



October 29, 2020

Chair Roman Baber, M.P.P York Centre
Standing Committee on Justice Policy
99 Wellesley Street West
Room 1405, Whitney Block
Queen's Park
Toronto, ON

Dear Chair Baber,

I am writing today on behalf of the Association of Municipal Managers, Clerks and Treasurers of Ontario (AMCTO) in response to Bill 218: *Supporting Ontario's Recovery and Municipal Elections Act, 2020*.

AMCTO represents excellence in local government management and leadership. With 2,000+ members working in municipalities across Ontario, AMCTO is Ontario's largest voluntary association of local government professionals, and the leading professional development organization for municipal professionals.

Members of your committee are likely familiar with the issue getting the most attention on Schedule 2 of the Bill related to amendments to the *Municipal Elections Act, 1996* (*hereafter, the Act*). However, for AMCTO, what has a more pressing concern for our members in the effective administration of local election services is the proposed change to nomination day.

We are concerned about the proposed amendments brought forward by the Bill – specifically, those in regard to s.31 of the *Act*, which would extend the nomination period of municipal elections by moving nomination day back to September from July. We have heard from our members across the province on this issue in the past several days, and we understand many of them have shared their concerns with their local representatives and the ministries.

During the [last review of the Act](#), AMCTO advocated to move nomination day to the summer in order to improve the effectiveness of managing and administering municipal elections. This is an area of critical interest for our members who serve their communities as municipal clerks and who act as local election officials under the authority of the *Act*.

Beyond making the use of alternative voting methods (i.e. voting by mail, internet or telephone voting) more challenging to implement, the nomination day change impacts

various components of election administration:

- Provides less time for clerks to verify and certify nominations for each office. This includes nominations for mayor, councillor (regional councillors in many cases), school board trustees (for multiple boards and in multiple languages in some cases). Verification and certification processes for these nominees are completed to ensure they meet the requirements set out in the *Act*.
- Provides a shorter turnaround time (less than a month between nomination day and election day) to supply vendors with the certified list of candidates and proof final regular ballots, mail ballots, online voter identification letters and so forth.
- Compresses time available for logic and accuracy testing which can take a number of days for traditional tabulators or for alternative voting methods. For medium and large municipalities, there are often thousands of ballots needed per office, with a number of ballot face variations to print and test once nominations are finalized.

Similarly, the marketplace for election-related products and services, including alternative voting providers, is small. As more municipalities look to alternatives voting methods to a) offer more options for electors to cast their ballots to increase voter turnout and b) to provide safe, accessible and public health conscious opportunities for all citizens to vote, this becomes a concern as demand for these services increases. A shorter period between nomination day and election day would mean that a small number of vendors must address increased demand to fill orders within a smaller window of time.

It has been acknowledged that municipal and school board elections are complicated in comparison to federal or provincial elections. Reducing the time between election day and nomination day can result in unnecessary complications in the administration of effective election services.

Clerks in smaller municipalities already have limited staffing resources and as a result, often must project manage and lead the delivery of elections while continuing to deliver day-to-day front-line services to their communities. Clerks in medium and larger municipalities need to verify dozens of nominations and certify those nominations for each office – often preparing thousands or tens of thousands of ballots. All of these processes take time – time that is being limited by the proposed Bill. This time is invaluable and has a direct impact on the overall effectiveness of municipal elections.

We strongly encourage the Committee to evaluate the potential consequences a reduced time period between nomination day and election day and kindly request that the Bill be amended to remove the proposed amendments to s.31 of *the Act* so that it remains unchanged.

For any questions, please do not hesitate to contact Alana Del Greco, Manager of Policy & Government Relations (adelgreco@amcto.com) who will be happy to assist.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Tremblay', with a large, stylized loop at the end.

Robert Tremblay CMO, AOMC, Dipl.M.A.
President, AMCTO
Chief Administrative Officer, Town of Whitewater Region

cc. Hon. Steve Clark, Minister of Municipal Affairs and Housing
Hon. Doug Downie, Attorney General
Kate Manson-Smith, Deputy Minister, MMAH
David Corbett, Deputy Attorney General