

February 19, 2026

Councillor Allison,

Summary of Disposition: Conflict of Interest Complaint

The following is the relevant extract from our disposition letter to the Complainant regarding their complaint against you, which is being provided for your information as a courtesy:

*We are writing in response to your complaint which was forwarded to us by the former integrity commissioner on December 29, 2025. Your complaint alleges that Councillor Allison was in a conflict of interest when he participated in Council's consideration of the Saugeen Valley Conservation Authority Flood Mapping and Weather Station MOU. Your complaint was supported by a Statutory Declaration dated December 23, 2025.*

*The particulars of your complaint are as follows:*

*Councillor Allison serves as a member of the Saugeen Valley Conservation Authority (SVCA) Board and has served in that capacity since December 2022.*

*The SVCA is responsible for flood hazard mapping affecting lands which include property owned by the Councillor.*

*You allege that his 'dual role' serving on the SVCA Board as well as on Council also places him in a conflict of interest.*

*Further,*

*On May 15, 2023, Council for Huron-Kinloss considered and approved the flood hazard mapping proposed by the SVCA within the Township.*

*The Councillor participated in the Council decision.*

*On November 17, 2025 Council again considered a report from the SVCA relating to flood mapping.*

*The Councillor again participated in Council's consideration of the matter.*

*You assert that the Councillor owns property located within, or directly affected by, the regulated / flood hazard zone and that his participation – both in 2023 and in November 2025 – caused him to be in a conflict of interest.*

*And further,*

*On December 15, 2025 Council considered a proposed Memorandum of Understanding (MOU) with SVCA regarding the installation of a weather station,*

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*which contemplates Township financial contributions, in-kind support, access to municipal land, and ongoing maintenance responsibilities.*

*You allege that Councillor Allison's dual role as an SVCA Board member places him in a conflict of interest.*

*As part of our review process, and in accordance with the tenets of procedural fairness, we forwarded your complaint to the Councillor and provided him an opportunity to respond. We have also reviewed relevant the reports to Council and relevant flood zone mapping.*

### Timing:

*The Municipal Conflict of Interest Act (MCIA) prescribes strict timelines regarding complaints of conflicts of interest, which would automatically preclude any review of your complaint regarding the May 2023 events.*

*8 (2) An application may only be made within six weeks after the applicant became aware of the alleged contravention.*

*Although the events which occurred in May 2023 are well-beyond the limitation period prescribed under the MCIA, you state that you only became aware of the alleged contravention on November 17, 2025. Council's consideration of the SVCA flood mapping on November 17, 2025 and the MOU considered on December 15, 2025 fall within the prescribed timelines.*

*Based on our determination that no conflict of interest exists, as explained in detail below, we find it unnecessary to make any finding as to whether your apparent lack of awareness of facts giving rise to a conflict of interest allegedly occurring in May 2023 could form the basis for a complaint under the MCIA.*

### Analysis

*When a member has a pecuniary interest in a matter, the obligations under subsections 5(1) and 5(2) of the MCIA are triggered.*

*5. (1) Where a member ... has any pecuniary interest ... in any matter and is present at a meeting of the council ... at which the matter is the subject of consideration, the member,*

- (a) shall, prior to any consideration of the matter at the meeting, disclose the interest and the general nature thereof;*
- (b) shall not take part in the discussion of, or vote on any question in respect of the matter; and*

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- (c) shall not attempt in any way whether before, during or after the meeting to influence the voting on any such question.

*A pecuniary interest may be direct or indirect.*

*2 . For the purposes of this Act, a member has an indirect pecuniary interest in any matter in which the council or local board, as the case may be, is concerned, if,*

*(a) the member ...*

*(iii) is a member of a body,*

*that has a pecuniary interest in the matter;*

### *'Dual role' not a conflict*

*The MCI A provides an exception for members of Council who are appointed by Council to various boards and agencies.*

*4 Sections 5, 5.2 and 5.3 do not apply to a pecuniary interest in any matter that a member may have,*

*(h) ...by reason only of the member being a member of a board, commission, or other body as an appointee of a council or local board;*

*Therefore, there is no conflict of interest which arises for the Councillor solely as a result of his 'dual role' because he is appointed by Council to the SVCA.*

*By reason of this exception, the Councillor was not in a conflict of interest when he participated in Council's consideration of the MOU with the SVCA, notwithstanding that the MOU contemplates financial contribution by the Township.*

### *Property ownership outside of SVCA regulated or screening areas (flood zone areas)*

*Based on our review of SVCA mapping we are satisfied that the Councillor does not own property within the SVCA flood zone areas. His property lies approximately 800 metres beyond the nearest SVCA screening area.*

*Where a member's property is situated outside the area affected by a decision of Council (typically a planning application matter, but in the case of a flood regulated area, the analysis is the same), case law provides guidance for determining whether the proximity gives rise to a conflict of interest. The 'rule of thumb' which is utilized by the courts and integrity commissioners places reliance on the notice distance mandated under the Planning Act – the distance from any planning application within which all properties lying in that radius receive notice of the application. This distance is 120 metres.*

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*Given that the Councillor's property lies 800 metres from the nearest SVCA screening area, no conflict of interest arises as a result of proximity to the SVCA flood zone.*

### Interest in Common

*Even where a member of Council owns a property located **within** an area affected by a decision of Council, if the member's property is similarly situated and no differently affected than a large number of other properties, that member may be deemed to have an interest in common.*

*4 Sections 5, 5.2 and 5.3 do not apply to a pecuniary interest in any matter that a member may have,*

*(j) by reason of the member having a pecuniary interest which is an interest in common with electors generally;*

*In the present circumstances, where the lands affected are quite vast, and many dozens if not hundreds of property owners are similarly situated, an interest arising from ownership of a property within the flood zone area would constitute an interest in common.*

*For these above reasons, we find that your complaint against Councillor Allison is not substantiated.*

*Having reviewed your concerns and finding no contravention, we will be concluding our involvement and closing our file. The Councillor will be notified of our disposition in this matter.*

Please let us know if you have any questions.

Sincerely,

Principles *Integrity*,  
Integrity Commissioner