December 11, 2025

Ministry of the Environment, Conservation and Parks (MECP)

Submitted via the Environmental Registry of Ontario (ERO) website

Reference: Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Subject: Submission from the Ontario Society of Professional Engineers (OSPE) - ERO Notice Number 025-1257: Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities

The Ontario Society of Professional Engineers (OSPE) appreciates the opportunity to provide feedback on the proposed regional consolidation of Ontario's 36 conservation authorities into seven regional conservation authorities, as well as the criteria used to inform the proposed boundaries. OSPE represents Ontario's engineering profession, which plays a central role in watershed management, flood-risk mitigation, stormwater infrastructure, natural hazard assessment, climate resilience, and land-use planning.

Ontario's conservation authorities (CA) are essential partners in ensuring public safety and protecting communities from natural hazards. Engineers rely on the high-quality watershed data, modelling expertise, monitoring networks, and permitting functions delivered by conservation authorities, which are often developed and carried out by engineers employed by CAs. These functions are foundational to the design of safe housing, infrastructure, stormwater systems, road networks, and community planning across Ontario.

OSPE supports the Province's objectives of improving consistency, efficiency, and technical capacity across the conservation authorities system. However, consolidation must be approached with caution. Administrative streamlining cannot come at the expense of the scientific, technical, and watershed-specific functions that underpin safe and sustainable development.

If not implemented carefully, consolidation may introduce uncertainty or delays that affect engineering practice and the ability of Professional Engineers (P.Eng.) to meet their statutory obligations for public safety, environmental protection, and duty of care. The following considerations and recommendations reflect the practical realities engineers face when navigating conservation authorities' processes and carrying out technical work dependent on timely, accurate, and regionally informed watershed information.

1. Consolidation Rationale and OSPE's Position

OSPE agrees that the current system can be fragmented:

- 36 separate conservation authorities, often with differing policies, technical capacity, fee structures, and service levels.
- Turnaround times for permits and reviews vary widely, contributing to project delays and uncertainty for engineers, builders, municipalities, and landowners.
- Consolidation may help improve standardization, data sharing, and service predictability—benefits that the engineering profession supports.

However, consolidation must not dilute local watershed knowledge and needs, long-term flood records, monitoring networks, or technical expertise.

From an engineering perspective, safe development depends on:

- High-resolution watershed modelling
- Real-time flood forecasting
- Soil, hydrologic, and geomorphic data
- Long-standing relationships with municipalities and landowners
- On-the-ground understanding of erosion, channel migration, and localized flood behaviour

Any new regional structure must preserve these assets and avoid broadening the scope so dramatically that local responsiveness is weakened.

2. Potential Gains and Risks of Consolidation

Potential Gains (if properly designed):

- Harmonized policies, service standards, and permitting criteria
- More consistent interpretation of technical requirements
- Improved data interoperability and digital infrastructure
- Reduced administrative duplication and potentially shorter approvals
- Greater alignment with provincial housing, climate, and infrastructure priorities

Key Risks That Must Be Managed:

- Loss of localized watershed expertise: Larger regions may not have adequate staff or local presence to respond to site-specific flood or erosion issues.
- Disruptions to data continuity: Long-term monitoring networks could be disrupted during transition.
- Reduced agility: Larger organizations may struggle to respond quickly to localized hazards or extreme weather events.
- Transition delays: Uncertainty in roles, contacts, permitting processes, or internal restructuring could delay engineering projects and increase costs.

OSPE strongly recommends establishing regional technical sub-units or field offices within each new authority to maintain localized capacity and ensure watershed-specific engineering assessments remain robust.

3. Impact on the Engineering Profession

Engineers frequently interact with conservation authorities for:

- Floodplain and hazard assessments
- Stormwater management designs
- Infrastructure and transportation projects
- Land development applications
- Natural heritage and hydrologic impact assessments

Consolidation can improve predictability and efficiency; if service standards and transition plans are clear and well-coordinated. However, without a stable transition, consolidation could:

- Delay critical permitting
- Disrupt project timelines
- Undermine public safety if technical assessments cannot be provided in a timely manner

A formal transition plan, with explicit service guarantees, clear points of contact, and continuity protocols is essential to avoid gaps.

4. Feedback on the Proposed Seven Regional Boundaries

OSPE recognizes that the proposed boundaries generally align with natural watershed systems and appear hydrologically reasonable. However, concerns remain:

a) Scale of some regions (especially Northern and Western Ontario)

These areas are vast and sparsely populated, raising questions about:

- Adequate technical staffing
- Travel distances for inspections and fieldwork
- Ability to maintain timely permitting and monitoring
- Equitable distribution of engineering resources
- Indigenous communities whose knowledge and rights inform watershed stewardship

Another key concern is the applicability of data collected within each proposed regional boundary. While interoperability between regions is referenced, data gathered within a newly established Regional Conservation Authorities (RCA) may not be representative or transferable across all areas within that same RCA. This is particularly important for the Huron–Superior RCA, which spans vastly different hydrologic conditions depending on location. Applying uniform data, models, or assumptions across such a diverse region could compromise the accuracy of assessments, infrastructure planning, and environmental decision-making.

b) Need for minimum technical staffing requirements

OSPE recommends establishing provincially mandated minimum ratios of qualified technical staff (e.g., professional engineers, professional geoscientists, hydrologists, geomorphologists) per watershed area.

c) Data interoperability and climate resilience

A centralized digital platform, shared modelling frameworks, and consistent hydrologic datasets are essential to support climate-resilient infrastructure planning.

d) Local and Indigenous engagement

Regional consolidation must not weaken relationships with:

- Municipal public works departments
- Conservation staff familiar with local flood history
- Indigenous communities whose knowledge and rights inform watershed stewardship

5. Governance, Local Representation, and Regional Flexibility

CAs provide watershed-specific insight that informs engineering decisions on hydrology, erosion hazards, floodplain risk, and environmental constraints. Ontario's watersheds and sub-watersheds vary widely in physiography, soils, hydrology, and agricultural practices. Reducing the number of governing bodies risks diminishing local knowledge, weakening relationships with municipalities, and limiting the ability to tailor technical responses to regional conditions.

Impact on Engineering: Engineers rely on access to local CA staff who understand historical flows, past projects, and system behavior. Loss of local representation or regional flexibility could delay design decisions, increase uncertainty in hazard assessments, and lead to over- or under-regulation in specific areas.

Recommendation: Maintain sub-watershed advisory groups and locally based technical staff, supported by local district offices, to ensure continued access to site-specific expertise and allow local technical adjustments to remain a core feature of watershed management.

6. Coordination with Provincial Legislation and Engineering Statutes

Provincial legislation, including the Drainage Act, Ontario Water Resources Act, Planning Act, and Lakes and Rivers Improvement Act, governs landowner- and municipal-initiated projects affecting watersheds. CAs provide technical input and ensure projects comply with these statutes.

Impact on Engineering: Changes to CA structure may disrupt established coordination processes, create uncertainty for Drainage Act projects, and complicate professional obligations for engineers to deliver timely, compliant work. Disruptions could delay approvals and increase liability.

Recommendation: Establish explicit transition protocols outlining how ongoing files, approvals, and technical reviews will proceed during and after consolidation to maintain continuity and clarity under provincial legislation. It is recommended that the regional CAs assign a dedicated staff member to each ongoing file and provide their contact information to applicants to support a smooth and efficient completion of in-progress projects.

7. Development Policies and Regional Guidelines

Some regions have development policies and guidelines tailored to local conditions, environmental sensitivities, and watershed characteristics. Standardized or centralized policies risk overriding these site-specific rules, potentially undermining approvals and protections in sensitive areas.

Impact on Engineering: Engineers depend on region-specific guidelines to design infrastructure, manage stormwater, and meet regulatory requirements. Standardized policies could create uncertainty, increase non-compliance risks, and delay project approvals.

Recommendation: Preserve region-specific development policies and guidelines to ensure that standardized frameworks do not compromise local watershed needs or site-specific approvals. It is recommended that regional CA staff be organized either by the geographic area they specialize in or by project type (e.g., Drainage Act projects, site development projects). This information should be clearly presented in a staff directory on the RCA's website to help applicants identify the appropriate point of contact.

8. Preservation of Technical and Institutional Knowledge, and Risk of Slower Approvals

CA datasets that include floodplain mapping, hydrologic modelling, erosion assessments, and ecological inventories form foundational inputs for engineering decisions. Loss of this historical data, institutional knowledge, or local expertise during consolidation could reduce review efficiency and increase requests for redesigns.

Impact on Engineering: Loss of historical watershed data or mapping could compromise engineers' ability to satisfy PEO's duty of care, increase risk exposure, and prolong project submissions.

Recommendation: Prioritize secure, standardized digitization and ensure continuity of all technical datasets, staff expertise, and institutional knowledge before structural changes take effect. Implement a structured transition plan that preserves local knowledge, maintains access to data, sets province-wide review standards, and ensures adequate staffing throughout the changeover period.

9. Operational Capacity, Staffing, Review Timelines, and Communication

Engineering work depends on predictable schedules for CA review, field inspections, and technical comments. Consolidation may affect operational capacity, staffing levels, and communication.

Impact on Engineering: Delays or unpredictability in CA response times affect project delivery, tendering schedules, and cost escalation. Limited access to qualified reviewers or ambiguous communication regarding new processes may increase compliance risks and slow project approvals.

Recommendation: Implement province-wide service standards with defined review timelines and escalation pathways. Maintain minimum staffing levels of qualified technical professionals in each region, supported by clear transition communications, updated technical guidelines, and an organizational map outlining regional CA responsibilities.

10. Financial Transparency and Predictability

Engineers routinely prepare project budgets, cost-benefit analyses, and long-term infrastructure plans.

Impact on Engineering: Uncertainty in permit fees, levy distributions, or project costing undermines municipal planning processes and complicates engineers' ability to prepare accurate budgets.

Recommendation: Provide clear, stable financial frameworks for fees, levies, and service charges throughout and after the consolidation period.

11. Additional Considerations

Conservation authorities are critical to Ontario's climate adaptation strategy, and their technical work directly supports the engineering profession's responsibility to protect public safety. OSPE urges the government to ensure consolidation is guided by evidence-based watershed science, transparent transition planning with engineering, municipal, agricultural, and Indigenous partners, and long-term investment in monitoring networks, modelling tools, and digital infrastructure. The success of consolidation will also depend on clear service standards, predictable permitting timelines, and strong staffing protections with ongoing capacity-building for technical teams.

While OSPE supports the Province's goal of improving consistency and administrative efficiency, consolidation must preserve the foundations that safe engineering practice

depends on: accessible local technical expertise, continuity of watershed data and institutional knowledge, predictable review timelines, and clear regulatory pathways for engineers performing statutory work. With these safeguards in place, Ontario can modernize the conservation authority framework while ensuring engineers continue to deliver safe, climate-resilient, and environmentally responsible infrastructure.

OSPE welcomes continued participation in this process and remains available for consultation as consolidation progresses.

Responses to the Government's Discussion Questions

1. Key factors for a successful transition

A successful transition to a regional conservation authority framework must be guided by:

- A clear, province-wide transition timeline with defined phases and milestones
- Explicit transition protocols for active files, approvals, and technical reviews
- Continuity of watershed data, flood records, and monitoring networks
- Secure digitization and preservation of all technical datasets and institutional knowledge
- Defined points of contact for applicants throughout the transition
- Province-wide service standards with predictable permitting timelines
- Minimum technical staffing thresholds to ensure review capacity
- Ongoing communication with municipalities, engineers, landowners, and Indigenous communities
- Retention and stabilization plans for experienced technical staff

2. Opportunities or benefits from a regional framework

If properly designed and implemented, a regional framework could deliver:

- Harmonized technical criteria and permitting standards across Ontario
- More consistent interpretation of regulatory requirements
- Improved digital mapping, modelling, and data interoperability
- Reduced administrative duplication
- Stronger coordination for climate resilience, flood management, and hazard mitigation
- More efficient delivery of provincially mandated programs
- Greater predictability for engineering project planning and approvals

3. Suggestions for governance structure

OSPE recommends a governance structure that ensures both **regional efficiency and local technical integrity**, including:

- Balanced board representation from:
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    - Municipalities
    - Indigenous communities
    - Technical experts, including professional engineers

- Board size calibrated to watershed complexity, not population alone
- Transparent appointment processes, with defined technical qualification requirements for certain seats
- Standing technical advisory committees composed of engineers and scientists
- Sub-watershed advisory groups and locally based technical staff supported by district offices to preserve site-specific expertise and responsiveness

4. Suggestions for transparent budgeting

Financial transparency and predictability should include:

- Clear, stable frameworks for fees, levies, and service charges
- Annual public reporting on:
    - Staffing levels
    - Monitoring networks
    - Capital needs
    - Performance metrics
- Multi-year budget planning aligned with service standards
- Consultation with municipalities and Indigenous communities during budget development to ensure affordability and predictability

5. Maintaining strong local relationships

To preserve the strength of local watershed governance, OSPE recommends:

- Regional field offices retaining locally based technical staff
- Regular municipal and stakeholder roundtables involving:
    - Engineers
    - Municipal staff
    - Indigenous communities
    - Watershed stakeholders
- Continued local flood forecasting and emergency response coordination
- Community-based restoration, education, and stewardship programs managed at the local level
- Protection of long-standing working relationships between engineers, CA staff, municipalities, and landowners

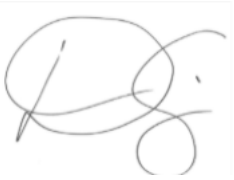
Conclusion

OSPE supports the government's goal of improving efficiency and consistency within Ontario's conservation authority system. However, the role and power of conservation authorities in protecting the environment and promoting sustainable development must not be diminished. Consolidation must also protect the technical depth, local expertise, and high-quality engineering data essential to safeguarding public safety and climate resilience.

Engineers stand ready to collaborate with the province on creating a modern, science-based, predictable conservation authority framework that supports housing, infrastructure, economic development, and environmental protection.

OSPE appreciates the opportunity to provide this feedback and welcomes further dialogue with the Ministry of the Environment, Conservation and Parks.

Sincerely,



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