

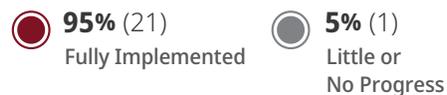
Follow-Up on the 2023 Special Report:

Ministry of Municipal Affairs and Housing

Special Report on Changes to the Greenbelt

// Overall Conclusion

22 Recommended Actions



The Province, as of August 20, 2025, has fully implemented 95% of actions we recommended in our 2023 **Special Report on Changes to the Greenbelt**.

The Province has fully implemented the recommendation to re-evaluate the 2022 decision to change the Greenbelt boundaries, which resulted in a reversal of that decision. In addition, the Premier's Office requested that the Integrity Commissioner of Ontario determine whether the former Chief of Staff to the Minister of Municipal Affairs and Housing acted contrary to the requirements of the *Public Service of Ontario Act, 2006*.

The Province has also fully implemented recommendations to establish a formal process whereby Deputy Ministers seek the advice and direction of the Secretary of the Cabinet if Chiefs of Staff or other political staff limit or affect the operational decision-making of a ministry, and to limit the use of confidentiality agreements by ministries. In addition, the Province has provided formal training to non-elected political public service staff on records retention policy, and reinforced communications on the inappropriate use of personal email accounts for government business.

The Ontario government has made little progress on one (5%) of the recommended actions: conducting an independent and comprehensive overall review of the *Lobbyists Registration Act, 1998*, *Members' Integrity Act, 1994* and *Public Service of Ontario Act, 2006* to strengthen lobbyist registration and the regulatory oversight powers of the Office of the Integrity Commissioner.

The status of actions taken on each of our recommendations is found in the **Appendix**.

// Status of Actions Taken on Recommendations

We conducted assurance work between June 2025 and August 2025. We obtained written representation from Cabinet Office that effective November 27, 2025, it has provided us with a complete update of the status of the recommendations we made in the original audit two years ago.

1. Key Observations from the Original Audit

The Greenbelt is an area of about 2 million acres of protected farmland, wetlands and woodlands encircling the densely populated Greater Golden Horseshoe region in southern Ontario. It was created in 2005 to permanently protect productive farmland and natural features from uncontrolled urban development.

In December 2022, the government amended the Greenbelt Plan and boundary to remove (or re-designate) 15 sites, totalling about 7,400 acres, from the Greenbelt. The government's communicated objective in adjusting the Greenbelt boundary was to allow for construction of a minimum of 50,000 new homes to help build 1.5 million homes across Ontario over 10 years by 2031.

In our original audit, we concluded that the way the government assessed and selected lands for removal from, and addition to, the Greenbelt in 2022 was not publicly transparent, objective or fully informed. Nor was it consistent with the vision, goals and processes of the Greenbelt Plan, as well as previous amendments to the boundary.

We found that the government-imposed Greenbelt removals proceeded without evidence they were needed to meet the government's housing goals. The Ministry of Municipal Affairs and Housing (Housing Ministry) had already allocated the entirety of the government's 1.5-million-unit housing target to municipalities in October 2022, one month before the government's November 2022 proposal to remove land from the Greenbelt. In addition, the February 2022 report of the Ontario government's Housing Affordability Task Force, which the government cited as the source of its goal to build 1.5 million homes over 10 years, concluded that a shortage of land was not the cause of the province's housing challenges.

We also found that the selection of land sites for removal from the Greenbelt was biased and lacked transparency. Rather than have the Housing Ministry's public service conduct a rigorous and comprehensive assessment of boundary change requests, the government embarked on a project that was substantially controlled and directed by the Housing Minister's Chief of Staff (Chief of Staff).

The Chief of Staff instructed the Housing Ministry's Deputy Minister (Deputy Minister) to assemble a small team of public servants (Greenbelt Project Team) to assess specific land sites in the Greenbelt Area for possible removal. The Chief of Staff provided public servants with the initial criteria to assess lands removal, enforced a time limit of four weeks to complete the assessment, and limited who they could speak to when conducting this work. The Chief of Staff required the Greenbelt Project Team to sign security attestation forms that they would not disclose information related to the Greenbelt Project to any external group. This hampered the Greenbelt Project Team's ability to complete a thorough analysis of the Greenbelt sites.

We found that, while approximately 630 site removal requests had been submitted to the Housing Ministry since the Greenbelt was established in 2005, the Greenbelt Project Team's review was limited to 22 specific sites, 21 of which were identified and provided directly by the Chief of Staff. Of the 15 sites ultimately approved for removal in December 2022, 14 were brought into the project by the Chief of Staff and one was identified by the Greenbelt Project Team. We also found that assessment criteria and land site boundaries were altered to facilitate the removals.

As well, we found that the proposal provided to Cabinet to alter the Greenbelt's boundaries did not clearly explain how land sites were identified, assessed and selected for removal.

We asked the then Deputy Minister whether she had communicated any concerns to the Chief of Staff or the Housing Minister about the project to amend the Greenbelt's boundary. She responded that this project was a government decision, and that the Ministry's concerns and risks were identified in the information given to government decision-makers. However, the identified risks did not make explicit the limitations and bias of the process used.

We noted that, even though it is a best practice to consult with the Secretary of the Cabinet (who oversees all Deputy Ministers) on politically sensitive matters, the Deputy Minister chose not to do so in this case. We found that, unlike the United Kingdom, Ontario does not have a process in place to transparently identify and address instances where senior public service ministry staff are not in agreement or have concerns with the direction provided by a minister.

We also found that developers and their representatives lobbied for the removal of 12 of the 15 parcels of land chosen for removal. About 92% of the land that was ultimately removed was requested by developers the Chief of Staff dined with at an industry association dinner in September 2022. Developers who had direct access to the Chief of Staff stood to significantly benefit financially by having received preferential treatment through the use of a biased process that was not transparent to the public.

We found that the Chief of Staff potentially contravened the conflict of interest regulation under the *Public Service of Ontario Act, 2006*. This regulation states that public servants shall not provide preferential treatment to any person or entity and shall endeavour to avoid creating the appearance that preferential treatment is being given to a person or entity that could benefit from it.

In addition, we found that political staff used personal email accounts contrary to public service cybersecurity guidelines. Political staff received emails from lobbyists and other external parties on their personal accounts that they then forwarded to their government email. Conversely, government emails were forwarded by political staff from their government accounts to their personal email. We also found that record-retention policies for political staff communications needed reinforcing. Emails were regularly being deleted by political staff, even though emails relating to the Greenbelt removals were not exempt from the *Archives and Recordkeeping Act, 2006*, and should not have been deleted.

As well, we found that the public and affected municipalities were not sufficiently and effectively consulted on the Greenbelt changes. For example, we found that public consultation, required under the *Environmental Bill of Rights, 1993*, was undermined by incomplete and inaccurate notices posted on the Environmental Registry of Ontario by the Housing Ministry. In addition, First Nations leaders we spoke to indicated that the extent and timing of the Ministry's consultation with Indigenous communities was insufficient to meet the Province's Duty to Consult with regard to treaty rights and other rights that apply to the areas removed from the Greenbelt in 2022.

2. Clarification of Roles and Responsibilities

Recommendation 1: Action Items 1, 2, 3 and 4

We recommend that, given the extensive influence and direct involvement of non-elected political public service staff in the operational decision-making of the Ministry of Municipal Affairs and Housing, and the demonstrated impact this has had on what should have been an objective and unbiased decision-making process, the Secretary of the Cabinet and the Chief of Staff to the Premier:

- clarify and document the role of Chiefs of Staff and the role of Deputy Ministers in policy development and operational decision-making;
- clarify and document the distinction between policy development and operational decision-making aligned with normal business processes;
- establish a formal process whereby Deputy Ministers seek the advice and direction of the Secretary of the Cabinet when Chiefs of Staff or other political staff limit or affect the operational decision-making of a ministry; and
- establish a formal process whereby a letter from the Deputy Minister can be provided to government, agreed to by the Secretary of the Cabinet, that distinctly highlights that the ministry was not able to provide a recommendation informed by sufficient supporting documentation and analysis.

Status:  Fully implemented.

Details

We found that the Ontario Public Service (OPS), through Cabinet Office and in consultation with the Premier's Office, developed a new Chief of Staff Handbook that outlines the roles, responsibilities and expectations for Chiefs of Staff in policy development and how they should work with Deputy Ministers on a ministry's operational matters. This handbook states that Chiefs of Staff work closely with Deputy Ministers but do not have authority to direct Deputy Ministers or other public servants employed by the ministry. According to this handbook, Chiefs of Staff operate under the outlook and mandate of the elected government, while Deputy Ministers represent a politically neutral bureaucracy and are responsible for the administration and operations of their ministry.

The handbook was introduced in a presentation that Chiefs of Staff were invited to in December 2023. It was subsequently shared with all Chiefs of Staff electronically in January 2024. We were also advised that this handbook is to be shared with all future Chiefs of Staff through their onboarding materials, which are available to all political staff via a website.

The OPS also developed a new Guide for Effective Cabinet Decision-Making and Policy Development for Ontario Public Servants (Policy Handbook). The Policy Handbook provides guidance to Deputy Ministers regarding when and how to escalate concerns to, and seek advice from, the Secretary of the Cabinet (Secretary) and central agencies, including the Cabinet Office. This handbook includes guidance on issues or concerns regarding political staff direction or requests related to ministry operational decision-making.

The Policy Handbook was introduced in a presentation that Deputy Ministers were invited to in December 2023 and came into effect in January 2024. It was also shared with all Deputy Ministers electronically in December 2023.

The OPS also updated the template for Cabinet Briefing Notes, which are shared with Cabinet members, and form the government's decision-making record. The template was revised to implement a new process for Deputy Ministers to note to Cabinet Office where ministries have been unable to conduct full analysis and due diligence on a proposal or submission due to circumstances outside the ministry's control.

Cabinet Office confirmed to us that, as of July 2025, there have not been any instances where a Deputy Minister has formally expressed a concern with political staff limiting or affecting the operational decision-making of a ministry. Cabinet Office confirmed that, should such an instance arise, the Secretary would document it in a formal memo to the Premier's Chief of Staff and the General Counsel in the Secretary's Office.

3. Limiting the Use of Confidentiality Agreements

Recommendation 2: Action Items 1 and 2

We recommend that, in view of the oath of secrecy all public servants take, the use of confidentiality agreements should be limited to only those circumstances requiring a high degree of confidentiality. The agreements should not be a barrier to the ability of public servants to consult and collaborate with other staff and experts as may be necessary, including public servants employed in other ministries and offices. Given public service employees are expected to maintain confidentiality in the conduct of their work, the use of confidentiality agreements by ministries:

- be limited and not serve as a barrier to the effective conduct of work by public service employees; and
- procedures be put in place that are transparent as to when it would be appropriate to ask a public service employee to sign a confidentiality agreement.

Status:  Fully implemented.

Details

We found that the OPS, through Cabinet Office, developed a new Confidentiality Undertaking and Acknowledgement (Confidentiality Acknowledgement) process in December 2023 to raise public servants' awareness and understanding of their confidentiality obligations. This process is intended to be used in place of any other form of confidentiality agreements, and reinforces the legal confidentiality obligations that public servants have through both the Oath of Office they take when entering public service and requirements of the *Public Service of Ontario Act, 2006*. Public servants assigned to work on sensitive projects or transactions, like the development of sensitive legislation or regulations, may be required to submit a Confidentiality Acknowledgement, which includes general commitments to uphold the confidentiality obligations inherent to public service. The Confidentiality Acknowledgement does not prevent public servants from gathering and sharing necessary information from other OPS staff or, if approved by the project lead, external stakeholders to fulfill their role on a given project.

The new process has been described to all Chiefs of Staff, Deputy Ministers and legal directors to reiterate the use and tracking of the new Confidentiality Acknowledgement process.

4. Compliance with the *Public Service of Ontario Act, 2006*

Recommendation 3: Action Item 1

We recommend that a request be made to the Integrity Commissioner of Ontario to determine whether the Chief of Staff to the Minister of Municipal Affairs and Housing acted contrary to the requirements of the *Public Service of Ontario Act, 2006* with respect to his liaisons with land developers and their representatives.

Status:  Fully implemented.

Details

On August 8, 2023, the Premier's Office made a request for the Integrity Commissioner of Ontario to determine whether the former Chief of Staff to the Minister of Municipal Affairs and Housing acted contrary to the requirements of the *Public Service of Ontario Act, 2006* with respect to liaisons with land developers and their representatives, as referenced in our Office's 2023 audit report.

5. Controls over the Receipt of Third-Party and Lobbyist Material

Recommendation 4: Action Item 1

We recommend that, in order to reduce the risk of actual and the appearance of conflict of interest, and so that both the non-political public service staff and non-elected political staff in ministers' offices are aware of materials provided by third parties, the government develop a procedure to ensure that any materials received from third parties, and that have been considered in the process of decision-making in a ministry or minister's office, are centrally recorded and shared with the relevant senior leadership in both a ministry and minister's office.

Status:  Fully implemented.

Details

We found that the OPS, through Cabinet Office, has developed a new process to centrally record and share materials that are received from lobbyists and third parties and used in decision-making. As part of this process, the Ministry of Public and Business Service Delivery and Procurement created a new digital repository where Premier's Office and Ministers' Office staff are required to upload received materials that have been, or reasonably may be, used or considered in policy development or decision-making. Chiefs of Staff and their respective Deputy Ministers are to meet weekly to discuss uploaded records and determine appropriate actions, including whether any materials should be shared with other ministry staff.

The first training session on this new process was held in February 2024, and all Chiefs of Staff and Deputy Ministers were provided with a guidance document describing all required steps. Subsequent training sessions have been provided on a regular basis, primarily for new staff (Chiefs of Staff and members of Deputy Ministers' Offices) to familiarize them with this repository process. The most recent training session was held in June 2025. As of July 2025, the digital repository contained nearly 1,100 files across more than 25 ministries.

6. Conflict of Interest and the Appearance of Conflict of Interest

Recommendation 5: Action Item 1

We recommend that, to reduce the risk of the appearance of conflict of interest, and consistent with the authority of Deputy Ministers under the *Public Service of Ontario Act, 2006*, to refer conflict of interest matters to the Integrity Commissioner of Ontario and seek his advice, processes be put in place for Deputy Ministers to proactively raise matters with the Secretary of the Cabinet, as their ethics executive, and that the Secretary of the Cabinet and the Deputy Ministers consult with the Integrity Commissioner on matters that may lead to reputational harm or public distrust of the Ontario Public Service.

Status:  Fully implemented.

Details

We found that the OPS, through Cabinet Office, has developed new guidance for Deputy Ministers on how and when to seek advice from the Secretary, as part of the new Policy Handbook that came into effect in January 2024 (described in **Recommendation 1**). The new Escalation Guidance for Deputy Ministers outlines how and when Deputy Ministers are to proactively escalate to the Secretary and potentially the Integrity Commissioner any concerns regarding potential or perceived conflicts of interest. The Secretary sent a memo to all Deputy Ministers in December 2023 to reinforce the conflict of interest rules and processes for the OPS.

Cabinet Office confirmed to us that, as of July 2025, there have not been any instances of Deputy Ministers raising conflict matters that would warrant the advice or involvement of the Integrity Commissioner. Cabinet Office confirmed that, should such an instance arise, the Secretary would document it in a formal memo to the Premier's Chief of Staff and the General Counsel in the Secretary's Office.

7. Records Retention (with a Focus on Emails)

Recommendation 6: Action Item 1

We recommend that non-elected political public service staff receive formal training on records retention policy as per the *Archives and Recordkeeping Act, 2006*, clarifying which types of emails and other documents are required to be retained and what information needs to be included on meeting calendars.

Status:  Fully implemented.

Details

We found that the OPS, through Cabinet Office, updated training materials and guidance for the Premier's Office and Ministers' Offices regarding their records retention and management obligations under the *Archives and Recordkeeping Act, 2006*. In March 2024, the Ministry of Public and Business Service Delivery and Procurement began providing quarterly training to political staff in the Premier's Office and Ministers' Offices using these updated materials. The training materials identify different types of records that political staff may come into contact with and whether those records are required to be preserved under the *Archives and Recordkeeping Act, 2006*.

Quarterly training is also being provided to political staff in the Premier's Office and Ministers' Offices by the Information and Privacy Commissioner of Ontario relating to the *Freedom of Information and Protection of Privacy Act*, with the most recent training session held in June 2025.

In addition, the General Counsel in the Office of the Secretary provided training to Ministers' Chiefs of Staff and other senior Ministers' staff in October 2023, and is scheduled to do so again by the end of 2025, to clarify what information needs to be included on meeting calendars.

8. Restriction on the Use of Personal Email Accounts for Government Business

Recommendation 7: Action Item 1

We recommend that non-elected political public service staff receive reinforced communications on the inappropriate use of personal email accounts for government business with annual, formal documented attestation that this policy is being followed.

Status:  Fully implemented.

Details

We found that the OPS, through Cabinet Office, has developed an Annual Recordkeeping Attestation for Employees in the Premier's Office and Ministers' Offices. This attestation requires those staff to confirm that they have managed records in accordance with the requirements of the *Archives and Recordkeeping Act, 2006*. Guidance accompanying this attestation reinforces that personal accounts (for example, Gmail, Hotmail, Facebook, Instagram, LinkedIn, etc.) and personal devices are not to be used for government business.

As part of this process, political staff attest annually that:

- they will conduct government business on government accounts; and
- any inadvertent communication relating to government business on any other accounts will be forwarded to a government account.

Each employee in the Premier's Office and Ministers' Offices is required to complete this attestation at the end of each fiscal year, which is also signed by their respective Chief of Staff. The most recent attestations were completed in May 2025 for the 2024/25 fiscal year.

Recommendation 8: Action Item 1

We recommend that non-elected political public service staff receive reinforced training from the Integrity Commissioner of Ontario on the requirements of the *Public Service of Ontario Act, 2006*, providing situational examples on how they should appropriately liaise with parties external to the government who have self-serving interests (e.g., developers, lobbyists and other representatives of developers), also ensuring that the information received is handled appropriately by decision-makers.

Status:  Fully implemented.

Details

We found that, since October 2023, the Integrity Commissioner of Ontario has been providing quarterly training to political staff on the requirements of the *Public Service of Ontario Act, 2006*, and ethics rules for Ministers' staff. The most recent training was provided in June 2025. This training is provided to political staff and covers the requirements of the *Public Service of Ontario Act, 2006*, conflict of interest rules, lobbying and rules for political activity. Each presented topic contains situational examples for discussion as a group, including examples on how to handle interactions with parties external to the government.

9. Consultation under the *Environmental Bill of Rights, 1993*

Recommendation 9: Action Item 1

We recommend that, in conjunction with the Deputy Minister of the Environment, Conservation and Parks, the purpose of the public consultation period required under the *Environmental Bill of Rights, 1993* be reviewed and clarified so that the consultation process respects public input within a time frame that supports and enables meaningful consultation about significant decisions impacting the environment.

Status:  Fully implemented.

Details

We found that the Ministry of the Environment, Conservation and Parks developed an Environmental Bill of Rights (EBR) guidance document that outlines the purpose of and approaches to fulfilling EBR consultation obligations. In January 2024, this guidance was shared with all Chiefs of Staff and Deputy Ministers, who were asked to circulate it to officials and staff in prescribed ministries. The document was also posted electronically for all OPS staff to access when needed. The guide explains the EBR's minimum requirements for public consultation and includes factors for determining the length of the consultation period, such as the related proposal's complexity and level of public interest, and timing considerations to ensure public comments are considered before a ministry makes a final decision. The guide states that "ministries should consider what would be an appropriate amount of time to read and consider public comments received, including time to modify the proposal before implementation and posting a decision notice on the [Environmental Registry]."

Despite the creation and circulation of this guide, our Office has continued to find cases in which ministries have not met their EBR responsibilities to consult the public before making environmentally significant decisions. For additional information on the Province's implementation of its EBR responsibilities, please see our latest report on the Operation of the *Environmental Bill of Rights, 1993*.

10. Consultation with Indigenous Leadership

Recommendation 10: Action Item 1

We recommend that Deputy Ministers be required to follow established protocols for appropriate and effective consultation with Indigenous leadership when proposing any initiatives that have the potential to affect their communities.

Status:  Fully implemented.

Details

We found that the Ministry of Indigenous Affairs and First Nations Economic Reconciliation developed a new Duty to Consult Overview document for all ministries that outlines the government's Duty to Consult requirements and best practices. This guidance was shared with all Deputy Ministers in December 2023.

In addition, as of January 2024, all ministries are required to participate in the Ontario Portal for Indigenous Consultation (OPIC), a new central resource intended to enable more effective consultation with First Nations. OPIC is an information repository on Aboriginal and treaty rights that provides guidance, maps and other tools intended to support more consistent and co-ordinated approaches across government to consult with Indigenous communities.

11. Consultation with Stakeholders

Recommendation 11: Action Item 1

We recommend that, to assist ministries in their consultation with stakeholders that may be impacted by government decisions, Deputy Ministers establish and follow consistent protocols for engagement and consultation with affected groups.

Status:  Fully implemented.

Details

We found that the OPS developed a new Guide to Public Participation in Policy Development for Ontario Public Servants, which was circulated to all Deputy Ministers in December 2023 and posted electronically for all OPS staff to access. This guide outlines best practices for consulting with the public and stakeholders throughout the development and implementation of new policies.

This guide also identifies the risks of not conducting meaningful public participation in policy development, including the erosion of public trust in institutions, and missed opportunities to gather valuable feedback and potential solutions or improvements.

12. Cabinet Submission Material

Recommendation 12: Action Items 1, 2 and 3

We recommend, for good governance that enables fully informed decision-making on significant issues, that:

- procedures be put in place so that Deputy Ministers raise to the Secretary of the Cabinet's attention submissions for which they have not been able to fully conduct unfettered work;
- the Deputy Minister, with a copy to the Secretary of the Cabinet, sign off on the submissions indicating where work has not been able to be fully performed by public service employees in a comprehensive and effective manner as expected by the people of Ontario, which as such could tarnish trust in the public service and trust in government; and
- sufficient time be given to Cabinet members to fully read and review any material provided around significant and higher-risk decisions.

Status:  Fully implemented.

Details

We found that, as part of the new Policy Handbook that came into effect in January 2024 (described in **Recommendation 1**), the OPS, through Cabinet Office, has developed new guidance for Deputy Ministers and Ministers on due diligence expectations when bringing forward policy submissions for Cabinet's consideration. The Policy Handbook also provides guidance to Deputy Ministers on how and when to flag and escalate to the Secretary any concerns with meeting the requirements and processes outlined in the handbook.

Cabinet Office confirmed to us that, since January 2024 and as of July 2025, there have been no instances where a Deputy Minister has raised an issue directly with the Secretary of the Cabinet about a Cabinet submission where they believed supporting work was not able to be fully performed in a comprehensive and effective manner.

The new Policy Handbook provides instruction for Deputy Ministers to flag for Cabinet Office and the Secretary where they or their ministry have had limited or insufficient time to conduct full analysis and due diligence on a Cabinet submission. In addition, Cabinet Office implemented a revised policy submission template in February 2024 to aid ministries in preparing materials for Cabinet that are clear and concise, reflect a range of options, and are supported by thorough analysis and considerations to inform decision-makers. The updated template includes a disclaimer so that Deputy Ministers can note where ministries have been unable to conduct full analysis and due diligence on a proposal or submission due to circumstances outside the ministry's control.

The new Policy Handbook also reinforces deadlines for Cabinet submissions to allow Cabinet members sufficient time to read and review the provided materials.

Recommendation 13: Action Items 1 and 2

We recommend that Deputy Ministers:

- sign a notification to Cabinet, with a copy to the Secretary of the Cabinet, where the public service has not been able to fully perform work and analysis supporting the submission consistent with public expectations of the role of the public service and which could result in diminished trust in the public service and the government; and
- the notification outline any concerns with the process, information and evidence or time provided to prepare the submission.

Status:  **Fully implemented.**

Details

We found that, as part of the new Policy Handbook that came into effect in January 2024 (see **Recommendation 1**), the OPS has developed new guidance for Deputy Ministers and Ministers with respect to expectations of due diligence when bringing forward policy submissions for Cabinet's consideration. The Policy Handbook also provides guidance to Deputy Ministers on how and when to flag and escalate to the Secretary any concerns with meeting the requirements and processes outlined in the handbook.

The new Policy Handbook also provides instruction for Deputy Ministers to flag for Cabinet Office and the Secretary where they or their ministry have had limited or insufficient time to conduct full analysis and due diligence on a Cabinet submission. The OPS updated the template for Cabinet Briefing Notes so that Deputy Ministers are to note where ministries have been unable to conduct full analysis and due diligence on a proposal or submission due to circumstances outside the ministry's control.

Cabinet Office confirmed to us that, since January 2024 and as of July 2025, there have been no instances where a Deputy Minister has raised an issue directly with the Secretary of the Cabinet about a Cabinet submission where they believed their ministry was unable to fully perform supporting work or analysis in a comprehensive and effective manner.

13. Re-evaluation of 2022 Decision to Change the Greenbelt Boundaries

Recommendation 14: Action Item 1

Given that the Premier and the Minister of Housing have communicated to us that they were unaware that the pre-selection of lands for removal from the Greenbelt was biased, controlled and directed by the Housing Minister's Chief of Staff (a political public servant) rather than informed by environmental, agricultural and infrastructure considerations, we recommend that the government request that the Housing Ministry, in conjunction with the Ministry of Natural Resources and Forestry, the Ministry of the Environment, Conservation and Parks and the Ministry of Agriculture, Food and Rural Affairs, Indigenous communities and relevant stakeholders, such as impacted municipalities, re-evaluate the 2022 decision to change the Greenbelt boundaries.

Status:  **Fully implemented.**

Details

We found that, following the release of our **Special Report on Changes to the Greenbelt**, the government re-evaluated its 2022 decision to change the Greenbelt boundaries. On October 16, 2023, the Ontario government introduced Bill 136, the *Greenbelt Statute Law Amendment Act, 2023*, which, amongst other things:

- added back to the Greenbelt the 15 sites that were removed/redesignated in December 2022; and
- made it so that any future amendments to the Greenbelt Area would require legislative rather than regulatory changes.

Bill 136 received Royal Assent and came into effect on December 6, 2023.

14. Strengthening Oversight by the Office of the Integrity Commissioner of Ontario

Recommendation 15: Action Item 1

We recommend that, based on our work during this audit, an independent and comprehensive overall review be conducted of the *Lobbyists Registration Act, 1998*, *Members' Integrity Act, 1994* and *Public Service of Ontario Act, 2006* to strengthen lobbyist registration and regulatory oversight powers of the Office of the Integrity Commissioner.

Status:  Little or no progress.

Details

Cabinet Office confirmed to us that it continues to have consultations with the Premier's Office relating to previous suggestions and feedback that the Office of the Integrity Commissioner has put forward regarding the *Lobbyists Registration Act, 1998*, *Members' Integrity Act, 1994* and *Public Service of Ontario Act, 2006*. The Premier's Office has advised that the government continues to consider conducting a review of these Acts and how the review may be implemented. As of July 2025, there was no planned course of action or target date confirmed by the government.

// Appendix

Recommendation Status Overview

	# of Action Items	Fully Implemented 	In the Process of Being Implemented 	Little or No Progress 	Will Not Be Implemented 	No Longer Applicable 
Recommendation 1	4	4				
Recommendation 2	2	2				
Recommendation 3	1	1				
Recommendation 4	1	1				
Recommendation 5	1	1				
Recommendation 6	1	1				
Recommendation 7	1	1				
Recommendation 8	1	1				
Recommendation 9	1	1				
Recommendation 10	1	1				
Recommendation 11	1	1				
Recommendation 12	3	3				
Recommendation 13	2	2				
Recommendation 14	1	1				
Recommendation 15	1			1		
Total	22	21	0	1	0	0
%	100	95	0	5	0	0