

Sent by email to: minister.mecp@ontario.ca

December 24, 2025

The Honourable Todd McCarthy
Minister of Environment, Conservation and Parks
5th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3

Subject: Recommendations for Successful Conservation Authority Transformation

Dear Minister McCarthy,

The Association of Municipalities of Ontario and Conservation Ontario are writing to provide joint feedback on ERO 025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities (CAs) complementing our respective and separate ERO submissions.

We support the goals of this proposal. Accelerating local approvals helps protect Ontario's economy amid global uncertainty. Faster, more predictable approvals, that maintain environmental protections and prioritize frontline conservation can unlock the new infrastructure and development required for a growing, competitive province.

Municipal and local partnership is key to CA success. The success of the CA model is local: expertise, governance, community trust, and partnerships. If regionalization results in structures that cover too large a geographic area, we risk losing what makes CAs effective:

- **Loss of local expertise:** Watershed-based CAs have extensive on-the-ground expertise and understanding of unique environmental conditions, enabling timely and effective decision-making on local development, and real-time responsiveness during storms and emergencies.
- **Loss of effective municipal oversight:** Municipal accountability and oversight help CAs effectively balance watershed management and community growth.
- **Loss of strong local relationships:** Key stakeholders (such as municipalities, Indigenous communities, businesses, the agricultural community, watershed residents, and other partners) provide funding, donations, and build public trust.

Over 100 municipalities have passed or are considering resolutions urging the Province to move forward by working together with municipalities and CAs to achieve provincial objectives while preserving local governance, accountability, and expertise.

AMO and CO propose a right-sized, simplified regional model that:

- is grounded in science-based watershed boundaries
- maintains strong municipal involvement and oversight
- preserves local relationships and community trust
- balances the need to stay connected at the community level with the needs of certainty, predictability, and consistency of service delivery standards for permitting and approvals
- avoids unnecessary complexity by allowing lands, major agreements (including employment), reserve funds etc. to remain within existing corporations

To achieve this, AMO and CO recommend that the Province:

1. Work together with an implementation working group (including AMO, Conservation Ontario and select CAs, municipal, developers, and Indigenous representatives) to jointly develop practical solutions, including:
 - service standards, permitting faster and standardized approvals
 - governance and boundary design
 - funding models, allocations, and reserve structures
 - shared “back office” efficiencies and,
 - clear transition planning including: service continuity; points of contact; permitting continuity measures; board and staff communications; and staff retention measures.
2. Commit to a clear implementation timeline and transition plan supported by the implementation working group to position transformation for success. This will ensure continuity of service certainty for all stakeholders.
3. Share comprehensive financial, operational, and governance impact analysis to support evidence-based decision-making.
4. Restore a 50-50 municipal-provincial funding partnership for CAs, reflecting expanded Provincial role in CA operations while ensuring affordability and long-term stability.

All stakeholders, including the development industry, benefit from certainty. This approach minimizes the risk of multiple significant changes occurring at the same time, limits disruption to program delivery, and creates conditions for better outcomes and buy-in.

Ministry McCarthy, we thank you for the opportunity to provide feedback and look forward to discussing these concerns with you. Please contact Karen Nesbitt, Director of Policy and Government Relations at AMO (knesbitt@amo.on.ca), to arrange a meeting at your earliest convenience.

Sincerely,



Robin Jones
AMO President
Mayor of the Village of Westport



Dave Barton
Chair, Conservation Ontario
Vice-Chair, Toronto and Region Conservation Authority
Mayor, Township of Uxbridge

cc: The Honourable Rob Flack, Minister of Municipal Affairs and Housing
Sarah Harrison, Deputy Minister, Ministry of Environment, Conservation and Parks
Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and Housing