



Monday, September 26, 2022

Ms. Paula Puddy  
Commission Secretary  
Federal Electoral Boundaries Commission for Ontario  
PO Box 37018 Southdale  
London, Ontario N6E 3T3  
Delivered by e-mail to [ON@redecoupage-federal-redistribution.ca](mailto:ON@redecoupage-federal-redistribution.ca)

**Re: Submission on the 2022 Federal Electoral Districts Redistribution**

Dear Commission Secretary Puddy,

On behalf of the Western Ontario Wardens' Caucus (WOWC), thank you for this opportunity to provide a submission to the Federal Electoral Boundaries Commission for Ontario regarding the proposed 2022 federal electoral districts redistribution.

The WOWC is a not-for-profit organization representing 15 upper and single-tier municipalities across Southwestern Ontario, representing more than 1.5 million residents. The WOWC aims to enhance the prosperity and overall well-being of rural and small urban communities across the region.

On behalf of its communities and its residents, and after significant consultation with Members of Parliament (MPs) from the region, the WOWC wishes to express its position on the proposed riding redistribution, with particular regard to:

- The need for an extension to the consultation timeline;
- The need to consult adequately regarding name changes;
- The need to ensure communities of interest remain whole; and
- The importance of maintaining the current rural seat count for Southwestern Ontario.

On August 19, 2022, the Commission released its proposed new electoral map for consideration at public hearings this fall. As it is understood by the WOWC membership, the Commission must make every effort to ensure that, except in circumstances it views as extraordinary, the population of each electoral district in the province remains within 25% (plus or minus) of the electoral quota (116,590 constituents). The upper limit of deviation from the quota is 145,738, and the lower limit of deviation from the quota is 87,443.

Given the short timeline that the municipal communities of Ontario have been granted to provide sufficient feedback – and consult appropriately with their constituents, their MPs, and other concerned parties and stakeholders – the WOWC is requesting a two-month extension to the consultation timeline. The current consultation timeline also coincides with the municipal elections scheduled across Ontario on October 24, 2022. Furthermore, it is the WOWC's understanding that similar extensions have been granted in other jurisdictions across Canada.

As an organization that represents the interest of rural and small urban constituents, the WOWC believes it is imperative that these communities be respected and consulted. As an example, Council of the Township of Tiny – located within the County of Simcoe – unanimously agreed that it does not support the proposal to rename the riding to Penetanguishene–Couchiching and recommended that the riding continue to be known as Simcoe North. The Commission must consider that there are historical components within the current name that are of significance to the communities represented.

While the WOWC understands that the location and density of population growth required the Commission to establish electoral districts that crossed municipal boundaries, the proposed federal electoral districts unnecessarily fragment many of our region's communities – and jeopardize our rural seat count in Southwestern Ontario.

Under the current proposal, multiple rural communities across the region will not be kept whole, including but not limited to: Dawn-Euphemia, Zorra, Tillsonburg, Warwick, and Chatham-Kent. This is damaging to these communities and unnecessarily divisive for many reasons, such as:

- Municipal community organizations would face greater time and complexity when seeking to engage federal government with the increased likelihood of having to organize two meetings rather than one. Also, there could be the potential for risk of contradictory positions by area MPs where they represent competing political parties.
- The proposal, if endorsed, will inevitably have an impact on provincial riding boundaries, which tend to mirror federal boundaries. This would only magnify complexities of breaking up municipal boundaries between two ridings where the provincial / municipal relationship is bound even more tightly across a number of service areas ranging from court administration, transportation, to long-term care to delivery of social services.

It is also important to note that based on the current electoral district populations, all the existing electoral districts across Southwestern Ontario meet the requirements for the lower and upper limits of the quotas (plus or minus 25% of the 116,590 figure). There is therefore no requirement to modify the electoral map, and the WOWC believes that the current proposal will create more harm than good to many of Southwestern Ontario's small and rural communities.

Although many communities will be negatively impacted by the proposal in various ways, the following additional example will further illustrate the severity and complexity of the situation. The proposed district boundaries would mean that the County of Elgin – another of the 15 WOWC member municipalities – would be split between two federal electoral districts: Elgin–Middlesex–Thames and London South–St. Thomas. Prior to the redistribution, the County of Elgin (including the Municipality of Central Elgin) was represented by the riding of Elgin–Middlesex–London.

For illustrative purposes, the proposed district boundaries would also result in the following:

- Elgin County would hold only a minority share of the population of any of the proposed electoral districts that include the Municipality of Central Elgin, diluting the ability to influence the local Member of Parliament to concentrate on and address Central Elgin and Central Elgin residents' interests.
- The community identity including the rural voice of the Municipality of Central Elgin, the Township of Southwold, and other local municipal partners would be significantly diluted across two ridings that would have larger City of London and urban concerns.
- The proposed ridings of Elgin–Middlesex–Thames and London South–St. Thomas do not respect the historical pattern of the County of Elgin's electoral districts.

- The justification provided by the Commission for the creation of the London South–St. Thomas electoral district does not even consider or acknowledge the Municipality of Central Elgin.
- The revised boundaries would effectively end the deeply embedded historical connection between the City of St. Thomas and the County of Elgin, where St. Thomas serves as the County seat. This connection has stood since Confederation. Integration of services between the City and the County has only grown in that time, particularly when it comes to areas such as courts, social services and land ambulances which all dramatically impact residents of every municipality in Elgin County, and should be represented federally and politically by one MP to ensure a common voice on these matters.

It is inconceivable, in the opinion of the WOWC, to redistribute the ridings as per the existing proposal. For the many reasons outlined in this submission, the proposed district boundaries will negatively and significantly impact the rural residents across the region. This concern is further exacerbated by the reality that no redistribution is required in Southwestern Ontario, in order to respect the electoral quotas.

Thank you in advance for your collaboration and your attention to this matter. On behalf of the WOWC and its constituents, I look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "George Cornell". The signature is written in a cursive, flowing style.

Warden George Cornell  
Chair, Western Ontario Wardens' Caucus