

June 11, 2025

TO: Ministry of Municipal Affairs and Housing

VIA: email & online submission: PlanningConsultation@ontario.ca

Subject: Submission on ERO 025-0461 – Protect Ontario by Building Faster and Smarter Act, 2025

Dear Ministry of Municipal Affairs and Housing,

The Ontario Association of Cemetery and Funeral Professionals (OACFP) is the province's leading bereavement sector professional association, consisting of cemeteries, crematoria, funeral homes, and transfer services. Collectively, our members care for over 85,000 Ontario families every year at their time of loss and greatest need.

OACFP applauds the government's efforts in removing unnecessary procedural impediments in increasing new home building supply throughout the Province of Ontario through Bill 17. At the same time, we believe that the growth of new and expanding urban populations as occasioned by this new legislation will also create increasing pressure on existing cemeteries and related bereavement sector infrastructure to accommodate residents who wish to be served and buried in the communities in which they work, live and raise their families.

Unlike in other parts of the world, Ontario cemeteries have the added unique and legal responsibility to exist and be maintained in perpetuity. OACFP wishes to draw the government's attention to the difficulties in establishing new cemetery locations across the province and particularly in the Greater Toronto Hamilton Area (GTHA).

Existing cemeteries with available grave spaces within urban boundaries are reaching the end of their life cycle as active burial grounds. The current timeline for cemetery development, from the time of property acquisition, and navigating the approvals process, to preparing the property for interments can take a minimum of 10 years. At the same time, population (Ontario has the most culturally diverse population in Canada) and the number of deaths continue to grow. This necessitates urgent attention to ensure suitable new land is available for licensed bereavement services based on growth forecasts, death rate projections, and community and cultural and religious considerations. Cemeteries are not just places of burial. They are of cultural importance, contributing to the establishment of complete communities and also serve as important green spaces that are protected indefinitely after their "active" phase, providing a perpetual benefit to the communities where they are situated.

We know that residents have a deep and abiding desire to be connected to their communities in both life and in death. Our members regularly tell us that their clients do not wish to be a burden on their loved ones after passing and this includes the ease with which loved ones can visit those who have passed on to grieve and memorialize.

To address these challenges, there is a need for provincial land use policy to grant cemeteries an 'as of right' designation in the same way that new section 35.1.1 of the Planning Act, per Bill 17, prioritizes the building of schools and ancillary uses to schools. In this way, the Province would be sending a clear signal to municipalities and land use planners that rising population growth and increasing death rates mandate a policy response. The urgency for new cemetery lands and related licensed bereavement services is critical as the population ages. Families are increasingly burdened with the challenge of finding burial spaces as existing options diminish. The government must act quickly to alleviate this burden by facilitating the establishment of new cemetery spaces that will serve future generations.

Sincerely,



Mark Richardson,
President



Darren Denomme,
Executive Director