

Grand River Conservation Authority

Report number: GM-08-26-84

Date: August 28, 2026

To: Members of the Grand River Conservation Authority

Subject: Environmental Registry Posting 026-0740: Improving Ontario's Conservation Authority System

Recommendation:

THAT Report Number GM-08-26-84 – Environmental Registry Posting 026-0740: Improving Ontario's Conservation Authority System be received as information and submitted as formal comments to the Province of Ontario.

Summary:

Not applicable.

Report:

In November 2025, the GRCA Board submitted comments to the Province regarding the proposed governance model for the new Regional Conservation Authorities (RCA). The Board supported the Province's objective of modernizing Ontario's conservation authority system while emphasizing that governance should continue to balance regional efficiency with meaningful municipal representation, watershed-based decision-making, and strong local accountability.

More specifically, the Board supported:

- meaningful municipal representation that reflects governance responsibilities and financial contribution;
- a strategic and appropriately sized RCA Board capable of effective decision-making;
- governance structures that preserve watershed-level input and local accountability; and
- maintaining strong local relationships, watershed expertise, and community responsiveness.

The Ad-hoc *Conservation Authorities Act* Committee met on August 5, 2026, to review and discuss the current ERO posting and the proposed governance framework for the new RCAs. The Committee's discussion considered the GRCA Board's previous governance position, the proposed representation model, and broader governance considerations for both Eastern Lake Erie Regional Conservation Authority (ELERCA) and the Ontario Provincial Conservation Agency (OPCA). The comments presented in this report reflect the Committee's discussion and are intended to inform the GRCA Board's response to ERO 026-0740.

Since the November 2025 submission, the Boards of the four conservation authorities that will form the ELERCA have also adopted shared [Guiding Principles for Transition](#). These principles provide a common framework for the transition and emphasize accountable and transparent governance, fiscal responsibility, workforce stability and talent retention, service excellence, risk management and business continuity, watershed-based science-informed management, and transparency, trust and clear communication.

Of particular relevance to the current governance proposal, the Guiding Principles call for a governance model that is effective, accountable, transparent, inclusive of all participating

municipalities, and compliant with provincial legislation. They also emphasize the importance of maintaining locally responsive services, preserving the watershed-based approach to conservation authority programs and decision-making, and maintaining strong relationships and public trust throughout the transition.

Overall, the current proposal represents significant progress in developing the governance framework for the new RCAs and responds to many of the recommendations previously submitted by the GRCA Board. In particular, the proposed Board representation model represents a significant improvement over the original proposal and provides a stronger foundation for effective and strategic regional governance.

The comments that follow build on the GRCA Board's previous governance position, the discussion of the Ad-hoc Committee, and the Guiding Principles jointly adopted by the four ELERCA conservation authorities. They identify areas where the proposed governance framework could be further strengthened, including ensuring municipal representation appropriately reflects population, financial contribution, geography, and watershed interest; preserving meaningful watershed and local input; supporting accountability and transparency; and maintaining clear roles and responsibilities between the municipally governed RCAs and the provincial oversight role of the OPCA.

Comments on the Current ERO Proposal

The Province has made several significant changes from the governance model originally considered by the Board in 2025. The size of the proposed RCA that includes the GRCA has been reduced, Board appointments are limited to participating upper-tier and single-tier municipalities, and a population-based tiered allocation formula has been introduced. Collectively, these changes respond to many of the governance principles previously identified by the GRCA Board and provide a more practical and strategic governance model.

The proposed regulation establishes the number of representatives that each participating upper-tier and single-tier municipality may appoint to the RCA Board. The responsibility for selecting and appointing those representatives rests with the participating municipalities, rather than the conservation authorities. Accordingly, the GRCA's comments are focused on the overall governance framework and whether the proposed allocation model supports an effective, representative, and watershed-focused Board.

The Board is generally supportive of the proposed direction; however, there are several areas where additional consideration could further strengthen the governance framework for ELERCA.

1. Board Size and Representation

Based on revised population information subsequently provided by the Province, the proposed ELERCA Board would consist of 23 members representing 17 participating municipalities. Given the size of ELERCA, a 23-member Board represents a reasonable size to support effective and strategic governance. The proposed 23-member composition also provides an odd number of members, which supports effective decision-making and is consistent with the governance structure commonly used by municipal councils. Overall, the proposed Board size is consistent with the Guiding Principles of establishing an effective, accountable, transparent governance model that is inclusive of participating municipalities.

Beyond overall Board size, consideration should also be given to how representation is allocated among participating municipalities. The proposed tiered formula provides an objective starting point by considering each municipality's share of the population within ELERCA. However, municipalities vary considerably in the proportion of their geographic area and population within ELERCA, as well as their financial contribution to the Authority. The Committee believes there should be a reasonable relationship between municipal representation and financial apportionment, considered alongside population and geography. Importantly, where only a portion of the municipality falls within the watershed, any population-

based allocation should reflect the percentage of the population actually residing within the ELERCA watershed rather than the percentage of the municipality's geographic area that falls within ELERCA's area. Together, these factors would better reflect the differing municipal and watershed interests represented around the Board table.

The Province's proposal allows participating municipalities to consider an alternative representation model following the initial appointments. The Board supports this flexibility, as it provides an opportunity to consider and develop models that appropriately balance population, geography, watershed interest, financial contribution, and effective Board size. This could include shared representation or municipal grouping agreements for municipalities with a very limited watershed population, geographic presence, or financial apportionment, while ensuring municipalities with significant watershed populations and interests are appropriately represented.

Representation should also evolve as communities grow and populations shift. Given that the allocation of Board seats is substantially based on population, the regulation should require Board composition to be reviewed and updated at least every 10 years using current population information and the prescribed representation criteria. Establishing this requirement in regulation, rather than leaving the decision to individual RCA Boards or participating municipalities, would provide consistency and transparency and avoid placing future Boards in the position of determining whether their own composition should change. It would also ensure that representation remains responsive to population growth and changing municipal and watershed interests over time.

2. Additional RCA Governance Considerations

While the current ERO is primarily focused on municipal representation and Board composition, the Committee identified several broader governance considerations that will become important as the new RCAs are established. Although these matters are not directly addressed through the proposed allocation formula, the Board believes they are important to the overall effectiveness of the new governance model and should be considered as the broader framework is developed.

The appointment of individual Board members rests with participating municipalities. Consistent with the GRCA Board's previous comments on governance, municipal councils should be encouraged to give preference to elected representatives when making appointments, recognizing the direct accountability of elected officials to their communities.

In making appointments, municipalities should also be encouraged to consider candidates' knowledge of local and watershed issues, together with relevant skills and experience in areas such as leadership, municipal governance, financial and risk management, human resources, and law. Experience or demonstrated interest in matters relevant to conservation authorities, including planning, agriculture, natural hazards, development, and water resources, would also contribute to a well-rounded and effective Board.

Once appointed, comprehensive orientation and governance training will be important to establishing a strong inaugural Board and supporting a common understanding of members' governance responsibilities. The inaugural Board should also be encouraged to establish an appropriate committee structure that draws on members' experience and expertise and supports effective consideration of governance, finance, risk management, and watershed issues.

The *Conservation Authorities Act* requires each RCA to establish one or more Watershed Councils for the purpose of assisting the Authority in identifying local priorities related to its programs and services and ensuring local interests are considered in the Authority's decision-making process. While the Act establishes this overall purpose, details regarding the number, composition, functions, powers, duties, and procedures of Watershed Councils are to be

established through regulation. The Board supports this direction and believes future regulations should ensure Watershed Councils provide meaningful watershed-level advice while maintaining clear accountability and decision-making authority with the RCA Board.

Consistent with the GRCA Board's previous comments, consideration should also be given to ensuring Watershed Councils provide a strong connection between the RCA Board, participating municipalities, and local watershed communities. Membership could include area mayors and/or other municipal elected officials, members of the RCA Board, and citizen members appointed by the RCA Board. This structure would provide both municipal and community perspectives while maintaining a direct connection to the RCA's governance structure.

In appointing citizen members, consideration should be given to individuals with knowledge of local and watershed issues and relevant interest or experience in areas such as planning, agriculture, natural hazards, building and development, and water resources. This would help ensure Watershed Councils have the local knowledge and range of perspectives necessary to provide meaningful advice to the RCA Board.

Maintaining local service delivery and strong relationships with municipalities, Indigenous communities, landowners, and watershed partners will also be important to preserving local knowledge and ensuring ELERCA remains responsive to watershed-specific issues. This is consistent with the Guiding Principles related to service excellence and watershed-based science-informed management, which emphasize maintaining high-quality, locally responsive programs and services and ensuring that consolidation does not dilute the watershed-based approach that has historically guided conservation authorities.

3. Ontario Provincial Conservation Agency Governance

The *Conservation Authorities Act* establishes a broad oversight role for OPCA, including oversight of conservation authority governance and operations, promoting consistent policies, standards and fees, and assessing and reporting on conservation authority effectiveness. As this statutory framework is implemented, it will be important to clearly define how OPCA's oversight responsibilities will operate alongside the governance and accountability responsibilities of the municipally governed RCA Boards.

The governance and composition of the OPCA Board will be important to its effectiveness and credibility. Appointments should reflect the skills and experience necessary to provide effective provincial oversight of the conservation authority sector. This should include knowledge of provincial and watershed issues, together with relevant skills and experience in areas such as leadership, Board governance, financial management, risk management, human resources, and law. Experience or demonstrated knowledge in areas relevant to conservation authorities, including planning, agriculture, natural hazards, building and development, and water resources, should also be considered.

The independence of the OPCA Board should also be an important consideration in its composition. To minimize actual or perceived conflicts of interest and maintain a clear distinction between provincial oversight and the organizations and interests that may be affected by that oversight, individuals currently serving as municipal, provincial, or federal elected representatives, or RCA Board members or staff, should not be appointed to the OPCA Board. Similarly, executives or senior representatives of organizations that are currently registered to lobby, or have been actively engaged in lobbying, litigation, or formal policy interventions on matters directly related to conservation authorities, land use regulation, or development approvals within the preceding two years, should generally not be appointed absent exceptional circumstances. This would help ensure that the OPCA Board remains independent, balanced, and focused on its provincial oversight mandate rather than representing particular sectoral or advocacy interests.

The Board supports the provincial oversight role established for OPCA, including promoting consistency, monitoring performance, and supporting accountability across the conservation authority sector. As this role is implemented, there should be clear parameters around the respective responsibilities of OPCA and RCA Boards. RCA Boards should continue to have clear responsibility and accountability for the governance and management of their organizations, including budgets, human resources, operations, strategic planning, and local program priorities, within the provincial legislative, regulatory, and policy framework.

The Board also believes that the OPCA, as a provincial oversight body, should be funded directly by the Government of Ontario rather than through apportionment or other charges to the nine RCAs. This approach would be consistent with the Guiding Principles of fiscal responsibility and accountable and transparent governance by providing clear accountability for the costs associated with provincial oversight and reinforcing the distinction between provincial responsibilities and municipally funded RCA operations. Should the Province determine that OPCA is to be funded in whole or in part by the RCAs, consideration should be given to requiring municipal representation on the OPCA Board to ensure that municipalities have an appropriate governance role where municipal funding supports the Agency.

Financial Implications:

Not applicable.

Other Department Considerations:

Not applicable.

Submitted by:

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