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**To: UTRCA Board of Directors**  
**From: Joe Gordon, Regulations Coordinator**  
**Date: February 24, 2026**  
**File Number: BoD-26-02-15**  
**Agenda #: 8.1**  
**Subject: Annual Report of Administration and Enforcement – Section 28,  
Prohibited Activities, Exemptions and Permits (O. Reg. 41/24)**

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## Recommendation

THAT the Board of Directors receives the report for information.

### Section 28 Annual Report on Timelines

UTRCA has tracked permit review timelines for many years based on standards that were set by the province in 2010 (MNR, *Policies and Procedures for Conservation Authority Plan Review and Permitting Activities, May 2010*). The previous policy directs conservation authorities to render an application decision regarding a permit within 90 days for a major application and 30 days for a minor application.

Annual reporting since 2019 changed in accordance with the Conservation Ontario updated *Client Service Standards for Conservation Authority Plan and Permit review (2019)* requesting annual statistics on permits issued within 21 days for Routine Permits, 30 days for Minor Permits and 90 days for Major Permits.

However, in 2024, new legislative and regulatory framework changes occurred to the *Conservation Authorities Act* which included a new Section 28 Regulation entitled “Ontario Regulation 41/24” Prohibited Activities, Exemptions and Permits” which came into effect on April 1, 2024.

As a result of the new Section 28 Regulation, Ontario Regulation 686/21: Mandatory Programs and Services under the *Conservation Authorities Act* was amended which now requires Conservation Authorities under regulation to “...*prepare and publish an annual report that outlines statistics on permits, including reporting on its level of compliance with requirements of Ontario Regulation 41/24... respecting an application for and issuance of permits, including any associated timelines.*” (s.8.1. O.Reg.686/21)

The CA Act and O. Reg. 41/24 outlines two distinct timelines associated with CA reviews of permit applications:

1. Upon receipt of an application and applicable fee, the Authority has 21 days to notify the applicant in writing whether or not the application is deemed a “complete application”.
2. Once an application is deemed “complete”, the CA will complete their review and make a decision. Per subsection 28.1 (22) of the CA Act, if the CA has not made

a decision within 90 days, the applicant may appeal the application directly to the Ontario Land Tribunal on the basis of a non-decision. All timelines presented are in calendar days and exclude statutory holidays.

In response to the annual reporting requirements now established within regulation, Conservation Ontario (CO) developed the *Annual Reporting Guide and Template: Permit Timelines and Regulatory Compliance (September 23, 2024)*.

The 2024 CO Guide recommends tracking by only two Permit Categories based on the following:

- **Major Applications** for section 28.1 permits require significant staff involvement. These are generally highly complex projects (e.g., large subdivisions requiring technical review supported by comprehensive analysis), or smaller-scale site-specific applications requiring complex technical reviews. These proposals may involve sites with significant natural hazards, environmental impacts, or multiple approval process requirements. Major applications may include:
  - Plans of Subdivision or Condominium;
  - large Site Plan Control applications;
  - major watercourse alterations, or
  - major infrastructure development.
- **Minor applications** for section 28.1 permits generally have minor impacts on the control of flooding, erosion, dynamic beaches, or unstable soil or bedrock. Permit applications may be considered minor due to a limited scale/scope of work, level of risk to health and safety of persons or property damage, location, or application requirements for technical information, studies or plans. Minor permit applications are reviewed by CA staff and generally require standard recommendations or conditions. Generally, these include minor fill, development, or site alteration where there is a high degree of certainty that issues associated with natural hazards are minimal.

In addition to reporting on permit statistics and timelines, the Annual Report template also provides details on compliance with the following elements of O. Reg. 41/24:

- Public availability and annual review of CA mapping;
- Notification of complete applications; and,
- Completion of administrative reviews (within 30 days following a request).

Once the annual report has been received by the Board, the Annual Report will be published on UTRCA's website.

## **2025 Data and Results**

The following table provides the 2025 annual report for UTRCA based on the Conservation Ontario Reporting Template.

<b>Upper Thames River Conservation Authority (2025):</b>	
<b>Annual Reporting – Permit Statistics</b>	
<b>Total Permits Issued (Overall)</b> (January 1 – December 31):	# 201
<b>Total Major Permits Issued</b> (January 1 – December 31):	# 58
<b>Total Minor Permits Issued</b> (January 1 – December 31):	# 143
<b>Total Applications Subject to Minister’s Order (Minister’s Review):</b>	# 0
<b>Annual Reporting – Permit Timelines</b>	
<b>COMPLETE APPLICATION REVIEW</b> Total complete application reviews completed in 21 days:	# + commentary for those not completed in 21 days. 216 <i>(12 completed outside of 21-days. Extended review period occurred during a holiday or due to review of multiple technical studies requiring technical staff review and more time to ensure all technical information was included)</i>
<b>PERMIT TIMELINES (MAJOR)</b> Total Major Permits Issued <u>Within</u> Decision Timeline (90 Days):	# 58
<b>PERMIT TIMELINES (MAJOR)</b> Total Major Permits Issued <u>Outside</u> Decision Timeline (90 Days):	# 0
<b>PERMIT TIMELINES (MINOR)</b> Total Minor Permits Issued <u>Within</u> Decision Timeline (30 Days):	# 141
<b>PERMIT TIMELINES (MINOR)</b> Total Minor Permits Issued <u>Outside</u> Decision Timeline (30 Days):	# 2 <i>(Zero outside regulation timeline of 90 days. 30-day review timeline is a Best Management Practice for streamlining Minor applications)</i>
<b>VARIANCE FROM TIMELINES</b> Reason for Variance from Timelines (Optional):	Commentary
<b>PERMIT TIMELINES (AVERAGE – ALL)</b> Overall Average Permit Review Timeline ():	Average # of days 6

<b>PERMIT TIMELINES (AVERAGE - MAJOR - 90 DAYS)</b> Average Major Permit Review Timeline:	Average # of days <b>6</b>
<b>PERMIT TIMELINES (AVERAGE - MINOR - 30 DAYS)</b> Average Minor Permit Review Timeline:	Average # of days <b>5</b>
<b>Annual Reporting - Compliance with O. Reg. 41/24</b>	
<b>MAPPING</b> Are maps of regulated areas available at the CA head office and on the CA website? (ss. 4(1) of O. Reg. 41/24)	Yes / No (+commentary) <b>Yes - UTRCA has an online GIS mapping portal that the public can search by address.</b>
<b>MAPPING</b> Has the Authority undertaken an annual review of the mapping and made necessary updates? (ss. 4(2) of O. Reg. 41/24)	Yes / No (+commentary) <b>Yes - currently under public consultation process prior to approval of updates.</b>
<b>ADMINISTRATIVE REVIEWS</b> Total requests for administrative reviews made to the Authority:	# <b>1</b>
<b>ADMINISTRATIVE REVIEWS</b> Total administrative reviews completed within 30 days of the request:	# + commentary for those not completed within 30 days <b>1</b>

### Total Service Statistics (2025)

Application Submissions	Permit Extensions	Clearance Permits	EA's	Hydro One SCR's	CA Act Inquiries	Grand Total
<b>228</b>	<b>23</b>	<b>317</b>	<b>13</b>	<b>8</b>	<b>137</b>	<b>724</b>

### Analysis and Conclusion:

UTRCA Regulation staff provided 724 formal written service transactions in 2025. This statistic does not include numerous non-formal verbal inquiries, meetings, site visits, or consultation services.

We are pleased to report that 201 permits were issued in 2025 with 99% meeting the Conservation Ontario annual reporting requirements. In addition, there were 228 complete application reviews in 2025 with 95% meeting the 21-day notice requirement.

A number of applications in 2025 were cancelled or withdrawn due to inactivity, including non-payment of application fees.

The regulation requires that staff notify an applicant within 21 days of application submission whether their application is complete, or if additional information is required. Once an application is complete then staff must render a decision on the complete application within 90 days.

In general, staff are spending more time on the earlier stages of an application submission to determine if the application is complete. The majority of staff review time, including technical review, is commonly completed after a notice for additional information is required and prior to the application being deemed complete.

In most cases, the applicable application fee is the last requirement to be satisfied and is typically received after the review of an application is complete, or mostly complete. This results in permits being issued within an average of 6 days from a complete application, in accordance with the regulatory timelines.

The complete average total timeline in 2025 for processing applications from submission date to permit issuance, including the applicant’s additional timeline for incomplete applications, was only 41 days. Well below the 90-day appeal period for a non-decision. Only 11% of the 2025 applications rendered a decision exceeding a total of 90 days. These timelines result from a period of extended time where it is the applicant’s responsibility to provide additional information after initial submission for a complete application.

Twenty-seven (27) application submissions from 2025 are still in-progress and/or remain incomplete. Only one (1) application from 2024 remains outstanding and is scheduled for a hearing before the UTRCA’s Hearings Committee in April of 2026.

**Permit Applications by Municipality (2025):**

Municipality	Total	Major	Minor	Percentage
Blanford-Blenheim	4	0	4	1.7%
EZ Tavistock	5	2	3	2.2%
Ingersol	6	2	4	2.6%
London	83	31	52	36.2%
Middlesex Centre	14	1	13	6.1%
Norwich	1	0	1	0.4%
Perth East	8	2	6	3.5%
Perth South	16	5	11	7.0%
South Huron	1	0	1	0.4%
South-West Oxford	8	2	6	3.5%
St Mary’s	4	1	3	1.7%
Stratford	15	4	11	6.6%

<b>Municipality</b>	<b>Total</b>	<b>Major</b>	<b>Minor</b>	<b>Percentage</b>
Thames Centre	<b>15</b>	5	10	6.6%
West Perth	<b>14</b>	3	12	6.6%
Woodstock	<b>17</b>	4	13	7.4%
Zorra	<b>17</b>	9	8	7.4%
	<b>228</b>	71	158	100.0%

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