

alPHa's members are  
the public health units  
in Ontario.

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Boards of Health  
Section

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Medical Officers of  
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**Organizations:**

Association of Ontario  
Public Health Business  
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Association of  
Public Health  
Epidemiologists  
in Ontario

Association of  
Supervisors of Public  
Health Inspectors of  
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Health Promotion  
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Ontario Association of  
Public Health Dentistry

Ontario Association of  
Public Health Nursing  
Leaders

Ontario Dietitians in  
Public Health

January 16, 2019

Hon. Todd Smith  
Minister of Economic Development, Job Creation and Trade  
900 Bay Street - Mowat Block, 6<sup>th</sup> Floor  
Toronto, ON M7A 1L2

Dear Minister Smith,

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

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On behalf of the Association of Local Public Health Agencies (alPHa) and its member Medical Officers of Health, Boards of Health and Affiliate organizations, I am writing today to provide comments on aspects of Bill 66, Restoring Ontario's Competitiveness Act, which we believe could have negative consequences for the health of Ontarians.

Bill 66 contains exemptions to several key legislative provisions that are in place to protect the health of the people. As public health professionals, we are on the front lines of protecting the people of Ontario from threats to their health and we have obligations under the Ontario Public Health Standards 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". Specific requirements include collaborating with municipalities under the Ontario Planning Act to reduce exposure to environmental health hazards in the community, which includes examining and addressing the potential impacts of land use decisions on ground water sources.

We are therefore troubled by the list in Schedule 10 of the Bill that itemizes the legislated environmental protections that could be suspended in favour of commercial interests and job creation. Far from being "red tape", these provisions are in place to protect healthy environments and prevent the introduction of and exposure to health hazards. It is very difficult to interpret exempting business from these provisions as anything other than eliminating their obligations to minimize their negative impacts on the environments within which they operate.

We are particularly concerned by the potential for exemptions from the source water protection clause of the Clean Water Act, 2006 that requires land-use planning decisions in the province to protect safe drinking water, which was passed in the wake of the May 2000 outbreak of *E. coli* O157:H7 in Walkerton, Ontario that killed 7 people and made over 2,300 – more than half of the town's population - seriously ill. Since that time, Ontario has applied the lessons learned from this tragedy to become a world leader in ensuring the availability of safe drinking water through a strict regulatory regime that includes source-to-tap protection, treatment, monitoring, and swift public notification of any potential hazards.

To exempt commercial interests from any part of this regime is to weaken a link in the strong regulatory chain that has made Ontario's drinking water among the safest and best protected in the world, putting the health of the people of Ontario at risk. We therefore strongly recommend that any potential exemptions to the legislated protections of Ontario's water sources be removed from Bill 66.

We would be pleased to meet with you to discuss our submission. To schedule a meeting, please contact Loretta Ryan, Executive Director, at [loretta@alphaweb.org](mailto:loretta@alphaweb.org) or 647-325-9594.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R. Kyle', written in a cursive style.

Dr. Robert Kyle,  
alPHa President

**COPY:** Hon. Christine Elliott, Deputy Premier & Minister of Health and Long-Term Care  
Hon. Steve Clark, Minister of Municipal Affairs and Housing  
Hon. Rod Phillips, Minister of the Environment, Conservation and Parks  
Dr. David Williams, Chief Medical Officer of Health  
Hon. Bill Walker, MPP, Bruce-Grey-Owen Sound