



Bill 100: Better Regional Governance Act, 2026
Submission to Standing Committee on Heritage, Infrastructure
and Cultural Policy

April 2026

April 28, 2026

Laurie Scott, MPP

Chair, Standing Committee on Heritage, Infrastructure and Cultural Policy
Whitney Block, Room 1405
99 Wellesley Street W
Toronto, ON M7A 1A2

Dear Chair Scott,

On behalf of [Association of Municipal Managers, Clerks and Treasurers of Ontario \(AMCTO\)](#) thank you for the opportunity to provide comments towards your committee's study of Bill 100: Better Regional Governance Act, 2026.

AMCTO represents excellence in local government, management and leadership. Since 1938, we have provided advocacy, education, accreditation, leadership and management expertise for Ontario's municipal professionals. With over 2,200 members working in municipalities across the province, we are Ontario's largest association of local government professionals.

We were pleased to see that in regulatory registry consultations related to this initiative, the Ministry appeared to respond to our request for clarity with respect to restricted act provisions and how these apply to strong mayors in an election year. We thank the Minister for his attention to this matter. We are cautiously optimistic that if the eventual regulations incorporate our feedback, that this sensitive time in the election period will be managed.

In our submission, we offer three recommendations for the committee's consideration:

1. Review and update Part VI.1 Special Powers and Duties of the Head of Council in collaboration with AMCTO to remove grey areas.
2. Remove the authority of strong mayors from administrative and employment matters including the hiring and removal of municipal leaders and staff, and forgo extending these to regional chairs.
3. Consider technical modifications to support implementation in a two-tier structure.

We remain concerned about the continued expansion of the powers as they relate to organizational structure and employment matters including the hiring and removal of the CAO and other municipal staff to regional chairs. Especially those without a local democratic mandate which was the original rationale for providing these powers to elected mayors.

AMCTO reiterates our call to remove these powers from the strong mayor framework and is opposed to the extension of these powers to regional chairs.



AMCTO is further concerned about the potential instability provincial appointments of chairs/war-dens could bring to the municipal organizations. Such changes can impact service efficiency, slow down decision-making and impact organizational culture.

A division between political oversight and the non-partisan, impartial and professionalized admin-istration is essential to the efficient and effective delivery of programs and services to local resi-dents in a way that ensures adherence to legislated rules and responsibilities, professional prac-tices and is future focussed rather than term focussed.

We would also reiterate our call to revisit the Part VI.1 of the *Municipal Act, 2001* in collaboration with the municipal sector and associations like AMCTO, so that the grey areas of the legislation that hamper effective implementation are removed.

Sincerely,

[original signed by]

Kyle Pratt, MPA, CMM III, CHRL, CMO, Dipl.M.A.
Vice President, AMCTO

CC: Hon. Rob Flack, Minister of Municipal Affairs and Housing
Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and Housing
Robert Dodd, Chief of Staff, Minister's Office, Ministry of Municipal Affairs and Housing
Laurie Miller, Assistant Deputy Minister, Local Government Division, Ministry of Municipal Affairs and Housing
Robin Jones, AMO President

Introduction

The majority of AMCTO's members have spent the last four years working through implementation of Part VI.1 Special Powers and Duties of the Head of Council and the accompanying regulations, *O. Reg. 530/22* and *O. Reg. 580/22*. There remains several areas within the legislation which would benefit from clarity.

We offer three overarching recommendations with a number of considerations for implementation including identifying potential issues related to conflicts, decision-making, budgeting, and appointment process:

1. Review and update Part VI.1 Special Powers and Duties of the Head of Council in collaboration with AMCTO to remove grey areas.
2. Remove the authority of strong mayors from administrative and employment matters including the hiring and removal of municipal leaders and staff, and forgo extending these to regional chairs.
3. Consider technical modifications to support implementation in a two-tier structure (including weighted voting).

Recommendations and Advice

Recommendation 1: Review and update Part VI.1 Special Powers and Duties of the Head of Council in collaboration with AMCTO to remove grey areas.

AMCTO has requested updates to legislation to remove areas that were written too broadly or did not adequately consider gaps or processes for implementation. We have [written about these elsewhere](#) and would refer you to these. However, we believe it pertinent that the ministry clarify the following within the legislation as soon as possible:

- **Mayoral directives:** In the interest of transparency and consistency, specify that mayoral directions/directives should be posted publicly just as mayoral decisions are. There are varying interpretations by heads of council and others which mean that the ways in which directives are made available differs municipality to municipality.
- **Tax ratios/levies/user fees:** We are aware of situations where councils consider not passing ratios, user fee or levy bylaws to prevent certain budgetary proposals put forward by the mayor from passing because members of council were not supportive of them for one reason or another.

Often these are considered before the mayor's budget process, though some municipalities pass these after. While council retains authority over these bylaws, the mayor's budget cannot move forward without the necessary levies. Legislative or regulatory updates which clarifies intent as outlined in the ministry's response to AMCTO in 2024 would be beneficial since members of council look to the legislation for direction.

- **Budget approvals outside of the budget process:** clarify whether a council can pre-approve budget projects or approve mid-year projects that do not affect the tax levy (possibly because reserves are used as the funding source).

These will be particularly necessary to clear up as the Government plans to extend these powers to regional chairs.

Recommendation 2: Remove the authority of strong mayors from administrative and employment matters including the hiring and removal of municipal leaders and staff and forgo extending these to regional chairs.

AMCTO remains strongly opposed to the strong mayor powers related to staff. AMCTO recently conducted detailed research on the use of strong mayor powers since their introduction.¹ In our analysis, 20% of heads of council have removed their CAO under strong mayor authority. Moreover, some heads of council are taking advantage of hiring and removal of staff unrelated to the stated intent of the legislation, streamlining of housing project approvals. A chair of a board or CEO does not get into the day-to-day hiring of departmental operational staff. In our recent analysis, at least 35% of mayors who retained power over hiring and removal of staff removed directors, managers, supervisors/team leads and others. That is a significant shift in municipal leadership and disruption to an organization which ultimately impacts service delivery and increases costs to the municipality.

Extending this power to the regional chairs means that consolidated municipal service managers, public health employees, paramedics, Provincial Offence Court managers and others would be subject to the decisions of the regional chair/warden and would risk politicization of more public services.

We continue to call for the removal of these powers from employment matters including organizational structure and the hiring and removal of staff.

Recommendation 3: Consider technical modifications to support implementation in a two-tier structure.

In addition to the above, in speaking with our members, AMCTO has identified the following challenges that the ministry will need to address before extending powers to regional chairs:

Changes to the Municipal Elections Act

Under the proposed bill, the ministry would amend the *Municipal Elections Act, 1996* to provide that any nominations that had already been filed for council positions that are no longer being elected would be deemed withdrawn.

¹ AMCTO circulated a survey to the clerks of the 215 municipalities identified in O. Reg. 530/22 and the City of Toronto. 201 municipalities completed the survey, providing for a 93% response rate. Respondents were asked a range of questions about the use of strong mayor powers in their municipality since they were introduced. The survey was open from November 26, 2025 – February 13, 2026.

Our members have indicated that withdrawal may pose additional administrative and operational challenges as those candidates will still have a defined campaign period that requires a financial statement submission in 2027. Therefore these candidates would still require a Compliance Audit Committee to address any requests for audits filed against that financial statement given that these individuals could fundraise or incur expenses between May 1st and whenever Bill 100 receives royal assent, if passed.

Instead, we would suggest amending the bill to state that nominations filed for those officers are *deemed not to have been filed* to avoid unnecessary administrative requirements.

Appointment Processes for Regional Chairs/Wardens

AMCTO has been clear that we are concerned about the impact frequent changes to municipal operations and governance has on service delivery, financial resilience and organizational culture.

Frequent turnover is not only costly, but it also results in instability that affects outputs and outcomes. AMCTO is similarly concerned that the Provincial appointment model will create further instability because of either the existing government who is unsatisfied with the performance of a chair or a new provincial government removes regional chairs/wardens at their leisure. Such changes have administrative and operational impacts to municipalities.

A clear pathway for the appointment process, including when the Province will make the appointment of chair, is necessary to ensure the smooth operation of upper tier councils post-election.

Moreover, the proposed legislation says the minister may appoint a chair, and if they do not, the local municipality must. The ministry must provide clear timelines as to when the minister will make an appointment. Otherwise, the municipality will need to initiate their own processes which take time and resources which could include submission and evaluation of applications or expressions of interest, conversations, consultations and the final appointment process.

Upper Tier Budgets

Legislative clarity is required as to how agencies, boards and commissions and local board budgets are managed and integrated into mayor or regional chair budgets. We would note that in 2024 AMCTO's Board of Directors passed a resolution approving the following policy statement:

The Province should review and provide clarity to the definition of local boards within the Municipal Act, 2001, while ensuring consistent usage in consequential legislation and regulations, to provide municipalities and local boards...with more certainty on which sections of the Municipal Act and other acts apply to local boards.

This is a long-standing issue that requires resolution in collaboration with the sector, including AMCTO. There are inconsistent approaches to managing the budget of local

boards and other agencies across municipalities as mayors have directed staff to address these in different ways. It remains unclear as well what local boards are within the scope of strong mayor powers.

Further, with respect to Police Service Boards and the budgets and estimates, there remains legislative uncertainty. We appreciate that Minister Flack and Solicitor General Kerzner wrote to municipalities with the Province's interpretation of strong mayor budget prerogatives related to Police Service Boards. However, this is another area where legislative amendment is needed.

Municipalities, including staff and members of council, rely on the text of statutes for their operations. The Part of the legislation itself is not clear on the relationship between municipal approvals of budgets and estimates and a Police Service Boards role in providing those estimates as a non-elected body. The Province's interpretation requires approval without the ability to control the content of these budgets and estimates. This leaves a procedural tension in this process due to competing roles of these councils and boards that puts municipal professionals in the middle of managing.

If it was not the intention to authorize heads of council to manage municipal costs as it relates to police services, then that should be made clear in the legislation. Adding clarity on exactly what elements of a police board's budget request are within council or a strong chair's ability to modify the municipality's budget is needed.

AMCTO would nevertheless point to the increasing costs of such services that are paid by the local rate payer as a significant budgetary pressure for municipalities. As others have already noted, these increasing costs are not sustainable.

Other Considerations

Some other considerations for the committee's study which would help avoid unnecessary conflicts, administrative and operational burden while ensuring accountability and transparency at the local level:

- Consideration for whether a ministerial appointee will be a two-hatter (a chair who is allowed to keep their position as a lower tier mayor) as currently allowed by s.218 of the *Municipal Act*.
 - If allowed to keep their lower-tier position, and they are from a municipality listed in the regulation as strong mayor, do they keep that authority and how does that authority align with their responsibilities as chair of the upper tier?
 - There could be a perception or a real scenario in which a strong chair seeks to allocate all regional resources to their local municipality in support of "provincial priorities" which would only require more than a one-third majority to get this done.
- In Simcoe County and Niagara Region, there are a mix of strong mayors and traditional so-called weak mayors. In Simcoe County there are also separated cities for which the County

provides services. It is unclear how this dynamic will play out in the new upper tier composition and structure, especially with respect to the budget. The Government must consider the variety of scenarios that could play out when drafting the regulations.

- In our response to the Regulatory Registry postings AMCTO will be requesting additional clarity on how the Government intends to set up a weighted voting framework as our members are the ones responsible for ensuring proper procedures are followed.

Conclusion

We thank the committee for opportunity to provide feedback to inform the committee's deliberations on Bill 100. AMCTO is at the committee's disposal to answer any questions or comment further on what we have submitted.