January 18, 2019

Michael Helfinger

Intergovernmental Policy Coordination Unit

900 Bay Street, Hearst Block, 7th Floor

Toronto, ON M6H 4L1

Dear Mr. Helfinger:

**Re: Bill 66, Restoring *Ontario’s Competitiveness Act*, 2018**

On behalf of Public Health Sudbury & Districts, I am writing today to provide comment on *Bill 66, Restoring Ontario’s Competitiveness Act, 2018*. Public Health Sudbury & Districts is required to implement the Ontario Public Health Standards of the MOHLTC, including Safe Water, Infectious and Communicable Diseases Prevention and Control, and Healthy Environments programs.

Public Health Sudbury & Districts appreciates and supports the intention of Bill 66 to enhance employment opportunities throughout Ontario and recognizes the health benefits of employment. However, we have serious concerns regarding potential negative consequences of Bill 66 on the health of Ontarians.

Schedule 3 – Ministry of Education: Amendments to the *Child Care and Early Years Act, 2014* and the *Education Act*.

Although Public Health Sudbury & Districts recognizes the efforts to enhance child care availability in Ontario, the proposed legislation raises concerns for child health and safety. With respect to child care providers, there is concern over caregiver/child ratio and quality of care. We highly recommend that the government evaluate the effects that this may have on child safety, infection prevention and control and developmental outcomes.

With the recommendation to reduce the age restriction from six years of age to four for registration in authorized recreation and skill building programs, there are safety concerns with respect to appropriate age grouping of children. It is recommended that the Ministry of Education be consulted to ensure that recreational activities are age appropriate and altered where necessary using an evidence-informed approach to accommodate the wider age range.

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Furthermore, authorized recreational and skill building programs are not proactively inspected for food safety and infection prevention and control by local public health units. There is potential for decreased hygienic practices with larger numbers of children congregating in one location. This is coupled with the risk of vaccine preventable diseases as the prescribed schedule for some doses of vaccines is not complete until age four to six. Additionally, facilities not routinely inspected may not have appropriate administrative (exclusion policies) and physical (appropriate cleaning and disinfection) infrastructures in place to prevent infections.

Schedule 5 – Ministry of Environment, Conservation and Parks: Repeal of the *Toxics Reduction Act, 2009*.

Public Health Sudbury & Districts recognizes the overlap that exists between federal and provincial programs in toxics reduction. It is recommended that rather than eliminating the *Toxics Reduction Act*, the province evaluate more effective opportunities for toxics reduction in Ontario that consider both healthy environments and reducing barriers for business.

Schedule 8 – Ministry of Health and Long-Term Care: Amendments to the *Long-Term Care Homes Act, 2007*.

Public Health Sudbury & Districts would want to ensure that temporary emergency licenses to accommodate persons affected by a temporary emergency are following measures that protect patient health and safety. A plan would need to be put in place to ensure that local health units are notified of the temporary licenses prior to placing/relocating patients in order to assess infection control, health hazard and food safety practices.

Schedule 10 – Ministry of Municipal Affairs and Housing: Amendments to the *Planning Act*.

As part of the Ontario Public Health Standards, Public Health Sudbury & Districts has an obligation to “reduce exposure to health hazards and promote the development of healthy built and natural environments that support health and mitigate existing and emerging risks”. We are concerned by the proposed amendments in Schedule 10 as these may compromise protected naturalized areas in favour of economic interests. Current legislation is in place to protect important drinking water sources, prevent exposure to health hazards, reduce potential disaster effects and preserve important greenspaces including agricultural lands, forests, marshes and parks. These protected areas provide multiple health, economic and environmental benefits that largely outweigh the use of these lands for alternate purposes.

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Of particular concern to Public Health Sudbury and Districts is the potential for exemptions from the source water protection clause of the *Clean Water Act*, 2006 put in place following the Walkerton Tragedy. This Act requires land-use planning decisions in the province to meet local Source Water Protection Plans designed to protect drinking water sources. Schedule 10 has major implications for public health and safety as there is the potential to jeopardize safe drinking water for the immediate community as well as those downstream or on the same aquafer. Public Health Sudbury and Districts strongly recommends that Bill 66 not be allowed to supersede the *Clean Water Act,* 2006.

We are concerned that Bill 66 weakens current legislation designed to protect the health and safety of Ontario residents. Further it is unaligned with the new provincial Made-in-Ontario Environment Plan which serves to enhance efforts to protect these important naturalized areas.

We respectfully ask the government to consider the impacts on the health of the public prior to Bill 66 proceeding through the legislative process. Despite the potential gains this legislation could create, Public Health Sudbury & Districts believes the negative impacts could greatly outweigh the benefits. We thank you for the opportunity to provide comment and your consideration of our feedback. If you have questions regarding our comments please contact my office at 705.522.9200, ext 291 or Burgess Hawkins, Manager at ext 218.

Sincerely,

*Original signed by*

Penny Sutcliffe, MD, MHSc, FRCPC

Medical Officer of Health and Chief Executive Officer

PS:ldp