontario RCA has its own Foundation, which are also independent corporate entities with the focused mandates of raising funds for the projects and programs of their CAs.

As independent corporations, the four CAs within the Western Lake Ontario RCA have their own internal financial processes and systems, contracts with banking institutions for financial and investment services, and financial assets and liabilities (e.g. debt servicing). The process to consolidate assets and liabilities of the four CAs and their Foundations would be complex and lengthy. A cost-benefit analysis and legal review of such a merger should be completed before any consideration of implementing an RCA framework.

Amalgamating landownership and land management will be equally complex. Legal instruments such as land titles, surveys, easement agreements, etc. will need to be reviewed in detail, and the costs and legal implications assessed prior to any CA consolidation.

Further, CAs are actively increasing self-generated revenues through sources such as user-fees, plan review and permit fees, facility rentals, annual park passes, camping, and external grant funding to decrease reliance on municipal levies. Operating and Capital Budgets to deliver watershed programs and services are established based on the performance of self-generated revenues. Should the Provincial Government move forward with an RCA framework, any self-generated revenues, municipal levies and financial assets must be committed to the jurisdiction from which they were collected.

Costs to Regional Conservation Authorities and Municipalities

NPCA is concerned that the proposed RCA framework will result in increased costs incurred by the RCAs and their municipal funding partners. The OPCA funding model allows a provincial agency to charge back fees to RCAs for providing support services to implement agency directives and can cost apportion operating costs to RCAs. Before the OPCA is established, a cost-benefit analysis should be undertaken to demonstrate that there will be no increased costs incurred by CAs and their funding municipalities and specify the value-added services of the Agency.

Costs associated with consolidation would include without limitation, legal services, harmonizing HR systems and policies, harmonizing salaries and benefits, integrating IT and GIS services, harmonizing services and delivery processes, equipment and facility upgrades, communications and marketing, additional debt service to cover costs, and increased levies. While some costs would be one-time transition related costs, others will be ongoing costs to maintain operations and infrastructure of the larger corporation.

The participating municipalities within NPCA's jurisdiction (Niagara, Hamilton and Haldimand) fund approximately 52% of the annual operating budget of NPCA through municipal levies, compared to the annual s. 39 natural hazard provincial transfer payment of approximately 0.5%. The remaining revenues are obtained through self-generated program revenues (27%), federal grant funding (6.5%), provincially funded programs such as Drinking Water Source Protection Program and the Niagara River Remedial Action Plan (3%), and other sources through cost-sharing programs and fundraising efforts (11%). NPCA's increased self-generated revenue efforts has resulted in a decreased reliance on municipal contributions since 2021. NPCA's ability to generate additional revenues or increase dependence on municipal levies to cover costs incurred resulting from the transition to an RCA framework will be very limited and resources would be diverted away from front-line natural hazard and watershed management programs that support local communities.

As noted, we support and welcome renewed provincial investment in CAs to enhance process improvements, IT transformations and modernization efforts. It is recommended that the province immediately reassess the s. 39 natural hazard transfer payments to provide sustainable, predictable provincial funding across conservation

authorities—particularly where gaps exist—to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years.

Risks to Delivery of Local Watershed Programs and Services

With the additional administrative oversight of the OPCA, RCA Boards representing larger and more diverse communities and potentially complex budgeting processes, there is a serious concern that our dedicated expert staff will be unable to deliver the same quality of programs and services that our communities expect. The NPCA recommends that the province pause any further implementation of OPCA and consideration of an RCA framework, and instead assess the use of legislative, regulatory and incentive tools that are already available to achieve the desired standardization and modernization of CAs.

Should the Province decide to move forward with the RCA framework, it will be imperative that existing staff complements be maintained, and RCAs can fill roles that will enable the continuation of current programs and services, to ensure continuity of front-line services without disruption, including commitments under agreements with our member municipalities. It is worth noting that the NPCA is a unionized work environment. The Collective Agreement between the NPCA and OPSEU Local 212 expires at the end of 2025 and bargaining is expected to begin in the Spring of 2026.

Thank you again for the opportunity to participate in discussions with the Minister, Chief Conservation Executive, and MECP staff and provide constructive input to ensure that any future framework continues to address the unique needs of our watersheds and achieves an effective balance between watershed protection and housing goals.

Should further amendments to the *Conservation Authorities Act* and related regulations to implement OPCA and the RCAs be proposed, we would welcome the opportunity to provide further comments related to policy reform.

Sincerely,

John Metcalfe
Chair, NPCA Board of Directors

Leilani Lee-Yates, BES, MSPL.RPD, MCIP, RPP
Chief Administrative Officer/Secretary-Treasurer

Encl: Appendix I - Niagara Peninsula Conservation Authority (NPCA) Comments on ERO #025-1257
Appendix II – NPCA Board of Directors Resolution FA-XXX-2025

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

Theme	Comments
<p>Preserve and Promote Local Institutional Knowledge</p>	<p>A transitional framework that incorporates and promotes the involvement of CA front-line staff is essential to ensure localized expertise and input is built-in from the beginning. To maintain and enhance service delivery there must not be any job losses during and post-transition to an RCA framework.</p> <p>Position needs and skills may be specific in each CA based on the local watershed objectives, and as such, the mandate for the structure and/or design of roles must be maintained at the local CA level.</p>
<p>Preserve Municipal Governance and Decision-Making</p>	<p>Consolidation of CAs poses risks to local, grassroots initiatives, it is imperative that local presence is maintained and strengthened to keep our communities informed throughout transitional phases.</p> <p>To further preserve local decision-making, transparency and clear delineations of authority of the OPCA and RCAs need to be established and communicated effectively.</p>
<p>Phasing Transitional Periods with a focus on Standardization before Amalgamations</p>	<p>Many areas of focus proposed for the OPCA (i.e. province-wide permitting platform and digital innovations) are initiatives that could be established across conservation authorities under their current structures.</p> <p>Software and standard processes can be CA lead and be prioritized, followed by amalgamations with existing local CA Boards in place to oversee their own amalgamations.</p> <p>Preventing transformation saturation will ensure these priority initiatives are implemented efficiently and successfully.</p>
<p>Consider alignment of Source Protection Boundaries</p>	<p>Source Protection Regions were identified as a key factor in establishing proposed boundaries for regional conservation authorities.</p>

Appendix I – Niagara Peninsula Conservation Authority (NPCA) Comments on ERO #025-1257

Theme	Comments
	<p>The proposed regional consolidation has the Niagara Peninsula Source Protection Authority merge with the Halton-Hamilton Source Protection Region and the Credit Valley Source Protection Area (which belongs to the Credit Valley – Toronto and Region – Central Lake Ontario Source Protection Region). The Niagara Peninsula is the only standalone Source Protection Authority included in the Western Lake Ontario RCA along with two Source Protection Regions.</p> <p>If the regional consolidation of the conservation authorities proceeds as proposed, there are several potential upcoming changes to the Source Protection Program as a result.</p> <p>Some of these potential changes could include:</p> <ul style="list-style-type: none"> • Reduction of 19 Source Protection Regions/Areas down to 7 to match the proposed regional conservation authorities. • Subsequent reduction of 19 Source Protection Committees down to 7. • Restructuring of Source Protection Committees and their member allocations. • Consolidation of Source Protection Plans and Assessment Reports. • Source Protection Plan policy review and restructuring. <p>Should the Province proceed with a RCA framework, it is recommended that the boundaries of the RCAs align with the boundaries of the 19 Source Protection Regions/Areas.</p>
<p>Clear Communication and Collaboration on Transition Frameworks</p>	<p>Engaging appropriate staff from RCAs through targeted working groups would ensure subject matter experts co-develop components of transitions that relate to their work.</p>

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

Theme	Comments
Provincial investments to enhance conservation authority operations while maintaining recognition of unique watershed characteristics / challenges	There are opportunities to enhance conservation authority operations with consistent policies and procedures while maintaining recognition for the diversity of landscapes across Ontario. However, enhancements can be coordinated through the OPCA under the current CA framework.
Investing in and empowering CA strengths through a standardized framework.	<p>Ensuring CAs have access to similar expertise and resources across Ontario is welcomed, but priority should be given to implementing changes where CAs have identified demonstrable need.</p> <p>Given that CAs currently meet Provincial Government legislated permit review timelines 90% or more of the time, the proposed changes would likely result in diminishing returns for the taxpayer. The benefits, therefore, would come from avoiding the many risks of moving quickly without evidence of needed changes and real measurements.</p>
A provincially sponsored integrated watershed management program	Provincial guidance and sponsorship of the next generation of integrated watershed management programs is welcomed to support economic and environmental resilience across Ontario, and conservation authorities are uniquely positioned to deliver these programs alongside their natural hazard mandate. There is an opportunity to reduce long-term costs by preventing flood damage, erosion, and infrastructure failures while protecting property values by maintaining healthy watersheds and greenspaces that attract growth in the community. It remains unclear how an RCA framework would be more beneficial than coordinating integrated watershed programs through the OPCA under the current CA framework.

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?

Theme	Comments
<p>Ensure Board composition of RCAs accounts for the vast complexities and size of jurisdictions</p>	<p>Current governance structures rely on population and property value-based approaches to determine municipal representation on Boards that would not capture the needs of the larger RCA watershed. This would result in the largest municipal jurisdictions having disproportionately low rates of representation.</p> <p>Under the proposed RCA structure, it is imperative that governance models reflect the size of jurisdictions served to ensure that all urban and rural areas are appropriately represented on the Board.</p> <p>A “one-size fits all” approach may not work. It is recommended that the OPCA consult with the municipalities within each RCA to determine the best formula/methodology for ensuring local representation balanced with ensuring efficiency of the Board.</p> <p>A set of core competencies should be developed to ensure RCA Board members have the desired experience and expertise to make local decisions related to CA mandates and responsibilities. Further, the Ministry or OPCA should provide a Board orientation and training session for each term of service.</p>
<p>Municipal appointments must be maintained</p>	<p>Participating municipalities provide substantial levy support to conservation authorities and should maintain their autonomy to appoint their allotted number of board members. In addition to elected official appointments, citizen and Indigenous community representation should be included.</p> <p>With changes to the <i>Planning Act</i> regarding removal of planning responsibilities from upper-tier municipalities there is an opportunity to explore how to best align RCA governance with local municipal planning responsibilities.</p>

Appendix I – Niagara Peninsula Conservation Authority (NPCA) Comments on ERO #025-1257

Theme	Comments
<p>Consider transitional supports for newly established RCA Boards</p>	<p>If RCA Boards are enacted after the 2026 municipal election, new Board members will be facing a plethora of information as they join a Board for brand-new institutions.</p> <p>The Province should explore establishing transitional supports to ensure newly established RCA Boards have institutional knowledge readily available for a pre-determined transitional period.</p> <p>This could include: extending current board terms for 2 years to support the RCA, appointing staff and/or Indigenous representatives</p>
<p>Maintain local watershed offices with independent delegated authority to serve local communities</p>	<p>The current CA offices should remain as local watershed offices with delegated responsibilities from the RCA Boards to ensure the continuous delivery of local programs and services, such as permit approvals, procurement and contract approvals, recruitment and management of staff, executing agreements and binding the authority, and preparing operating and capital budgets.</p> <p>Senior leadership of local offices could coordinate across the RCA through staff committees and report to the RCA Board or Committees, such as an Executive Committee, Governance Committee, or Finance Committee.</p> <p>The option to form public advisory committees or ad-hoc committee at the local level should remain.</p> <p>Equally important to maintain are the current local CA Foundations and their Boards who connect with donors and the community to raise funds to directly support the work of CAs. Foundations are a key source of revenue for non-mandatory programs and services, and have built community trust and confidence over several decades. Foundations must continue to operate without disruption.</p>

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

Theme	Comments
<p>Prioritize Municipal Engagement in Budget Development</p>	<p>A transparent and consultative budgeting process should clearly outline the scope of services and timelines for delivery, with measurable outcomes that are co-developed to meet the unique needs of participating municipalities.</p> <p>Maintain meaningful local representation directly in the budget process so that each local CA has clear input and influence, and local priorities drive levy discussions.</p> <p>Respecting local special levies/funding and municipal service agreements so that locally funded initiatives—such as land acquisition, land management, trail maintenance, restoration projects, or capital works—remain under local control and cannot be redirected without municipal consent.</p> <p>Using a clear, standardized regional budget framework in which each local CA develops its own budget in alignment with local municipalities, and these are then consolidated at the regional level for transparency and oversight.</p>
<p>Consolidation-related Costs must be funded by the province.</p>	<p>NPCA has made significant investments in software, systems and process improvements in recent years. It would be unreasonable for municipal partners to shoulder the cost of Agency-directed initiatives without involvement in the decision-making process.</p> <p>It is recommended that the OPCA fully fund the transitional costs and not download those costs to the municipalities who fund CAs. Costs related to lost opportunity and investments made by CAs should be accounted for and supported by the OPCA. Further, it is recommended that there is an annual audit of OPCA performed, versus the initial 3-year reporting schedule.</p>

Appendix I – Niagara Peninsula Conservation Authority (NPCA) Comments on ERO #025-1257

Theme	Comments
<p>Funds generated by watershed jurisdictions must be retained in their communities</p>	<p>Participating municipalities need to be consulted on any changes and remain confident that the apportionment model is sustainable and equitable.</p> <p>Any self-generated revenues and financial assets rolled into newly established RCAs must be committed to the jurisdiction they were collected from.</p> <p>Ensuring full disclosure and due diligence on assets, liabilities, capital obligations/asset management for all local CAs before any apportionment or levy model is adopted.</p>

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

Theme	Comments
<p>Proactive engagement and awareness initiatives is critical to mitigate risks of disconnection with communities</p>	<p>Locally relevant communications and brand identities are at risk of being lost; communication must be consistent and proactive to ensure interested parties stay informed.</p> <p>There are concerns that RCAs would erode long-standing working relationships that have enabled the collaborative, grassroots approach that underpins NPCAs programs and services.</p> <p>A very cautious implementation process that engages with local communities and interested parties would reduce risk and disruption of programs and services.</p>
<p>Co-development of Transitional Period Phases</p>	<p>Implementation of the transition to RCAs will require a resource shift to focus on consolidating organizational structures, municipal relationships, financial systems, software, and internal processes, pulling resources away from providing programs and services to the communities CAs serve.</p> <p>Co-developing these transition periods will enable CAs and participating municipalities to determine what priorities would best serve their communities now, and how they will get there.</p> <p>It is recommended that the current Board structures for each local CA office remains as is and the amalgamation of Boards is formulated and lead by the local Board representatives. This would provide a sufficient transition period at which time the new RCA Boards would take effect after the 2030 municipal elections. This would mitigate operational disruptions and build trust and confidence in the new governance model.</p>
<p>Ensure responsive representation and accessible staff remain in the communities they serve</p>	<p>Local offices, staff, and programs are essential for timely permitting, service delivery, and effective stewardship. Delivering on community needs is at risk without a known local presence.</p>