



December 22, 2025

MECP Conservation and Source Protection Branch
300 Water Street North Tower, 5th Floor
Peterborough, ON K9J 3C7

To the Ministry of the Environment, Conservation and Parks

RE: ERO 025-1257 Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Introduction

On behalf of the Ontario Farmland Trust (OFT), thank you for the opportunity to comment on the proposed consolidation of Ontario's 36 Conservation Authorities, to form seven larger Regional Conservation Authorities.

OFT is a not-for-profit organization dedicated to protecting and preserving Ontario's farmlands and associated agricultural, natural and cultural landscapes. We do this through direct land securement, stewardship, research and policy advocacy. Farmland comprises less than 5% of Ontario's land base yet supports the agri-food sector employing over 871,000 Ontarians and contributing more than \$51 billion annually to the province's GDP.

Background

Watersheds are fundamental in providing clean drinking water, preventing flooding and droughts, supporting the natural environment and critical ecosystems, and a variety of economies including agriculture. Watersheds are also critical support networks for the province's food security, climate resilience, rural and urban communities and long-term land use planning goals. Integrated management by local, watershed based conservation authorities is necessary to protect public health and the health of Ontario's agriculture, natural heritage and water resource systems for current and future generations. Based on this, OFT provides the following comments for the Ministry of the Environment, Conservation and Parks, and the Ontario Provincial Conservation Agency to consider when determining its approach to Regional Conservation Authorities.



Ontario Farmland Trust Comments on the Proposed Regional Conservation Authorities

The proposal to consolidate the 36 conservation authorities into seven regional conservation authorities raises significant concerns about whether the approach would be effective for watershed planning and management and delivery of conservation authority services. The large geographical scope of the proposed Regional Conservation Authorities brings concern of their ability to be responsive and effective to immediate local risks. The Province should consider if smaller, more locally scoped Regional Conservation Authorities are more appropriate in some areas to improve efficiency, access to services, preserve local knowledge and existing community relationships.

The reduction in the number of conservation authorities also dilutes local representation in governance and causes a concern for appropriately balancing rural and urban interests. The local context of conservation authorities has always been critically important in protecting our natural resources and watersheds on a more appropriate level that can allow for a differentiation in approach for urban and rural areas. This capacity and capability needs to be maintained.

OFT requests that the Province undertake more extensive public engagement before proceeding with these changes to the *Conservation Authorities Act* to create the new Regional Conservation Authorities. There should be a widespread opportunity for various agencies, stakeholders, conservation authorities, municipalities, Indigenous communities and members of the public to inform this consolidation. OFT urges the Province to carefully consider their input before making any final consolidation decisions.

The Province indicates the transition process to a Regional Conservation Authority will include consultation with conservation authorities, municipal and stakeholder involvement to minimize disruptions as changes are implemented. Should the Regional Conservation Authority consolidation advance, OFT looks forward to participating in these engagement opportunities providing further input on transition supports.

OFT supports efforts to modernize and improve efficiency to better protect watersheds and the integrity of our natural environment, but it is not clear how existing conservation authority programs and services will be maintained or restructured, creating uncertainty on how watershed planning and management will be undertaken. Before any restructuring of the current 37 conservation authorities, a more comprehensive understanding of the proposed approach is necessary.



Conclusion

OFT respectfully requests that the Province further engage in public consultation on the proposed amalgamation of the 36 existing conservation authorities into seven Regional Conservation Authorities to determine if there is a need for the extent of the proposed consolidation and refinement of the geographical scope of the proposed Regional Conservation Authorities. The intent of the extended public engagement and consultation is to determine measures to enhance the processes and systems to make Conservation Authorities more efficient while maintaining the local representation and science-based decision-making of the watersheds.

OFT thanks you for the opportunity to provide these comments and I remain available for further discussion.

Sincerely,

Martin Straathof, MSc
Executive Director
Ontario Farmland Trust