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# **Board of Directors**

# **Supplemental Agenda**

Date: December 11<sup>th</sup>, 2025

**Time:** 9:00 a.m.

Location: SNC Watershed Room

**SNC Office** 

38 Victoria Street Finch, ON K0C 1K0



## **Board of Directors**

# **Supplemental Agenda**

December 11th, 2025, 9:00 a.m.

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- a. Request for Approval: ERO #025-1257 Proposed Regional Consolidation
   of Conservation Authorities Submission: Carl
   b. Update: Estimated Statement of Operations for November 30<sup>th</sup>, 2025: Johanna
   9-10
- 2. Closed Session
  - a. Request for Approval: Legal Fees Expenditures: Eric 11

Carl Bickerdike,

Chief Administrative Officer.

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To: **Board of Directors** From: Carl Bickerdike, CAO December 3<sup>rd</sup>, 2026 Date:

Request for Approval: ERO #025-1257 Proposed Regional Consolidation Subject:

of Conservation Authorities Submission

#### RECOMMENDATION:

The Board of Directors approve the South Nation Conservation submission to the ERO #025-1257 Proposed Regional Consolidation of Conservation Authorities posting as discussed.

#### **DISCUSSION:**

On November 7, 2025, the Ministry of the Environment, Conservation and Parks posted a proposal on the Environmental Registry of Ontario titled "Proposed boundaries for the regional consolidation of Ontario's conservation authorities" (the "ERO Proposal").

The ERO Proposal outlines a plan to consolidate the province's 36 conservation authorities into seven regional conservation authorities ("regional CAs"). The ERO Proposal states regional CAs will remain independent organizations operating with municipal oversight.

The Board of Directors was briefed on the posting and approved a position statement at the November meeting (BD-199/25). A copy of the SNC Position Statement is attached. Staff will seek input from the Board at the meeting for any additional comments to be included in the SNC submission to the ERO Proposal. The posting deadline is December 22, 2025.

Carl Bickerdike,

CAO.

Attachment South Nation Conservation Position Statement: ERO #025-1257

Proposed Regional Consolidation of Conservation Authorities

# South Nation Conservation Response to the Environmental Registry of Ontario Posting on Proposed Amendments to the Conservation Authorities Act (ERO #025-1257)

#### Draft Position Statement for Internal Use — November 2025

South Nation Conservation (SNC) has reviewed the Province of Ontario's Environmental Registry posting ERO #025-1257, which proposes amendments to the *Conservation Authorities Act* and seeks feedback on consolidating Ontario's 36 Conservation Authorities into larger regional bodies governed by a new provincial agency. The posting is open for comment until December 22, 2025.

SNC supports provincial goals to improve consistency, strengthen digital permitting, and modernize environmental services. We continue to advance improvements in these areas and remain committed to working collaboratively with the Province and our municipal partners.

However, SNC has serious concerns regarding transparency, local governance, watershed-based management, donor lands, administrative burden, and the unique realities of Eastern Ontario. These concerns are outlined below.

#### 1. SNC Operations Continue Without Disruption

All SNC services continue without interruption. We remain fully operational in natural hazard management and permitting, land use planning review, flood forecasting and low water response, drinking water source protection, forestry and restoration work, agricultural stewardship, and the management of public conservation lands.

SNC is the only environmental agency in our watershed with local field staff supporting municipalities, landowners, and partners through technical review, site visits, monitoring, and emergency response. Our service commitment remains unchanged throughout this consultation.

#### 2. Lack of Transparency and Evidence Undermines the Proposal

SNC has significant concerns about the limited transparency accompanying the restructuring proposal. Municipalities and Indigenous communities received minimal advance notice, and the Environmental Registry posting does not reference the legislative amendments in Bill 68 (Schedule 3) that would enable consolidation. This lack of clarity makes it difficult for the public to fully understand or assess the implications.

No cost-benefit analysis or evidence-based justification has been provided. Provincial reports, including the Housing Affordability Task Force Report, do not identify Conservation Authorities as barriers to housing or economic development. In practice, CAs help streamline approvals by identifying natural hazard and environmental risks early using updated mapping, technical expertise, and local knowledge.

SNC is a partner of choice for its member municipalities. 100% of planning reviews and development-related screenings are completed within municipal timelines, and staff work directly with municipal planners, developers, and property owners to resolve issues early, reduce delays, and support local economic growth. SNC also demonstrates how shared-service models reduce municipal costs and improve service delivery: SNC delivers Ontario Building Code Part 8 sewage system permitting for 16 municipalities, issuing 100% of permits within required timelines, with an average review period of just 9 days.

The Province's 2022 amendments to the *Conservation Authorities Act* removed CAs' ability to provide natural heritage and hydrogeological reviews. This change has not worked for rural Ontario, forcing municipalities to hire private consultants at higher cost, with longer timelines, and with less local knowledge—illustrating why past changes need careful, meaningful consultation before further restructuring is considered.

SNC performs strongly in the responsibilities it retains: 98% of SNC permits are issued within provincial timelines, demonstrating our commitment to efficient, responsive service. These results do not support the premise that structural reform will improve outcomes.

### 3. Local Governance, Municipal Oversight, and Rural Representation Must Be Protected

SNC was created by local municipalities in 1947 and has been municipally governed for nearly 80 years. Locally elected representatives approve SNC's budgets and ensure accountability to the taxpayers who fund the vast majority of our work; provincial contributions have declined to approximately 3%, compared to the 50% funding levels from past decades.

Local governance keeps watershed decisions grounded in community needs. Shifting authority to provincially controlled regional bodies would reduce municipal oversight of the services that municipalities fund and rely on.

The proposal to create a new Ontario Provincial Conservation Agency and Regional Conservation Authorities would centralize decision-making under the Province, replacing the long-standing municipal partnership model that ensures watershed programs reflect local conditions, priorities, and risks.

SNC also strongly supports the collaborative, province-wide network facilitated by Conservation Ontario (CO), which enables effective coordination, shared expertise, and strong municipal partnerships across Ontario. Our member municipalities have clearly indicated that the funds they contribute to support CO should not be redirected to establish a new provincial agency, and we expect that any such agency should be fully funded by the Province—not municipal taxpayers.

The proposed structure also raises significant concerns about future Board representation. If SNC were merged into a regional agency with 46 municipalities that includes large urban centres such as Ottawa, Kingston, and Cornwall, representation—allocated based on municipal levy contributions—would heavily favour these cities. Rural municipalities, despite representing most of the land base and facing some of the most complex natural hazard, agricultural, shoreline, and land-use challenges, would hold minimal influence. This risks marginalizing rural communities and undermining balanced decision-making.

Structural changes will not improve watershed protection or municipal outcomes without restoring reliable provincial funding for watershed science, hazard management, monitoring, and climate resilience.

#### 4. Donor Lands Must Remain Locally Stewarded

SNC manages over 13,000 acres of conservation land, much of it donated by residents and farming families, with the expectation of local, community-based stewardship. This natural legacy was built on over seventy years of local relationships, and the forest cover it protects is critical for the well being Eastern Ontario residents and their posterity.

SNC also manages numerous municipal conservation properties under service agreements that leverage our technical expertise, volunteer programs, and stewardship capacity. This cooperative land management model is highly valued in Eastern Ontario and reflects decades of shared effort between SNC and our municipalities.

Transferring these lands to a large regional entity raises concerns regarding donor intent and will have implications for charitable trust obligations, *Income Tax Act* requirements, municipal agreements, donation conditions, conservation easements, and bequests. These lands exist for the benefit of local communities, and their responsible stewardship depends on local presence, established relationships, and knowledge.

Maintaining donor and municipal confidence is essential to future conservation in Eastern Ontario.

## 5. Local Watershed Governance Enables Effective Regional Partnerships

Ontario's watershed-based model is internationally recognized and has protected communities for 80 years. Natural hazards, water quality, and ecological processes follow watershed boundaries—not municipal or administrative ones.

Eastern Ontario has distinct natural resources, hydrology, and geology, and it already takes over an hour to travel across each major watershed. Expanding these jurisdictions into larger regional systems would complicate coordination and reduce the responsiveness required for effective watershed management.

SNC already participates in strong regional partnerships that achieve consistency and efficiency. The Ottawa CA Partners (SNC, RVCA, and MVCA) coordinate land use planning reviews, watershed monitoring, and joint delivery of stewardship programs such as tree planting and water quality improvement projects. SNC and the RRCA maintain a service model delivering drinking water source protection and community programs.

These collaborations extend to natural hazard management. Along the Lower Ottawa River, the Ottawa CA partners work closely with the Ottawa River Secretariat, and municipalities to monitor river conditions, share data, and deliver coordinated flood forecasting and communications—demonstrating that effective, science-based watershed management already occurs across jurisdictions without restructuring.

SNC also delivers specialized agricultural stewardship programs not offered consistently across the proposed new region. Agriculture is a major economic driver within the South Nation Watershed, and SNC's long-standing municipal and farm-sector partnerships support environmental improvements on private land. SNC leads the Eastern Ontario Farm Stewardship Collaborative, coordinating federal funding and technical support across the region—services built on trusted relationships and deep local knowledge that cannot simply be scaled.

These partnerships demonstrate that alignment, consistency, and efficiency can be achieved without compromising local decision-making, watershed science, or community responsiveness.

### 6. Restructuring Would Increase Costs and Disrupt Services

Large-scale restructuring would require major administrative effort, including governance realignment, HR transitions, IT integration, renegotiation of municipal agreements, harmonized policies, and the transfer of lands and assets. These transitions routinely take years and would divert staff and municipal resources away from core watershed programs that protect people and property.

SNC is a high-performing, well-resourced CA with strong municipal partnerships and successful shared-service arrangements. Restructuring SNC into a large regional agency would not resolve capacity issues elsewhere; it would dismantle existing efficiencies and reduce responsiveness in Eastern Ontario.

Any provincially driven restructuring must also be funded by the Province. Municipal levy dollars are intended to support local environmental priorities—not to finance a provincial reorganization. Redirecting municipal funds toward restructuring would undermine frontline watershed work and weaken local accountability.

This proposal also follows a decade of legislative and regulatory changes that have already added extensive administrative burdens, including program categorization, dozens of municipal service agreements, updated governance policies, and implementation of a consolidated provincial regulation. Adding a full restructuring on top of these requirements would significantly increase costs and strain CA and municipal capacity at a time when watershed and climate pressures are rising.

#### 7. French Language Rights and Bilingual Service Obligations Must Be Maintained

SNC is the only bilingual CA in Southern Ontario, and bilingual service is a core part of our identity, mandate, and history. A majority of residents within the South Nation Watershed speak French, and several municipalities in our jurisdiction are designated under Ontario's *French Language Services Act*, requiring French to be available as a first point of contact.

SNC has built a fully bilingual service delivery model, including bilingual public communications, programs, education materials, signage, consultations, and customer service. This bilingual capacity is not optional—it is essential for meeting legal obligations, serving our communities effectively, and maintaining trust with the region's large francophone population.

Any future restructuring must respect and protect SNC's bilingual mandate. Integrating SNC into a much larger regional agency would require substantial investment to ensure that all partner municipalities in the new region are able to meet bilingual service expectations. This could significantly increase administrative and operational costs for municipalities that currently do not operate in both official languages.

Centralizing governance without maintaining bilingual requirements risks diminishing the quality and accessibility of services for francophone residents. Protecting the right to service in French must be a foundational principle in any proposed provincial restructuring.

# 8. Consistency and Modernization Can Be Achieved Without Restructuring

SNC supports the Province's goals to enhance consistency and modernization, including the development of an online provincial permitting system. CAs have already made major improvements through digital permitting, standardized service timelines, administrative bylaw updates, enhanced guidance materials, and strengthened pre-consultation and review protocols.

The Province's recent move to a single, consolidated provincial regulation has already standardized permitting across Ontario. While this strengthens consistency, it has also created unintended challenges—particularly in Eastern Ontario—where the loss of local flexibility introduced new regulatory areas not supported by all municipalities, affected wetland permitting, and created additional rural considerations that remain unresolved.

SNC's watershed also encompasses unique natural hazard challenges. The Casselman to Lemieux Potential Retrogressive Landslide Area, which includes the largest documented landslides in Ontario's history, requires specialized local expertise, geological knowledge, and tailored policy frameworks. Effective risk management and local policies in these areas should not be centralized without compromising community safety.

These realities show that modernization can continue successfully without restructuring the watershed governance model or reducing local decision-making capacity.

### 9. Constructive Participation and a Call to Action

SNC will participate constructively in the consultation and will continue working with Conservation Ontario, municipalities, Indigenous communities, agricultural organizations, and communities to coordinate feedback. We encourage comments to the Environmental Registry before December 22, 2025.

There are opportunities for increased efficiency, and SNC supports exploring regional shared-service models for corporate services, technology systems, and information management. These improvements can reduce costs and improve services without undermining the watershed-based model that municipalities rely on.

Any structural changes must ensure that offices and staffing remain in place. CA staff provide field expertise, monitoring, and rapid on-site support essential to municipalities, residents, and emergency response.

SNC remains committed to protecting people and property, supporting municipalities and landowners, safeguarding drinking water, restoring natural systems, and delivering high-quality watershed services.

Healthy watersheds are the foundation of healthy communities and strong local economies. SNC supports the Province's goal of improving service delivery, strengthening natural hazard management, and enhancing digital permitting tools to help streamline the development process. We encourage the government to build on the significant strengths already present within Ontario's Conservation Authority system, rather than replacing them, by investing in modernization, supporting local capacity, and ensuring sustainable provincial funding.

With the right commitment, this moment can become an opportunity to shape the future of conservation in Ontario in a meaningful and lasting way.



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**To:** Board of Directors

From: Johanna Barkley, Director of Finance

Date: December 8, 2025

**Subject:** Update: Estimated Statement of Operations for November 30<sup>th</sup>, 2025

#### **RECOMMENDATION:**

The Board of Directors receive and file the Estimated Statement of Operations for the year ending December 31<sup>st</sup>, 2025, as of November 30<sup>th</sup>, 2025, update.

#### **DISCUSSION:**

The Net Overall amount represents total expenditures, operating, capital, and project, minus total revenue. The operational budget is the day-to-day expenses the Authority requires for normal activities. Expenses for projects are normally for a fixed term period. Capital expenditures are as per SNC's *Tangible Capital Assets Policy* revised in August 2021. "Tangible" capital assets are goods that have a life expectancy of more than one (1) year, and costs normally over \$5,000, with some exceptions. This Policy can be reviewed at any time, if necessary.

Currently, Senior Management, Team, and Project Leads are estimating a balanced budget. A full review of 2025 revenues and expenditures will continue through to the end of 2025.

The final 2025 reserve transfer will be presented to the Board along with the audited financial statements at the March 2026 board meeting.

#### FINANCIAL IMPLICATIONS/ADHERENCE TO SNC POLICY:

Compliance with Budget

The 2025 budget represents the Board of Directors approved Budget of January 16<sup>th</sup>, 2025.

**SNC Policy Adherence**:

SNC approved Policies are adhered to.

Director of Finance.

Attachments: Estimated Statement of Operation



ESTIMATED STATEMENT OF OPERATIONS As of November 30, 2025	YTD Actuals	Final Budget	Updated Forecast
EXPENDITURES			
OPERATING EXPENSE			
Resource Management			
Water Response Programs	417,929	521,312	363,900
Partner Programs	411,155	773,000	1,155,434
Landowner Stewardship Outreach	836,038	487,426	1,230,095
Total Resource Management	1,665,121	1,781,738	2,749,429
Property & Approvals			
Property	1,788,351	1,496,767	2,256,255
Approvals	1,457,636	1,718,916	1,660,067
Total Property & Approvals	3,245,987	3,215,683	3,916,323
Corporate & Community Services			
Corporate Services	1,174,825	1,391,956	1,290,072
Information Management and Technology	170,028	170,761	218,600
Communications and Outreach	224,652	248,698	304,266
Total Corporate & Community Services	1,569,506	1,811,415	1,812,937
TOTAL OPERATING EXPENSE	6,480,614	6,808,836	8,478,689
CAPITAL and PROJECT EXPENSE			
Resource Management			
Capital	6,699	37,500	59,200
Projects	977,242	1,546,644	1,256,725
Total Resource Management	983,941	1,584,144	1,315,925
Property & Approvals			
Capital	1,271,487	662,619	1,769,832
Total Property & Approvals	1,271,487	662,619	1,769,832
Corporate & Community Services			
Capital	38,265	25,000	45,000
Projects	-	-	-
Total Corporate & Community Services	38,265	25,000	45,000
TOTAL CAPITAL AND PROJECT EXPENSE	2,293,692	2,271,763	3,130,756
TOTAL OVERALL EXPENSE	8,774,306	9,080,600	11,609,446
REVENUE	2,111,000	2,222,222	,,
Other Sources	3,354,783	3,455,462	5,395,344
General Levy	4,341,125	4,636,678	4,636,678
Capital Levy	187,248	200,000	200,000
Special Levy	742,666	497,000	870,227
Source Protection	147,817	143,240	143,240
MNRF (Regular)	91,070	91,070	91,070
TOTAL REVENUE	8,864,710	9,023,450	11,336,559
NET OVERALL	(90,404)	57,150	272,886
Transfer To / (From) Reserve	(56,569)	(57,150)	(272,834)
Cash (Surplus) Beginning of Year	(,-20)	_	-
Cash Deficit / (Surplus) End of Year	(146,973)	0	000153
Cach Solion / (Garpino) Lina of Tour	(140,070)	<b>J</b>	<u> </u>