

**TO: Chair and Members of the Source Protection Committee Meeting #1/26, March 25, 2026**

**FROM: Behnam Doulatyari, Senior Manager, Watershed Plans and Source Water Protection**

**RE: Impacts to CTC from Proposed boundaries for the regional consolidation of Ontario's conservation authorities**

## **RECOMMENDATION**

**THAT** the CTC Source Protection Committee receives the staff report entitled "Impacts to CTC from Proposed boundaries for the regional consolidation of Ontario's conservation authorities", at meeting #1/26 for information.

**AND FURTHER THAT** staff be directed to share this report with all Source Protection Authorities, and municipalities within the CTC Source Protection Region.

## **EXECUTIVE SUMMARY**

The report informs the CTC Source Protection Committee of the potential implications of the Province's March 10, 2026, decision on proposed boundaries for the regional consolidation of Ontario's conservation authorities. Because source protection areas are tied to conservation authority jurisdiction under s.4(1) and 4(2) of the *Clean Water Act, 2006*, the proposed consolidation raises significant operational, governance, and administrative considerations for the CTC Drinking Water Source Protection Program.

### **Background**

During the consultation period for ERO No. 025-1257, The CTC Source Protection Committee ("Committee"), on their meeting on December 10, 2025, received a [report](#) titled "Proposed changes to the Clean Water Act, 2006, the Conservation Authorities Act and other relevant legislative and regulatory updates". The committee directed staff to share the report with three Source Protection Authorities and local and regional municipalities in CTC Source Protection Region (SPR), as well as the Ministry of Environment, Conservation and Parks (MECP), the Ontario Provincial Conservation Agency (OPCA), and the Ministry of Municipal Affairs and Housing (MMAH). A letter was sent to the ministries and Source Protection Authorities on December 11, 2025. A brief was shared with municipal councils on January 12, 2026.

On March 10, 2026, the Province posted a decision on Environmental Registry of Ontario regarding the “Proposed boundaries for the regional consolidation of Ontario’s conservation authorities”. A decision has been made on the boundaries for the regional Conservation Authorities (CA), to consolidate 35 of the current CAs into eight regional CAs, by way of statutory amalgamation, to occur in early 2027, or a later date prescribed by the Lieutenant Governor in Council, Lakehead Region CA with its current jurisdiction, for a total of 9 regional CAs. This plan will be led by OPCA. Please see ERO No. [025-1257](#) for details and mapping.

The Province, in the Technical Briefing Improving Ontario’s Conservation Authority System outlines the guiding principles below:

- Retain local influence
- Maintain CA watershed-based jurisdictions
- Reduce administrative overlap and duplication
- Strengthen CA capacity
- Continuity of services
- Improve customer service

## Analysis and Recommendations

This section provides an overview of potential impacts and a few recommendations to minimize disruption to program delivery and improve resilience<sup>1</sup>.

### New Regional Boundaries

As noted in the report to the Committee noted above, under section 4 of the *Clean Water Act*, 2006, the area over which a conservation authority has jurisdiction under the Conservation Authorities Act is established as a drinking water source protection area. This requirement, which ensures the watershed basis of the program, has important operational and structural implications for any changes to those boundaries. The decision does not provide any additional information about the impact to the Drinking Water Source Protection Program (“program”). However, given the proposed regionalization framework, there are two options available to MECP:

- Aligning the SPR boundaries with the new regional CAs. In this case CTC SPR will be split across two Regional CAs. This will require revisions to existing documentation (i.e., local assessment reports, Source Protection Plan), governance (i.e., local SPA, Committee, CTC Management Committee), and digital infrastructure (i.e., software licensing, data ownership and intellectual property, data management processes, agreements, and website design).
- Keeping SPRs unchanged under the new regional CA framework. In this case CTC SPR will be governed by two Regional CAs. This path would require further legislative and regulatory changes to the Clean Water Act and will have similar operational challenges.

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<sup>1</sup> Here **resilience** is defined as the program’s ability to continue fulfilling its mandate under changing conditions.

The proposed governance model under both options will change how lower Tier municipalities are represented at the Source Protection Authority<sup>2</sup>. It is unclear at this point whether or how the watershed council would play a role in the program. Aligning the SPR boundaries with the new regional CAs will require new source protection committees to be formed if source protection is to continue as currently prescribed by the *Clean Water Act*. A new program would have to be started in the new Central Lake Ontario Region CA while the program at CVSPA will have to be merged under the new Western Lake Ontario Region CA.

In either option transitioning the program to the new structure will have significant administrative burden and challenges for governance, operation and digital infrastructure. The transfer of payment agreement through which MECP provides funding for the program, including mandatory tasks such as amendments under sections 34 and 36 of the Act, and program maintenance (governance and administration). Source Protection Authority staff will continue to prioritise maintaining service delivery, however capacity and service delivery will be negatively impacted during the transition. Delivery of the CTC comprehensive amendment has already been delayed by a year due to the regulatory and legislative changes in 2025. We also note the timelines for roll out of proposed structures coincides with renewal of Transfer of Payment Agreement, creating additional challenges for work planning and budgets.

- Additional engagement from the Source Protection Authorities and municipal councils during the transition may be required to maintain level of service, particularly as related to ongoing municipal amendments under s.34 of the Act.
- Keeping SPRs unchanged under the new regional CA framework may be easier to implement as it allows time for other components of regionalization to be prioritized. However, this option carries risk because of required amendments to the Act and its regulations.

### CTC Program Priorities

With several “Large and Fast-Growing Municipalities” (Provincial Planning Statement, 2024), the current operational priorities for the CTC SPR are:

- Updating Tier 2 water budgets to ensure adequate assessment of water quantity pressures in the face of significant growth.
- Revisiting how Lake Ontario intakes are assessed under the program and implementation of improved modeling tools.
- Updating the CTC SPP policies to the latest Technical Rules.
- Development of a program evaluation framework to meaningfully assess program effectiveness.
- Increasing technical capacity in the program to maintain level of service, support municipalities facing increase in download of responsibilities from the province and offset declining technical capacity at the ministry.

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<sup>2</sup> Item 16 of the [agenda](#) for the January 16, 2026 meeting of the Credit Valley Conservation (CVC) Authority board of director meeting includes councils endorsed positions from CVC municipalities on the regionalization.

- Stewardship funding (s. 97 of the Act) to support successful rural water quality programs, which facilitate implementation and improve water quality.

The proposed changes to CA boundaries, under either option, would contribute little to these priorities or improving the overall outcomes of the program.

- Municipally funded collaborative initiatives such as the Oak Ridges Moraine Groundwater Program and Lake Ontario Collaborative Group are efficient ways for improving cross jurisdictional collaboration, maintaining the scientific base of the program, and improving technical capacity on a regional basis.
- Improved technical capacity in hydrogeology, geoscience, surface water (engineering, quality, geomorphology) are important for program success. This technical capacity can be integrated regionally through the program's Municipal Implementation Working Group to help identify and support local needs.
- Increased collaboration between SPAs and local Public Health Units to support municipalities dealing with developments relying on private service, with a focus on leveraging existing data and regional solutions.

### Consultation

The Clean Water Act, 2006 established a locally driven, science-based, multistakeholder process that promotes the shared responsibility of all stakeholders to protect local sources of drinking water from threats to both water quantity and water quality. The goals of the program include the need to strategically ensure adequate good quality drinking water to support future development. The Walkerton Inquiry called for drinking water sources to be protected by developing watershed-based source protection plans. Conservation authorities were tasked with leading local source protection efforts in recognition of their technical expertise, experience in watershed-based work, and the ability to facilitate cooperation among local stakeholders. Accordingly, any changes to the program should be done through a locally driven process including direct engagement with all relevant stakeholders.

The committee has raised concerns about the lack of adequate consultation on several occasions, most recently through the letter sent to the minister, on December 11, 2025, which among other things, requested direct engagement with the source protection authorities and implementing municipalities. Legislative and regulatory changes without proactive engagement with program stakeholders will cause further implementation challenges and duplication of efforts.

- Source Protection Authorities welcome the opportunity to work more closely with the MECP through early engagement in achieving provincial priorities.

## Next Steps

Pending endorsement by the Committee, staff will share this report with the Credit Valley, Toronto and Region, and Central Lake Ontario Source Protection Authorities, and municipalities across the CTC SPR.

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