The Town of Goderich 57 West Street Goderich, Ontario N7A 2K5 519-524-8344 townhall@goderich.ca www.goderich.ca



November 21, 2025

SENT VIA EMAIL - minister.mecp@ontario.ca

The Honourable Todd J. McCarthy
Minister of Environment, Conservation and Parks
College Park, 5th Floor
777 Bay Street
TORONTO, Ontario
M7A 2J3

Dear Minister McCarthy:

On October 31, 2025, the Ontario Ministry of Environment, Conservation and Parks (MECP) announced proposed amendments to the *Conservation Authorities Act* (CAA), to establish the Ontario Provincial Conservation Agency (OPCA) to provide leadership, governance, and strategic direction to Conservation Authorities (CAs). The agency will be responsible for:

- Developing a single digital permitting platform;
- Streamlining and standardizing service delivery by setting provincewide performance, standards
 - as well as maintaining centralized data and updated floodplain mapping; and
- Overseeing the consolidation of Conservation Authorities.

The Ministry of Environment, Conservation and Parks are proposing that the agency would require the local Conservation Authorities to pay for the costs of the Ontario Provincial Conservation Agency.

Additionally, the MECP has introduced an amendment to the Conservation Authorities Act that outlines the proposed boundaries for establishing Regional Conservation Authorities. The proposed consolidation will entail, including reducing the number of Conservation Authorities from 36 to 7.

MECP has indicated that they plan to consult with stakeholders, municipalities, conservation authorities, and Indigenous communities. This consultation includes a policy proposal notice period posted on the Environmental Registry of Ontario for 45 days, inviting feedback on the

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proposed boundaries and criteria for the regional consolidation of Ontario's 36 CAs with a deadline of December 22, 2025.

The Town understands that the timelines for the proposed CAA amendments are as follows:

- Consultation occurs throughout the Q1 2026;
- Conservation authorities operate within current governance structure until after the 2026 Municipal election; and
- Changes come into force January 1, 2027.

The Town of Goderich has identified several concerns relating to the proposed CAA amendments:

- What is the cost of establishing and operating the proposed Ontario Provincial Conservation Agency (OPCA)? The OPCA would require significant resources while local watershed advisory boards would still be needed to guide priorities and provide oversight.
- > What is the anticipated total cost of consolidating the 36 Conservation Authorities to 7?
- As a local organization, the Maitland Conservation is responsive to community needs. Municipalities, landowners and community partners drive the services and priorities of the organization. A move to the OPCA, and the consolidation of Conservation Authorities, would mean less municipal input on service priorities, yet member municipalities currently financially contribute over 80% of the MVCA's operating budget, while the Province provides approximately 2%.
- Will the needs of rural communities and the agricultural sector will be adequately recognized and prioritized in this consolidation? Particularly since the lead Conservation Authority, for each of the 7 new regional conservation authorities, is expected to be in an urban setting in each region.
- ➤ A core priority for Maitland Valley Conservation Authority is reducing the risk of loss of life and community damage caused by flooding and erosion. MVCA are responsible for approving development in or near natural hazard areas, ensuring that new construction and additions are not at risk from flooding or erosion in floodplains or along the Lake Huron shoreline.
- MVCA's permitting process is efficient and consistent. In 2024, the average time to process all types of permits was just 5.7 days. The average time for reviewing and issuing permits by all conservation authorities is 12.5 business days.

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From start to finish, MVCA staff work closely with landowners, emphasizing customer service and helping them identify safe building locations outside hazardous areas. Will the proposed digital permitting platform be able to match MVCA's turnaround times and maintain this high level of customer experience? Additionally, what will the costs be for developing, implementing and maintaining this new platform?

The Town of Goderich encourages the Provincial government to partner with the current Conservation Authorities to build capacity and support local solutions to watershed issues. This will require a multi-year commitment to reinvesting in Conservation Authorities.

In order to protect Ontario's prosperity, the Town would like to see an emphasis placed on developing and protecting the health of watersheds. They are the foundation of not only our economic prosperity but our life support system as well. Clean water, diverse forests and healthy soils directly support key sectors like tourism, forestry and agriculture, which in turn support economically strong local communities.

Healthy Lake Huron (HLH) is a model of collaboration between federal, provincial and county agencies, 5 Conservation Authorities and several community groups. HLH has been successful in supporting stewardship initiatives aimed at improving water quality along the Lake Huron shoreline. Using this collaborative approach across all the watersheds in Ontario to build healthy watersheds would result in effective, cost-efficient results.

Working seamlessly together, we can achieve superior results.

Respectfully,

Janice Hallahan

Chief Administrative Officer

Janue Hallahan

Cc: The Honourable Doug Ford, Premier of Ontario

The Honourable Lisa Thompson, Minister of Rural Affairs, and MPP for Huron-Bruce

The Honourable Rob Flack, Ministry of Municipal Affairs and Housing

Association of Municipalities of Ontario

Environmental Registry of Ontario

Ed McGugan, Chair of the Maitland Valley Conservation Authority