

Sent by e-mail to: Minister.SOLGEN@ontario.ca

July 11, 2025

The Honourable Michael Kerzner
Solicitor General
Ministry of the Solicitor General
George Drew Building, 18th Floor
25 Grosvenor Street
Toronto, Ontario M7A 1Y6

Dear Minister Kerzner,

The Association of Municipalities of Ontario (AMO) is a non-partisan, non-profit association representing the 444 municipal governments across Ontario. Municipal governments work through AMO to achieve shared goals and meet common challenges.

AMO members understand the important role that the Ontario Provincial Police (OPP) and municipal police services play in maintaining public safety in communities across Ontario. As the order of government responsible for providing policing services to their local communities, municipalities understand the importance of this responsibility.

For more than a decade, AMO has been shining a light on the significant cost pressures municipalities are facing as a result of [growing police costs](#). AMO is appreciative of the \$77M the province provided last fall to offset unusually large OPP billing increases as well as efforts through this review to make sure no such unexpected massive cost increase happens again. However, the fiscal challenges municipalities are facing extend beyond the OPP billing model to municipal police forces and a fundamentally broken provincial-municipal fiscal framework.

AMO is pleased to provide comments on the ongoing OPP billing review. We are aware that the mandate of this review is narrow and specific to the OPP billing model. However, we believe that the ministry needs to be aware of the broader issues affecting our sector in order to adequately address the policing cost challenges impacting all municipalities. We would also urge the government to take a more comprehensive approach and engage municipalities on a broader Social and Economic Prosperity Review.

This submission provides AMO's input into the OPP policing review, focusing on five broad themes that emerged from consultation with our members: transparency and timing, spending in areas of provincial responsibility, vacancy costs and recruitment issues, court security and prisoner transfer costs, and inequitable policing costs in service hub communities.

Transparency and timing

Municipalities currently receive their bills for OPP policing services very late in the municipal budget planning cycle. We understand that the OPP relies on time sensitive data sets to determine bills. However, municipalities receiving variable bills in the middle of the municipal budget process is unnecessarily challenging and makes it more difficult to balance other competing municipal priorities. The scale of the cost increases for the 2025 bills only highlights an existing challenge.

AMO would encourage the government to work with the OPP to streamline processes to allow the distribution of bills earlier in the fall, at a time more in line with the planning cycle of our members. Notice of potentially large billing increases should be provided even further in advance with an opportunity for municipalities to spread these increases out over time.

There is also an opportunity to improve transparency in billing and the service that municipalities are receiving. AMO members have reported challenges in understanding the detailed services covered by their bills.

The amount of information shared between the OPP and municipalities is also inconsistent across the province. Some have open and transparent relationships, while other municipalities are unable to receive basic information from their detachments about how many police officers are in their municipality.

The OPP should provide greater transparency on how individual municipal bills are developed and the number of officers assigned to each municipality.

Spending in areas of provincial responsibility

Municipalities across Ontario are at the frontlines of responding to increases in homelessness, encampments and mental health and addiction challenges. AMO's recent report, [Municipalities under pressure: The Human and Financial Cost of Ontario's Homelessness Crisis](#), showed how much municipalities are investing from the property tax base in responding to this growing social challenge.

Access to mental health and addictions treatment is uneven across the province and wait lists are long. Police are increasingly being asked to respond to these challenges in the place of adequate provincially funded services. The *Safer Municipalities Act, 2025* established a range of additional police tools for responding to encampments and public drug use. Police response to these growing social challenges is an important contributor to the rising police costs being born by all our members.

Municipalities across Ontario are also working collaboratively with local police services and community partners to build comprehensive Community Safety and Well-Being Plans meant to enhance upstream interventions to prevent crime. AMO has long advocated for provincial funding for these plans to help improve public safety and

alleviate growing police costs.

The province should work collaboratively with municipalities, police chiefs and police service boards to estimate the proportion of police costs attributable to homelessness and mental health and addictions and provide appropriate provincial funding for these costs. The province should also ensure that upstream municipal programs that target the root causes of crime are adequately funded.

Vacancy costs and recruitment issues

In the last Auditor General value for money review in 2020, the OPP vacancy rate was found to be over 25 percent in most of the province. This is a significant number of officers not able to work. Many municipal police forces face similarly high vacancy rates. These vacancy rates lead to increase costs, as forces must rely on more costly overtime to cover for officers on leave.

As well, these rates are not helped by the ongoing struggle of police forces across Canada to recruit new officers. AMO and its members appreciate recent actions taken by the government to address these challenges, including the Answer the Call campaign to improve police recruitment and Warrior Health initiative to provide 24/7 mental health resources for emergency personnel.

We welcome these upstream actions and would encourage continued collaboration with police associations and municipalities. However, we need urgent support now to respond to the growing vacancy challenge.

The province should provide funding to offset costs associated with police away from work on WSIB approved leaves of absences so that police services can align their actual strength with authorized strength and reduce reliance on overtime. The province should consider the [2015 AMO recommendations](#) to shift specific functions to civilians or other security providers where appropriate.

Prisoner transport and court security

In the 2008 *Provincial Municipal Service Delivery Review*, the province committed to uploading all prisoner transport and court security costs to a maximum of 125 million dollars per year. Prisoner transport here refers to the secure transportation of inmates between courts, prisons, and other security locations, while court security means the physical security of provincial courts.

While the negotiated \$125 million cap covered all municipal costs at the time of the agreement, it is no longer sufficient. Municipalities are now funding costs that were previously uploaded.

To lower policing costs, the province should remove the \$125 million cap and provide full funding for prisoner transport and court security each year.

Inequitable policing costs in service hub communities

While AMO recognizes that the current model is more equitable than previous iterations, there are opportunities for further improvement. Some municipalities act as hubs for surrounding communities because they house provincial infrastructure like hospitals and courts, or provide social services used by residents of other jurisdictions. These communities continue to face much higher calls for service on a per capita basis than other municipalities and pay greater per capita costs.

The current discount model should be replaced with a grant given to municipalities with the highest calls for service cost per capita. Both OPP and independently policed municipalities should be eligible for this cost relief.

Conclusion

AMO is encouraged that the province is taking action to improve the OPP billing model. We appreciate that the province is trying to find ways avoid large surprise increases and to make sure the unexpectedly large increases from 2025 do not happen again.

Municipalities are increasingly faced with tough choices between paying for increasing police budgets and investing in long-term infrastructure projects that are critical to Ontario's long-term economic growth.

The fiscal framework that enables municipalities to provide both critical services and infrastructure is broken. While program-specific reviews like this one are appreciated, AMO continues to call on the provincial government to work with the municipal sector on a new comprehensive fiscal relationship that would better support public safety and economic growth in communities across Ontario.

Sincerely,



Robin Jones
AMO President

cc: The Honourable Rob Flack, Minister of Municipal Affairs and Housing
Mario Di Tommaso, Deputy Solicitor General, Ministry of the Solicitor General
Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and Housing