

DECEMBER 17, 2025

TO: Environmental Registry of Ontario

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

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

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

In passing Bill 68 the government chose to ignore the normal democratic process of standing committee hearings and public consultation. By proceeding with only the ERO 025-1257 comment process, the Bill received royal ascent without the benefit of committee and public input. Our concern with this approach is not related to the government's objectives; rather, it is with a proposed consolidation model that, in combining communities and watersheds with little shared hydrology or infrastructure, is simply not suited to the Conservation Authority mandate.

The "Huron-Superior Regional Conservation Authority", for example, would collapse 7 existing authorities into a single entity serving 5 cities, 21 municipalities, 20 towns and 34 townships. This "Super-CA" would be attempting to provide service to 80 different mayors, councils, and planning departments. It is not only a recipe for failure, but it has, as the history of large, top-down, and rapid government-mandated changes to public services shows us, the potential for truly disastrous results.

While we agree that there is room for improvement of the Conservation Authority model and management processes, at the same time we also acknowledge that there are authorities that are doing an excellent job fulfilling their mandate. The best practises employed by these authorities should be identified and implemented across the system. There are good reasons why conservation authorities are locally created, funded, and governed entities. To be successful, watershed planning and land use must be effectively integrated at the municipal level. Permitting, floodplain management and watershed planning must be based on local site conditions and municipal growth patterns.

The local knowledge and expertise of the existing Conservation Authorities will be invaluable in the design and implementation of a mandate and function-based rationalization of the 36 conservation authorities.

As stated in our first letter, the Mono Mulmur Citizens' Coalition calls 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.