

## GSCA Submission to ERO Posting 025-1257

December 18, 2025

Via Environmental Registry of Ontario

**Subject:** Comments on ERO Posting No. 025-1257 – Proposed Boundaries for Regional Consolidation of Ontario's Conservation Authorities

### To Whom It May Concern:

Grey Sauble Conservation Authority (GSCA) appreciates the opportunity to comment on the proposed consolidation of Ontario's conservation authorities. We share the Province's objectives of improving efficiency, consistency, and modernization in service delivery. GSCA has already implemented significant improvements, including digital permitting, streamlined processes and enhanced customer service, and we remain committed to advancing these objectives.

However, GSCA does **not support the proposed consolidation into the Huron–Superior Regional Conservation Authority**. This model would create a geographically vast entity (over 23,500 km<sup>2</sup> and 80 municipalities) combining watersheds with little shared hydrology, climate, or economic alignment.

Such a structure risks:

- **Loss of Local Accountability and Rural Voice:** GSCA currently operates with strong municipal representation and local decision-making. Under the proposed model, local priorities could be overshadowed by urban centres hundreds of kilometers away.
- **Increased Costs and Bureaucracy:** No cost-benefit analysis or feasibility assessment has been provided. Transition costs (IT integration, HR harmonization, rebranding) and additional layers of governance will likely increase municipal cost apportionment and offer little in the way of savings to GSCA's member municipalities.
- **Reduced Responsiveness:** Larger administrative structures often slow processes, contrary to the Province's stated goal of streamlining approvals.
- **Disruption of Community Partnerships:** GSCA manages 29,000 acres of land, much of it donated by local residents with the expectation of local stewardship. GSCA also works with a network of dedicated volunteers and partners. Consolidation into a vast regional conservation authorities risks eroding these relationships and the trust that has been built locally.

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### Member Municipalities

Municipality of Arran-Elderslie, Town of the Blue Mountains, Township of Chatsworth, Township of Georgian Bluffs, Municipality of Grey Highlands, Municipality of Meaford, City of Owen Sound, Town of South Bruce Peninsula

**GSCA supports modernization without amalgamation, through:**

- Province-wide standards and policies for permitting.
- Provincially developed and updated technical guidelines.
- Refined Key Performance Indicators (KPIs) to ensure that Provincial objectives are being met.
- Shared digital platforms and tools.
- Sustainable provincial funding to enable modernization and service delivery.

**Responses to ERO Consultation Questions**

**1. Key factors for a successful transition and outcome of regional consolidation:**

GSCA does not support the proposed regional consolidation of conservation authorities and is firmly of the opinion that the Government's objectives would be better served without adding red-tape and bureaucracy. However, if consolidation proceeds, success depends on:

- Pausing the current consolidation proposal to allow the Ontario Provincial Conservation Agency time to develop a well thought out business plan, including cost-benefit analysis and feasibility assessments.
- Clear provincial leadership and phased implementation to avoid service disruption.
- Retention of local knowledge and staff expertise, which is critical for ongoing program management.
- Retention of local offices and staff, including management, to provide continuance of local partnership, accessibility and front-line service.
- Continuation of locally prioritised and tailored programming to reflect local community needs.
- Transparent governance frameworks that preserve municipal influence and watershed identity.
- Dedicated provincial funding for all transition costs.
- Robust communication strategies to keep municipalities, stakeholders, and the public informed and engaged throughout the process.

**2. Opportunities or benefits of a regional conservation authority framework**

GSCA is of the opinion that these benefits can be achieved through collaboration, shared systems and voluntary service agreements without the cost and complexity of consolidation. The potential benefits of such service agreements could include:

- Shared technical expertise and modern tools across multiple watersheds.

- Consistent permitting standards and digital platforms that improve predictability for applicants. These should be provided by the Province regardless of consolidation.
- Opportunities for joint procurement and shared services to reduce duplication.

### **3. Suggestions for governance structure at the regional level**

The current governance structure provides the most representative and accountable system by offering each funding partner a meaningful voice at the governance table. GSCA has eight (8) participating municipalities represented by eleven (11) Board Directors appointed from each of the participating municipalities. This system provides a well-balanced structure that allow the participating municipalities the opportunity to design programs and policies that align with local municipal priorities, align with local municipal budgets, and represent the needs of the local community. If the Province proceeds with consolidation, the following governance structure may provide the next best option:

- A streamlined board (10–20 members) with representation grouped by upper-tier municipalities or counties to maintain fairness and efficiency.
- Utilizing the existing Upper Tier and Single Tier frameworks for local governance and apportionment to provide a more manageable option. That is, members of the Regional CA Board would be appointed from local upper tier or single tier municipalities within the Region’s jurisdiction.
- In this model, it is recommended that apportionment would also move to the Upper Tier / Single Tier level.
- Clear protocols for communication between regional boards and municipalities.
- The creation of Regional Boards provides an opportunity to include other community groups within the Board structure, including local Indigenous representation and local industry representation. If this option is considered, it is recommended that the additional representatives would be excluded from budget votes.

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

The current budget process provides for the most transparent, accountable, accessible and consultative budgeting process as each participating municipality is afforded the opportunity to review draft budgets and representation at the Board table is such that individual municipal input is factored into budget decisions. This will be lost by the proposed consolidation model.

If consolidation moves forward, the following process should be utilized:

- A standardized regional budget framework with clear timelines and assumptions.
- Locally developed operating and capital budgets for each local office that are factored into the regional budget framework. These budgets can be reviewed and presented to sub-regional (local) budget advisory committees to ensure local priorities are considered.

- Publicly accessible budget documents and early consultation aligned with municipal budget cycles.
- Transparent levy apportionment formulas and regular financial reporting to all member municipalities.

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

Relationships with local communities and stakeholders have been developed over years or decades. Unless local offices, staff and leadership are maintained, not only will relationships weaken, they are at risk of disappearing altogether.

- Retain local offices and staff presence to ensure accessibility and responsiveness.
- Maintain clear communication channels and decision-making processes for local issues.
- Preserve local branding and identity to sustain trust and engagement.

## **Closing Statement**

GSCA urges the Province to prioritize modernization through shared standards, tools, and funding rather than large-scale structural amalgamation. We remain committed to working collaboratively to achieve efficiency and consistency while preserving the watershed-based governance model that has served Ontario effectively for decades.

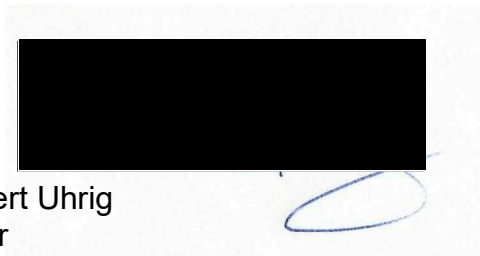
### **Submitted by:**

Grey Sauble Conservation Authority  
[www.greysauble.on.ca](http://www.greysauble.on.ca)

Thank you,



Tim Lanthier  
Chief Administrative Officer  
Grey Sauble Conservation Authority



Robert Uhrig  
Chair  
Grey Sauble Conservation Authority

**Motion No.: FA-25-097  
December 17, 2025**

**Moved By: Jon Farmer  
Seconded By: Scott Mackey**

**WHEREAS the Province of Ontario has posted Environmental Registry Notice No. 025-1257 (“Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities”), proposing to reduce Ontario’s 36 conservation authorities to 7 regional entities as part of a broader restructuring; and**

**WHEREAS Bill 68 (Schedule 3) has effectively created the Ontario Provincial Conservation Agency whose objects include overseeing conservation authorities and the transition to a regional watershed-based framework for conservation authorities in Ontario with municipal cost contribution yet to be defined; and**

**WHEREAS the Conservation Authorities Act enables municipalities to establish local conservation authorities, and when municipalities choose to form such authorities, they assume responsibility for governance and funding through the appointment of a Board of Directors and the provision of an annual levy to cover expenses; and**

**WHEREAS the municipalities within the northern portions of Bruce and Grey Counties established the North Grey Region Conservation Authority in 1957 and the Sauble Valley Conservation Authority in 1958 which amalgamated into the Grey Sauble Conservation Authority (GSCA) in 1985; and**

**WHEREAS GSCA generates approximately 50 percent of its own revenues and local municipalities provide approximately 43% of total GSCA funding, while the Province of Ontario provides less than 7%; and**

**WHEREAS under this proposal, the Grey Sauble Conservation Authority (GSCA) would be consolidated into a new “Huron-Superior Regional Conservation Authority” that is over 23,000 square kilometres in size and consists of 80 municipalities; and**

**WHEREAS municipalities have governed their respective conservation authorities for decades, tailoring programs and services to local watershed needs, maintaining accountable service standards, and ensuring fair and predictable costs for ratepayers; and**

**WHEREAS conservation authorities collectively own and manage thousands of hectares of land, much of which was donated or sold by local residents and entrusted to conservation authorities as a personal legacy for long-term protection, stewardship, and the public good, with the expectation that such lands would be cared for by locally governed conservation authorities; and**

**WHEREAS no governance model has been provided to ensure that local municipalities are still able to make local decisions related to the functioning and programs of the conservation authorities; and**

**WHEREAS no business plan, cost-benefit analysis, or feasibility assessment has been provided to justify the proposed consolidation; and**

**WHEREAS the Province already has the authority to establish overarching legislation, regulations and standards through the Conservation Authorities Act and the Ministry of Environment, Conservation and Parks to address issues related to permitting, by establishing guidance, online permitting platforms and technical standards through legislation that could help build homes; and**

**WHEREAS the GSCA has already undertaken significant modernization work aligned with provincial objectives, including Information Technology / Information Management, and leveraging technology to streamline planning and permit review processes processing 100% of major permits within the provincial timelines in 2024.**

**NOW THEREFORE BE IT RESOLVED:**

**THAT the Board of Directors of the Grey Sauble Conservation Authority calls on the Government of Ontario to maintain local, independent, municipally governed, watershed-based conservation authorities to ensure strong local representation in decisions related to municipal levies, community-focused service delivery, and the protection and management of conservation lands; and**

**THAT the Board of Directors of the Grey Sauble Conservation Authority does not support the proposed “Huron-Superior Regional Conservation Authority” boundary configuration outlined in Environmental Registry Notice 025-1257 as the proposal lacks sufficient justification, would significantly diminish local governance, and fails to recognize the effectiveness and efficiencies already achieved within existing watershed-based models; and**

**THAT the Board of Directors of the Grey Sauble Conservation Authority affirms that large-scale regional consolidation is unnecessary, would introduce substantial transition costs, and would divert resources away from frontline watershed programs. The Council further asserts that restructuring at this scale would erode local decision-making, weaken municipal accountability, and disrupt long-standing community partnerships that are central to delivering responsive watershed management; and**

**THAT while the Board of Directors of the Grey Sauble Conservation Authority supports provincial goals for consistent permit approval processes, shared services, and digital modernization, imposing a new top-down approach structure without strong local accountability and governance risks creating unnecessary cost, red-tape, and bureaucracy, thereby undermining efficiency and responsiveness to local community needs; and**

**THAT the Board of Directors of the Grey Sauble Conservation Authority urges the Province to strengthen centralized standards, resources, and tools rather than undertaking broad structural amalgamation and to provide sustainable, predictable provincial funding across conservation authorities to enable local CAs to advance ongoing digitization and systemization work that has already resulted in improved efficiency and consistency in recent years; and**



**THAT the Board of Directors of the Grey Sauble Conservation Authority believes that the Province’s proposed new online permitting portal can be implemented within the existing conservation authority framework without requiring structural amalgamation; and**

**THAT the Board of Directors of the Grey Sauble Conservation Authority requests that the Ministry engage meaningfully and collaboratively with affected municipalities, conservation authorities, and local First Nations before advancing any consolidation, to ensure that any changes reflect both local needs and the practical realities of implementation; and**

**THAT this resolution be included in the Grey Sauble Conservation Authority’s ERO response and forwarded to the Premier of Ontario, the Minister of the Environment, Conservation and Parks, local MPPs, all of Ontario’s municipalities, conservation authorities, AMO, and Conservation Ontario.**

**Carried**

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