

Ministry of Public and Business Service Delivery and Procurement
Policy and Governance Branch
222 Jarvis Street, 3rd Floor
Toronto ON M5B 2B8

July 28, 2026

To whom it may concern,

This letter is to express our views on proposal 26-MPBSD009 “Proposal to make Regulatory Amendments under the Not-for-Profit Corporations Act, 2010”. We thank the Ministry for this opportunity to follow up on feedback we last provided concerning statutory and regulatory amendments including most recently:

- June 2022 (sent to Mike McRae regarding a wide range of opportunities for improvement),
- November 2022 (sent to Michelle Canale regarding changes to how the rules governing access to members records), and
- September 2025 (in a meeting with Minister’s Office staff, including Adwet Sharma concerning dispute resolution under the Act)

The proposed change to the income threshold for absolute audit or review engagement requirement is unquestionably a positive step, but we are disappointed to see this proposal in isolation of a broader package of improvements to the statute.

We reiterate just a couple of the recommendations we have made over the years in order to emphasize that these remain frequent issues raised to us through public enquiries and by participants at workshops we deliver:

- **Governance dispute resolution:** Our single most common enquiry received from the public is a request for an office to direct complaints concerning nonprofit governance non-compliance to. We therefore urge the Minister to look to the Condo Authority of Ontario or BC’s Civil Resolution Tribunal as a possible model for a complaint/dispute resolution body.
- **Access to members records:** Members of nonprofits continue to be alarmed at the extent of access to their information by other members. While we appreciate the difficulty in striking a balance between members’ participatory rights and members’ privacy, we urge the Minister to consider at minimum adding to the



ONCA a requirement for boards to notify members in a timely way when their information has been requested by another member, that way they have an opportunity to exercise the right to object already accorded to them under ONCA.

We also reiterate our support broadly for the recommendations made by the Ontario Bar Association to clarify and streamline ONCA.

In short, we hope to see a more fulsome package of improvements including the abovementioned range of issues, as well as others, in the near future.

About ONN

ONN is the independent nonprofit network for the 64,000 nonprofits in Ontario, focused on policy, advocacy, and services to strengthen the sector as a key pillar of our society and economy. We work to create a public policy environment that allows nonprofits to thrive. We engage our network of diverse nonprofit organizations across Ontario to work together on issues affecting the sector and channel the voices of our network to government, funders, and other interest holders.

Conclusion

Please let us know if you have any questions. We are available to clarify any part of our submission. Thank you for your leadership on this issue.

Sincerely,

Pamela Uppal-Sandhu
Director of Policy, Co-Executive Director (Interim)
Ontario Nonprofit Network (ONN)