

To: Delegation during the AMO Conference, August 2025

From: FONOM Board

Date: August 1, 2025

Subject: Making the NORDS Program Permanent and Expanding Eligibility to Support Rural and Northern Infrastructure Needs

ISSUE:

The Northern Ontario Resource Development Support (NORDS) pilot program has proven to be a vital financial mechanism for addressing infrastructure degradation in Northern Ontario communities resulting from natural resource sector activity. However, despite the program's success, the temporary nature of the pilot and its limited eligibility criteria leave critical infrastructure gaps, particularly in rural municipalities impacted by intensive agricultural operations. To support equitable and sustained infrastructure investment across the North, the Ministry of Northern Economic Development and Growth must be made permanent in the NORDS program and expanded in scope to recognize additional forms of industrial impact on municipal assets.

RECOMMENDATION:

The Federation of Northern Ontario Municipalities (FONOM) strongly urges the Ministry of Northern Economic Development and Growth to:

- Make the Northern Ontario Resource Development Support (NORDS) program permanent, ensuring ongoing and reliable support for municipalities impacted by natural resource sector activity.
- Expand program eligibility to include infrastructure degradation caused by agricultural machinery and operations, particularly in rural municipalities where such activity has a comparable impact to resource extraction industries.
- Encourage and formalize the continued use of multi-year stacking of NORDS allocations, allowing communities to plan and deliver large-scale infrastructure projects that support long-term economic development and community well-being.
- By taking these steps, the Ministry will help secure Northern Ontario's infrastructure resilience and support inclusive, regionally sensitive economic development.

ANALYSIS:

1. Proven Effectiveness of the NORDS Pilot Program

Since its launch, the NORDS pilot program has delivered timely, flexible, and much-needed funding to municipalities across Northern Ontario. Communities such as the City of North Bay have used the program not only to address immediate infrastructure needs but also to strategically plan and stack multi-year allocations to advance significant capital projects. These investments have had direct and measurable benefits for community growth, economic development, and long-term planning.

2. Infrastructure Pressures Tied to Natural Resource Development

Northern Ontario's municipal road systems, water services, and other critical infrastructure assets face growing strain from industrial activities, including mining, forestry, and other resource extraction sectors. The heavy equipment and high traffic volumes associated with these sectors accelerate wear and tear, creating financial and operational burdens that small and mid-sized municipalities often struggle to manage without targeted external support.

3. Overlooked Impact of Agricultural Activity

Rural municipalities are increasingly facing similar challenges due to the size and intensity of agricultural operations. The frequency and weight of modern farm machinery are placing undue stress on rural roads and bridges, yet these impacts currently fall outside the scope of the NORDS pilot. This exclusion creates a disparity in access to support and overlooks a significant contributor to municipal infrastructure degradation in many Northern and rural areas.

4. Need for Predictable, Multi-Year Investment Tools

The ability to stack NORDS allocations over multiple years has emerged as one of the program's most valuable features. This flexibility allows municipalities to aggregate funding for transformative infrastructure projects rather than being limited to smaller-scale, short-term interventions. Formalizing this feature would ensure continued planning certainty and fiscal efficiency, enabling communities to leverage other funding programs and partnerships more effectively.

5. Alignment with Broader Economic Development Objectives

The Community Support program of the Ministry promotes infrastructure and economic development investments as cornerstones of regional growth. Making NORDS permanent and expanding its eligibility aligns with these goals by directly supporting the foundational assets communities need to attract investment, sustain population growth, and support industrial activity. Moreover, incorporating impacts from agricultural activity into the funding framework would advance equity among Northern and rural municipalities.

To: Delegation during the ROMA Conference, August 2026

From: FONOM Board

Date: January 2026

Subject: Modernizing Northern Ontario's Trans-Canada Highway Corridors

ISSUE

The Trans-Canada Highway corridors across Northern Ontario (Highways 11 and 17) remain largely two-lane routes, despite being vital national trade and mobility links. These highways have some of the highest fatality and collision rates in Canada, creating unacceptable safety risks, economic inefficiencies, and national vulnerabilities.

RECOMMENDATION:

That the Minister of Transportation of Ontario:

1. **Formally support** the modernization and expansion of Highways 11 and 17 — including strategic four-laning and twinning — as a nationally significant infrastructure project.
2. **Advocate with the Federal Government** for the project's inclusion in the Major Projects Office portfolio under the *Building Canada Act*.
3. **Commit to a long-term, phased funding partnership** with the federal government, recognizing these corridors as essential to national safety, trade, and sovereignty.

ANALYSIS:

The Federation of Northern Ontario Municipalities (FONOM) urges both levels of government to treat the modernization of the Trans-Canada Highway through Northern Ontario as a nation-building priority.

- **High Fatality and Collision Rates**

Over the past eight years, Northern Ontario has averaged **66 road fatalities annually**, representing **8.5 deaths per 100,000 population** — more than double the rate in southern Ontario (3.8) and far higher than international leaders such as Sweden and Norway (<2).

Highways 11 and 17 account for the majority of these collisions, resulting in a **social cost of approximately \$460 million annually** — equivalent to the cost of constructing nearly 100 kilometres of new highway per year.

- **National Economic Impact**

More than **8,400 trucks transport goods valued at over \$200 million daily** across these corridors. Each major collision disrupts national supply chains, affects trade with Western Canada, and limits development opportunities tied to strategic projects such as the **Ring of Fire**, the **NWMO facility in Ignace**, and emerging **James Bay corridor proposals**.

- **Growing Traffic and Risk**

Truck traffic along the Trans-Canada through Northern Ontario is projected to **double within the next decade**, while **35% of all fatal crashes** in the region are head-on collisions — underscoring the urgent need for a safer, more resilient transportation network.

- **Nation-Building Context**

Ontario must not remain the “weak link” in Canada’s national highway system. FONOM, supported by AMO, ROMA, NOMA, and the EOWC, advocates for a **strategic and phased modernization plan** that includes:

- **Four-lane expansion** of key highway segments to enhance safety and capacity.
- **Targeted twinning** in high-volume and high-risk sections to reduce collision rates and improve reliability.

This approach aligns with international best practices, promotes regional equity, and strengthens Canada’s economic and safety objectives.

CONCLUSION:

FONOM respectfully requests that the Minister of Transportation of Ontario endorse this initiative and work collaboratively with federal counterparts to have the **Northern Ontario Trans-Canada Modernization Project** recognized and supported through the **Federal Major Projects Office**

To: Delegation during the ROMA Conference
From: FONOM Board
Date: January 2026
Subject: A Compassionate Intervention Framework for Ontario - Health

Issue

Northern Ontario communities are experiencing a disproportionate impact from the intersecting crises of addiction, mental illness, homelessness, and public disorder.

FONOM municipalities report:

- Repeated emergency department visits by the same individuals experiencing severe substance use disorders;
- Police and MCITs cycling individuals through hospitals with little or no lasting intervention;
- Emergency departments are overwhelmed and ill-equipped to manage addiction-related crises;
- Community agencies and Ontario Works offices requiring permanent security due to safety concerns;
- Significant strain on police, EMS, hospitals, and social services, diverting resources from the broader population.

Despite substantial government investments, outcomes continue to worsen. Residents increasingly express frustration and a loss of confidence in institutions at all levels. Municipal leaders are left answering for systems that **lack the targeted legislative authority** needed to intervene meaningfully.

Limitations of the Current Legislative Framework

Under the current Mental Health Act, addiction alone does not provide sufficient grounds for involuntary assessment or treatment unless narrowly tied to an acute psychiatric diagnosis. As a result:

- Individuals who are repeatedly intoxicated by drugs or other substances are released quickly, even when risks are evident;
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- Police and MCITs are left with few options beyond repeated apprehensions or emergency department transfers;
- Hospitals become revolving doors rather than places of recovery;
- Jails and correctional facilities increasingly serve as de facto detox centres.

FONOM believes this legislative gap contributes directly to preventable harm, overdose deaths, community disorder, and frontline system burnout.

RECOMMENDATION

The Federation of Northern Ontario Municipalities (FONOM), representing 110 municipalities across Northern Ontario, respectfully submits this policy proposal to the Ontario Solicitor General to request strategic, targeted amendments to Ontario’s Mental Health Act (MHA)—not a full legislative review.

FONOM urges the Province to modernize specific provisions of the Mental Health Act to enable a Compassionate Intervention framework, modelled in part on recent and emerging legislative approaches in Saskatchewan, Manitoba, and British Columbia. These jurisdictions are pursuing focused amendments that allow for time-limited, medically supervised involuntary treatment for individuals with severe substance use disorders who pose a demonstrable risk to themselves or others, while preserving Charter protections and medical ethics.

This proposal builds on FONOM’s long-standing advocacy, including formal submissions made during the 2024 AMO Conference and correspondence with the Premier of Ontario. Municipalities, police services, hospitals, emergency responders, social service agencies, and community partners across Northern Ontario consistently report that existing legislative tools are insufficient to respond to the growing crisis of addiction-driven harm, repeat emergency interventions, and escalating community safety concerns.

FONOM recognizes the sensitivity of involuntary treatment and approaches this issue with humility, caution, and compassion. However, the status quo is failing individuals suffering from severe addictions, overburdening emergency systems, and eroding public confidence. The recent legislative actions taken or underway in Saskatchewan, Manitoba, and British Columbia demonstrate that provinces can act deliberately and

narrowly, without reopening mental health legislation wholesale, while respecting Charter rights and clinical standards.

1. Recognition of Addiction as a Health Condition

FONOM reiterates its request that addiction be formally recognized within defined sections of the Mental Health Act as a substance use disorder, enabling appropriate clinical interventions without reopening the Act in its entirety.

2. Compassionate Intervention Authority

Ontario legislation should permit police, MCITs, or authorized health professionals to initiate a temporary, non-criminal apprehension when an individual:

- Is severely impaired by drugs or other substances; and
- Presents a credible risk to themselves or others; and
- Is unable or unwilling to voluntarily access treatment.

3. Medical Oversight and Due Process

Any involuntary intervention must include:

- Immediate clinical assessment by a qualified psychiatrist or addiction specialist;
- Clear statutory criteria for admission and continuation;
- Regular reviews and appeal mechanisms;
- Strict time limits and Charter-compliant safeguards.

4. Graduated Mandatory Hold Model

Building on previous FONOM recommendations, a graduated approach could be considered:

- First intervention: minimum 2 days of assessment and stabilization;
- Second intervention: minimum 4 days;
- Third intervention: minimum 7 days;
- Fourth intervention: minimum 90 days, accompanied by a comprehensive discharge plan including housing and community supports;
- Subsequent interventions: length of stay determined by a panel of psychiatrists based on the individual's best interests.

At the conclusion of a mandatory hold, individuals may voluntarily extend their stay.

Role of the Public Guardian and Trustee

FONOM acknowledges concerns related to individual rights. Ontario already recognizes circumstances where substitute decision-making is necessary, including through the Office of the Public Guardian and Trustee (OPGT).

Should addiction be included within the scope of targeted Mental Health Act amendments, FONOM recommends exploring a role for the OPGT or a similar independent advocate to:

- Act in the best interests of individuals undergoing compassionate intervention;
- Ensure informed consent, rights protection, and continuity of care;
- Support treatment and discharge planning where no power of attorney exists.

Importance of Inter-Ministerial Collaboration

FONOM strongly urges that this initiative be led collaboratively, with the Solicitor General playing a central role alongside:

- Ministry of Health;
- Ministry of the Attorney General;
- Ministry of Municipal Affairs and Housing;
- Federal partners, including Health Canada.

The current fragmented, siloed ministry approaches will not succeed. The complexity of addiction requires coordinated leadership and shared accountability.

Learning from Saskatchewan: Compassionate Intervention

Saskatchewan's *Compassionate Intervention Act*, tabled in December 2025 and expected to pass in spring 2026, provides a timely and relevant model. The legislation permits involuntary intervention for individuals with severe addictions when there is a demonstrated risk to personal or public safety, subject to medical oversight, due process, and time limits.

FONOM is **not** advocating for punitive detention. Rather, we support a **health-led, rights-respecting model** that prioritizes treatment, stabilization, and recovery.

Conclusion

FONOM does not bring this proposal forward lightly. Municipal leaders, police chiefs, physicians, nurses, EMS, social workers, and community advocates across Northern Ontario are united in their belief that **doing nothing is no longer an option**.

A Compassionate Intervention framework, grounded in care rather than punishment, offers Ontario an opportunity to save lives, restore dignity, support families, and relieve immense pressure on frontline systems. We respectfully ask the Associate Minister of Mental Health and Addictions to work with FONOM and partner ministries to open the *Mental Health Act* and begin this critical work.

FONOM stands ready to participate in consultations, pilot projects, and ongoing dialogue in support of meaningful, compassionate reform.

To: Delegation during the AMO Conference, August 2025
From: FONOM Board
Date: August 1, 2025
Subject: Policing costs for all communities in Northern Ontario

ISSUE

The Federation of Northern Ontario Municipalities (FONOM) is increasingly concerned about the unsustainable and inequitable costs of policing services that burden communities in Northern Ontario—both those served by the Ontario Provincial Police (OPP) and by municipal forces. These communities, often characterized by low population densities, geographic isolation, and limited tax bases, are disproportionately affected by rising policing costs. This situation threatens the sustainability of municipal budgets and the delivery of other essential public services.

FONOM urges the Government of Ontario to commit to the phased implementation of a \$100 million Northern Ontario Policing Grant over the next three years to support the 157 municipalities in the region. This grant aims to create a more equitable and predictable policing cost structure that is responsive to the unique economic and demographic realities of Northern communities.

RECOMMENDATION:

Given the increasing financial pressures faced by municipalities across Northern Ontario—including limited revenue capacity, aging infrastructure, and rising operating costs—it is crucial for the Province of Ontario to reassess and enhance its support for community policing.

FONOM recommends that the Government of Ontario establish a Northern Policing Grant to alleviate the disproportionate burden that policing costs place on small and rural municipalities served by the Ontario Provincial Police and municipal forces.

Specifically, FONOM recommends the following:

1. Introduce a \$100 million Northern Policing Grant, phased in over three years (2026–2029), for the 157 Northern Ontario communities.
2. Each eligible municipality should receive:
 - A base grant of \$60,000
 - An additional allocation based on population to ensure an equitable distribution of the remaining funds.

****Funding Cap Mechanism: **** To avoid overcompensation, if the sum of the base grant and the population-based allocation exceeds the amount each community would have otherwise received under the 2024 OPP billing (plus CPI adjustment), the funding should be capped at that maximum amount.

****Annual Inflation Adjustment: **** After the third year, the total grant fund should increase annually by at least the Consumer Price Index (CPI) to keep pace with inflation and rising costs.

This funding mechanism will help provide Northern municipalities with the financial stability needed to maintain safe communities without compromising their ability to invest in critical infrastructure and services. It also reflects the principle of fairness, acknowledging that Northern Ontario communities face unique economic and geographic challenges that are not shared equally across the province.

FONOM urges the Government of Ontario to include this recommendation in the next provincial budget process and to collaborate with municipalities to ensure a sustainable, long-term solution to policing affordability in Northern Ontario.

ANALYSIS:

Policing costs in Northern Ontario have become increasingly unsustainable and inequitable. The Federation of Northern Ontario Municipalities (FONOM) has identified that the current funding and billing frameworks—especially those related to the Ontario Provincial Police (OPP)—do not account for the economic realities of the region. Municipalities in Northern Ontario face a combination of systemic and structural challenges that make it difficult to absorb continually rising policing costs, including

low population densities, limited own-source revenue, geographic isolation, and aging infrastructure.

A 2015 shift to standardized OPP billing models (under Section 5.1 of the Police Services Act) aimed to streamline cost distribution, but for small and rural municipalities in Northern Ontario, it created new affordability issues. In 2024, Northern municipalities received billing notifications from the OPP with an average annual increase of 17.8%, representing approximately 7.7% of the average municipal tax levy. These sharp increases, combined with pre-existing infrastructure deficits, are forcing many municipalities to choose between funding policing and maintaining essential services like roads, water systems, and recreational facilities.

The estimated annual cost of OPP services in the Northeast is approximately \$43 million. After grants, the 2025 police levy for the four largest Northeastern Ontario cities is projected to reach \$174 million. These figures underscore the magnitude of the financial burden placed on Northern municipalities, many of which are already operating at or near their fiscal capacity.

FONOM's proposed \$100 million Northern Ontario Policing Grant is designed to alleviate this pressure in a fair and targeted manner. The model includes:

A base grant of \$60,000 per municipality, recognizing the fixed costs of policing services regardless of population size.

Population-based allocations to ensure larger communities receive proportionate support.

A funding cap to prevent surplus funding beyond each community's 2025 OPP cost (adjusted annually for inflation), ensuring accountability and program sustainability.

An annual Consumer Price Index (CPI) adjustment beginning in Year 4 to maintain the fund's relevance in real economic terms.

The model was tested using example communities to demonstrate impact and feasibility:

Example Allocations Based on the Model

Year One (2026 – \$34M Total Fund)

Community A (Population 1,513): \$101,320.03 (Cap: \$284,949.50)

Community B (Population 8,057): \$280,036.67 (Cap: \$2.56M)

Community C (Population 41,145): \$1,183,669.95 (Cap: \$21.03M)

Year Two (2027 – \$67M Total Fund, CPI ~3%)

Community A: \$160,160.60 (Cap: \$293,497.98)

Community B: \$593,373.40 (Cap: \$2.64M)

Community C: \$2,783,799.00 (Cap: \$21.66M)

Year Three (2028 – \$100M Total Fund, CPI ~3%)

Community A: \$217,306.61 (Cap: \$302,302.91)

Community B: \$897,686.29 (Cap: \$2.72M)

Community C: \$4,337,845.65 (Cap: \$22.31M)

These examples demonstrate how the proposed grant structure provides meaningful relief across communities of various sizes while maintaining fiscal discipline through the cap mechanism.

Moreover, by reallocating financial responsibility in a predictable and needs-sensitive way, the grant would allow Northern municipalities to stabilize policing budgets, reinvest in critical infrastructure, and enhance public service delivery. It would also better align the Province's policing cost-sharing model with its broader commitments to community safety, fiscal responsibility, and regional equity.

This analysis supports the urgent need for a dedicated, phased-in Policing Grant program tailored to the realities of Northern Ontario. Without provincial action, many municipalities in the North will face increasingly difficult trade-offs between public safety and core service delivery.

Strategic Amendments to Ontario’s Mental Health Act

A Compassionate Intervention Framework for Severe Addiction

Issue

Northern Ontario communities are experiencing a disproportionate impact from severe addiction, often intersecting with mental illness, homelessness, and public disorder. Frontline systems repeatedly respond to the same individuals—without the legislative tools needed to intervene meaningfully or sustainably.

This Is a Targeted Request

This is not a request to reopen Ontario’s Mental Health Act for a full legislative review. FONOM is requesting strategic, targeted amendments to address a specific and urgent gap when severe addiction results in profound impairment and creates a demonstrable risk to the individual or public safety.

What Communities Are Experiencing (Proof on the Ground)

- Repeated emergency department visits by the same individuals
- Police and Mobile Crisis Intervention Teams (MCIT) are cycling individuals through hospitals with no treatment pathway
- Emergency departments overwhelmed by addiction-driven crises
- Community agencies requiring permanent security measures
- Increasing strain on police, EMS, hospitals, and social services

Proposed Compassionate Intervention Framework

A health-led, rights-respecting model that would allow short-term, medically supervised involuntary treatment only when an individual is severely impaired by substance use, presents a clear risk, is unable to access care voluntarily, and all less intrusive options have failed.

Safeguards

- Immediate clinical assessment
- Strict time limits
- Due process and appeal mechanisms
- Charter-compliant protections

Request to the Solicitor General

FONOM respectfully asks the Province to lead targeted amendments to the Mental Health Act, work collaboratively across ministries, and engage municipalities and frontline professionals early.

To: Delegation during the ROMA Conference, January 2026

From: FONOM Board

Date: January 19, 2026

Subject: Strengthening Ontario's Blue Box Program
Extending Producer Responsibility to the ICI Sector

ISSUE

The Federation of Northern Ontario Municipalities (FONOM) is calling on the Province of Ontario to amend **Ontario Regulation 391/21: Blue Box** to ensure producers are fully responsible for the end-of-life management of their products and packaging **from all sources**, including the **Industrial, Commercial, and Institutional (ICI)** sectors.

While the current regulation requires producers to manage recyclable materials from designated “*eligible*” residential sources, it excludes significant waste streams generated in ICI settings such as municipal facilities, provincial government buildings, schools, hospitals, and other public institutions. As a result, these sectors must either absorb the cost of recycling or divert materials to landfill—placing additional strain on Ontario’s already limited landfill capacity.

This regulatory gap undermines the principles of Extended Producer Responsibility and creates inequitable outcomes. For example, a beverage container recycled at home falls under producer responsibility, while the same container consumed at a government facility does not—shifting costs directly onto municipalities and taxpayers.

WHY THIS MATTERS FOR NORTHERN ONTARIO

- **Limited landfill capacity:** Northern communities face higher transportation costs and fewer disposal options.
- **Public-sector cost pressure:** Municipalities and public institutions must fund recycling programs for materials identical to those covered in residential systems.
- **Inconsistent policy outcomes:** The point of consumption—not the product—determines responsibility, creating inefficiencies and inequities.

With new landfill siting increasingly costly, complex, and time-consuming, Ontario must prioritize **waste reduction and diversion** through a strengthened EPR framework.

RECOMMENDATION:

FONOM strongly recommends that the Province of Ontario amend **Ontario Regulation 391/21: Blue Box** to require producers to assume **full responsibility for the end-of-life management of their products and packaging from all sources**, including **Industrial, Commercial, and Institutional (ICI) properties**.

Expanding producer responsibility beyond residential settings will:

- Ensure **fair and consistent application** of EPR principles
- Reduce the **financial and operational burden** on municipalities and public institutions
- Increase **waste diversion** and reduce reliance on landfills
- Support Ontario's transition to a **circular economy**

FONOM urges the Ministry of the Environment, Conservation and Parks to take this targeted, practical step to close the existing regulatory gap and strengthen the long-term sustainability of Ontario's waste management system.

ANALYSIS

Under the current regulation, producers are responsible for managing recyclable materials only from designated *eligible* sources—primarily residential. The ICI sector, including municipal governments and provincial facilities, remains excluded despite generating large volumes of the **same products and packaging**.

As a result:

- Recyclable materials from ICI sources are often landfilled or recycled at **public expense**
- Municipal and provincial governments pay to manage waste created by producer products
- Ontario's landfill capacity continues to erode, accelerating future infrastructure challenges

Environmental organizations and municipal stakeholders broadly agree that extending producer responsibility to ICI sources is a logical and necessary evolution of Ontario's Blue Box program. Aligning responsibility with the **product**, rather than the **location of use**, reinforces environmental accountability and delivers measurable benefits in diversion, cost control, and system efficiency.

KEY MESSAGE FOR THE MINISTER

If a product is recyclable at home, it should be recyclable everywhere—at the producer's responsibility.

Amending Ontario Regulation 391/21 to include ICI sources is a **policy-consistent, fiscally responsible, and environmentally sound** step that supports municipalities, protects landfill capacity, and strengthens Ontario's leadership in waste reduction.

FONOM represents 110 municipalities across Northern Ontario and remains committed to working collaboratively with the Province to build fair, sustainable, and practical environmental policy.