

DECEMBER 15, 2025

TO: Environmental Registry of Ontario

FROM THE MONO MULMUR CITIZENS' COALITION [First of Two Submissions]

SUBJECT: **Ontario Government's Amendments to the Conservation Authorities Act - ERO 025-1257**

<https://ero.ontario.ca/notice/025-1257>

The Board and members of the Mono Mulmur Citizens' Coalition have deep concerns about the Ontario Government decision to restructure 36 Local Conservation Authorities into a new compilation of seven large districts, each covering very large, unique, and diversified areas. In what has unfortunately become the usual fashion, when dealing with the complex issues related to the protection of our environment, the government has settled on a new approach without allowing for reasonable pre-decision consultation. A consultation that would have provided the opportunity to address any current concerns with the existing structure and provide valuable and well-informed alternatives for improvement.

Over the recent years, the Ontario government has reduced the current mandates of the Conservation Authorities; however, there is significant room for discussion, input, and possible recommendations that would improve the current direction. Without the contributions from local conservation authority expertise and well-informed community groups that focus on Ontario environment issues, this proposal demonstrates a disappointing result and will contribute to voter distrust. The short period that allows for written comments should never be mistaken for true consultation, and to announce and enact new legislation just before the holiday season seems typical of the lack of importance placed on environmental issues by this government. It would be very unfortunate if this important issue was to proceed without the opportunity to expand and explore long-term solutions and to gain worthwhile and informed professional recommendations.

There is serious important conservation work being accomplished on the local levels, with the support of local Councils and citizens. This lack of discussion will mean a missed opportunity to garner expertise from a wide portfolio of proven best practices. Consultation might also have led to decisions on the boundaries for these Authorities based on a logical definition of shared concerns and issues. Instead, what we have is an approach that seems to be based on the principle that bigger is always better. And many of us know from experience that such an approach, in the long-term, has been shown repeatedly to be wrong. The farther away the decision makers are from those impacted the worse those results tend to be.

We have focused here on the process and approach used by the Ontario Government to initiate a major change in in how the province is managing a critical aspect of our environmental management. We are not alone in requesting a more equitable approach to decision making on many fronts, and in saying that the way the decisions regarding the Conservation Authorities are being made need significant improvement

We call on the Province to withdraw this application and commit to a meaningful public consultation process and to working with the Conservation Authorities on a sound plan for modernization.

Don MacFarlane

President,

For the Board of The Mono Mulmur Citizen's Coalition.