

December 12, 2025

## **FOCA Comment Submission on ERO #025-1257**

### **RE: Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities**

Thank you for the opportunity to comment on ERO #025-1257 regarding the Province's proposal to consolidate Ontario's 36 Conservation Authorities (CAs) into seven large regional entities.

FOCA represents 50,000 waterfront property owners in over 550 community associations across Ontario. Our communities rely on strong, locally responsive watershed management systems that protect people, property, and ecosystems. Conservation Authorities are a critical partner in this work.

**FOCA is opposed to the scope and scale of the proposed consolidation.** We do not believe this model will deliver improved consistency or customer service across the province. Instead, it will weaken local watershed expertise, dilute municipal and community representation, and disrupt nearly 80 years of successful Conservation Authority operations.

The magnitude of the proposed changes far exceeds what would be required to address administrative inefficiencies or procedural inconsistencies. Ontario is facing more frequent and severe climate-driven flooding—and now is not the time to destabilize the system designed to protect public safety.

Conservation Authorities provide far more than permitting and hazard prevention. For FOCA's member communities, CAs are the local face of:

- watershed stewardship and restoration
- science, monitoring, and technical advice
- climate resilience
- education and outreach
- parks, trails, and community programming
- land and water management that reflects local geography, history, and risk.

This local presence underpins public confidence and is essential to the long-standing relationships between CAs, municipalities, landowners, and watershed groups including FOCA's membership. A regionalized model, where some regions would span more than 28,000 km<sup>2</sup> and up to 80 municipalities, cannot meaningfully maintain these relationships or respond to local conditions in a timely or contextual manner.

The Province cites inconsistency between CAs as justification for amalgamation. FOCA does not agree that standardization is inherently desirable. As one example, a solution suitable for the Lakehead Region on Lake Superior will not be the same as one needed for the very different geography, pressures, and population dynamics of Lake Simcoe, yet under the proposed plan, these two watersheds will be grouped together in the same regional CA.

FOCA's main concerns with the proposed amalgamation include:

**Lack of consultation.** The proposal was released immediately after the passage of Bill 68, without meaningful engagement with municipalities, First Nations, CAs, watershed groups, or the public.

**Scale of disruption.** Amalgamating 36 CAs into seven represents a significant governance and operational overhaul with substantial transition costs, administrative burden, and risk of service interruptions.

**Weakening watershed-based governance.** Conservation Authorities were intentionally formed around watershed boundaries—not administrative regions. Diluting watershed-based decision-making undermines the scientific foundation of the model.

**Questionable linkage to housing.** There is no evidence that CAs are a primary barrier to housing approvals. Where CAs advise caution or restrict development, it is typically because a location is unsafe or at risk from flooding, erosion, or other natural hazards. These are measures that protect public safety and prevent property damage, infrastructure loss, and other expensive consequences. Weakening this oversight does not support responsible or economically sound housing development.

While FOCA does not support the consolidation model, we provide the following responses to the Province's discussion questions in ERO #025-1257:

*1. Key factors to support a "successful" transition and outcome of regional consolidation?*

FOCA does not believe that a successful transition is achievable under the proposed consolidation model. The scale of the changes, combined with the diversity of Ontario's watersheds and communities, makes meaningful, effective regional governance highly unlikely. The regional model proposed cannot deliver improved outcomes over the current CA model without:

- Robust, broad-based consultation with municipalities, Indigenous communities, CAs, and stakeholders before any restructuring occurs, to ensure local needs and risks are understood.
- Maintenance of strong local presence, including field offices and staff within each watershed to preserve relationships, local knowledge, and timely service delivery.
- Protection of watershed-specific science, data, and programs that are at risk of being lost or deprioritized in a large regional structure.
- Realistic transition timelines to prevent interruptions to permitting, hazard management, and other critical public safety functions.

Even with these measures, FOCA's position is that the proposed regional consolidation is fundamentally flawed and unlikely to achieve the Province's stated objectives.

*2. Potential opportunities or benefits of a regional CA framework?*

While the Province suggests that a regional model could improve consistency and efficiency, FOCA does not see evidence that these benefits outweigh the substantial risks of local disengagement and service disruption. Opportunities such as shared services, harmonized policies, or administrative support for under-resourced CAs can be achieved without dismantling

the existing watershed-based system, and would likely be faster, more cost-effective, and more responsive to local needs. FOCA does not believe the proposed consolidation provides meaningful benefits; any advantages would primarily serve developers at the expense of sound public policy and community safety.

### *3. Governance structure at the regional level?*

FOCA does not believe that regional consolidation can create an effective governance model. Large boards spanning multiple watersheds and dozens of municipalities will inevitably dilute local accountability and expertise. The regional model proposed cannot deliver improved outcomes over the current CA model without:

- Municipal representation proportionate to population and watershed, to preserve local accountability.
- Sub-watershed advisory committees or local governance structures, to retain technical and community knowledge.
- Clear and manageable board sizes with defined responsibilities and decision-making authority.
- Municipal flexibility in appointments, allowing representatives with local watershed expertise.

Even with these safeguards, governance under a regional CA would remain unwieldy and disconnected from local communities. FOCA does not believe it could succeed.

### *4. Maintaining a transparent and consultative budgeting process?*

Transparency will be significantly harder under a regional model, given the pooling of municipal funds across large areas. The regional model proposed cannot deliver improved outcomes over the current CA model without:

- Watershed-specific budget allocations, so municipal levies support work in the communities that contributed them
- Increased and sustained provincial funding, particularly to support smaller municipalities and CAs facing rising flood risks, climate adaptation pressures, and costly infrastructure needs.
- Predictable, multi-year provincial funding frameworks to ensure CAs can deliver critical watershed services and plan effectively for the long term.
- Mandatory consultation periods with municipalities and stakeholders prior to budget approval.
- Public reporting by watershed, showing how funds were spent and programs delivered.
- Independent audits, ensuring funds are directed appropriately and efficiently.

Even with these measures, FOCA believes regional consolidation risks undermining the clear link between local funding, local priorities, and local services.

### *5. Maintaining and strengthening relationships with local communities and stakeholders?*

The effectiveness of CAs depends on close relationships with local municipalities, landowners, and community organizations. A regionalized model inherently distances decision-makers and staff from the communities they serve. The regional model proposed cannot deliver improved outcomes over the current CA model without:

- Retention of local offices and staff, to ensure on-the-ground presence and timely responsiveness.
- Preservation of local identity, including naming of parks, conservation areas, and facilities.

- Establishment of advisory groups or sub-watershed committees, to maintain meaningful two-way engagement with municipalities, First Nations, and stakeholder communities.

Even with these measures, FOCA believes that a regionalized CA model cannot replicate the level of community engagement, responsiveness, and local expertise currently provided by existing watershed-based authorities.

**In summary, FOCA opposes the regional CA proposal.**

Ontario's Conservation Authority system is not broken. It is a proven, science-based governance model that has served communities for generations. Improvements to consistency and service delivery are welcome, but they must strengthen rather than erode watershed-based decision-making.

FOCA urges the Province to reconsider the proposed consolidation and to work collaboratively with municipalities, CAs, First Nations, and community stakeholders to develop solutions that protect public safety, support responsible development, and maintain the trusted local relationships that underpin effective watershed management.

Thank you for the opportunity to provide comments. FOCA would welcome further discussion with the Ministry.

Respectfully,



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*FOCA is the Federation of Ontario Cottagers' Associations, the only go-to provincial advocacy organization committed to sustaining and enhancing the Ontario cottage experience. We work collaboratively to identify and address key issues by providing credible expertise, environmental stewardship, targeted programs and services, and a robust network of strategic partners.*

*Since 1963, FOCA has united Ontario's waterfront community. We are a non-profit membership organization representing over 550 lake, road, cottage, camp, and rural waterfront associations—together, 250,000 families and voters who steward 15,000 km of shoreline and 50 hectares of privately owned waterfront land from Kenora to Kingston, Lake Erie to north of Temagami. Our [2022 Economic Impact Study](#) confirmed that every 100 waterfront properties generate 63 jobs in Ontario, with 54 of those jobs in the community itself.*

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