



Association of
Municipalities
of Ontario

Municipal Environmental Assessments

AMO'S SUBMISSION TO THE MINISTRY OF ENVIRONMENT, CONSERVATION
AND PARKS

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About AMO

The Association of Municipalities of Ontario (AMO) is a non-profit, non-partisan association that represents the interests of all 444 municipal governments across Ontario. AMO addresses common challenges facing our members and provides meaningful advice to the provincial and federal governments on practical solutions on a wide range of issues that directly impact local governments and the citizens they serve. AMO is commenting on this consultation because municipal governments play an important role in undertaking environmental assessments (EAs) and Indigenous consultation to support the delivery of critical infrastructure.

Clear and Consistent Environmental Assessments

AMO appreciates the opportunity to comment on the proposed modernization of municipal environmental assessments. Municipalities want the same outcomes as the province: faster approvals and an expedited path to construction starts. The updated proposal responds to recommendations raised in our [March 2024 ERO submission](#) on how to expedite routine, low-risk projects while balancing public input into complex projects with greater environmental and cultural risks. Specifically through:

- Consistent application of the new framework that would subject private sector led water infrastructure projects to the streamlined EA process
- Strengthening requirements for Indigenous consultation

Our latest submission provides three recommendations to mitigate implementation risks that could result in project delays and hamper Indigenous consultation.

Recommendation 1: Ensure there is a consistent framework for all project types that aligns with wider planning approvals and permitting processes

Multiple planning and permitting requirements at project inception can increase project delivery timetables and costs through duplicative or inconsistent processes, and greater legal/construction risk. Further, as identified in StrategyCorp's 2025 Chief Planner Survey, constant changes to these requirements are slowing down delivery¹.

¹ Ontario Municipal Chief Planner Survey 2025, Strategy Corp <https://strategycorp.com/2025/12/ontario-municipal-chief-planner-survey-2025/>

To mitigate this risk, the Ministry of Environment, Conservation and Parks (MECP) needs to ensure the new Municipal Project Assessment Process (MPAP) is consistent with the overall oversight framework and existing processes. This supports more timely, predictable and fairer outcomes for municipalities, Indigenous communities, and private sector partners.

AMO recommends working with municipal sector experts, such as the Municipal Engineers Association, to achieve this by:

- Reviewing the MPAP against other municipal planning processes (e.g. Transit Project Assessment Process, *Environmental Protection Act*, and *Planning Act*) to address inconsistent or duplicative requirements
- Developing a detailed cost-benefit analysis quantifying the impacts of the change across all involved parties, including the initial and ongoing costs, to support accurate project budget and delivery planning for municipalities
- Reviewing the proposed assessment process to address potential unintended delays to development timelines e.g. through the new requirement for an Environmental Project Report
- Reviewing the list of designated private sector projects to ensure they deliver fair and equitable outcomes for municipal and private sector proponents

Recommendation 2: Ongoing engagement with Indigenous communities on archaeological assessment

AMO strongly supports meaningful Indigenous consultation, and municipalities recognise the need to protect treaty rights, archeological heritage and burial sites. The sector's experience has been that Indigenous participation at the planning stage improves project outcomes. These examples range from mitigating risks that cause delays, improving environmental outcomes and building strong municipal-Indigenous relationships that support reconciliation.

AMO appreciates the province actively supporting proponents through the new requirements to engage and consider feedback from Indigenous communities. Municipalities can face capacity constraints, including those related to costs, in assessing archaeological sites. Clear guidance and thresholds for the streamlined Archaeological Assessment Process (AAP) helps ensure all partners work together to support reconciliation and advance projects.

To support this, AMO recommends:

- Engaging collaboratively with Indigenous communities on the design and implementation of the new archaeological assessment process
- Aligning the AAP with broader heritage/archaeological processes through the proposed Heritage Framework Transformation

Recommendation 3: Provide guidance, training and transitional support to municipalities

Clear and consistent guidance for municipalities will reduce the risk of the transition creating short-term delays to project development. This needs to include training and transitional support to assist municipalities in understanding while applying the new requirements, such as when and how to appropriately consult with Indigenous communities. Developing guidance documents in advance of new requirements coming into force will also help promote consistent interpretation and application across all partners in the development process.

We are keen to work with the province to ensure our sector has the training materials and support needed e.g. by co-hosting webinars. We welcome the opportunity to participate in any implementation working group to further these mutual goals.

Conclusion

The updated proposal reflects AMO's long-standing advocacy for a more focused and efficient EA process, while balancing the need to maintain strong environmental oversight and safeguards. We appreciate the province's continued engagement and commitment to working with municipalities and Indigenous communities to address the implementation risks outlined in this submission.