

July 4, 2025

Local Government Policy Branch
777 Bay St., 13th Flr.
Toronto, ON
M7A 2J3
Canada

Subject: *Response to ERO #025-0570 – Bill 45, Peel Transition Implementation Act, 2025*

The City of Brampton supports the Government of Ontario's intent to help the lower-tier municipalities, including Brampton to meet their growing needs and address their local challenges with greater independence over certain public works. Brampton is one of the fastest growing of Canada's 25 largest cities and represents 90% of the net population growth within the Region of Peel between 2016 and 2021, according to Statistics Canada. The city is now the third-largest city in Ontario, behind Toronto and Ottawa, and we welcome more ability to make our own decisions and control over services our residents depend on. While *Bill 45, Peel Transition Implementation Act, 2025* (the Act) provides Brampton with more control over services, it requires careful consideration and clarification to ensure a smooth and effective transition of services and responsibilities.

The Act does not permanently transfer waste collection authority to lower-tier municipalities; instead, it suspends the Region's power to reclaim jurisdiction until December 31, 2035. As a result, Bill 45 does not establish permanent authority for lower-tier municipalities over waste collection as it does for roads and stormwater. The changes proposed in the legislation would result in the Region of Peel retaining the ability to resume control over waste collection after 2035. The proposed legislation also does not clearly exclude from the jurisdiction to be transferred, the waste collection activities at the Region's recycling centres and does not transfer any of the Region's personal property associated with waste collection. Furthermore, the proposed changes do not clearly place the lower tiers in the Region of Peel's position without creating contractual issues and raising questions about the complexity of dividing up single regional contracts among the lower tier municipalities. This necessitates regulatory measures to assign or distribute rights and obligations, therefore matters related to implementation of the transfer of regional waste collection services should be facilitated by the Office of the Provincial Land and Development Facilitator (OPLDF) process to ensure all aspects of the transfer of responsibilities and fully considered.

Furthermore, the proposed authority transfer date of January 1, 2026, for waste collection does not provide sufficient time to prepare for the assumption of waste collection, and which is necessary for a seamless and orderly transition that would ensure uninterrupted service delivery to the residents. The City of Brampton requests that transfer of authority over waste collection services from the Region of Peel to Mississauga, Brampton and Caledon go through the Office of the Provincial Land and Development Facilitator process to ensure sufficient time and processes for an orderly transfer.

The transition process of authority over regional roads and associated stormwater process requires further clarity on asset transfers, contractual obligations, and authority over infrastructure such as stormwater systems draining regional lands not directly within or linked to highways. Furthermore, in conjunction with the transfer of jurisdiction over the Region's highways, the Act does not provide for the transfer of the Region's adjacent reserves or other lands acquired or suitable for potential road widening purposes. Also, in respect of regional road improvement or widening projects, which may

involve replacement or upgrades to other regional infrastructure, consideration is needed to determine how those projects underway or soon to be commenced are to be managed. Consideration should also be given to any regional roads that are bounded by noise attenuation walls and whether those walls are on regional property or are the subject of agreements which impose obligations on the Region.

The issues highlight above demonstrate the need for careful consideration and clarification to ensure a smooth and effective transition of services and responsibilities under the Peel Transition Implementation Act, 2025 and for regulatory clarity to ensure a stable transition. The City requests that all aspects of transfer of authority over regional roads and associated stormwater infrastructure, and waste collection from the Region of Peel to the three lower-tier municipalities of Mississauga, Brampton and Caledon be facilitated by the OPLDF to establish an adequate process.

The City of Brampton appreciates the opportunity to provide feedback and contribute to a process that ensures seamless and orderly transition of services our residents depend on every day.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christopher Ethier', with a stylized flourish at the end.

Christopher Ethier
Director of Intergovernmental Affairs
Office of the CAO
City of Brampton