

December 19, 2025

Hon. Todd J. McCarthy
2nd Floor, Macdonald Block
900 Bay Street
Toronto, ON M7A 1N3

Re: ERO 025-1257 - Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Dear Minister McCarthy,

The National Farmers Union-Ontario (NFU-O) is an accredited farm organization representing sustainable farmers in Ontario and has advocated for farmers across Ontario since 1969. Members work together to achieve agricultural policies that ensure dignity and income security for farmers, while protecting and enhancing rural environments for current and future generations.

The Conservation Authorities Act of 1946 was established in response to widespread flooding, drought, erosion, and deforestation problems. The key principle guiding their formation was the management of natural resources on a watershed basis rather than by political or municipal boundaries. Amalgamating these scientifically-backed conservation authority (CA) zones from thirty-six to just seven would severely undermine the original mandate of the Act and conservation initiatives thereof, putting farmers and citizens at risk.

The legislative changes described in ERO #025-1257 and under Schedule 3 of Bill 68 give the Minister of Economic Development, Job Creation and Trade sweeping powers to override local voices in conservation decision making, diminishing the crucial support farmers need to advance on-farm conservation initiatives. With climate change increasingly impacting farm livelihoods, many farmers work directly with local CA staff who are on the ground, accountable to their communities, and serving them with science-based work. CA's are partners with farmers, working to advance on-farm conservation initiatives that improve soil health, water quality, reduce erosion, protect wetlands and at-risk or endangered species, support sustainable woodlot management, provide risk reduction for rural properties with flooding or droughts, and so much more. As ecological features like watersheds, riparian zones, and forest connectivity vary greatly geographically, **localized CA's** are essential to farmers and climate resiliency efforts that impact us all.

Amalgamating Ontario's CA's from thirty-six to just seven regions would severely undermine the expertise CA's provide and put citizens and farmers at risk of acute and long-term environmental impacts. A few of the risks associated with centralizing the work of CA's include:

- Increased flood risk
- Reduction in localized food security
- Disruptions in agricultural stewardship
- Diluting rural representation
- Complicating permitting and timelines with less flexible local decision making

The NFU-O is opposed to legislative and regulatory changes that erode protective regulations for farmland and natural heritage lands, and that diminish transparent, democratic decision-making. We urge you not to proceed with the amalgamation of Ontario's thirty-six established CA's with decades of localized knowledge into just seven, spanning regions with drastically different ecological and watershed features. This will threaten not just the livelihoods and conservation efforts of farmers, but Ontarians as a whole.

Sincerely,



Max Hansgen
President, National Farmers Union - Ontario