



December 19, 2025

Ministry of the Environment, Conservation and Parks
Conservation and Source Protection Branch
300 Water Street North Tower, 5th Floor
Peterborough, ON K9J 3C7

**RE: Regional Response to ERO #025-1257 – Proposed
Boundaries for the Regional Consolidation of Ontario’s
Conservation Authorities (2025-CG-14), Our File: L14**

**The Regional
Municipality of
Durham**

Corporate Services
Department –
Legislative Services
Division

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**Alexander Harras
M.P.A.
Director of
Legislative Services
& Regional Clerk**

Council of the Region of Durham, at its meeting held on December 17, 2025, passed the following resolution:

- A) That the following be endorsed as the Region of Durham’s comments on ERO #025-1257, proposed boundaries for the regional consolidation of Ontario’s conservation authorities:
- i) The province should consider how consolidations at a smaller geographic scale than the seven regional CAs proposed could still meet the criteria of reducing administrative burden for municipalities while combining watersheds that are more geographically and contextually similar. Considering shared environmental protection priorities, similar biological, geological and ecological attributes, and simplified administration, the Region recommends that the province consider two regional CAs within Durham, one that serves the urbanized Lake Ontario shoreline and one serving the area north of the Oak Ridges Moraine;

- ii) Each regional CA should be equally equipped with the appropriate resources (i.e., human and financial) and flexibility to respond to the urban context in order to support provincial housing objectives;
- iii) The province should ensure that existing Memoranda of Understanding (MOUs) remain in force through the consolidation process;
- iv) The Region and its area municipalities require continued, proportionate representation to ensure that local watershed priorities and risks are reflected in decision-making;
- v) The centralization of administration and the establishment of the Ontario Provincial Conservation Agency (OPCA), as proposed, may weaken relationships with Indigenous communities through the loss of localized, meaningful engagement and potential erosion of relationship continuity and trust;
- vi) The province should leverage existing processes and resources already established under Conservation Ontario and clarify any future role of Conservation Ontario under the new regional CA framework;
- vii) The Region requests clarification if upper tiers will continue to have a role in funding CAs and supports a review of the existing CA funding model to increase clarity and understand potential financial impacts to municipalities and shifts amongst municipalities resulting from the proposed consolidation. Any proposed changes should not result in increased costs individual municipalities;
- viii) The province should complete a Financial Impact Analysis, at their expense, to fully understand the overall financial implications of consolidation and the specific financial impact of consolidation on each municipality;
- ix) Municipalities should not be responsible, through the municipal levy, for funding the activities of the OPCA, this should remain a provincial cost;
- x) The OPCA should develop a standardized template for CA budget submissions to reduce administrative burden for municipalities that continue to have multiple CAs within their jurisdiction under the proposed new regional CA framework;

- xi) The ability for regional CAs to access grant funding to deliver local programs and services should not be compromised as a result of consolidation;
- xii) The province should ensure that regional CAs are equipped to respond to localized flood, natural hazard and water quality concerns despite being geographically vast;
- xiii) The province should ensure that OPCA applied standards are flexible to local hydrological and ecological conditions;
- xiv) The province should prioritize the maintenance of regional CA involvement in local partnerships and community-driven environmental and climate projects, as agreed to by municipalities, to avoid weakening the effectiveness of these important initiatives;
- xv) The Region supports the transition toward a more predictable, criteria-based CA permitting system;
- xvi) All current mandatory (Category 1) programs and services should be maintained as part of the proposed changes, with emphasis on maintaining existing service levels and avoiding increased administrative burden to municipalities that already have delivery agreements in place;
- xvii) The province should prioritize staff continuity and local technical capacity throughout the consolidation process;
- xviii) The province should ensure that data systems, monitoring networks, and technical records supporting plans and policies (e.g., Source Protection Plans) remain intact, accessible, and interoperable throughout the transition, and that existing data-sharing agreements remain in force until successor arrangements are established;
- xix) The province should ensure that Clean Water Act governance boundaries remain stable, and any re-designation of Source Protection Authorities occur only after careful coordination with affected municipalities;
- xx) Municipal support for Risk Management Official functions and Risk Management Plan implementation should continue to be identified as a mandatory service within any new regional CA mandate;

- xxi) The province should ensure stable, dedicated funding for Clean Water Act program delivery during and after consolidation to prevent program interruptions;
 - xxii) A phased implementation schedule for consolidation that safeguards ongoing monitoring, reporting, and policy update commitments throughout the transition is recommended; and
- B) That a copy of Report #2025-CG-14 of the Commissioner of Community Growth and Economic Development be forwarded to the Ministry of the Environment, Conservation and Parks, the Region's five conservation authority partners, area municipalities, and Williams Treaty First Nations.

Please find enclosed a copy of Report #2025-CG-14 for your information.

Alexander Harras

Alexander Harras, M.P.A.
Director of Legislative Services & Regional Clerk
AH/tf

- c:
- J. Grossi, Clerk, Town of Ajax
 - F. Lamanna, Clerk, Township of Brock
 - J. Gallagher, Clerk, Municipality of Clarington
 - M. Medeiros, Clerk, City of Oshawa
 - S. Cassel, Clerk, City of Pickering
 - B. Labelle, Clerk, Township of Scugog
 - D. Leroux, Clerk, Township of Uxbridge
 - C. Harris, Clerk, Town of Whitby
 - C. Darling, CAO, Central Lake Ontario Conservation Authority
 - L. Laliberte, CAO/Secretary-Treasurer, Ganaraska Region Conservation Authority
 - M. Majchrowski, CAO, Kawartha Conservation
 - R. Baldwin, CAO, Lake Simcoe Region Conservation Authority
 - J. MacKenzie, CEO, Toronto and Region Conservation Authority
 - Alderville First Nation
 - Beausoleil First Nation
 - Chippewas of Georgina Island First Nation
 - Chippewas of Rama First Nation

Curve Lake First Nation

Hiawatha First Nation

Mississaugas of Scugog Island First Nation

S. Austin, Commissioner of Community Growth and Economic Development

A. Burgess, Director, Communications and Engagement

If this information is required in an accessible format, please contact 1-800-372-1102 ext. 2564.



The Regional Municipality of Durham Report

To: Regional Council
From: Commissioner of Community Growth and Economic Development
Report: #2025-CG-14
Date: December 17, 2025

Subject:

Regional Response to [ERO #025-1257](#) – Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities

Recommendation:

That it be recommended to Regional Council:

- A) That the following be endorsed as the Region of Durham’s comments on [ERO #025-1257](#), proposed boundaries for the regional consolidation of Ontario’s conservation authorities:
- i) The province should consider how consolidations at a smaller geographic scale than the seven regional CAs proposed could still meet the criteria of reducing administrative burden for municipalities while combining watersheds that are more geographically and contextually similar. Considering shared environmental protection priorities, similar biological, geological and ecological attributes, and simplified administration, the Region recommends that the province consider two regional CAs within Durham, one that serves the urbanized Lake Ontario shoreline and one serving the area north of the Oak Ridges Moraine;
 - ii) Each regional CA should be equally equipped with the appropriate resources (i.e., human and financial) and flexibility to respond to the urban context in order to support provincial housing objectives;

- iii) The province should ensure that existing Memoranda of Understanding (MOUs) remain in force through the consolidation process;
- iv) The Region and its area municipalities require continued, proportionate representation to ensure that local watershed priorities and risks are reflected in decision-making;
- v) The centralization of administration and the establishment of the Ontario Provincial Conservation Agency (OPCA), as proposed, may weaken relationships with Indigenous communities through the loss of localized, meaningful engagement and potential erosion of relationship continuity and trust;
- vi) The province should leverage existing processes and resources already established under Conservation Ontario and clarify any future role of Conservation Ontario under the new regional CA framework;
- vii) The Region requests clarification if upper tiers will continue to have a role in funding CAs and supports a review of the existing CA funding model to increase clarity and understand potential financial impacts to municipalities and shifts amongst municipalities resulting from the proposed consolidation. Any proposed changes should not result in increased costs individual municipalities;
- viii) The province should complete a Financial Impact Analysis, at their expense, to fully understand the overall financial implications of consolidation and the specific financial impact of consolidation on each municipality;
- ix) Municipalities should not be responsible, through the municipal levy, for funding the activities of the OPCA, this should remain a provincial cost;
- x) The OPCA should develop a standardized template for CA budget submissions to reduce administrative burden for municipalities that continue to have multiple CAs within their jurisdiction under the proposed new regional CA framework;
- xi) The ability for regional CAs to access grant funding to deliver local programs and services should not be compromised as a result of consolidation;

- xii) The province should ensure that regional CAs are equipped to respond to localized flood, natural hazard and water quality concerns despite being geographically vast;
- xiii) The province should ensure that OPCA applied standards are flexible to local hydrological and ecological conditions;
- xiv) The province should prioritize the maintenance of regional CA involvement in local partnerships and community-driven environmental and climate projects, as agreed to by municipalities, to avoid weakening the effectiveness of these important initiatives;
- xv) The Region supports the transition toward a more predictable, criteria-based CA permitting system.
- xvi) All current mandatory (Category 1) programs and services should be maintained as part of the proposed changes, with emphasis on maintaining existing service levels and avoiding increased administrative burden to municipalities that already have delivery agreements in place;
- xvii) The province should prioritize staff continuity and local technical capacity throughout the consolidation process;
- xviii) The province should ensure that data systems, monitoring networks, and technical records supporting plans and policies (e.g., Source Protection Plans) remain intact, accessible, and interoperable throughout the transition, and that existing data-sharing agreements remain in force until successor arrangements are established;
- xix) The province should ensure that Clean Water Act governance boundaries remain stable, and any re-designation of Source Protection Authorities occur only after careful coordination with affected municipalities;
- xx) Municipal support for Risk Management Official functions and Risk Management Plan implementation should continue to be identified as a mandatory service within any new regional CA mandate;
- xxi) The province should ensure stable, dedicated funding for Clean Water Act program delivery during and after consolidation to prevent program interruptions;

- xxii) A phased implementation schedule for consolidation that safeguards ongoing monitoring, reporting, and policy update commitments throughout the transition is recommended; and
- B) That a copy of this report be forwarded to the Ministry of the Environment, Conservation and Parks, the Region's five conservation authority partners, area municipalities, and Williams Treaty First Nations.
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Report:

1. Purpose

- 1.1 On October 31, 2025, the province announced plans to introduce legislation to amend the Conservation Authorities Act (CA Act) to create the Ontario Provincial Conservation Agency (OPCA), a provincial board-governed agency to provide centralized leadership, strategic direction, and oversight to Ontario's conservation authorities (CAs). It is not clear how the establishment of the OPCA will impact the existing role of Conservation Ontario, a non-profit association that currently represents the existing 36 CAs.
- 1.2 The announcement also outlined the province's intention to consolidate Ontario's existing 36 CAs into seven regional CAs. Following this announcement, the province formally initiated consultation on proposed boundaries and criteria for this consolidation through the Environmental Registry of Ontario ([ERO #025-1257](#)) on November 7, 2025. Feedback on the proposal is invited until December 22, 2025 (a 45-day commenting period). The purpose of this report is to provide an overview of the proposal and seek Council endorsement of Regional staff comments.
- 1.3 Once endorsed by Regional Council and in advance of the December 22, 2025, commenting deadline, a response letter and a copy of this report will be sent to the Ministry of the Environment, Conservation and Parks.

2. Background

- 2.1 The CA Act, which sets out the organization of CAs, was established in 1946 in response to widespread flooding, erosion and deforestation that threatened Ontario's natural resources. Recognizing that natural features do not follow municipal boundaries and are best managed holistically, CAs were organized along natural watershed boundaries, rather than political ones.

2.2 There are currently five CAs with jurisdiction in Durham:

- Toronto and Region Conservation Authority (TRCA) – Pickering, the majority of Ajax, and a portion of Uxbridge;
- Lake Simcoe Region Conservation Authority (LSRCA) – the majority of Brock and Uxbridge, and western portion of Scugog;
- Central Lake Ontario Conservation Authority (CLOCA) – Whitby, Oshawa, portions of Ajax, and the western portion of Clarington;
- Kawartha Region Conservation Authority (KRCA) – the majority of Scugog, portions of Brock, and a small portion of Uxbridge; and
- Ganaraska Region Conservation Authority (GRCA) – the eastern portion of Clarington.

2.3 While the initial focus of CAs was watershed-based environmental protection and hazard mitigation (e.g., flood and erosion control), over time their mandate expanded to include a broad range of programs and services. For example, environmental monitoring and research, source water protection, environmental education, land use planning and regulations, watershed restoration, and landscape-level conservation.

2.4 In 2015, the province released the Conservation Authorities Act Discussion Paper to identify ways to improve existing CA legislation, regulatory and policy framework, and programs and services. The Region provided comments in response to themes of CA governance, funding mechanisms, and roles and responsibilities ([Report #2015-J-49](#)).

2.5 Building on feedback from that Discussion Paper, in May 2016, the province released a consultation document entitled, “Conserving Our Future: Proposed Priorities for Renewal”. The Region responded to address various priority actions including, strengthening CA oversight and accountability, increasing clarity and consistency, improving collaboration and engagement, modernizing funding mechanisms, and enhancing flexibility for the province ([Report #2016-COW-12](#)).

2.6 Following these initial consultation exercises, there have been numerous legislative and regulatory changes to the CA Act. These changes have focused on modernization and refinement of core responsibilities and narrowing CA focus to hazard prevention, with the intention to streamline permitting and align with provincial growth and housing objectives.

2.7 Reports detailing these amendments to the CA Act are provided in the following section of this report.

3. Previous Reports and Decisions

3.1 The following reports detailing amendments to the CA Act have been provided to Regional Council in recent years:

- In July 2017, Regional comments on Bill 139, the Building Better Communities and Conserving Watersheds Act, 2017 were provided through Report [#2017-INFO-79](#).
- In May 2019, an overview of provincial proposals to amend the CA Act was provided through Report [#2019-P-27](#).
- In May 2019, Regional comments on Bill 108, the More Homes, More Choice Act and associated discussion papers related to the CAs were provided through Report [#2019-A-22](#).
- In November 2020, Regional comments on Bill 229, the Protect, Support and Recover from COVID-19 Act (Budget Measures), including changes to the CA Act were provided through Report [#2020-P-26](#). Regional Council, at its meeting on November 25, 2020, passed a resolution requesting that Schedule 6 to Bill 229 be removed.
- An update on the final version of Bill 229, in particular Schedule 6, was provided through Report [#2021-INFO-1](#).
- In July 2021, an overview of Phase 1 regulatory proposals under the CA Act was provided through Report [#2021-INFO-82](#).
- In March 2022, an overview of Phase 2 regulatory proposals under the CA Act was provided through Report [#2022-INFO-22](#).
- In November 2022, an overview of Bill 23, the More Homes Built Faster Act, 2022 and Regional comments on the Bill were provided through Report [#2022-INFO-93](#).

4. Overview of Proposal to Consolidate the Conservation Authorities

4.1 The province is proposing to consolidate Ontario's existing 36 CAs into seven regional CAs, listed below and shown in Attachment #1. Durham-specific regional CAs are highlighted in **bold** and shown in Attachment #2.

- **Huron-Superior Regional Conservation Authority (HSRCA)** – existing LSRCA jurisdiction within Durham;

- **Central Lake Ontario Regional Conservation Authority (CLORCA)** – existing TRCA jurisdiction within Durham;
 - **Eastern Lake Ontario Regional Conservation Authority (ELORCA)** – existing CLOCA, KRCA and GRCA jurisdictions within Durham;
 - Lake Erie Regional Conservation Authority (LERCA);
 - Western Lake Ontario Regional Conservation Authority (WLOORCA);
 - St. Lawrence Regional Conservation Authority (SRCA); and
 - Northeastern Ontario Regional Conservation Authority (NORCA).
- 4.2 The similarity in name between the CLORCA and the existing CLOCA may cause confusion. Additionally, TRCA’s Board and stakeholders have expressed concerns about the costs associated with TRCA’s proposed name change to CLORCA.
- 4.3 The province is not proposing to change the total amount of geographic area that is currently governed by the CAs, but rather existing CAs are proposed to be grouped together to form each regional CA. While a proposed governance model has yet to be released, the province has indicated that regional CAs will remain independent organizations, operating with municipal governance and oversight (required by the CA Act).
- 4.4 It is Regional staff’s understanding that governance changes are not intended to be initiated until after municipal elections in October 2026. Existing Board members would continue to serve their terms until that time.
- 4.5 On November 6, 2025, the province released Bill 68, the Plan to Protect Ontario Act (Budget Measures), 2025 (Bill 68). Bill 68 received Royal Assent on November 27, 2025. Schedule 3 of Bill 68 changes the CA Act to create the OPCA. The OPCA will provide centralized leadership to all regional CAs by overseeing the CA consolidation, implementing province-wide performance standards, policies and fees and a digital permitting platform, and assessing and reporting on the effectiveness of regional CAs.
- 4.6 The province has indicated that the intention behind the proposed consolidation is to reduce duplicative administrative costs, direct resources to frontline conservation, and better align CA services with provincial housing, economic, infrastructure and climate resilience priorities. Under the proposed consolidation, the Region will have three regional CAs within our jurisdiction (currently five CAs), so may not benefit from the same reduction in administrative costs as other municipalities.

4.7 The criteria applied for determining the proposed boundaries for the seven regional CAs are:

- maintaining watershed-based jurisdictions – aligning with natural hydrological boundaries;
- streamlining relationships between CAs and municipalities – reducing administrative duplication and overlap for municipalities and CAs;
- balancing expertise and capacity across CAs – enhancing technical skills and resources across CAs; and
- ensuring service continuity – providing uninterrupted delivery of local CA programs through and after consolidation.

4.8 Regional staff participated in a virtual information session, hosted by the province on November 18, 2025.

5. Regional Staff Analysis and Comments on the Proposal to Consolidate the Conservation Authorities

5.1 Staff from the Region’s Community Growth and Economic Development Department, Works Department, Health Department, and Finance Department collaborated on the following comments.

5.2 The province’s proposal was also considered by the Durham Environment and Climate Advisory Committee (DECAC) at their November 20, 2025, meeting. DECAC’s comments have been considered by staff in the preparation of these comments.

Governance and Administrative Considerations

5.3 The Region recognizes that CA consolidation is desired and supports provincial efforts to continue utilizing watershed boundaries for the proposed regional CAs. **The province should consider how consolidations at a smaller geographic scale than the seven regional CAs proposed could still meet the criteria of reducing administrative burden for municipalities while combining watersheds that are more geographically and contextually similar. Considering shared environmental protection priorities, similar biological, geological and ecological attributes, and simplified administration, the Region recommends that the province consider two regional CAs within Durham, one that serves the urbanized Lake Ontario shoreline and one serving the area north of the Oak Ridges Moraine.**

- 5.4 The nature of current growth and expected future growth within the Region's southern municipalities is largely urban and urbanizing. For example, the municipalities of Pickering, Ajax, Whitby, Oshawa, and Clarington have been identified by the province as "large and fast-growing municipalities" because of their size and rapid population growth. In the province's proposal, Pickering and most of Ajax are to be included within the Central Lake Ontario Regional CA (currently TRCA). TRCA's watershed boundaries remain intact with no proposed changes. The rest of Ajax, Whitby, Oshawa and Clarington (currently covered by CLOCA and part of GRCA) are proposed to be within the Eastern Lake Ontario Regional CA (see Attachment #2). The Eastern Lake Ontario Regional CA, which extends easterly to Kingston, and northerly to Highlands East, has substantially more rural area, which will require a balance between rural and urban circumstances. **Each regional CA should be equally equipped with the appropriate resources (i.e., human and financial) and flexibility to respond to the urban context in order to support provincial housing objectives.**
- 5.5 Under previous changes made to the CA Act through Bill 229, the Region established memoranda of understanding (MOUs) for the delivery of CA programs and services with our five CA partners. The process to establish these MOUs began in 2021 and completed MOUs were in place by January 1, 2023. The Region was expecting to work with our CA partners to update the MOUs, beginning in early 2026. It is unclear how this work will proceed in light of proposed consolidation. Regardless, existing MOUs will have to be restructured to align with the proposed regional CA framework. **The province should ensure that existing MOUs remain in force through the consolidation process.**
- 5.6 CA Board composition typically includes members appointed by municipalities within the watershed, usually elected officials, alongside citizen representatives. Representation is reflective of each municipality's financial contribution or area, ensuring local input into watershed management decisions. Merging CAs and including many more municipalities under each regional CA could result in larger CA Boards, leading to reduced local decision-making. It may also lead to conflicts when CAs are providing programs and services, with limited budgets, for many more municipalities with differing priorities. The province should provide more information about who holds accountability and how municipal, Indigenous, and local stakeholder voices will be maintained under a regional CA framework. **The Region and its area municipalities require continued, proportionate representation to ensure that local watershed priorities and risks are reflected in decision-making.**

- 5.7 Many CAs have established relationships with Indigenous communities. **The centralization of administration and the establishment of the OPCA, as proposed, may weaken relationships with Indigenous communities through the loss of localized, meaningful engagement and potential erosion of relationship continuity and trust.**
- 5.8 Conservation Ontario is a not-for-profit, board-governed organization that represents Ontario's 36 CAs. The core functions of Conservation Ontario are in policy and program development, business development and partnerships, communications, education and training, collective corporate services, government relations and information management and research. With the establishment of the OPCA, it is not clear what future role Conservation Ontario will have, if any. **The province should leverage existing processes and resources already established under Conservation Ontario and clarify any future role of Conservation Ontario under the new regional CA framework.**

Financial Considerations

- 5.9 Under the CA Act, CAs levy, through participating municipalities, for the portion of their operating expenses and capital costs not funded by other revenue sources. The CA can determine the amount of levy required and can apportion an amount of the total to each participating municipality. Current cost apportionment methods include:
- modified current value assessment – combines the relative modified current property assessment dollars and the relative percentage of municipal jurisdiction within the CAs jurisdiction and creates a percentage of what each municipality is to pay of the total levy amount the CA determines for its annual budget;
 - authority-municipal agreement – maintenance costs can be apportioned by agreement between the CA and participating municipalities on what the benefit derived is for each participating municipality related to the maintenance costs where the modified current value assessment method is not considered appropriate. Capital costs may also be apportioned by this method; and
 - apportionment by the CA – this method is often used for capital projects. The CA decides which participating municipalities should pay and how much each should pay based on benefits derived.

It is unclear if the proposed consolidation will have impacts on current apportionment methods or if upper-tier municipalities will continue to fund CAs going forward as only lower-tier municipalities were listed in the supplemental materials included with the ERO posting. Without the province providing information on each municipalities' assessment within the new consolidated CA boundaries and the total budgets for the consolidated CAs, it is not possible to quantify the financial impacts of the proposed consolidation for Durham Region and its property taxpayers. **The Region requests clarification if upper tiers will continue to have a role in funding the CAs and supports a review of the existing CA funding model to increase clarity and understand potential financial impacts to municipalities and shifts amongst municipalities resulting from the proposed consolidation. Any proposed changes should not result in increased costs for individual municipalities.**

- 5.10 There may be significant costs associated with the proposed CA consolidation. For example, costs associated with IT systems, human resources, legal and administrative work, rebranding, and integration of policies, procedures and internal controls. **The province should complete a Fiscal Impact Assessment, at their expense, to fully understand the overall financial implications of consolidation and the specific financial impact of consolidation on each municipality.**
- 5.11 Amendments to the CA Act to establish the OPCA include cost recovery stipulations to allow the OPCA to determine costs and expenses that the authorities owe to the OPCA and apportion those amounts to the authorities. It is anticipated that funding for the regional CAs will continue to come largely from the municipal levy. **Municipalities should not be responsible, through the municipal levy, for funding the activities of the OPCA, this should remain a provincial cost.**
- 5.12 As a municipality with five CAs (proposed to be three) within its jurisdiction the Region reviews budget submissions that vary in format and detail. **The OPCA should develop a standardized template for CA budget submissions to reduce administrative burden for municipalities that continue to have multiple CAs within their jurisdiction under the new regional CA framework.**
- 5.13 CAs apply for and receive program-specific funding and external grants from a variety of sources. For example, CLOCA was recently awarded \$1.6M from the Canada Water Agency through the Great Lakes Freshwater Ecosystem Initiative to restore and protect Oshawa Second Marsh coastal wetlands. To be awarded grant funding, CAs and their municipal partners often must meet specific criteria, which may no longer apply under a regional CA framework. **The ability for regional CAs**

to access grant funding to deliver local programs and services should not be compromised as a result of consolidation.

Human Health and Environmental Considerations

- 5.14 The province has indicated that the work CAs do to protect people and property from the risk of flooding and other natural hazards will not change as a result of this proposal. **The province should ensure that regional CAs are equipped to respond to localized flood, natural hazard, and water quality concerns despite being so geographically vast.**
- 5.15 Natural heritage varies across the province and within and between watersheds. CAs are relied upon for their local, technical expertise in this regard. **The province should ensure that OPCA applied standards are flexible to local hydrological and ecological conditions.**
- 5.16 Regional CAs may have reduced ability to prioritize and capacity to actively participate in and collaborate on local climate adaptation and environmental stewardship projects. **The province should prioritize the maintenance of CA involvement in local partnerships and community-driven environmental and climate projects, as agreed to by municipalities, to avoid weakening the effectiveness of these important initiatives.**

Program and Service Delivery Considerations

- 5.17 Development or site alteration within CA regulated natural hazard areas requires a permit from the CA to proceed. CAs make permit decisions based on the rules and standards in provincial legislation, regulatory requirements, technical standards and CA approved policies. The Region recognizes that processing times for permits can vary widely across CAs and differences in technical standards, mapping methodology, and interpretations for landowners working across multiple CA jurisdictions can be challenging. **The Region supports the transition toward a more predictable, criteria-based CA permitting system.**
- 5.18 The Region, area municipalities and local school boards rely on the CAs to deliver a variety of important programs and services. There are resourcing differences between the CAs within Durham, which results in differences in program offerings and access across the region. While the Region is supportive of efforts to improve coordination and efficiency, significantly increasing the geographic extent of the CAs may impact their ability to maintain strong local engagement and deliver localized programs at existing service levels.

- 5.19 While the province has indicated that implementation of the proposed consolidation will be phased to ensure uninterrupted delivery of key programs, a change of this magnitude brings a significant risk of service disruption, loss of staff and technical expertise, and confusion about roles and responsibilities. **All current mandatory (Category 1) programs and services should be maintained as part of the proposed changes, with emphasis on maintaining current service levels and avoiding increased administrative burden to municipalities that already have delivery agreements in place.**
- 5.20 Notwithstanding the proposed consolidation, the Region will continue to advocate for coordinated program delivery. For example, recent CA collaborations in Durham include the [Durham Trees Program](#) and [Resilient Agriculture Landscape Program](#). These programs are examples of CAs working together successfully to offer programs region-wide, while reducing administrative costs and leveraging partnerships to secure funding.

Technical Expertise Considerations

- 5.21 CA staff possess specialized knowledge of local natural heritage features and functions, aquifers, wellfield vulnerability assessments, hydrogeological conditions, and agricultural challenges and opportunities. Regional staff are concerned about potential loss of local expertise, staff capacity, and institutional knowledge as a result of consolidation. Given the vast proposed boundaries of the regional CAs, it is unclear how this expertise will be preserved. **The province should prioritize staff continuity and local technical capacity throughout the consolidation process.**
- 5.22 Data integrity and continuity are critical to maintaining defensible technical work. To support this, municipalities and CAs currently operate under numerous data sharing agreements. Consolidation could create data management challenges, if monitoring networks, databases, and GIS systems are merged without clear standards. **The province should ensure that data systems, monitoring networks, and technical records supporting plans and policies (e.g., Source Protection Plans) remain intact, accessible, and interoperable throughout the transition, and that existing data-sharing agreements remain in force until successor arrangements are established.**

Clean Water Act Implementation Considerations

- 5.23 The Clean Water Act is implemented through Source Protection Authorities (SPAs) that are aligned with existing CA boundaries, allowing source protection plans to reflect local conditions affecting municipal drinking water systems. Consolidation will

likely require re-designation of SPAs and reconstitution of Source Protection Committees (SPCs). Given that the proposed regional CA boundaries would continue to include three SPCs within Durham, there is unlikely to be any reduction in duplication or administrative burden for the Region.

5.24 Proposed changes risk disrupting established SPA governance structures, delaying ongoing Section 36 updates, and creating inconsistencies in policy interpretation, implementation and monitoring. **The province should ensure that Clean Water Act governance boundaries remain stable, and any re-designation of SPAs occur only after careful coordination with affected municipalities.**

5.25 Risk Management Officials (RMOs) are appointed by the municipality that is responsible for implementing Part IV of the Clean Water Act. They negotiate and establish Risk Management Plans and review development applications and issue Section 59 notices in vulnerable areas around drinking water sources. Since 2013, the Region has performed the RMO responsibility in Durham. The Region currently employs two RMOs, one responsible for the northern municipalities and one responsible for the southern municipalities. Municipal staff and RMOs rely on CA technical staff for policy interpretation, mapping and Section 59 screenings. Any interruption in CA support could delay development review, Risk Management Plan Implementation, and policy enforcement. **Municipal support for RMO functions and Risk Management Plan implementation should continue to be identified as a mandatory service within any new regional CA mandate.**

5.26 Changes to CA funding structures could affect resource allocation for source protection delivery. Municipalities may experience increased financial burden or reduced service levels if provincial funding is redistributed across larger regional CAs. **The province should ensure stable, dedicated funding for Clean Water Act program delivery during and after consolidation to prevent program interruptions.**

5.27 Source water protection reporting obligations, including annual reports and five-year reviews, could be compromised during CA restructuring. **A phased implementation schedule for consolidation that safeguards ongoing monitoring, reporting, and policy update commitments throughout the transition is recommended.**

6. Relationship to Strategic Plan

6.1 This report aligns with the following Strategic Directions in Durham Region's 2025-2035 Strategic Plan:

a) Connected and Vibrant Communities

- C2. Enable a full range of housing options, including housing that is affordable and close to transit.
- C7. Create accessible, lively, and culturally welcoming public spaces, including opportunities to access nature.

b) Environmental Sustainability and Climate Action

- E3. Prepare for and respond to severe weather impacts.
- E5. Respect the natural environment, including greenspaces, waterways, and agricultural lands.

c) Healthy People, Caring Communities

- H1. Implement preventive strategies to support community health, including food security.
- H7. Prepare for and respond to local health emergencies in partnership with the community.

d) Strong Relationships

- S1. Enhance inclusive opportunities for community engagement and meaningful collaboration.
- S2. Build and strengthen respectful relationships with First Nations, Inuit, Métis, and urban Indigenous communities.
- S3. Collaborate across local area municipalities, with agencies, non-profits, and community partners to deliver co-ordinated and efficient services.
- S4. Advocate to the federal and provincial government and agencies to advance regional priorities.
- S5. Ensure accountable and transparent decision-making to serve community needs, while responsibly managing available resources.

7. Conclusion

7.1 The province is seeking feedback on proposed boundaries and criteria for the consolidation of Ontario's 36 CAs to seven regional CAs ([ERO #025-1257](#)).

7.2 Regional staff from Community Growth and Economic Development, Works, Health, and Finance collaborated on a recommended Regional response. Regional staff

support the province's objective to improve efficiency and coordination, and highlight concerns regarding potential impacts to local representation, funding, technical capacity, watershed-based planning, and implementation of programs and services.

- 7.3 Following consideration by Regional Council, a Regional response letter and a copy of this report will be sent to the Ministry of the Environment, Conservation and Parks in advance of the December 22, 2025, commenting deadline.
- 7.4 It is anticipated that the province will be engaging in future consultations as associated legislative and regulatory proposals are released. Regional staff will keep Council apprised of these consultations, as appropriate.
- 7.5 For additional information, contact: Amanda Bathe, Senior Planner at Amanda.Bathe@durham.ca.

8. Attachments

Attachment #1: Provincial Map of Proposed Regional Conservation Authorities

Attachment #2: Proposed Regional Conservation Authority Boundaries in Durham Region

Respectfully submitted,

Original signed by

Sandra Austin
Commissioner of Community Growth and
Economic Development

Recommended for Presentation to Council

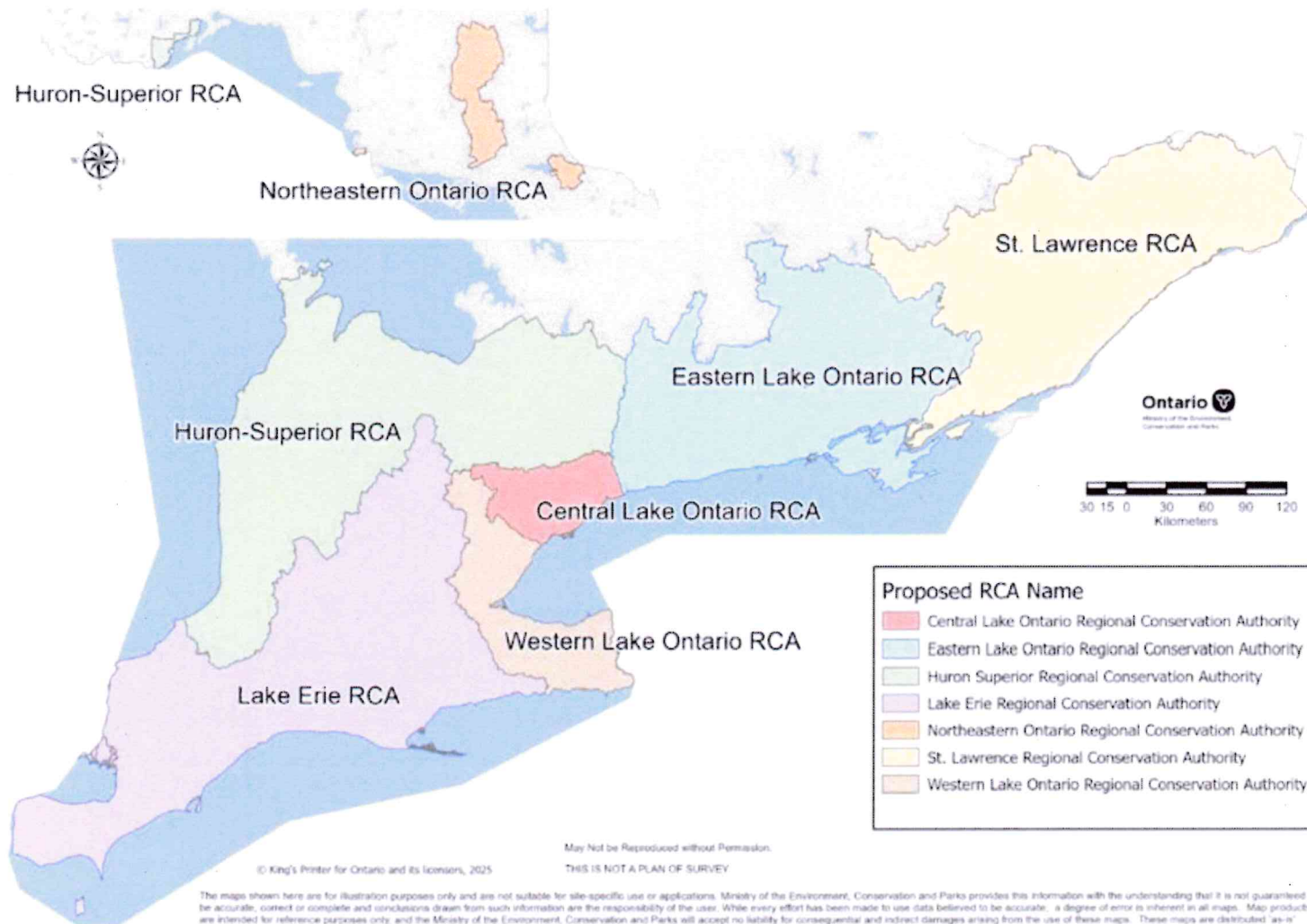
Original signed by

Elaine C. Baxter-Trahair
Chief Administrative Officer

Maps

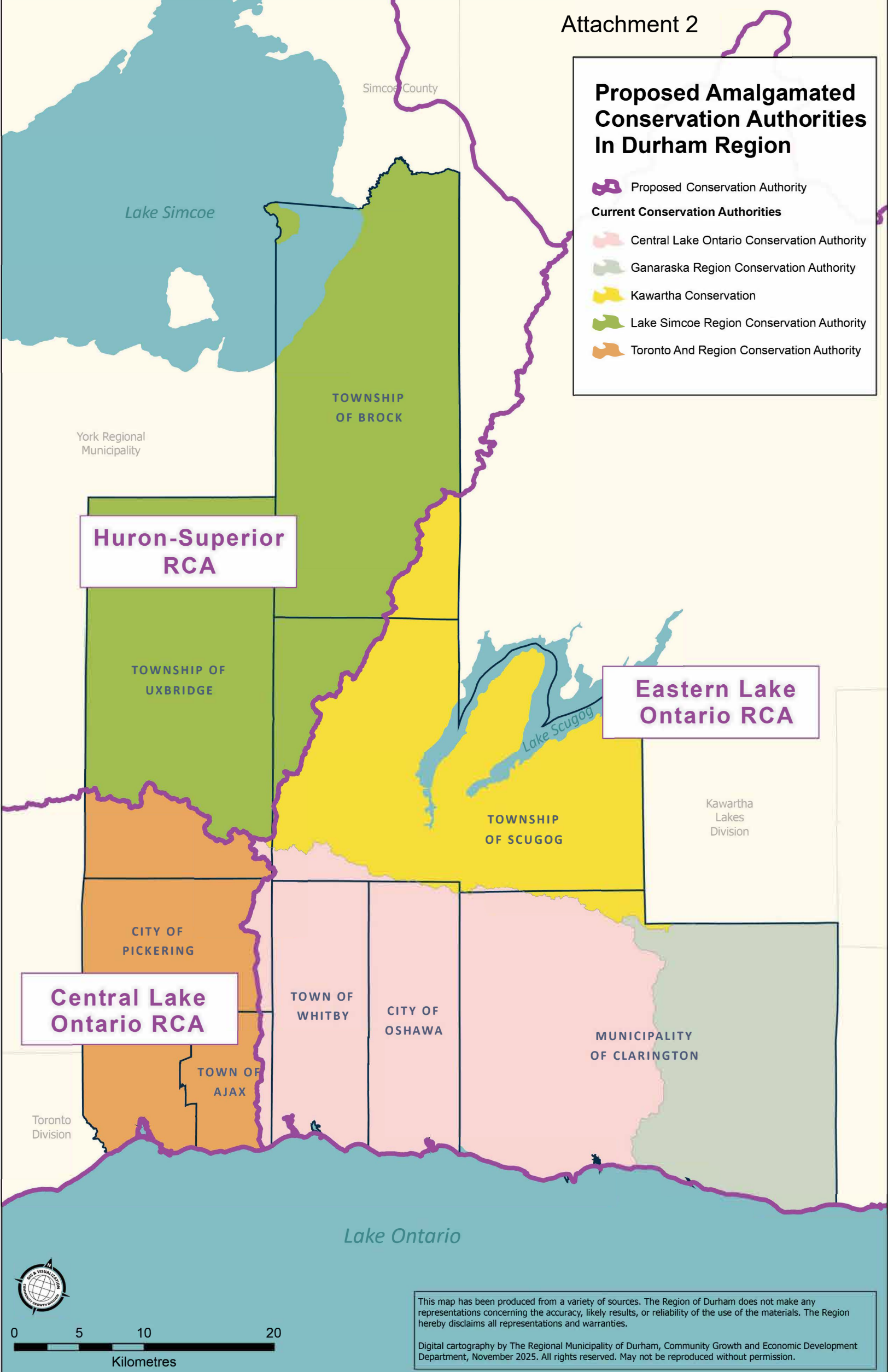
Map of Proposed Regional Conservation Authorities

PROPOSED 7 REGIONAL CONSERVATION AUTHORITIES (RCA)



Proposed Amalgamated Conservation Authorities In Durham Region

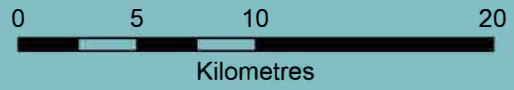
-  Proposed Conservation Authority
- Current Conservation Authorities**
 -  Central Lake Ontario Conservation Authority
 -  Ganaraska Region Conservation Authority
 -  Kawartha Conservation
 -  Lake Simcoe Region Conservation Authority
 -  Toronto And Region Conservation Authority



Huron-Superior RCA

Eastern Lake Ontario RCA

Central Lake Ontario RCA



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