

Sent via e-mail to: minister.mlitsd@ontario.ca
minister.mah@ontario.ca

November 18, 2025

The Honourable David Piccini
Minister of Labour, Immigration, Training
and Skills Development
400 University Ave, 14th Floor
Toronto, Ontario M7A 1T7

The Honourable Rob Flack
Minister of Municipal Affairs and Housing
College Park, 17th Floor
777 Bay Street
Toronto, Ontario M7A 2J3

Dear Minister Piccini and Minister Flack,

I am writing with respect to the fast-tracking of Bill 30, the seventh *Working for Workers Act*, and requests for amendments based on the concerns it raises for municipalities.

Given the current economic uncertainty, the Association of Municipalities of Ontario (AMO) understands the need to make planning and development processes faster and more streamlined. This is essential to build the infrastructure Ontario workers and businesses need for a competitive and resilient workforce. This is why AMO has supported many other recent measures to address the impacts of tariffs and economic uncertainty. However, AMO continues to question the rationale for Bill 30's proposals to:

- Exempt Skills Development Fund (SDF) Capital Stream projects from the *Planning Act*; and
- Create the authority to limit or waive municipal authorities for SDF Capital Stream projects under the *Municipal Act*.

Planning Act Exemptions

AMO has provided written comments in response to Environmental Registry of Ontario (ERO) posting #025-1159 on Bill 30, *Working for Works Seven Act, 2025*, which focused on the *Planning Act* exemptions (and planning provisions in the *City of Toronto Act*). In this submission, AMO questions the blanket exemption for SDF Capital Stream projects, which provide sweeping planning exemptions to private sector organizations based solely on receiving SDF funding. AMO had supported the province in its previous planning exemptions for public entities, confident in the robust regulatory and accountability frameworks that govern these types of services to provide the oversight necessary to meet important health, safety, financial environmental, and broader community objectives and to properly mitigate risks.

The extension of these exemptions to private interests such as those funded through the SDF, who operate without rigorous public accountability frameworks and reporting, raises significant concern. It remains unclear to AMO how the SDF Capital Stream eligibility criteria provides sufficient rationale for wholly exempting any funded project

from needing to meet important municipal standards, including those that ensure flood prevention, safe site design, and adequate municipal infrastructure capacity.

Municipal Act Exemptions

While it remains unclear which municipal authorities the province intends to limit or waive under the *Municipal Act*, these exemptions create additional risks for businesses and residents. *Municipal Act* exemptions have the potential to erode municipal oversight and decision-making in important areas such as:

- The issuance of building permits.
- The ability to set and collect property taxes and fees/charges.
- The execution of local housing and economic development initiatives.
- The establishment of sound local business operations, such as noise control and waste management.

Municipalities rely on by-laws created under the *Municipal Act* to maintain healthy, sustainable communities. Upholding these by-laws is necessary because they:

- Maintain the health, safety and well-being of residents and workers.
- Protect people and property.
- Ensure the economic, social and environmental well-being of the community.
- Enable fair and sustainable funding for community costs.

Waiving the need to adhere to municipal laws by virtue of a funding source alone does not seem to be an adequate bar to meet for these significant steps.

Given that Bill 30 was fast tracked through the legislative process, AMO did not have an opportunity to request to speak at Standing Committee to raise our questions and additional considerations for unintended consequences brought about by the Bill's proposed changes to requirements under the *Planning Act* and authorities to waive or limit *Municipal Act* requirements. As the Bill moves through the legislature, we ask that you reconsider these two legislative exemptions and amend the Bill. The significant risks associated with these exemptions clearly outweigh the purported benefits.

AMO continues to welcome conversation at the confidential AMO-MOU table to discuss ways to move forward in partnership. We are committed to working with you and our sector to develop solutions that address your concerns about SDF Capital Stream project developments while upholding municipalities' ability to maintain healthy, sustainable communities.

Sincerely,



Robin Jones
AMO President
Mayor of the Village of Westport

cc: Jonathan Lebi, Deputy Minister of Labour, Immigration, Training and Skills Development
Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and Housing

Attachment: AMO's Submission to the Environmental Registry of Ontario & Regulatory Registry on Matters Related to Bill 30, *Working For Workers Seven Act, 2025*

Safeguarding Critical Municipal Planning Processes and Authorities

AMO'S SUBMISSION TO THE ENVIRONMENTAL REGISTRY OF ONTARIO &
REGULATORY REGISTRY ON MATTERS RELATED TO BILL 30, *WORKING FOR
WORKERS SEVEN ACT, 2025*

ERO 025-1159

November 16, 2025

Executive Summary

The Association of Municipalities of Ontario (AMO) appreciates the opportunity to provide comments on Bill 30, *Working for Workers Seven Act, 2025* through the Environmental Registry of Ontario posting on proposed amendments to the *Planning Act* (and planning provisions in the *City of Toronto Act, 2006*) (ERO # 025-1159).

Amendments to the *Planning Act* and *City of Toronto Act, 2006*

Over the last several months, municipalities across Ontario have been at the front lines of trade and tariff disruptions, navigating their direct impacts on local economies and workforces. Municipalities understand the need for bold and innovative action to respond to unprecedented economic challenges and applaud the government for taking steps to protect workers and the economy. AMO has commended the province for its strong, decisive leadership in response to the threat posed by tariffs and related measures.

AMO and its members also understand the need to make planning and development processes faster and more streamlined, especially when building the infrastructure that Ontario workers and businesses require for a competitive and resilient workforce. That is why AMO previously supported other, more focused public sector *Planning Act* exemptions for facilities such as schools, post-secondary institutions, hospitals, long-term care homes, and childcare centers from *Planning Act* requirements. Risks associated with these exemptions are mitigated by the robust regulatory and accountability frameworks governing these facilities and their operations. These frameworks provide the oversight and control measures necessary to meet important health, safety, financial, environmental, and broader community objectives and to properly mitigate *Planning Act* exemption risks. However, the legislative amendments proposed in Bill 30 that would exempt projects funded by the Skills Development Fund (SDF) – Capital Stream from the *Planning Act* and planning provisions in the *City of Toronto Act 2006* do not meet these standards.

While there are many elements of Bill 30 that appear to be responsive to urgent needs in the context of ongoing tariff concerns, AMO questions the rationale for the proposed legislative amendments in Bill 30. Under the eligibility criteria of the SDF's Capital Stream, any private employer in Ontario can apply for funding as primary applicants. The proposed legislative amendments would allow for any private entity, which operate without rigorous public accountability frameworks and reporting, to be exempt from the *Planning Act* and planning provisions in the *City of Toronto Act 2006*, based solely on being a recipient of SDF Capital Stream funding. The eligibility criteria of the SDF's Capital Stream is insufficient and too broad in scope to justify wholly exempting any funded project and recipient private organization from needing to meet important municipal planning standards in the *Planning Act*.

Exempting projects funded through the SDF's Capital Stream from the *Planning Act*

poses a range of potential risks and impacts for municipalities that will likely put development and growth in Ontario at risk – the opposite of what the Bill intends to do with this proposal.

Loss of municipal site planning control

The proposed legislative amendments in Bill 30 to exempt SDF Capital Stream projects from the *Planning Act*, would erode municipal oversight of site planning control. This could have substantial impact on municipalities across the province, limiting their ability to:

- Prevent building on flood plains and lands critical for stormwater management. This could result in an increased risk of flooding in and around an area designated for an SDF Capital Stream project.
- Ensure safe design of transportation features such as road access, loading areas, parking, and public walkways.
- Install easements required to maintain and repair public infrastructure.

Loss of municipal infrastructure planning control

The exemption of SDF Capital Stream projects from the *Planning Act* would erode municipal infrastructure planning control, which municipalities rely on for proper long-term planning.

- Without municipal infrastructure planning oversight through the *Planning Act*, a project funded through SDF's Capital Stream could put strain on municipal servicing. Unmanaged increased draws on municipal servicing – for example, if a project uses a significant portion of a municipality's service capacity (i.e. water) – could limit or delay future development in the project area, possibly delaying other critical infrastructure development planned nearby.
- Exempting projects funded through SDF's Capital Stream from the *Planning Act*, could also mean that these projects are built without consideration of current or future property uses. This could include areas designated for residential purposes, prime agricultural lands, or land reserved for educational use.

Restricts municipal ability to comply with provincial planning policies

Allowing recipients of SDF's Capital Stream funding to be exempt from the *Planning Act* will create a potential misalignment with provincial planning policy requirements and broader land use planning policy frameworks – limiting the ability of municipalities to ensure compliance with the Provincial Planning Statement (PPS). This could include policy requirements set out in the PPS such as building on prime agricultural lands or environmentally sensitive areas.

Conclusion

The municipal sector understands that there is a need for innovative solutions to take on the extraordinary economic and fiscal challenges presented as a result of ongoing trade and tariff disruptions. This includes the need to make planning and development processes faster and more streamlined to spur Ontario's economy and build the infrastructure that communities desperately need. This is why AMO has previously supported other more focused public sector *Planning Act* exemptions which retain robust regulatory and accountability frameworks. However, the exemptions proposed under Bill 30 will likely put development and growth in Ontario at risk. Despite significant fiscal pressure and rising contribution costs, municipalities have been increasing investments in infrastructure in 2025 to support growth, manage climate change, and maintain critical infrastructure. Further encroachment into municipal approval processes, as is proposed in this legislative amendment, are not justified.