

**2026**

# **Proposed Policy Resolutions**

Annual General Meeting  
Ottawa



ontario  
chamber of  
commerce

## Proposed Resolutions: 2026 Annual General Meeting

This booklet contains proposed policy resolutions for debate at the Annual General Meeting (“AGM”) of the Ontario Chamber of Commerce (“OCC”) on **April 24-25, 2026**. They have been developed by our network of affiliated local chambers of commerce and boards of trade (the “Chamber Network”).

In 2026, **34 resolutions** are to be debated on the floor at the AGM. Each resolution has been reviewed by the OCC’s Policy and Advocacy Committee (“PAC”), comprised of representatives from the Chamber Network and the OCC’s corporate members.

The PAC is mandated to ensure that all resolutions presented for consideration at the AGM meet the following criteria:

- The issue is a business issue.
- The issue is deemed important enough to be on the legislative agenda of the government or be of considerable concern to most members.
- The issue is provincial in scope or impact.
- The resolution does not pit one industry or region of Ontario against another.
- The resolution does not duplicate any existing resolutions. Duplicative resolutions will be considered invalid.

Resolutions must also employ best efforts to specify funding sources, where appropriate, for any Ontario Government policy or action it recommends be taken.

PAC’s feedback, according to the above criteria, has been reflected within this booklet as follows:

Recommendation	Description
<b>Support</b>	As the resolution meets the required criteria, no feedback is reflected within the booklet.
<b>Support as Amended</b>	Following its review, PAC worked with the resolution’s author to amend the proposal. The final proposal is published in this booklet.
<b>No Consensus</b>	PAC was unable to reach consensus; rationale is outlined.
<b>Does not Support</b>	The resolution does not meet one or more of the required criteria and PAC determined it could not be supported.

During the debate, proposed resolutions will be discussed and debated, with voting delegates being asked to adopt or defeat the resolution.

It is important to note that only the **recommendations** contained within the proposed resolutions are open for debate, rather than the “issue” and “background” sections.

If adopted at the AGM, policy resolutions will be included in the Compendium of Resolutions and will form part of the Ontario Chamber’s advocacy agenda for the next three years. In addition to policies approved at the AGM, the Ontario Chamber actively responds to emerging issues as they develop, working through its policy councils to advance its policy pipeline and broader advocacy agenda.

## Resolutions Debate Procedures

Prior to debating the proposed resolutions, a motion will be presented to place the entire policy book on the floor. This avoids the need to present a new motion to adopt each resolution as they are brought forward.

### Resolution Debate

#### 1. Introduction:

Discussion for each resolution will begin with the moderator naming the proposed resolution. A representative from the sponsoring group (i.e., the submitting chamber/board of trade) is entitled to make a brief statement (approximately one minute) concerning the proposed resolution.

- a. If the PAC did not support, or if they were unable to reach consensus on the proposed resolution, an OCC staff member representing the PAC may provide a brief comment.

#### 2. Debate:

All delegates will have the opportunity to discuss the proposed resolution. Although everyone is allowed to participate in the debate, only voting delegates have the right to move or second motions, amendments or other motions to vote.

- a. If making remarks, a delegate must wait to be recognized by the moderator and must identify themselves and their organization before they begin. Due to limited time for policy debates, the OCC asks all delegates to keep their commentary up to **60 seconds**.

#### 3. Voting:

Voting delegates are responsible for making voting decisions in accordance with their beliefs about what is in the best interests of the OCC's policy agenda.

Delegates have two (2) voting options for each proposed resolution:

- a. **To adopt it** – with or without amendments – thus making it official OCC policy; or
- b. **To defeat it.**

### Voting Governance

The policy debate is governed by Robert's Rules of Order. It is OCC policy to require a **50% plus one** of the voting delegates to pass any motion or amendment.

## 2026 OCC AGM

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## Competitiveness: Summary of Committee Feedback

Resolution	Organization	PAC Recommendation
1. Ensuring Access to In-Person Banking Services in Small and Rural Ontario Communities	Georgina Chamber of Commerce	Does Not Support
2. Strategic Provincial Investment in Municipal Infrastructure and Tax Equity	Chatham-Kent Chamber of Commerce	No Consensus
3. Strengthening Ontario's Advanced Manufacturing Competitiveness Through Enhanced Investment Supports	Oakville Chamber of Commerce	Support

# 1. Ensuring Access to In-Person Banking Services in Small and Rural Ontario Communities

<b>PAC RECOMMENDATION</b>
<b>Does Not Support</b>
<p>The Committee does not support this resolution due to jurisdictional concerns. As banks are federally regulated and branch siting is a private business decision, provincial government action is limited. PAC recommends focusing only on provincially regulated recommendations, while adding rationale to justify any action with fiscal impact.</p> <p><b>PAC has discussed feedback with the authoring chamber and has requested amendments be made at the AGM debate.</b></p>

**Submitted by:** Georgina Chamber of Commerce

**Co-sponsored by:** Prince Edward County Chamber of Commerce, Belleville Chamber of Commerce, Muskoka Lakes Chamber of Commerce and the St. Thomas & District Chamber of Commerce

## Issue

Small and rural communities across Ontario are experiencing the steady closure of local bank branches, resulting in reduced or eliminated access to in-person banking services for residents and businesses.

According to the Bank of Canada, 67.7% of rural census subdivisions had no financial institution branch in 2019, increasing to 70.8% by 2022—demonstrating a growing gap in access to financial services. As closures continue, they disproportionately impact seniors, small businesses, farmers, not-for-profits, and individuals without reliable access to digital banking or transportation.

While banking regulation is a federal responsibility, the economic and social impacts of branch closures fall within areas of provincial jurisdiction, including rural economic development, consumer protection, infrastructure, and oversight of credit unions. Without targeted provincial action, these closures will continue to erode local economic capacity and community well-being.

## Background

Ontario’s small, rural, seasonal, and tourism-based communities depend on reliable access to in-person banking services to support local commerce, employment, agriculture, and community development.

Although digital banking continues to expand, it does not meet the needs of all Ontarians. Many rural communities face barriers including aging populations, limited public transportation, and

inconsistent broadband connectivity. As a result, in-person banking remains essential for financial inclusion and economic participation.

The loss of bank branches also represents more than a reduction in services—it signals disinvestment, weakens local business environments, and reduces opportunities for growth and investment attraction.

### **Populations Most Impacted**

#### **Seniors**

- Seniors are more likely to rely on in-branch services for everyday transactions and financial guidance.
- In rural areas, limited transportation options increase barriers, safety concerns, and vulnerability to fraud.

#### **Small and Medium-Sized Businesses**

- Local businesses depend on nearby branches for cash handling, deposits, and access to credit.
- Closures increase travel time, costs, and security risks, particularly for cash-based operations. With three banks closing in Georgina in the past three years, businesses are having to travel 30 minutes or more (one-way) for deposits and in-person banking.

#### **Non-Profit and Community Organizations**

- Many non-profits rely on in-person banking for cheque processing, governance, and financial oversight.
- Bank branches also play a key role in sponsoring and supporting local community initiatives.

#### **Migrant and Temporary Foreign Workers**

- Workers in agricultural regions such as Prince Edward County rely on physical banking services to manage finances and send remittances.
- Language barriers, limited transportation, and lack of digital access increase their reliance on in-person services.

#### **Rural Residents Without Reliable Transportation**

- Residents may be required to travel 20–40 kilometres or more to access banking services, disproportionately impacting low-income individuals, seniors, and people with disabilities.

#### **Growing Communities and Future Residents**

- Communities experiencing population growth are seeing a reduction—not expansion—of financial services, undermining long-term planning, housing development, and investment confidence.

## Indigenous and Neighbouring Communities

- Limited access to banking services restricts economic participation and entrepreneurship, creating barriers to growth and reconciliation-focused economic development.

## Broader Impacts on Communities

- Increased reliance on costly third-party ATMs and cash-back services
- Higher transaction fees for residents and businesses
- Reduced support for local events, sponsorships, and community initiatives
- Vacant bank buildings contributing to economic decline and reduced investor confidence. This is evident in areas like Muskoka Lakes where the TD Bank in Bala has sat empty since November 2025 and Port Carling, where they are about to lose the Scotiabank at the top of the main retail area downtown.
- Greater strain on residents who must absorb the time and cost of accessing essential services

Access to in-person banking services remains a critical component of economic inclusion and community sustainability in Ontario's rural and small communities. While the decisions to open or close branches are made by financial institutions, the Province of Ontario has a clear and important role to play in mitigating the impacts of these closures.

By leveraging its authority in economic development, infrastructure, and credit union regulation, the province can help ensure that all Ontarians—regardless of geography—have equitable access to essential financial services.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

- 1. Align financial access with provincial infrastructure investments.**  
Ensure that provincial investments in infrastructure directly support access to financial services by:
  - a. Accelerating broadband expansion to enable reliable digital banking.
  - b. Enhancing rural and regional transportation options to improve access to in-person services.
  - c. Recognizing that digital solutions must be supported by both connectivity and mobility.
- 2. Recognize in-person banking access as essential economic infrastructure.**  
Acknowledge access to in-person financial services as critical to the sustainability of rural, northern, and tourism-based communities, and incorporate this consideration into provincial economic development and community planning frameworks
- 3. Leverage provincial policy tools to support access to financial services.**  
Utilize provincial economic development programs, consumer protection frameworks, and community partnerships to incentivize and support the presence of in-person financial services in underserved areas.

**4. Strengthen and modernize the credit union system.**

As provincially regulated entities, enable credit unions to play a greater role in addressing service gaps by:

- a. Modernizing regulatory frameworks to support growth and innovation.
- b. Providing targeted incentives for rural expansion.
- c. Encouraging shared-service and community-based delivery models.

**5. Advocate for rural banking access through federal collaboration**

Work collaboratively with the federal government and financial institutions to:

- a. Highlight the regional economic impacts of branch closures.
- b. Share Ontario-based data and case studies.
- c. Advocate for national approaches that reflect the realities of rural and small communities.

## 2. Strategic Provincial Investment in Municipal Infrastructure and Tax Equity

PAC RECOMMENDATION
<b>No Consensus</b>
<p>The Committee was unable to reach consensus due to:</p> <ul style="list-style-type: none"><li>• Overlap between the recommendations and existing policies/programs and existing property tax-related OCC resolutions; and</li><li>• Fiscal and administrative capacity impact on small and rural communities.</li></ul> <p>PAC also noted that while smaller communities face higher infrastructure costs, these should not dissuade municipal councils from advancing high-density housing that supports growth objectives.</p> <p><b>PAC discussed feedback with the authoring chamber and requested amendments be made at the AGM debate.</b></p>

**Submitted by:** Chatham-Kent Chamber of Commerce

**Co-sponsored by:** Windsor-Essex Chamber of Commerce, St. Thomas & District Chamber of Commerce, Greater Sudbury Chamber of Commerce, Belleville Chamber of Commerce, Greater Barrie Chamber of Commerce, Brockville and District Chamber of Commerce, and the Peterborough and Kawarthas Chamber of Commerce

### Issue

Ontario's business competitiveness depends on reliable, well-maintained municipal infrastructure and equitable tax policy. Currently, municipalities face a structural mismatch between responsibilities and revenues: they must deliver critical economic-enabling infrastructure from a narrow property tax base while business taxpayers carry disproportionate burdens and provincial funding formulas ignore the distinct cost structures of rural, agricultural, and urban communities. This undermines productivity, discourages investment, and constrains the GDP growth that benefits all Ontarians.

### Background

Ontario's business community views municipal infrastructure not as municipal expense but as provincial economic capital. Roads, bridges, water systems, industrial land, and broadband form the platform on which private enterprise operates: goods movement, manufacturing inputs, workforce access, digital commerce, and site selection all depend directly on infrastructure quality and reliability.<sup>1</sup> When the Province funds this infrastructure strategically, it generates

<sup>1</sup> Tassonyi, A. T. (2022). Financing Local Government and Development in Canada in the Aftermath of a Global Pandemic: Continuity and Change. *Canadian Tax Journal*, 70 (supp.), 97-132.; Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.

multiplier effects that exceed initial expenditure through increased productivity, private capital attraction, employment growth, and expanded future tax capacity.<sup>2</sup>

The current reality contradicts this investment logic. Ontario municipalities face an infrastructure deficit estimated at over \$60 billion, with one-third of assets in fair, poor, or very poor condition.<sup>3</sup> Deferred maintenance and deteriorating infrastructure impose direct costs on business through supply chain disruptions, higher logistics expenses, service unreliability, and reduced competitiveness relative to jurisdictions with modern infrastructure.<sup>4</sup> For firms making location and expansion decisions, infrastructure quality is a primary competitiveness factor—the Province's failure to ensure adequate, predictable municipal infrastructure funding is, fundamentally, a failure to invest in economic growth.<sup>5</sup>

Ontario's provincial-municipal fiscal relationship suffers from vertical fiscal imbalance: municipalities have been assigned expanding responsibilities—housing, homelessness responses, climate adaptation, social services—yet have limited access to growth-sensitive revenue sources.<sup>6</sup> The property tax, which funds 52% of municipal revenues, cannot sustainably support both traditional local services and province-driven mandates.<sup>7</sup> This creates two direct business impacts.

Facing revenue constraints, municipalities rely disproportionately on commercial and industrial taxpayers. In many communities, business properties pay tax rates 1.5 to 2.5 and in some communities 6-8 times residential rates on equivalent assessed value (e.g., commercial ratio 1.9 and industrial rates 6.0-8.4 versus residential 1.0), yet business does not consume local services proportionally.<sup>8</sup> Recreation facilities, local roads, libraries, and many social programs primarily serve residents but are substantially funded through business property taxes. This structural inequity raises business operating costs, penalizes capital-intensive investment, and reduces Ontario's competitiveness against jurisdictions with more balanced tax structures.<sup>9</sup>

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<sup>2</sup> Tassonyi, A. T. (2022). Financing Local Government and Development in Canada in the Aftermath of a Global Pandemic: Continuity and Change. *Canadian Tax Journal*, 70 (supp.), 97-132.; Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.

<sup>3</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto; Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30.

<sup>4</sup> Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30.

<sup>5</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.

<sup>6</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.; Papcunová, V., Hudáková, J., Štubňová, M., & Urbaníková, M. (2020). Revenues of Municipalities as a Tool of Local Self-Government Development: Comparative Study. *Administrative Sciences*, 10(4), 101.

<sup>7</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.

<sup>8</sup> Municipality of Chatham-Kent. (2025). Tax Policy 2025. Report to Mayor and Members of Council. Chatham-Kent: Financial Services Department.; Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto

<sup>9</sup> Municipality of Chatham-Kent. (2025). Tax Policy 2025. Report to Mayor and Members of Council. Chatham-Kent: Financial Services Department.; Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto

Unable to raise sufficient revenue without politically unsustainable tax increases, municipalities defer capital projects and maintenance. The result: declining infrastructure condition, service disruptions, and mounting long-term liabilities that threaten both municipal fiscal health and business productivity.<sup>10</sup>

Provincial funding formulas based primarily on population systematically disadvantage rural and agricultural municipalities. These communities face fundamentally different economics: vast geographic areas, dispersed populations, low-density settlement, extensive gravel and paved road networks, long linear water and wastewater systems, and heavy infrastructure (bridges, culverts) supporting agricultural equipment and resource extraction.<sup>11</sup> Per-capita and per-kilometre costs are significantly higher than in dense urban centres, yet per-kilometre assessment is far lower.<sup>12</sup>

Agriculture contributes over \$47 billion annually to Ontario's economy, yet farmland carries preferential tax treatment (typically 20-25% of residential rates) to preserve farm viability.<sup>13</sup> Rural municipalities must maintain farm-to-market roads, industrial land for agri-food processing, and rural broadband with constrained fiscal capacity.<sup>14</sup> Urban municipalities, meanwhile, face congestion, intensification pressures, growth-related capital demands, and aging underground systems requiring massive renewal investment.<sup>15</sup>

Current provincial infrastructure programs fail to differentiate adequately between these realities. A funding formula that treats a rural municipality with 5,000 residents spread across 500 square kilometres the same as a dense urban suburb with 5,000 residents in five square kilometres ignores basic cost economics and guarantees inequitable outcomes.<sup>16</sup> Modern infrastructure policy must explicitly weight geographic factors, density, linear infrastructure per capita, agricultural land use, and economic function—not simply population headcount.<sup>17</sup>

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<sup>10</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.;

Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30.

<sup>11</sup> Vodden, K., & Hall, H. (2016). Bringing Municipalities into Rural Community Development: Issues and Prospects in Newfoundland and Labrador. *Journal of Rural and Community Development*, 11(4), 58-78. ; Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30.

<sup>12</sup> Vodden, K., & Hall, H. (2016). Bringing Municipalities into Rural Community Development: Issues and Prospects in Newfoundland and Labrador. *Journal of Rural and Community Development*, 11(4), 58-78. ; Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30.

<sup>13</sup> Municipality of Chatham-Kent. (2025). Tax Policy 2025. Report to Mayor and Members of Council. Chatham-Kent: Financial Services Department.

<sup>14</sup> Vodden, K., & Hall, H. (2016). Bringing Municipalities into Rural Community Development: Issues and Prospects in Newfoundland and Labrador. *Journal of Rural and Community Development*, 11(4), 58-78.; Municipality of Chatham-Kent. (2025). Tax Policy 2025. Report to Mayor and Members of Council. Chatham-Kent: Financial Services Department.

<sup>15</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.

<sup>16</sup> Vodden, K., & Hall, H. (2016). Bringing Municipalities into Rural Community Development: Issues and Prospects in Newfoundland and Labrador. *Journal of Rural and Community Development*, 11(4), 58-78. ; Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30

<sup>17</sup> Vodden, K., & Hall, H. (2016). Bringing Municipalities into Rural Community Development: Issues and Prospects in Newfoundland and Labrador. *Journal of Rural and Community Development*, 11(4), 58-78. ; Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30

## The Path Forward: Strategic Reform in Four Dimensions

From a business advocacy perspective, the Province must implement integrated reforms across four dimensions to create an infrastructure and tax framework that supports, rather than hinders, economic growth and competitiveness.<sup>18</sup>

**Dimension 1: Predictable, legislated infrastructure funding.** Multi-year funding envelopes—not application-based, politically driven project grants—allow municipalities to undertake strategic asset management, plan capital programs, and create the certainty needed for business investment decisions.<sup>19</sup> Legislated funding also enables private sector co-investment by reducing policy risk.<sup>20</sup>

**Dimension 2: Cost-based, equity-focused funding formulas.** Formulas must reflect the economic function of infrastructure (goods movement, industrial servicing, agricultural supply chains) and the cost drivers specific to municipal types (rural lane-kilometres and bridges, urban transit and intensification, agricultural land constraints).<sup>21</sup> Equal treatment does not mean identical treatment—it means proportional support relative to need and cost structure.<sup>22</sup>

**Dimension 3: Property tax rebalancing.** Provincial guidance on ratio ranges, transitional supports, and evidence-based impact analysis can enable municipalities to moderate extreme business tax ratios without destabilizing residential affordability.<sup>23</sup> This is not redistribution—it is aligning tax burden with service consumption and economic capacity.<sup>24</sup>

**Dimension 4: Revenue diversification.** Over time, modest provincial revenue sharing (e.g., a small, dedicated portion of consumption or income tax) or expanded user-fee authority tied to benefits-received principles can reduce over-reliance on property taxes and create fiscal space for infrastructure investment without unsustainable tax increases.<sup>25</sup>

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<sup>18</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto

<sup>19</sup> Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30.; Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.

<sup>20</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.

<sup>21</sup> Vodden, K., & Hall, H. (2016). Bringing Municipalities into Rural Community Development: Issues and Prospects in Newfoundland and Labrador. *Journal of Rural and Community Development*, 11(4), 58-78. ; Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30.

<sup>22</sup> Vodden, K., & Hall, H. (2016). Bringing Municipalities into Rural Community Development: Issues and Prospects in Newfoundland and Labrador. *Journal of Rural and Community Development*, 11(4), 58-78

<sup>23</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.; Municipality of Chatham-Kent. (2025). Tax Policy 2025. Report to Mayor and Members of Council. Chatham-Kent: Financial Services Department.

<sup>24</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.; Municipality of Chatham-Kent. (2025). Tax Policy 2025. Report to Mayor and Members of Council. Chatham-Kent: Financial Services Department.

<sup>25</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.; Municipality of Chatham-Kent. (2025). Tax Policy 2025. Report to Mayor and Members of Council. Chatham-Kent: Financial Services Department.

## The Business and Fiscal Case for Reform

Strategic provincial investment in municipal infrastructure, coupled with property tax equity and revenue diversification, yields direct economic returns. Improved infrastructure reduces business operating costs, attracts private capital, raises productivity, and generates GDP growth that expands future provincial revenues through income, sales, and corporate taxes.<sup>26</sup> Fairer tax treatment improves Ontario's investment competitiveness and signals to firms that the Province values business capital and job creation.<sup>27</sup>

At the same time, equitable funding across rural, agricultural, and urban municipalities ensures that all regions can support economic activity: agricultural production and agri-food processing, resource extraction and value-added manufacturing, tourism and recreation, and the diverse industries that depend on reliable roads, water, broadband, and industrial land.<sup>28</sup> In a slow-growth, high-competition environment, Ontario cannot afford policies that disadvantage rural economies or penalize business investment through structural tax inequity and infrastructure underinvestment.<sup>29</sup>

This is not a municipal issue—it is a provincial economic competitiveness strategy that happens to be implemented through municipal infrastructure and tax policy.<sup>30</sup> The return on asset is measurable, the fiscal case is sound, and the business case is compelling.<sup>31</sup>

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Enact a Provincial–Municipal Infrastructure Partnership providing stable, formula-based, multi-year funding for core economic-enabling infrastructure (roads, bridges, water, wastewater, industrial land, broadband) and a dedicated stream for housing, homelessness, and shelter capital, as well as operational funds.

<sup>26</sup> Tassonyi, A. T. (2022). Financing Local Government and Development in Canada in the Aftermath of a Global Pandemic: Continuity and Change. *Canadian Tax Journal*, 70 (supp.), 97-132. ; Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.

<sup>27</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.

<sup>28</sup> Vodden, K., & Hall, H. (2016). Bringing Municipalities into Rural Community Development: Issues and Prospects in Newfoundland and Labrador. *Journal of Rural and Community Development*, 11(4), 58-78. ; Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30.

<sup>29</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.; Papcunová, V., Hudáková, J., Štubňová, M., & Urbaníková, M. (2020). Revenues of Municipalities as a Tool of Local Self-Government Development: Comparative Study. *Administrative Sciences*, 10(4), 101.

<sup>30</sup> Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.

<sup>31</sup> Tassonyi, A. T. (2022). Financing Local Government and Development in Canada in the Aftermath of a Global Pandemic: Continuity and Change. *Canadian Tax Journal*, 70 (supp.), 97-132.; Côté, A., & Fenn, M. (2014). Provincial-Municipal Relations in Ontario: Approaching an Inflection Point. *IMFG Papers on Municipal Finance and Governance No. 17*. Toronto: Institute on Municipal Finance and Governance, University of Toronto.; Cooper, T., Downer, P., & Faseruk, A. (2020). The Design, Funding, and Management of Infrastructure in Local Municipalities: A Study from Canada. *Journal of Applied Business and Economics*, 22(8), 11-30.

2. Require all major municipal infrastructure programs to use formulas that weight rural lane-kilometres, bridges, density, linear water/wastewater/broadband infrastructure, and reduced farmland tax ratios, and that guarantee rural minimum per-capita and per-kilometre allocations.
3. Lead a comprehensive fiscal review to (a) align provincial mandates with predictable funding, (b) explore modest provincial revenue sharing and expanded user-fee tools, and (c) enable gradual, supported moderation of excessive commercial and industrial tax ratios based on evidence of service use and competitiveness impacts.
4. Make provincial infrastructure funding conditional on robust asset management plans and require standardized, publicly reported municipal fiscal and infrastructure indicators, disaggregated for rural and urban municipalities.
5. Establish a formal table with business, rural and urban municipalities, and key ministries to co-design and monitor these reforms, assess economic and competitiveness impacts, and track progress in closing Ontario's municipal infrastructure gap.

### 3. Strengthening Ontario’s Advanced Manufacturing Competitiveness Through Enhanced Investment Supports

**Submitted by:** The Oakville Chamber of Commerce

#### Issue

Ontario’s manufacturing sector is facing growing global competition as other jurisdictions offer more aggressive, longer-term investment incentives. While the province has introduced programs such as the Ontario Made Manufacturing Investment Tax Credit (OMMITC) and the Advancing Ontario Made Manufacturing Plan, existing supports lack the scale, duration, and firm-specific flexibility needed to attract major investments and help small and medium-sized manufacturers modernize and expand.

#### Background

Ontario’s manufacturing sector continues to be a foundational element of the provincial economy producing more than 40 per cent of Canada’s total manufacturing output, generating over \$100 billion in annual exports, and supporting more than 700,000 direct jobs across the province. The sector is deeply interconnected with Ontario’s innovation ecosystem, natural resource industries, and service economy, driving technological advancement and community prosperity across both urban and rural regions.<sup>32</sup>

However, global competition for advanced manufacturing investment has intensified sharply. U.S. states and other international jurisdictions are deploying highly competitive tax credits, direct grant programs, and long-term funding guarantees to attract new facilities and re-shoring projects. Many major capital investments now hinge on the availability of multi-year financial certainty, as investors weigh options between countries and regions with comparable infrastructure and workforce advantages.

Ontario has taken important steps in recent years to strengthen its industrial foundation by introducing the Ontario Made Manufacturing Investment Tax Credit (OMMITC),<sup>33</sup> launching the Advanced Manufacturing Council 2024 Final Report<sup>34</sup> and expanding regional economic development programs. These initiatives demonstrate a clear recognition of manufacturing’s strategic importance. Yet, more can be done to provide the predictability, scale, and customization needed to remain globally competitive.

Manufacturers, particularly small and medium-sized enterprises (SMEs) continue to face challenges in financing technology adoption, scaling production, and maintaining productivity under rising capital and workforce costs. Programs are often complex, short-term, or geared toward larger firms with greater administrative capacity. At the same time, large-scale investors require a longer investment horizon to justify multi-million-dollar commitments in automation, clean technology, and digitization infrastructure.

<sup>32</sup> <https://cme-mec.ca/initiatives/manufacturing-ontarios-future/>

<sup>33</sup> <https://www.ontario.ca/page/ontario-made-manufacturing-investment-tax-credit-and-expanded-ontario-made-manufacturing>

<sup>34</sup> <https://www.ontario.ca/page/2024-advanced-manufacturing-council-final-report>

Expanding and diversifying Ontario's investment support would address these gaps, enhance business confidence, and attract sustained private-sector investment. Strengthening tax incentives such as the OMMITC would send a strong signal that Ontario is committed to long-term manufacturing success. Establishing a dedicated SME stream would ensure that smaller firms can access early-stage capital and technology supports, helping them integrate into the broader advanced manufacturing ecosystem. Increasing grant and loan programs would make Ontario's support levels comparable to partner jurisdictions and help secure new investment cycles.

Modernizing the province's manufacturing incentive framework will position Ontario to capitalize on nearshoring trends, foster advanced technology adoption, and sustain the province's reputation as a North American leader in manufacturing excellence and innovation.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Strengthen and broaden investment tax credits by extending the enhancing the Ontario Made Manufacturing Investment Tax Credit (OMMITC) rate of 15 per cent for a 10-year period (through to 2035) to align with the Advancing Ontario Made Manufacturing Plan, providing long-term certainty for large capital projects.
2. Develop and action an Ontario Advanced Manufacturing Build Strategy, leveraging recommendations from the 2024 Advanced Manufacturing Council final report and stakeholder consultations.
3. Expand direct financial support (grants and loans) by increasing grant amounts under existing manufacturing, technology, and regional economic development programs, such as the Ontario Together Fund, Trade Impacted Communities Program, and the Ontario Made Manufacturing Investment Tax Credit, to ensure Ontario's support levels are competitive with leading U.S. jurisdictions and other Canadian provinces.
4. Increase repayment terms for interest free or low interest manufacturing loans by extending the standard repayment period beyond the current four-year post completion schedule used in programs such as the Advanced Manufacturing and Innovation Competitiveness (AMIC) stream, to better reflect the long asset life and payback periods of major manufacturing capital projects.

## **Fiscal/Taxation: Summary of Committee Feedback**

<b>Resolution</b>	<b>Organization</b>	<b>PAC Recommendation</b>
4. Establishing a Retail-Accessible Ontario Emerging Entrepreneurs Fund (O-EEF) Pilot to Strengthen SME Capital Formation and Productivity	Whitby Chamber of Commerce	<b>Support</b>
5. Exempt Northern and Rural Ontario from the Non-Resident Speculation Tax	Thunder Bay Chamber of Commerce	<b>Support as Amended</b>
6. Tax Credit Reform: A Catalyst for Ontario's Film and Television Sector Growth	The Greater Kingston Chamber of Commerce	<b>Support as Amended</b>

## 4. Establishing a Retail-Accessible Ontario Emerging Entrepreneurs Fund (O-EEF) Pilot to Strengthen SME Capital Formation and Productivity

**Submitted by:** Whitby Chamber of Commerce

**Co-sponsored by:** Burlington Chamber of Commerce, Peterborough and Kawartha Chamber of Commerce, Barrie Chamber of Commerce, Halton Hills Chamber of Commerce, Milton Chamber of Commerce, Orillia and District Chamber of Commerce, Greater Oshawa Chamber of Commerce, Chamber of Commerce Brantford-Brant and the North Durham Chamber of Commerce

### Issue

Ontario faces a persistent capital-formation gap for small and medium-sized enterprises (SMEs), particularly at the early and growth stages. This gap constrains domestic ownership, limits productivity growth, and reduces the ability of Ontario firms to scale.

Unlike peer Canadian jurisdictions—including British Columbia, Manitoba, and Saskatchewan—which offer investor tax incentives ranging from 30–45% to mobilize private capital into SMEs, Ontario has lacked a comparable investor-side mechanism since the cancellation of the Labour-Sponsored Venture Capital Corporation tax credit in 2011.

International competitors such as the United States and the United Kingdom actively incentivize long-term domestic investment in small businesses through mechanisms such as Qualified Small Business Stock and Venture Capital Trusts. These tools have contributed to stronger capital markets and higher SME productivity.

In Ontario, SME financing remains disproportionately intermediated through banks and institutional venture capital, leaving retail investors largely excluded from direct participation in the growth of Ontario enterprises. This over-reliance on debt financing and foreign capital weakens SME balance sheets, increases risk exposure, and limits local retention of economic upside.

Despite strong entrepreneurial capacity and evident investor interest, business investment and productivity growth in Ontario remain weak—indicating a structural policy gap rather than a lack of market demand. Ontario households hold substantial investable assets but lack practical, diversified, and tax-efficient pathways to deploy capital into Ontario-based SMEs.

Strengthening SME capital formation therefore requires crowding in private capital from a broader range of actors, rather than substituting public funding for private risk.

### Background

SMEs are a foundational driver of Ontario's economic growth, innovation, and employment. However, early-stage and growth-stage firms face chronic challenges accessing patient, equity-based capital. Existing financing channels skew toward debt or institutional venture capital,

which may not align with the long-term reinvestment and productivity objectives of domestic SMEs.

Other Canadian provinces have successfully mobilized private capital by offering targeted investor incentives, while maintaining fiscal discipline through program caps and oversight. Similarly, international models demonstrate that well-regulated, long-term retail participation in SME equity can strengthen domestic capital markets, improve productivity outcomes, and broaden economic participation.

Ontario's absence of a modern, retail-accessible SME investment framework places its businesses at a competitive disadvantage and limits opportunities for Ontarians to invest directly in the province's economic growth. A time-limited, tightly governed pilot program would allow Ontario to test a balanced approach—mobilizing private capital while protecting investors and public finances.

## Recommendations

That the Ontario Chamber of Commerce urge the Government of Ontario to:

1. **Establish a time-limited, capped pilot Ontario Emerging Entrepreneurs Fund (O-EEF)** designed to mobilize long-term, patient private capital into eligible Ontario SMEs.
2. **Structure the O-EEF pilot to enable participation beyond banks and traditional venture capital**, including retail investors, through regulated and diversified investment vehicles.
3. **Provide targeted investor incentives for certified O-EEF investments**, including:
  - a. A non-refundable provincial investment tax credit for equity invested in certified O-EEF vehicles;
  - b. A provincial personal income tax exemption on dividends derived from certified O-EEF investments, time-limited and conditional on compliance; and
  - c. Targeted provincial capital gains relief for long-term holdings, subject to holding-period requirements and annual caps.
4. **Facilitate retail investor access exclusively through pooled, professionally managed structures**, including but not limited to:
  - a. Licensed fund managers;
  - b. Regulated financial institutions; and
  - c. Approved digital investment platforms, ensuring diversification, investor protection, and regulatory oversight.
5. **Require participating SMEs to comply with enforceable discipline**, including:
  - a. Minimum reinvestment thresholds for after-tax profits;
  - b. Restrictions on eligible uses of capital, including productivity enhancement, innovation, workforce growth, and export development; and
  - c. Clawbacks or penalties in cases of non-compliance.
6. **Implement explicit fiscal and governance guardrails for the pilot**, including annual program caps, independent oversight, public reporting, and a mandatory mid-term review prior to any program expansion.

## 5. Exempt Northern and Rural Ontario from the Non-Resident Speculation Tax

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Thunder Bay Chamber of Commerce

**Co-sponsored by:** Greater Sudbury Chamber of Commerce, Muskoka Lakes Chamber of Commerce, North Bay & District Chamber of Commerce, Timmins Chamber of Commerce

### Issue

The Non-Resident Speculation Tax (NRST), applied broadly across the province, imposes a significant and unintended barrier for foreign workers seeking to establish a home in the communities that need them most. While the tax was designed to curb speculative real estate investment, its provincewide application fails to reflect regional realities and is undermining economic growth outside major urban centres.

### Background

The 25% Non-Resident Speculation Tax (NRST) applies to the purchase or acquisition of an interest in residential property location anywhere in Ontario by individuals who are foreign nationals (individuals who are not Canadian citizens or permanent residents of Canada) or by foreign corporations or taxable trustees.<sup>35</sup> Implemented in 2017 under the Liberal government, it was intended to quell the trend of foreign speculators looking to turn a quick profit.

When first implemented, the NRST applied only to properties in the Greater Golden Horseshoe Region at a rate of 15 per cent. In March 2022, the government expanded the tax to cover the entire province and increased the rate to 20 per cent. Just months later, on October 24, 2022, the rate was raised again to the current 25 per cent.

At the time of the 2022 expansion, the Minister of Finance described the measure as “the most comprehensive Non-Resident Speculation Tax in the country,” arguing it was necessary to help young families, seniors, and workers struggling to find suitable housing. Yet despite these intentions, Ontario continues to face a severe housing shortage and escalating costs that have pushed home ownership further out of reach for many.

Exemptions to the NRST are limited. The Ontario Immigrant Nominee Program (OINP) provides relief to foreign applicants seeking gainful employment in Ontario. However, OINP processing can take months or years, does not cover all critical shortage occupations, and many foreign workers who would contribute meaningfully to Northern communities do not meet the program's

<sup>35</sup> <https://www.ontario.ca/document/non-resident-speculation-tax#section-6:~:text=the%20Act%20applies,->

strict eligibility criteria. This leaves a significant gap where skilled workers willing to establish permanent roots face a prohibitive tax barrier. The province also offers exemptions if the foreign national has refugee status or is purchasing property with a Canadian spouse.

While discouraging speculative investment is a reasonable policy goal, the Ministry of Finance has overlooked the unintended consequences of expanding the NRST across the entire province.

Northern and rural communities face a very different housing landscape than major urban centres, and the NRST fails to account for these regional realities. Rather than speculative buying, Northern and rural communities contend with long-term population decline, aging demographics, and persistent workforce shortages. Non-resident ownership supports workforce development, strengthens local economies, and contributes to municipal tax bases that support local infrastructure and fund essential services. A one-size-fits-all tax ignores these realities, discouraging investment and further constraining housing availability in communities already working to attract people and economic opportunity.

Attracting and retaining skilled labour is already a major challenge for employers in Northern and rural Ontario, and the expansion of the NRST has only made this harder. Businesses in these regions have long struggled to find qualified Canadian candidates for a wide range of roles - including healthcare, mining, forestry, hospitality and tourism - leaving them increasingly reliant on international talent to fill critical positions. By imposing a significant tax burden on foreign workers seeking to establish a home in the communities that need them most, the NRST directly undermines employers' ability to recruit and retain the workforce essential to sustaining local economies and community stability.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Exempt Northern and rural communities from the Non-Resident Speculation Tax for foreign nationals who commit to occupying the property as their primary residence or hold permanent employment in the community.
2. Conduct a regional impact assessment of the Non-Resident Speculation Tax in jurisdictions where it remains in effect to determine whether it is meeting its intended objectives and evaluate additional regional exemptions.

## 6. Tax Credit Reform: A Catalyst for Ontario’s Film and Television Sector Growth

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** The Greater Kingston Chamber of Commerce

**Co-sponsored by:** Belleville Chamber of Commerce, The Brockville & District Chamber of Commerce and the North Durham Chamber of Commerce

### Issue

Ontario’s film industry is a significant driver of regional economic activity and growth, generating large economic returns. Despite an expanding film industry, small and mid-sized towns capture only a limited share of production activity. In 2024, Ontario’s film and television production industry grew to \$2.65B and employed over 35,000<sup>36</sup> with most of this economic activity centered around Toronto and Northern Ontario which benefit from a dedicated stackable film fund. Small and mid-sized towns in Ontario, who are actively working to develop this important sector, have limited incentives unlike other provinces.

With independent producers increasingly being priced out of the GTA, it is a growing concern as we observe increasing competitiveness with nearby U.S. states like New Jersey, New York, and Illinois who now offer higher credits (up to 35–40%) that also stimulate rural growth. Without targeted adjustments, Ontario faces a growing risk of production leakage, as producers increasingly pursue more affordable and regionally supported ecosystems in jurisdictions such as Manitoba and Nova Scotia and elsewhere, who have proactively positioned themselves to capture both domestic and foreign productions.

### Background

Ontario’s film and television sector is now approaching \$3 billion in annual production spending and roughly 40,000 high-value full-time equivalent jobs.<sup>37</sup> The industry has seen significant growth in recent years with the number of productions nearly doubling in Ontario from 232 in 2020 to 419 in 2022.<sup>38</sup> During the production of the Ontario-created series Murdoch Mysteries, for every dollar of the Ontario Film & Television Tax Credit (OFTTC), \$5.58 were generated in economic output and added \$4.13 in GDP and \$3.15 in labor income. With every \$100,000 of the OFTTC, 4.6 full-time jobs were created and for every dollar of the Canadian Film or Video

<sup>36</sup> Actratoronto. [https://actratoronto.com/film-and-television-facts/?utm\\_source=chatgpt.com](https://actratoronto.com/film-and-television-facts/?utm_source=chatgpt.com)

<sup>37</sup> Ontario Creates Film and Television Production Impact. <https://www.ontariocreates.ca/assets/images/research/statistics/eng/2022-film-and-television-production-statistics-background-final.pdf>

<sup>38</sup> Ontario Creates Film and Television Production Impact. <https://www.ontariocreates.ca/assets/images/research/statistics/eng/2022-film-and-television-production-statistics-background-final.pdf>

Production Tax Credit (CPTC), production generated C\$15.97 in economic output, C\$11.81 in GDP and \$9.02 in labour income.<sup>39</sup>

Furthermore, there are proportionality variances within the current OFTTC Regional Bonus Program. For example, a city like Hamilton which falls within the ON Creates Regional Bonus map, will qualify for the 10% OFTTC bonus. However, rapid agglomeration since the map was created has effectively folded Hamilton into the broader Greater Toronto production ecosystem. In contrast, Cities more than 200 – 300 Kilometers from Toronto with populations under 500,000, don't actualize comparable proportional incentive support<sup>40</sup>. Additionally, the (OFTTC) Regional Bonus of 10%, currently only applies to Canadian productions, while the Ontario Production Services Tax Credit (OPSTC) applied to US/foreign service productions does not, which further limits the growth and prospects for sustained production in distant municipalities.

Ontario's film tax credits have been adjusted to great appreciation, many times through normal legislative or regulatory changes with little impact to the underlying framework. Ontario's 2022 Budget and regulatory updates extended credits to digital-only releases and broadened eligible expenses to include on-location site fees. The 2024 Budget similarly restructured the animation VFX credit to simplify eligibility.<sup>41</sup> In each case, the changes were handled as targeted amendments to the existing framework, not as wholesale rewrites. Extending the existing 10% OFTTC Regional Bonus to also apply to OPSTC, and adding a new stackable 5% Distance Bonus, the government would simply expand current language and eligibility. Crucially, these are funded credits (the government reimburses a percentage of spending), not upfront grants, so they function within budgetary controls. Economic analyses confirm these incentives have outsized payoffs. Because of this high return, a carefully scoped 5-year pilot (as proposed) could be enacted via regulatory amendment and monitored for impact.

A similar framework has seen proven success elsewhere. In Victoria BC, there is both a higher regional bonus of 12.5 percent for films produced outside of Vancouver, but also a 6 percent distant location bonus depending on subsequent kilometres from the city.<sup>42</sup> Consequently, Victoria saw around 60 million in film and television production.<sup>43</sup> Other mid-sized towns like Kelowna and Kamloops saw 10 million and 90 million in film production, respectively.<sup>44</sup> If the provincial government were to increase incentives for smaller towns and cities further from Toronto, similar success could be experienced here.

Ontario's Regional Bonus framework now requires targeted modernization to remain competitive in an increasingly aggressive North American production market. Extending Regional Bonus eligibility to OPSTC productions and introducing a modest stackable Distance Bonus for municipalities with populations under 500,000 located more than 200 km from Toronto would align Ontario's incentives with proven models used successfully in competing

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<sup>39</sup> Worldscreen, Murdoch Mysteries Economic Impact. <https://worldscreen.com/tvdrama/murdoch-mysteries-drives-over-c1-billion-in-economic-output-in-ontario/>

<sup>40</sup> Attracting Film . <https://www.ontariocreates.ca/assets/images/research/Attracting-Film-Production-to-Small-Town-Ontario.pdf?>

<sup>41</sup> Ontario budget. <https://budget.ontario.ca/2022/annex.html?>

<sup>42</sup> British Columbia Provincial Film and Television Tax Credit

<https://www.canada.ca/en/revenue-agency/services/tax/businesses/topics/corporations/provincial-territorial-corporation-tax/british-columbia-provincial-corporation-tax/british-columbia-film-television-tax-credit.html>

<sup>43</sup> Vancouver Island South Film and Media Commission

[Microsoft PowerPoint - F.6 Presentation Vancouver Island South Film Commission](#)

<sup>44</sup> Kamloops Film Impact Report

[TNFC says economic impact from movie shoots in 2025 'on par' with prior year - CastanetKamloops.net](#)

jurisdictions. Implemented as a time-limited pilot, this approach would distribute economic activity more proportionally across the province while strengthening Ontario's overall production competitiveness globally.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. A 5-year pilot to expand the existing 10 percent regional bonus of the OFTTC to include service productions as part of the OPSTC.
2. Providing a stackable additional 5 percent distance bonus to municipalities more than 200km or more from the greater Toronto area that have populations under 500,000 to eligible local production companies that have been in business for at least two years within the region, and have delivered at least one feature film or series that with a minimum budget of \$500,000 and that engaged at least 50% local hires.

## Infrastructure/Transportation: Summary of Committee Feedback

Resolution	Organization	PAC Recommendation
7. Drive Ontario's Automotive Future by Integrating Critical Minerals, Advanced Manufacturing, and Dual-Use Supply Chains	Windsor-Essex Regional Chamber of Commerce	Support as Amended
8. Oppose Excessive OMVIC Fee Increases and Strengthen Oversight to Protect Ontario Consumers and Dealers	Windsor-Essex Regional Chamber of Commerce	Do Not Support
9. Reducing Traffic Congestion on Ontario Highways Due to Vehicular Accidents	Tillsonburg Chamber of Commerce	No Consensus
10. Shifting Gears on Northern Ontario's Freight Corridors	Timmins Chamber of Commerce	Support as Amended
11. Strengthening Ontario's Airport System Through Provincial Leadership, Funding, and Planning	Sarnia-Lambton Chamber of Commerce	Support as Amended
12. Supporting Ontario Contractors and Expediting Infrastructure Builds by Addressing the Backlog of Ontario One Call Locate Requests Through Adaptive Technological Innovation	Timmins Chamber of Commerce	Support
13. Tripartite Agreement Renewal & Long-Term Transportation Prioritization	Toronto Region Board of Trade	Support as Amended
14. Turning Scrap into Strength: Provincial Metal Recycling Framework	Chamber of Commerce Brantford-Brant	Support as Amended

## 7. Drive Ontario’s Automotive Future by Integrating Critical Minerals, Advanced Manufacturing, and Dual-Use Supply Chains

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Windsor-Essex Regional Chamber of Commerce

**Co-sponsored by:** Chatham-Kent Chamber of Commerce, Guelph Chamber of Commerce, Orillia Chamber of Commerce, Halton Hill Chamber of Commerce, Leamington Chamber of Commerce, Burlington Chamber of Commerce, St. Thomas & District Chamber of Commerce, and the Greater Sudbury Chamber of Commerce

### Issue

Ontario’s automotive and advanced mobility ecosystem is being reshaped by electrification, software-defined vehicles, and intensifying global competition. Provincial supports remain fragmented and too narrowly focused on final assembly rather than the full value chain - including critical minerals, processing/refining, battery materials, automation, cybersecurity, and dual-use commercialization. Without an integrated strategy linking Northern critical-mineral assets to Southern manufacturing and aligning with federal measures, Ontario risks losing investment, intellectual property, and high-value jobs.

### Background

Ontario’s auto sector supports more than 100,000 workers and has attracted over \$46 billion in EV-battery and vehicle manufacturing investment in the past five years.<sup>45</sup> The province is home to deposits of 34 critical minerals, and the Ring of Fire contains one of the world’s largest chromite deposits.<sup>46</sup> The launch of Ontario’s \$500-million Critical Minerals Processing Fund provides a strong foundation for in-province refining and processing, supported by necessary enabling infrastructure and Indigenous partnership.<sup>47</sup>

At the federal level, Canada’s 2026 National Auto Strategy reinstates consumer EV incentives, strengthens GHG standards, invests \$1.5 billion in charging and hydrogen infrastructure, and commits to doubling national grid capacity. Workforce supports, industrial transition funding, and tariff-response measures further enhance competitiveness.<sup>48</sup>

<sup>45</sup> Ontario Vehicle Innovation Network (OVIN). Driving Trade Forward: Annual Comprehensive Sector Report 2024–25 (Executive Summary), 2025.

<sup>46</sup> Government of Ontario. Ontario’s Critical Minerals Strategy 2022–2027. ;Government of Ontario. Mineral exploration and production values and commodities (incl. Ring of Fire/chromite).

<sup>47</sup> Ontario Newsroom. Ontario Launches \$500 Million Critical Minerals Processing Fund (O-AMP), Dec. 12, 2025.

<sup>48</sup> Government of Canada. Canada’s New Automotive Strategy (Feb. 5, 2026) – announcement/backgrounders.

Suppliers require clearer multi-year pathways to adopt automation, AI, cybersecurity, and advanced materials, and to comply with CUSMA rules of origin, while preparing for dual-use markets.<sup>49</sup>

WHEREAS Ontario's automotive sector remains a cornerstone of the provincial economy and is undergoing a rapid transformation driven by electrification, advanced manufacturing, and global supply-chain realignment; and

WHEREAS critical minerals—including lithium, nickel, cobalt, graphite, and rare earth elements—are essential inputs to electric vehicles, batteries, and advanced automotive technologies, and Ontario possesses significant mineral assets alongside a globally competitive manufacturing base; and

WHEREAS Ontario's long-term competitiveness depends on stronger integration between Northern resource development and Southern manufacturing and battery supply chains, aligned with federal strategies and Indigenous economic participation; and

WHEREAS small- and medium-sized suppliers require sustained modernization support to meet CUSMA rules of origin, adopt advanced technologies, and remain competitive within North American automotive and industrial value chains; and

WHEREAS Ontario has initiated important actions through programs such as the Ontario Vehicle Innovation Network (OVIN), the Ontario Automotive Modernization Program (O-AMP), the Critical Minerals Processing Fund, and the Integrated Energy Plan, and further scale, coordination, and execution clarity are required to maximize their impact; and

WHEREAS talent shortages across automotive, battery, mining, and advanced-manufacturing sectors threaten the pace of investment and supply-chain localization, and post-secondary institutions play a critical role in workforce development and applied innovation.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

### **Integrated Automotive–Critical Minerals Strategy**

1. Publish, within twelve (12) months, a single Integrated Automotive–to–Critical Minerals Strategy, led by a designated ministry and co-designed with industry, Indigenous governments, labour, municipalities, and post-secondary institutions, which:
  - a. Links Northern critical-mineral development, including processing and refining, with Southern Ontario manufacturing, battery, and automotive supply chains;
  - b. Aligns provincial actions with federal automotive, clean-technology, and critical-minerals strategies; and
  - c. Establishes clear multi-year targets for investment attraction, supply-chain localization, and workforce development.

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<sup>49</sup> Global Affairs Canada. CUSMA: Automotive rules of origin (technical summary).

## **Supplier Modernization and Supply-Chain Resilience**

2. Strengthen supplier competitiveness and resilience through a multi-year Supplier Modernization and Dual-Use Commercialization stream, delivered through existing programs such as OVIN and O-AMP, to support:
  - a. Adoption of automation, artificial intelligence, robotics, cybersecurity, and advanced materials;
  - b. Supplier compliance with CUSMA rules of origin and North American content requirements; and
  - c. Dual-use commercialization opportunities serving automotive, defence, mining, public safety, and critical-infrastructure markets.

## **Domestic Processing, Refining, and Energy Readiness**

3. Prioritize domestic processing and refining capacity for critical minerals by expanding and scaling existing programs, including the Critical Minerals Processing Fund, particularly where demand exceeds available funding, and by:
  - a. Co-investing with federal partners, Indigenous communities, and industry in enabling Northern infrastructure that connects mineral assets to Ontario manufacturing hubs; and
  - b. Clarifying Ontario's role in energy readiness as implementation-focused, aligned with the Integrated Energy Plan, by advancing grid readiness, storage, distributed energy resources, and smart-grid and vehicle-to-grid pilot projects that support industrial growth and electrification.

## **Talent, Skills, and Workforce Development**

4. Scale talent-development pipelines aligned to automotive, battery, and critical-minerals supply chains, in partnership with industry and the post-secondary sector, including:
  - a. Post-secondary programs and work-integrated learning opportunities;
  - b. Micro-credentials, apprenticeships, and rapid up-skilling in battery manufacturing, recycling, mining automation, materials science, and automotive software; and
  - c. Alignment with federal workforce and industrial-transition supports.

## 8. Oppose Excessive OMVIC Fee Increases and Strengthen Oversight to Protect Ontario Consumers and Dealers

### PAC RECOMMENDATION

#### Do Not Support

The Committee does not support this resolution due to concern it may not be important enough to be on the legislative agenda or of considerable concern to most members.

**PAC has discussed feedback with the authoring chamber and has requested amendments be made at the AGM debate.**

**Submitted by:** Windsor-Essex Regional Chamber of Commerce

**Co-sponsored by:** Chatham-Kent Chamber of Commerce; St. Thomas & District Chamber of Commerce; Leamington Chamber of Commerce; Guelph Chamber of Commerce, Peterborough & Kawartha Chamber of Commerce, Orillia Chamber of Commerce, Halton Hill Chamber of Commerce, Burlington Chamber of Commerce

### Issue

The Ontario Motor Vehicle Industry Council (OMVIC) has introduced repeated and significant fee increases since 2024 — including lifting the per-vehicle transaction fee from \$12.50 to \$22.00 effective September 1, 2025, alongside higher registration/renewal and late fees — that cumulatively raise costs for dealers and consumers across Ontario. These increases arrive despite longstanding concerns documented by Ontario’s Auditor General, and amid substantial formal complaints from dealers and associations.<sup>50</sup>

### Background

Regulatory context and fee increases. OMVIC is the delegated administrative authority for motor vehicle dealers/salespeople. In June 2025, OMVIC issued a 60-day notice of new fees effective September 1, 2025, including dealer annual renewal to \$392, salesperson renewal to \$205, branch renewals to \$392, and a transaction fee increase to \$22 per retail sale/lease/fleet transaction.<sup>51</sup>

Prior consultation materials sought input on increasing the transaction fee from \$12.50 to \$22.00 and raising most registration fees by ~2.5% (reflecting escalation from \$10 in 2023 → \$12.50 in 2024 → \$22.00 in 2025).<sup>52</sup>

Performance concerns from the Auditor General (AG). The 2021 VFM Audit found that about 50% of ~5,400 consumer complaints (2016–2020) resulted in no resolution and identified

<sup>50</sup> OMVIC – 60-Day Notice to the Profession: New fees effective September 1, 2025 (Dealer Bulletin, June 27, 2025). ; OMVIC – 2025 Fee Increase Consultation (Dealer Bulletin, May 7, 2025). ; Office of the Auditor General of Ontario – Value-for-Money Audit: Ontario Motor Vehicle Industry Council (December 2021).

<sup>51</sup> OMVIC – 60-Day Notice to the Profession: New fees effective September 1, 2025 (Dealer Bulletin, June 27, 2025).

<sup>52</sup> OMVIC – 2025 Fee Increase Consultation (Dealer Bulletin, May 7, 2025); Government/OMVIC – Consultation portal invitation for fee submissions (2025).

weaknesses in inspections, investigations, dispute resolution, governance, and Ministry oversight. The 2023 AG follow-up reported OMVIC had fully implemented most recommendations directed at it and improved risk-based inspections, inspection oversight, and complaint-escalation frameworks — important progress but not a complete remedy to marketplace risks.<sup>53</sup>

Persistent consumer risks. Despite operational improvements, re-VINning (vehicle identity fraud) and violations of all-in price advertising continued to surface in 2024, illustrating that consumer risks remain significant even as OMVIC modernizes.<sup>54</sup>

Documented, formal complaints on pricing. The Used Car Dealers Association of Ontario (UCDA) mounted a formal, public campaign — “Dealers Can’t Afford OMVIC” — asserting fee hikes are excessive and urging formal objections.<sup>55</sup>

The government-recognized consultation process invited formal written submissions from registrants and stakeholders on the 2025 fee increases.<sup>56</sup>

Industry media also documented dealer backlash over compounding financial pressure and a perceived lack of accountability for fee growth; UCDA later issued an open letter questioning OMVIC’s expansion plans amid a provincial agency hiring freeze.<sup>57</sup>

Why is OCC action warranted now? OMVIC’s funding model draws almost entirely from registrant and transaction fees; sharp increases act like a quasi-levy that can be passed to consumers. Given the AG’s findings and the partial maturity of reforms, additional fee escalation without stronger transparency, cost control, and oversight risks eroding affordability and competitiveness — especially for small and independent dealers.<sup>58</sup>

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Pause and review OMVIC’s 2024–2025 fee increases — including the transaction fee rise to \$22.00 — pending an independent assessment of economic impacts on dealerships (by size/region) and consumers; publish results and alternatives before any further fee adjustments.<sup>59</sup>
2. Mandate an independent financial and operational audit of OMVIC (beyond internal action plans) to test cost drivers of fee growth, staffing expansion, and the value

<sup>53</sup> Office of the Auditor General of Ontario – Value-for-Money Audit: Ontario Motor Vehicle Industry Council (December 2021). ; Office of the Auditor General of Ontario – 2023 Follow-Up on 2021 VFM Audit: OMVIC (Chapter 1, Section 1.12, October 20, 2023).

<sup>54</sup> Automobile Protection Association / OMVIC – 2024 Year in Review: Top Consumer Challenges (Dec 19, 2024).

<sup>55</sup> Used Car Dealers Association (UCDA) – Dealer Alert: Dealers Can’t Afford OMVIC (May 15, 2025).

<sup>56</sup> Government/OMVIC – Consultation portal invitation for fee submissions (2025).

<sup>57</sup> Dealerpull blog/industry media – OMVIC and Ontario Auto Dealers: Balancing Protection with Pressure (June 23, 2025). ; UCDA – Open letter on OMVIC hiring freeze and fee increases (LinkedIn, Oct 23, 2025).

<sup>58</sup> Office of the Auditor General of Ontario – Value-for-Money Audit: Ontario Motor Vehicle Industry Council (December 2021). ; Office of the Auditor General of Ontario – 2023 Follow-Up on 2021 VFM Audit: OMVIC (Chapter 1, Section 1.12, October 20, 2023).

<sup>59</sup> Government/OMVIC – Consultation portal invitation for fee submissions (2025).

delivered to consumers; require public reporting and a corrective-action plan with milestones.<sup>60</sup>

3. Establish a provincial fee-setting framework and oversight mechanism (through the Ministry of Public and Business Service Delivery) tying any future OMVIC fee increases to demonstrable regulatory need, measurable outcomes (e.g., complaint resolution rates, investigation timeliness, compliance trends), operational efficiencies, and robust stakeholder consultation.<sup>61</sup>
4. Require OMVIC to implement and publicly track administrative and digital-process efficiencies (e.g., streamlined registrant reporting, modernized portals, risk-based inspection scheduling) before seeking additional fee increases, with performance KPIs published annually.<sup>62</sup>
5. Develop a targeted cost-relief or fee-stabilization mechanism for small and independent dealerships, recognizing their limited capacity to absorb cumulative fees while maintaining local employment and consumer choice.<sup>63</sup>
6. Formalize a standing consultation forum with dealer associations, chambers/boards, and consumer advocates to review OMVIC's annual business plan, fee proposals, and KPI results — ensuring transparent, evidence-based decisions that balance consumer protection with business competitiveness.<sup>64</sup>

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<sup>60</sup> Office of the Auditor General of Ontario – Value-for-Money Audit: Ontario Motor Vehicle Industry Council (December 2021); Office of the Auditor General of Ontario – 2023 Follow-Up on 2021 VFM Audit: OMVIC (Chapter 1, Section 1.12, October 20, 2023).

<sup>61</sup> Office of the Auditor General of Ontario – 2023 Follow-Up on 2021 VFM Audit: OMVIC (Chapter 1, Section 1.12, October 20, 2023); Government/OMVIC – Consultation portal invitation for fee submissions (2025).

<sup>62</sup> Office of the Auditor General of Ontario – 2023 Follow-Up on 2021 VFM Audit: OMVIC (Chapter 1, Section 1.12, October 20, 2023).

<sup>63</sup> Used Car Dealers Association (UCDA) – Dealer Alert: Dealers Can't Afford OMVIC (May 15, 2025); Dealerpull blog/industry media – OMVIC and Ontario Auto Dealers: Balancing Protection with Pressure (June 23, 2025).

<sup>64</sup> Government/OMVIC – Consultation portal invitation for fee submissions (2025).

## 9. Reducing Traffic Congestion on Ontario Highways Due to Vehicular Accidents

*This is a sunset resolution*

PAC RECOMMENDATION
<p><b>No Consensus</b></p> <p>The Committee was unable to reach consensus due to concerns around the narrow scope of recommendations focused on a single region. PAC recommends that the resolution centre around higher-traffic highway corridors to improve the relevance to most members. It further recommends adding rationale to justify any action with fiscal impact.</p> <p><b>PAC has discussed feedback with the authoring chamber and has requested amendments be made at the AGM debate.</b></p>

**Submitted by:** Tillsonburg District Chamber of Commerce

**Co-sponsored by:** Chatham-Kent Chamber of Commerce, Simcoe & District Chamber of Commerce, St. Thomas & District Chamber of Commerce, Woodstock District Chamber of Commerce, Ingersoll District Chamber of Commerce, and the Township of Norwich Chamber of Commerce

### Issue

The Highway 401/403 network serves as a critical trade artery, supporting international commerce for manufacturing, agricultural and other business sectors spanning from Windsor to the GTA and beyond. However, traffic congestion on Ontario's 400-series highway, remains a primary barrier to economic productivity. With non-recurrent congestion, such as accidents causing over 50% of delays<sup>65</sup>, the province requires a transition from reactive clearing to a performance-based, incentive-driven recovery model to protect the "Just-in-Time" supply chains of Southwestern Ontario.

### Background

Since this policy was first adopted, Ontario has made strides in towing industry regulation through the Towing and Storage Safety and Enforcement Act (TSSEA). However, the province still lacks the successful, incentive-based clearance models seen in Georgia (TRIP) and Florida (RISC), which have achieved an 80% reduction<sup>66</sup> in clearance times by clearing major accidents

<sup>65</sup> Transport Canada. (2006). *The costs of non-recurrent congestion in Canada*. Final Report. [http://www.bv.transports.gouv.qc.ca/mono/0964770/01\\_Report.pdf](http://www.bv.transports.gouv.qc.ca/mono/0964770/01_Report.pdf)

<sup>66</sup> Georgia Department of Transportation. (2023). *Georgia Department of Transportation's (GDOT) Towing and Recovery Incentive Program (TRIP) can reduce clearance times by 80 percent*. ITS Knowledge Resources. <https://www.itskrs.its.dot.gov/2023-b01706>

in 90 minutes or less. Every dollar (\$1) invested in rapid incident management - roving patrols/Traffic Incident Management (TIM) - yields \$6 to \$28 in recovered economic activity.

In Southwestern Ontario, the 401/403 junction in Woodstock remains a critical bottleneck, handling 60,000+ heavy trucks daily. This gridlock costs industry vehicles an estimated \$122 per hour per vehicle. Without specialized incident management pilots (including roving patrols and local reporting centers), Ontario businesses continue to lose over \$500M annually in lost productivity and fuel.

While the province has not yet extended the incentive-based "Georgia Model" specifically to the Oxford-to-Windsor corridor, they have implemented a Tow Zone Pilot Program<sup>67</sup> on sections of the 401 and other 400-series highways in the GTA.

Southwestern Ontario is a hub for automotive manufacturing (e.g. GM, Toyota supply chains). While the GTA has seen pilot programs, the international supply chain in Southwestern Ontario remains at risk of multi-hour shutdowns. One accident-related shutdown can cost industry sectors millions of dollars in Just-In-Time delivery delays. When an accident shuts down 401 or 403, for three, four (or more hours), it doesn't just delay a commute; it halts assembly lines and costs the industry \$122 per hour per truck. Quick clearance practices can result in many benefits for drivers, responders, and the environment including decreases in:

- Non-recurrent congestion delay.
- Secondary incidents, including those involving responders.
- Response time to traffic incidents and other emergencies.
- Vehicle fuel consumption.
- Vehicle emissions.
- Motorist stress levels.
- Aggressive driving behavior.
- Freight movement impacts in the region.
- Regional economic impacts.
- Local tourism impacts.
- Future potential land use impacts. (56)

Highway 401 Exit 250, the Drumbo / Innerkip stretch, and the 401/403 junction, remain the most accident-prone and congested sections of the provincial highway system.<sup>68</sup> The current clearing models often lead to secondary collisions and prolonged closures. Prioritizing a regional pilot program first in Oxford County, ahead of higher-volume segments like the Kitchener-Waterloo or Brantford-to-Toronto corridors – would allow the Province to fine-tune the process as it expands toward the GTA.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

<sup>67</sup> Ministry of Transportation of Ontario. (2021). *Tow zone pilot program*. Government of Ontario. <https://www.ontario.ca/page/tow-zone-pilot-program>

<sup>68</sup> CTV News Kitchener. (2025, December 11). *Four serious crashes in the last four weeks on Highway 401 west of Ayr*. <https://www.ctvnews.ca/kitchener/article/four-serious-crashes-in-the-last-four-weeks-on-highway-401-west-of-ayr-ont/>

1. **Implement an 18-month "Freight-First" Pilot Program** on the Highway 401 corridor from Oxford County to Windsor using performance-based financial incentives like the successful programs in Georgia and Florida. Upon a successful 18-month evaluation, the program should be expanded to include the entire 400-series highway network. The estimated investment cost for this pilot would be between \$3.5M - \$6.5M, which is a fraction of the cost of physical highway expansion. For example, the widening of Highway 401 through the Kitchener-Waterloo and Cambridge corridors was completed in two primary phases over approximately **8 to 10 years**, with a total investment exceeding **\$300 million**.
2. **Establish a Highway-Specific Collision Reporting Centre (CRC)** in Oxford County to remove property-damage-only vehicles from the 401/403 live lanes immediately.
3. **Expand Specialized Roving Highway Safety Patrols** from Toronto to London to provide direct service to motorists and clear debris, mirroring the high-ROI safety models currently utilized on private toll routes.

## 10. Shifting Gears on Northern Ontario's Freight Corridors

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Timmins Chamber of Commerce

**Co-sponsored by:** Sault Ste. Marie Chamber of Commerce, Thunder Bay Chamber of Commerce, Muskoka Lakes Chamber of Commerce, North Bay and District Chamber of Commerce, Northern Corridor Chamber of Commerce, Cochrane Board of Trade, Greater Sudbury Chamber of Commerce

### Issue

Ontario's economic competitiveness depends on reliable, safe, and resilient transportation corridors that connect regions, industries, and markets. Northern Ontario's highway network forms the backbone of east-west trade within the province and across Canada, linking Western supply chains to manufacturing, processing, and export hubs in Southern and Eastern Ontario. Much of this network remains built to outdated standards that no longer reflect modern freight volumes, safety risk, climate realities, or the province's economic ambitions.

### Background

Northern Ontario's primary highway corridors support an estimated \$200 million in daily commercial activity and carry nearly one million truck shipments annually.<sup>69</sup> Primary corridors such as Highways 11 and 17 serve as critical economic routes connecting Northern, Eastern, Southern, and Western Ontario, while also supporting key economic linkages with Northern Quebec. Despite their provincial and national significance, large portions of these corridors remain two-lane highways maintained under classifications that prioritize local passenger volumes rather than freight intensity, economic risk, or system-wide consequences of failure.

Disruptions on northern corridors create ripple effects well beyond the region. Highway closures and reliability issues delay manufacturing inputs, disrupt just-in-time inventory systems, constrain access to consumer goods, and increase costs for businesses and households across Ontario.<sup>70</sup> With limited redundancy, extended closures frequently force long-distance rerouting, including, in some cases, detours through the United States, adding travel time, operational costs, and regulatory complexity for Ontario-based carriers. In 2026, this is no longer a simple detour; it is a major economic drain involving bonded freight complexities, driver visa restrictions, and increased border compliance costs.<sup>71 72</sup>

<sup>69</sup> [ONOM, Economic Impact of Northern Ontario Highways, 2023.](#)

<sup>70</sup> [Mordor Intelligence: Canada Road Freight Transport Market Size & Growth \(2026–2031\).](#)

<sup>71</sup> [Federal Register - FY 2026 Customs User Fees.](#)

<sup>72</sup> [KPMG \(2025/2026\), Impacts of US Tariffs on Canada's Transportation Industry.](#)

Stakeholder engagement conducted by the Timmins Chamber of Commerce reinforces these system-level impacts.<sup>73</sup> A targeted survey of large and industrial employers who rely on highway transportation daily found that 86% experience regular or occasional operational impacts due to highway conditions. More than half reported annual losses exceeding \$50,000 from unplanned closures, and one-third reported losses over \$100,000. While the sample is limited to specific businesses, the findings are consistent with long-standing feedback from logistics operators, municipalities, and industry associations across Northern Ontario, indicating that cumulative economic losses scale into the tens of millions of dollars annually.

When these disruptions occur, impacts are often concentrated in corridor communities including Cochrane, Kapuskasing, Hearst, Nipigon, Rainy River, Sudbury, North Bay, and further south, where truck staging and prolonged congestion can restrict local access and disrupt business activity for days after highways reopen. These operational challenges create compounding economic effects for both local enterprises and industries dependent on predictable transportation timelines.

These impacts manifest through delayed deliveries, spoiled goods, idle equipment, missed contracts, increased insurance costs, and workforce disruptions. For trucking operators, even short-duration closures can result in significant productivity losses across fleets.<sup>74</sup> Safety and reliability also affect labour availability, as employers report difficulty recruiting and retaining drivers willing to operate on northern corridors, compounding supply chain pressures throughout the province.

Safety outcomes further demonstrate that existing standards are misaligned with corridor function. Provincial road safety data consistently shows that Highways 11 and 17 experience a significant share of fatal and serious injury collisions relative to traffic volumes, higher than provincial averages.<sup>75</sup> While commercial vehicles are involved in a notable share of serious incidents, passenger vehicles account for many collisions and fatalities, reflecting increased traffic volumes and interaction between heavy freight and personal travel on infrastructure not designed for mixed, high-volume use.

Consumer behaviour has intensified these pressures. The growth of e-commerce and next-day delivery expectations has permanently increased freight traffic on northern highways, particularly during winter weather events.<sup>76</sup> In regions with limited transportation alternatives, this has resulted in more trucks operating during active storms, increasing congestion, conflict points, and collision risk. Operational maintenance improvements alone have not offset these systemic pressures.

Climate variability further compounds reliability challenges. Northern corridors experience more frequent severe winter events and freeze-thaw cycles, placing stress on infrastructure built to earlier standards.<sup>77</sup> Unlike Southern Ontario, where multiple highway routes and modal alternatives provide redundancy, Northern Ontario businesses and communities remain highly dependent on single corridors, increasing economic and safety consequences when failures occur.

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<sup>73</sup> [Timmins Chamber of Commerce, Northern Business Transportation Survey, 2025.](#)

<sup>74</sup> [Ontario Trucking Association Operating Cost Analysis and Driver Retention Survey, Q2 2025](#)

<sup>75</sup> [Ontario Road Safety Annual Reports \(ORSAR\), 2023.](#)

<sup>76</sup> [Mordor Intelligence, Canada Road Freight Transport Market Size & Growth Analysis \(2025-2026\).](#)

<sup>77</sup> [Canadian Climate Institute - Due North Report.](#)

Modernizing Northern Ontario's highway framework also presents an opportunity to strengthen reconciliation and economic participation. Primary corridors traverse the traditional territories of many First Nations, whose communities are rights holders and essential partners in regional development. Advancing reclassification, maintenance reform, and long-term upgrades through meaningful engagement and collaboration can support employment, contracting opportunities, and improved access to markets and services.

Recent provincial investments, including targeted four-laning, 2+1 pilot segments, and enhanced winter maintenance standards, represent progress.<sup>78</sup> However, these initiatives remain incremental and corridor-specific, and collision and fatality rates on Northern Ontario's primary highway corridors remain disproportionately high. In the first five weeks of 2026, primary Northern corridors have faced over 130 hours of full closures, including a catastrophic multi-fatality closure on Highway 11 in late January, as well as multiple fatal head-on collisions on Highway 17 in early 2026.

With no viable domestic detours, these frequent failures physically sever Canada's east-west supply chain, resulting in millions of dollars in immediate productivity losses and reinforcing the urgent need for a statutory four-lane mandate.

Ontario's ambition to compete globally depends on the reliability of the infrastructure that supports its foundational industries. Northern Ontario's gold, metals, forestry, and critical minerals sectors are nationally and internationally significant, yet remain dependent on highway corridors designed for a different era. A coordinated, corridor-based approach is required to ensure these highways meet the demands of a modern, integrated provincial economy.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Mandate the MTO to reclassify and transition all primary northern corridors to a "Freight-Critical" Class 1 Standard maintenance as a single Class 1 economic unit, ensuring that maintenance funding and resources are scaled to provide consistent service across the entire corridor, regardless of local passenger volume.
2. Direct the Ministry of Transportation to develop a phased corridor twinning program within Ontario's Transportation Capital Plan, prioritizing the upgrade of primary Northern corridors to a divided four-lane standard with median safety barriers. The program should define clear freight-tonnage and safety performance thresholds that guide the sequencing of investments, with 2+1 configurations deployed as interim safety improvements on priority segments pending full four-lane upgrades. The province is asked to identify initial priority corridors, estimated timelines, and funding mechanisms, including potential federal partnership opportunities, as part of its next transportation capital planning cycle.
3. Modernize corridor operations by deploying automated road-weather monitoring and smart corridor technologies to optimize maintenance and incident response in real time. Additionally, the province should use its convening role to engage with the federal government and private operators to explore opportunities to strengthen complementary rail, air cargo, and intermodal logistics capacity along Northern corridors, supporting supply chain

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<sup>78</sup> [Government of Ontario, 2025-2026 Northern Highways Program Update \(Summer 2025 Edition\)](#).

continuity during highway disruptions where rail infrastructure falls under federal or private jurisdiction.

## 11. Strengthening Ontario’s Airport System Through Provincial Leadership, Funding, and Planning

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Sarnia-Lambton Chamber of Commerce

**Co-sponsored by:** Chamber of Commerce Brantford-Brant, Tillsonburg District Chamber of Commerce, and the St. Thomas & District Chamber of Commerce.

### Issue

Without provincial leadership, Ontario’s airports - especially smaller regional facilities seeking to restore or attract scheduled air service - face increasing financial risk, declining infrastructure condition, and loss of connectivity that undermines economic development, health services, and regional competitiveness.

Ontario does not have a dedicated provincial airport capital or operating assistance program for regional and community airports.

Provincial support is largely limited to remote and northern airports and ad-hoc eligibility through general economic development programs.

Regional airports must rely disproportionately on municipal property tax bases, limited federal programs with restrictive eligibility, and airport-generated revenues that are often insufficient for major capital needs. This approach contrasts sharply with other provinces and territories.

Without action, Ontario risks the gradual erosion of its regional airport network and the economic, social, and transportation benefits those airports provide.

A coordinated provincial role is essential to protect, stabilize, and grow Ontario’s airport system for the long term.

### Background

The province has already acknowledged the importance of airports:

- The Southwestern Ontario Transportation Plan (Connecting the Southwest) identifies airports as an integral component of a multimodal transportation system, supporting:
  - Economic development and trade
  - Emergency response and health services
  - Regional and interregional connectivity

- The Plan explicitly committed to assessing airport activity and infrastructure to better understand their role in supporting people and goods movement across Southwestern Ontario.

These actions establish a clear policy foundation: airports are essential public infrastructure, not optional or discretionary assets.

The Southwestern Ontario Transportation Task Force Final Report (2023) goes further by recommending that the province:

- Support the sustainability of municipal and regional airports
- Encourage collaboration across federal, provincial, and municipal governments to address airport financial challenges
- Help identify new investment mechanisms and funding solutions
- Promote awareness of the economic and social value of airports
- Encourage efforts to attract and retain commercial passenger and freight air services

These recommendations implicitly recognize that municipalities cannot sustain airport infrastructure alone, particularly when airports deliver benefits that extend well beyond municipal boundaries.

The Province of Ontario has already laid the policy groundwork through the Southwestern Ontario Transportation Plan and the Southwestern Ontario Transportation Task Force. What is now required is implementation.

#### Comparator programs in other Provinces and Territories

Most other Canadian jurisdictions have accepted a clear provincial role in airport sustainability:

- British Columbia: BC Air Access Program provides consistent capital funding to community airports.
- Alberta: Community Airport Program supports infrastructure rehabilitation and safety improvements.
- Saskatchewan: Community Airport Partnership Program delivers provincial cost-sharing.
- Manitoba and Atlantic provinces: Provide operational and capital assistance recognizing airports as regional infrastructure.
- Northern territories: Treat airports as essential public transportation assets with sustained territorial funding.

Ontario's absence from this list places its airports - and the communities they serve - at a structural disadvantage.

### **Recommendations**

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Take a more active role in the funding, planning, and long-term sustainability of airports across Ontario, particularly regional and community airports.
2. Respond to findings and actions identified by the Ministry of Transportation (MTO) through the Southwestern Ontario Transportation Plan and the Southwestern Ontario Transportation Task

Force and address the growing competitiveness gap between Ontario and other Canadian provinces and territories.

3. Align action with existing provincial policy and national best practices by formally recognizing regional and community airports as critical provincial transportation infrastructure and establish a dedicated provincial airport support program focused on capital projects, asset preservation and rehabilitation, and readiness for scheduled passenger and cargo service.
  - a. This program should be designed to reflect the shared jurisdiction and shared benefits of airport infrastructure, leveraging cost-sharing partnerships between provincial, federal, and municipal governments, as well as opportunities for private-sector participation where appropriate.
4. Review and expand existing provincial economic development programs in Southern Ontario to ensure regional and community airports are consistently eligible for funding - similar to supports available in Northern Ontario - and consider enhancing these programs to provide more predictable and accessible funding streams for airport infrastructure and service development.

## 12. Supporting Ontario Contractors and Expediting Infrastructure Builds by Addressing the Backlog of Ontario One Call Locate Requests Through Adaptive Technological Innovation

*This is a sunseting resolution*

**Submitted by:** Timmins Chamber of Commerce

**Co-sponsored by:** North Bay Chamber of Commerce, Sault Ste. Marie Chamber of Commerce, Northern Corridor Chamber of Commerce, Greater Sudbury Chamber of Commerce, Cochrane Board of Trade, Muskoka Lakes Chamber of Commerce

### Issue

For any excavating of a new building, repairing buried infrastructure, landscaping, residential paving, building concrete slabs, or anything else that requires you to break ground, you must contact Ontario One Call at a minimum of five (5) days prior to your excavation. The provincial government and Ontario One Call have made meaningful progress since 2023, with Bill-153 granted Ontario One Call enforcement powers to ensure compliance with mandatory locate timelines.<sup>79</sup> However, critical challenges remain. Locator workforce shortages and the absence of instant digital locate solutions continue to cause delays. The system has not yet leveraged transformative technologies such as augmented reality, artificial intelligence, and algorithmic risk assessment that could provide near-instant clearance for low-risk excavations.

### Background

The Ontario One Call system is the primary method for identifying underground infrastructure prior to excavation and is essential for protecting public safety and maintaining the integrity of essential services. Significant legislative and operational progress has been made to address critical backlogs, including the passage of Bill-153 (Building Infrastructure Safety Act, 2024), the expansion of Dedicated Locator services<sup>80</sup>, launch of the Locate Sharing Service,<sup>81</sup> and digital infrastructure modernization with cloud-based systems and improved accessibility<sup>82</sup>, supported by \$25 million in transformation funding through 2026.

While these changes have improved on-time locate completion rates and enhanced accountability across the system from 2023 levels, current data and reporting indicates late locates persist, with enforcement actions taken as recently as late 2025 confirming ongoing delays.<sup>83</sup> Locator workforce shortages and the absence of instant digital locate solutions continue to cause project delays and cost overruns. The system has not yet leveraged transformative technologies such as augmented reality, artificial intelligence, and algorithmic

<sup>79</sup> [Building Infrastructure Safety Act, 2024, S.O. 2024, c. 1 - Bill 153](#)

<sup>80</sup> [Ontario One Call – Dedicated Locator](#)

<sup>81</sup> [Ontario Underground Infrastructure Notification System Act, 2012, S.O. 2012, c. 4](#)

<sup>82</sup> [Ontario One Call - 2024 Annual Report](#)

<sup>83</sup> [OOC - Locate Delivery Performance by Region Report](#)

risk assessment that could provide near-instant clearance for low-risk excavations, reduce field time, and fundamentally eliminate the backlog problem. These delays directly impact the province's ability to deliver on housing targets and critical infrastructure priorities.

Global case studies provide compelling evidence of what is possible. A vGIS field study demonstrated a 50% reduction in locate time for jobs over 20 minutes, with quality assurance validation time reduced by 66 to 85%.<sup>84</sup> Urbinit AI in New York uses predictive algorithms to prioritize tickets based on damage risk factors, contributing to measurable reductions in statewide damages.<sup>85</sup> telMAX in Ontario reduced mapping and locating timelines from three weeks to less than one week by using a centralized, cloud-based platform.<sup>86</sup> The City of Burnaby, British Columbia, automated its BC 1 Call process, reducing response time from 15 minutes to 3-5 minutes while providing 24/7 service and projecting \$500,000 in savings over five years.<sup>87</sup>

These examples demonstrate that prioritizing digital infrastructure, AI-driven decision-making, and immersive technologies can deliver measurable improvements in speed, accuracy, cost savings, and damage prevention. Beyond efficiency gains, these technologies make the locate profession more attractive to new workers by providing modern tools and reducing physical demands, helping address the persistent workforce shortage.

The Ontario Underground Infrastructure Mapping Strategy<sup>88</sup> (OUIMS), led by Ontario One Call and Infrastructure Ontario, provides a critical framework for the digital data standards necessary to support AR, VR, and AI systems. These technology improvements directly support the province's ability to deliver on housing development, manufacturing expansion, and critical minerals strategy.

Ontario has the legislative foundation and funding commitment in place. Now is the time to deploy these proven solutions at scale. The question is no longer whether to modernize, but how quickly we can deploy these solutions before we fall further behind.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Build upon the foundation of the Ontario Underground Infrastructure Mapping Strategy and move beyond exploring emerging technologies by:
  - a. Working with Underground Infrastructure Owners to provide accurate digital mapping data while implementing Machine Learning algorithms that automatically triage and clear low-risk excavation requests and enable instant automated clearance where appropriate.
  - b. Establishing clear compliance timelines and provincial support mechanisms, such as a Municipal GIS Capacity Fund to update mapping and digitize legacy records, ensuring they can meet the data standards required to participate in next-generation

<sup>84</sup> [Measuring effectiveness of Augmented Reality in the locate services industry](#)

<sup>85</sup> [Urbinit - Emergency Preparedness & Response](#)

<sup>86</sup> [Case studies: Geolantis.360 success stories from the field](#)

<sup>87</sup> [Harnessing the power of automation for operational efficiency](#)

<sup>88</sup> [Ontario Underground Infrastructure Mapping Strategy Report](#)

automated clearance technologies.

- c. Deploying augmented reality (AR) technology for field locators to enhance the accuracy of physical markings on the ground and enable the real-time digital capture of subsurface infrastructure during the locate process, preventing future locate backlogs.
- d. Providing virtual reality (VR) and advanced GIS training modules for both new and current technicians, addressing the workforce shortage through faster onboarding and ensuring the existing workforce is upskilled to operate next-generation digital mapping and locate tools.

### 13. Tripartite Agreement Renewal & Long-Term Transportation Prioritization

*This is a sunset resolution, formerly titled  
“Support for the Renewal of the Billy Bishop Toronto City Airport Tripartite Agreement”*

PAC RECOMMENDATION
<b>Support as Amended</b>
The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Toronto Region Board of Trade

**Co-sponsored by:** Timmins Chamber of Commerce

#### Issue

Billy Bishop Toronto City Airport - Ontario’s third-busiest airport - plays an essential role in connecting the Toronto region with other communities, supporting business travel, and enabling critical healthcare access, yet its ability to fully support Ontario communities and economy is increasingly constrained by an outdated operating framework. With the Tripartite Agreement expiring in 2045, and the federal government’s decision not to advance the Pickering Airport confirming that the GTA will continue to rely solely on Pearson and Billy Bishop for future aviation capacity, the need for timely and decisive action to secure the airport’s long-term role has become urgent.

#### Background

Billy Bishop Toronto City Airport remains one of Ontario’s most strategic transportation assets. Located approximately 3 km from Toronto’s downtown core, it connects Toronto to major Ontario cities including Ottawa, Sault Ste. Marie, Timmins, and Thunder Bay, strengthening trade, tourism, workforce mobility, and regional development. The airport also supports vital public services: as the Toronto base for ORNGE, it enables thousands of medical transport flights each year, ensuring rapid access to specialized care.

In early 2025, the Government of Canada formally announced that it will not proceed with developing a new airport on the Pickering Lands, instead transferring most of the land to Parks Canada to expand Rouge National Urban Park. This confirms the GTA will continue relying on Toronto Pearson and Billy Bishop as its two core airports for future air travel and supply-chain needs.

With U.S. Customs and Border Protection (CBP) preclearance opening in early 2026, passengers will clear U.S. entry requirements before departure. This enables new 2026 routes to New York–LaGuardia, Boston, Chicago O’Hare, and Washington Dulles, deepening Ontario’s business and cultural connectivity.

The airport is currently governed by the Tripartite Agreement, which imposes strict limits on the types of aircraft permitted. According to the Competition Bureau's 2025 airline market study, such restrictive governance reduces competition, limits passenger choice, and slows the adoption of cleaner aviation technologies. Furthermore, the Q400s dominant at the airport are now out of production and operated by few carriers. These constraints restrict competition and limit route development, which is particularly felt by regional and northern communities.

Ontario's long-term economic strength and social well-being depends heavily on transportation connectivity. Aviation plays a uniquely essential role distinct from roads, rail, and transit. In Northern Ontario, aviation is often the only reliable year-round link to healthcare, jobs, education, and essential supplies. Without dependable air service, economic and social participation becomes severely limited.

Southwestern Ontario cities - including Windsor and London - depend on efficient air connections to support advanced manufacturing, cross-border trade, and academic and innovation ecosystems.

Ontario's broader ambitions, including development of the Ring of Fire, further rely on predictable aviation access. Resource development, Indigenous partnerships, environmental oversight, and emergency response all depend heavily on-air transport.

Aviation infrastructure is foundational to competitiveness, resilience, and quality of life. Ensuring airports like Billy Bishop have modern, flexible operating frameworks is essential to supporting economic development and community connectivity.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Declare support for Billy Bishop Toronto City Airport as a critical transportation link for Ontario and a key piece of transportation infrastructure for the province's economic future.
2. Recognize that predictable, modern, and future-ready aviation and transportation infrastructure is a provincial priority, essential to connecting communities -including Northern Ontario and the Ring of Fire and Southwestern Ontario - to opportunity and essential services.
3. Work with all signatories to the Tripartite Agreement to urgently modernize and renew the agreement, ensuring the airport can adopt cleaner technologies, expand competitive service options, and support Ontario's long-term economic and connectivity needs.

## 14. Turning Scrap into Strength: Provincial Metal Recycling Framework

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Chamber of Commerce Brantford-Brant

**Co-sponsored by:** Cambridge Chamber of Commerce, Hamilton Chamber of Commerce, and the Greater Barrie Chamber of Commerce

### Issue

Businesses across Ontario are facing a surge in incidents of scrap metal theft, resulting in millions of dollars in repair costs, insurance increases, and operational downtime for manufacturers, constructors, utilities, and commercial property owners. Municipalities have responded with local bylaws that vary widely across the province in scope, enforcement tools, and expectations of salvage yards and scrap metal dealers. In practice, this creates opportunities to avoid scrutiny in some municipalities and scrap metal to be transported to and sold in jurisdictions with weaker rules, displacing the problem instead of resolving it. Municipal action alone cannot act as a meaningful deterrent to organized groups.

A province-wide, standardized framework is needed to close jurisdictional gaps, protect critical infrastructure, and create a level playing field.

### Background

Scrap metal theft has become a recurring business risk across Ontario, affecting manufacturers, construction firms, utility providers, and commercial property owners. Rising theft of copper wiring, metal fixtures, and utility components has led to significant financial losses, construction delays, production stoppages, and insurance premium increases.

The City of Brantford has documented repeated break-ins and copper wire theft affecting local employers and has directly stated that municipal regulations alone cannot deter organized theft operations capable of crossing city lines to avoid enforcement.<sup>89</sup> There have been over 443 reports of copper and metal thefts in the City of Brantford since 2019, some costing the victims upwards of \$100,000 to repair.<sup>90</sup>

<sup>89</sup> City of Brantford – Advocacy for Stronger Scrap Metal Laws.

<https://www.brantford.ca/en/business-and-development/advocacy-for-stronger-scrap-metal-laws.aspx>

<sup>90</sup> City of Brantford – Report No. 2024-194.

[Bylaw Restrictions for Copper and Metal Theft Occurrences \[Financial Impact: None\]](#)

The City of Brantford's 2024 Salvage Yard bylaw 37-2024<sup>91</sup> demonstrates a more comprehensive regulatory model by strengthening its licensing and regulatory framework for salvage yards. The bylaw:

- identifies “Prohibited Items” targeted in thefts.
- defines “restricted scrap metal,” including copper and bronze components from HVAC systems, historical markers, marked metals, and stripped or burned wiring matching the most common forms stolen material takes when resold.

requires that restricted scrap metal transactions be conducted using traceable, non-cash payment methods and 24 hours reporting, reducing anonymity and enabling faster investigations. Together, these measures have reduced anonymous walk-in copper sales and improved the speed of police investigations.

Across Ontario, municipalities regulate scrap metal inconsistently, creating predictable “escape routes” for stolen materials:

- Hamilton: exempts most metal scrap from documentation and reporting<sup>4</sup>
- Barrie: requires licensing but lacks definitions of high-risk metals, limits on cash transactions, or reporting rules<sup>5</sup>
- Cambridge: focuses on zoning and land use rather than theft prevention<sup>6</sup>
- Haldimand County: no traceable payment or reporting requirements<sup>7</sup>
- Norfolk County: treats scrap metal as a waste/property issue with no dedicated dealer oversight<sup>8</sup>

These inconsistencies enable theft displacement: when one municipality strengthens its rules, resale simply shifts to the next jurisdiction.

Regional crime data reinforces the need for a standardized approach. Police investigations across the Guelph and Waterloo Region recently reported large-scale copper thefts, including incidents involving rooftop entry and the dismantling of HVAC units to extract copper and aluminum. These copper wire thefts caused a loss of more than \$40,000 and were explicitly linked by police to resale through a black-market network that exploits cross-municipal gaps<sup>9</sup>

Police also noted that the stolen materials were transported across municipal boundaries before resale, directly illustrating the loopholes a provincial framework would close.<sup>10</sup>

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<sup>91</sup> City of Brantford – By-law 37-2024, Salvage Yard Licensing (Prohibited Items, Restricted Scrap Metal, Traceable Transactions).  
4. City of Hamilton – Business Licensing By-law 12-021.

<https://www.hamilton.ca/sites/default/files/2022-04/12-021.pdf>

<sup>5</sup> City of Barrie – General Business Licensing By-law 2006-226. <https://www.barrie.ca/General-Business-Licensing-Bylaw.pdf>

<sup>6</sup> City of Cambridge – By-law 44-13: Zoning By-law Amendment. [BY-LAW 44-13](https://www.cambridge.ca/By-law-44-13)

Haldimand County – Salvage Yard Licensing By-law.

<https://www.haldimandcounty.ca/government-administration/by-laws-and-policies/by-law-directory/salvage-yard-licensing-by-law/>

<sup>7</sup> Norfolk County – Business Licensing By-law & Lot Maintenance By-law.

<https://www.norfolkcounty.ca/council-administration-and-government/by-laws-and-policies/by-law-directory/business-licensing-by-law/>

<sup>8</sup> Norfolk County Fire – Scrap Metal & Electronic Waste Bins.

<https://norfolkcountyfire.ca/scrap-metal-and-electronic-waste-bins/>

Due to these variations, theft is easily displaced. Once one municipality tightens regulations, sellers can pivot to other areas with weaker rules. This not only undermines the intent of local bylaws but creates unfair competitive conditions, where compliant businesses face higher administrative costs while others operate under lower standards.

A notable framework comes from Alberta, which introduced the Scrap Metal Dealers and Recyclers Identification Act to create consistent provincial standards. The Act requires buyers to verify government-issued identification, record transaction details, retain records for at least two years, and use traceable currency for higher-value transactions.<sup>92</sup> It also requires certain high-risk or high-volume transactions to be reported to law enforcement within 24 hours. The implementation of this Act in Alberta demonstrates that province-wide regulation is administratively feasible and that a harmonized framework can set clear expectations for businesses without requiring complex new infrastructure.

Alberta's experience shows that a province-wide system is feasible and minimally burdensome for legitimate recyclers, many of whom already use similar practices.

While Brantford's approach meaningfully limits the resale of stolen metal, the absence of provincial standards leaves uneven enforcement and predictable displacement. A unified framework would support coordinated enforcement, reduce theft displacement, and provide regulatory predictability across Ontario.

For businesses, this would help stabilize insurance costs, reduce downtime, and support legitimate recyclers competing on equal regulatory footing.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Consult with AMO, OBCM, and ROMA to align existing municipal salvage yard and business licensing bylaws with provincial requirements, while preserving municipal authority.
2. Establish a province-wide scrap metal regulatory framework that standardizes:
  - a. definitions of high risk and prohibited materials;
  - b. licensing expectations, and;
  - c. core enforcement tools such as reporting and verification
3. In consultation with the scrap metal industry, consider new requirements for all scrap metal dealers to:
  - a. verify government issued ID for all restricted metal transactions
  - b. retain electronic transaction records for two years, and;
  - c. provide these records to police services upon request under a uniform provincial template that protects business privacy while maintaining an efficient legal

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<sup>9</sup> CBC News – *Police in Guelph and Waterloo Region investigate copper wire thefts*, Nov. 28, 2025.

<sup>10</sup>Province of Alberta – Scrap Metal Dealers and Recyclers Identification Act, Office Consolidation (Sept. 1, 2025). [Alberta King's Printer](#):

process such as a warrant.

4. Mandate traceable, non-cash payments for copper and other high-risk materials.
5. Publish annual data on theft trends and enforcement outcomes and regularly review the list of prohibited and restricted materials in consultation with municipalities, utilities, and industry.

**Housing: Summary of Committee Feedback**

Resolution	Organization	PAC Recommendation
15. Preserving and Strengthening Ontario's Affordable Rental Housing System	Chatham-Kent Chamber of Commerce	<b>No Consensus</b>
16. Supporting Ontario's Small Landlords to Strengthen the Rental Housing Market	London Chamber of Commerce	<b>Support</b>

## 15. Preserving and Strengthening Ontario’s Affordable Rental Housing System

<b>PAC RECOMMENDATION</b>
<p style="text-align: center;"><b>No Consensus</b></p> <p>The Committee was unable to reach consensus due to legal and practical risks associated with eliminating a tenant opt-out for rent reporting to credit bureaus. PAC recommends greater specificity within the resolution, including clear parameters and examples, to improve clarity, consistency, and alignment with tenant protections.</p> <p><b>PAC discussed feedback with the authoring chamber and requested amendments be made at the AGM debate.</b></p>

**Submitted by:** Chatham-Kent Chamber of Commerce

**Co-sponsored by:** London Chamber of Commerce and the Sault Ste. Marie Chamber of Commerce

### Issue

Ontario’s rental housing system is under growing pressure due to two interconnected challenges:

1. the lack of a standardized and reliable mechanism for assessing tenant rent payment behaviour.
2. limited access to capital financing for repairs and renovations in aging rental housing subject to rent control.

The absence of consistent rent payment data has contributed to increasingly risk-averse tenant screening practices, higher levels of fraud and misrepresentation in rental applications, and reduced access to housing for tenants with limited, damaged, or non-traditional credit histories.

At the same time, Ontario’s aging rental housing stock — predominantly owned by small and medium-sized landlords — faces significant barriers to financing essential repairs. Without access to capital, buildings deteriorate, units are lost from the rental market, tenants are displaced, and pressure on municipalities and provincial housing systems increases.

### Background

Ontario’s rental housing supply is overwhelmingly private-sector and small-owner driven. Approximately 80% of Ontario rental homes are owned by landlords with fewer than 100 units, and roughly 70% are owned by landlords with fewer than 20 units, indicating that the majority of

rental housing is not controlled by large corporate landlords but by small and medium-sized investors with limited access to capital markets.<sup>93</sup>

At the same time, Ontario's rental housing stock is aging. Over 60% of purpose-built rental units were constructed before 1980, and nearly one-third were built before 1960, particularly in small and mid-sized municipalities.<sup>94</sup> These buildings increasingly require major capital investment, including roof replacements, plumbing and electrical upgrades, heating system replacements, and structural repairs to meet current building and safety standards.

Rent is the largest monthly financial obligation for most Ontario households yet rent payment history is not consistently reported to credit bureaus. As a result, tenants who pay rent on time receive no formal credit recognition, while landlords must rely on incomplete credit files or self-reported information. In the absence of a trusted, standardized "source of truth," landlords tighten screening criteria, which disproportionately impacts newcomers, individuals rebuilding credit after divorce or bankruptcy, and lower-income renters.

While voluntary rent reporting programs exist through private platforms reporting to national credit bureaus, uptake remains limited due to tenant opt-in requirements, administrative burden, and lack of landlord incentives. As a result, rent reporting has not reached the scale necessary to improve trust or reduce fraud across the rental market.

For aging rental buildings, financing barriers compound these challenges. Rent control has limited revenue growth, while operating costs — including insurance, utilities, property taxes, and interest rates — have risen sharply. Many small and medium-sized landlords are unable to increase rents sufficiently to unlock equity or qualify for traditional financing. Alternative and private lending options often carry interest rates between 7% and 15%, making repairs financially unviable.<sup>95</sup>

When capital is unavailable, repairs are deferred. Deferred repairs increase the likelihood of unsafe conditions, building orders, and eventual displacement of tenants. In these circumstances, applications for major renovations or redevelopment are often mischaracterized as "renovictions," despite being driven by financial necessity rather than displacement intent. Addressing the underlying financing gap would reduce the need for such outcomes by enabling landlords to complete repairs while preserving tenancies.

Existing provincial and federal tools — including CMHC repair programs and long-term forgivable loans — demonstrate that targeted financing can preserve housing stock. However, current funding is disproportionately directed toward new construction, while the preservation of existing affordable rental housing remains under-supported, despite housing the majority of Ontario renters.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

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<sup>93</sup> Canada Mortgage and Housing Corporation (CMHC), *Rental Market Report – Ontario*; Statistics Canada, *Profile of Residential Property Owners*; Statistics Canada, *Profile of Residential Property Owners*

<sup>94</sup> CMHC, *Housing Stock by Period of Construction*

<sup>95</sup> Financial Services Regulatory Authority of Ontario (FSRA), *Mortgage Lending and Capital Requirements*

## **1. Implement Mandatory Rent Reporting**

- a. Require rent payment reporting to credit bureaus for all residential landlords.
- b. Eliminate tenant opt-out, consistent with other credit obligations.
- c. Implement a phased approach:
  - Phase 1: Landlords and property managers with four (4) or more rental units
  - Phase 2: Landlords with one (1) to three (3) rental units, supported by simplified reporting tools.

## **2. Support Landlord Participation in Rent Reporting**

- a. Introduce tax credits or deductions to offset reporting costs.
- b. Enable government-supported or bulk reporting platforms.
- c. Provide education and guidance on reporting standards and credit impacts.

## **3. Establish a Provincial Rental Housing Repair and Preservation Fund**

- a. Leverage provincial housing allocations alongside federal CMHC programs.
- b. Provide low-interest loans, forgivable loans (10–20 year terms), and matching grants for essential repairs to existing rental housing.

## **4. Enable Financing Models that Preserve Affordability**

- a. Permit tenant-based rent supplements or housing supports to flow through rent, allowing landlords to qualify for financing while maintaining affordability.
- b. Tie financing to tenant protections, affordability commitments, and measurable building condition outcomes.

## **5. Streamline Approvals and Reduce Administrative Barriers**

- a. Avoid duplicative municipal regulations that delay essential repairs without addressing financing constraints.

## **6. Improve Data Collection and Policy Coordination**

- b. Collect and publish data on rental housing age, condition, financing barriers, and unit loss.
- c. Establish a Provincial Rental Housing Advisory Committee with representation from landlords, tenants, municipalities, lenders, and business.

## 16. Supporting Ontario’s Small Landlords to Strengthen the Rental Housing Market

**Submitted by:** The London Chamber of Commerce

**Co-sponsored by:** Cambridge Chamber of Commerce

### Issue

Ontario is experiencing a generational housing supply and affordability crisis that is now widely recognized as one of the most significant threats to economic competitiveness. High housing costs and a lack of available rental supply are driving up labour expenses, constraining workforce mobility, and making it increasingly difficult for Ontario businesses to attract and retain talent. Small landlords—who provide a large share of Ontario’s rental housing—face regulatory, financial, and administrative challenges that discourage their participation in the market, further aggravating the province’s housing shortage. Supporting small landlords is therefore not only a housing policy imperative but also a critical economic priority for Ontario’s business community.

### Background

Ontario’s rental housing market has become deeply strained, with demand far outpacing supply, contributing directly to affordability pressures across the province. The housing crisis is no longer just a social or urban planning issue—it has become a central economic concern. Recent research from KPMG Canada shows that 94 per cent of Canadian business leaders now view housing affordability and lack of supply as the top risk to the economy. Businesses report that high housing costs are forcing them to increase wages simply to help workers absorb escalating living expenses, with 87 per cent of companies noting they have had to boost compensation as a direct response to the cost of housing. These wage pressures raise operating costs, fuel inflation, and create challenges for businesses already navigating high interest rates and uncertain economic conditions.<sup>96</sup>

The Ontario Chamber of Commerce has also highlighted that employers across sectors increasingly cite housing constraints as a major barrier to talent attraction and retention. When workers cannot afford to live near their jobs, employers face higher turnover, reduced productivity, and diminished competitiveness. This is especially acute in high-growth regions, where limited rental options make recruitment more difficult and drive-up overall labour market volatility.<sup>97</sup>

At the same time, households are experiencing unprecedented financial strain. High housing costs and elevated interest rates are leaving many families vulnerable, limiting their mobility, and reducing their capacity to engage in the economy. These pressures create broader systemic risks, particularly in periods of economic slowdown.

Small landlords play a vital role in addressing these challenges. They are responsible for a significant share of Ontario’s rental supply, particularly secondary suites, basement apartments,

<sup>96</sup> [Housing should be priority No. 1 in the federal budget - KPMG Canada](#)

<sup>97</sup> [Home Stretched: Tackling Ontario’s Housing Affordability Crisis Through Innovative Solutions and Partnerships](#)

garden suites, and other forms of “gentle density” that are essential to meeting the province’s long-term housing needs. Despite their importance to the housing ecosystem, small landlords face an outdated regulatory framework, administrative burdens, and slow dispute-resolution processes that can discourage them from offering units or keeping them on the market.

Bill 60, the Fighting Delays, Building Faster Act, 2025, has taken meaningful steps toward improving transparency, fairness, and efficiency at the Landlord and Tenant Board (LTB). However, REALTORS®, housing stakeholders, and many in the business community agree that a more comprehensive modernization of Ontario’s rental housing system is needed. Persistent LTB backlogs—though improved from their peak—continue to delay dispute resolution and disrupt rental availability. The current digital-first hearing model has reduced opportunities for informal “hallway mediation,” contributing to lower mediation success rates and slower case resolution.

The data shows that in-person hearings deliver faster, more effective outcomes than virtual ones, even as the LTB reports a backlog reduction from 53,057 to 41,465 cases. Despite this improvement, landlords are still waiting three to seven months for hearings, compared to just three to seven weeks in 2018, when in-person hearings were the norm. With far fewer adjudicators, the pre-Tribunals Ontario, in-person system resolved nearly the same number of cases through hearings, highlighting how the shift to virtual proceedings has reduced efficiency and prolonged financial risk for landlords—especially small property owners dealing with non-payment.<sup>98</sup>

Additionally, the Residential Tenancies Act, 2006 (RTA) no longer reflects the realities of today’s rental market, particularly the needs and risks of small landlords. Issues such as privacy concerns, procedural complexity, and outdated eviction rules discourage participation and contribute directly to supply shortages that ultimately harm employers and the broader economy.

Recent polling conducted by Abacus on behalf of OREA underscores the depth of Ontario’s rental housing challenges and the degree to which they affect both renters and small landlords. Over half of Ontarians (56%) believe the rental market is fundamentally unbalanced, with nearly two-thirds describing it as unaffordable. Renters report significant pressure, with 82% citing high prices and 62% pointing to a shortage of suitable units, even though satisfaction with their current housing remains relatively high. On the supply side, small landlords face mounting barriers that discourage their participation in the market: 70% report difficulty finding reliable tenants, 53% struggle with screening, and among those who have interacted with the Landlord and Tenant Board, 77% have experienced delays or other issues. These challenges directly reduce rental availability—27% of landlords have chosen to leave a unit vacant due to difficulties managing tenants, and 18% of homeowners have space they could rent out but opt not to. With only 32% of Ontarians satisfied with LTB dispute resolution, the need for a more efficient, balanced, and predictable rental system is clear. Together, these pressures limit rental supply, drive up housing costs, and weaken Ontario’s ability to attract talent and support a competitive business environment.<sup>99</sup>

Other jurisdictions, including British Columbia, New Zealand, Spain, and U.S. states such as California and New York, provide examples of modernized rental frameworks with formalized

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<sup>98</sup> <https://tribunalwatch.ca/2025/the-landlord-and-tenant-board-annual-report-progress-but-still-a-long-way-to-go/>

<sup>99</sup> [A-Fair-Rental-Market-for-a-Stronger-Ontario.pdf](#)

mediation services, updated tenancy legislation, and targeted incentives for small landlords. Ontario has an opportunity to adopt similar measures to improve rental supply, support affordability, and strengthen the province's economic competitiveness.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Conduct a full modernization of the Residential Tenancies Act to reflect today's rental market, reduce red tape for small landlords, and create a more predictable rental system that supports labour mobility and business competitiveness.
2. Strengthen and formalize mediation services at the Landlord and Tenant Board by adopting a structured pre-hearing mediation model—similar to British Columbia's—that would resolve disputes faster, reduce the backlog, and return rental units to the market more efficiently.
3. Restore in-person hearings as the primary format at the Landlord and Tenant Board with virtual options by mutual consent, in order to support more effective mediation and improve the speed and fairness of case resolution.
4. Introduce targeted income-tax incentives for small landlords (five or fewer units) who bring previously unrented or underused space into the long-term rental market. Eligibility could be limited to landlords in good standing with no active LTB judgements.

## Workforce Development: Summary of Committee Feedback

Resolution	Organization	PAC Recommendation
17. Advancing Strategic Investment in Artificial Intelligence, Talent, Infrastructure and Commercialization	Greater Barrie Chamber of Commerce	<b>Support as Amended</b>
18. Creating Ways to Retain and Attract More Women to Careers in the Skilled Trades	Cambridge Chamber of Commerce	<b>Support as Amended</b>
19. Ensuring the Sustainability of Ontario's Agri-Food and Life Sciences Workforce through Veterinary Education and Research	Guelph Chamber of Commerce	<b>Support as Amended</b>
20. Improve Early Childhood Educational Outcomes Through Expanded Education Opportunities and Innovation in Childcare	Sault Ste. Marie Chamber of Commerce	<b>Support as Amended</b>
21. Ontario SME Training Tax Credit for Paid Release Time	Greater Niagara Chamber of Commerce	<b>Support</b>
22. Removing Barriers to Boost Ontario's Labour Pool and Creating Opportunities for Businesses to Prosper	Cambridge Chamber of Commerce	<b>Support as Amended</b>
23. Strengthening Ontario's Workforce Through Improvements to the Ontario Immigrant Nominee Program	The London Chamber of Commerce	<b>Support as Amended</b>
24. Sustaining the Rural Primary Care Workforce Through Fair and Predictable Compensation for Ministry of Health and Ontario Health Funded Organizations	Tillsonburg District Chamber of Commerce	<b>Support as Amended</b>

## 17. Advancing Strategic Investment in Artificial Intelligence, Talent, Infrastructure and Commercialization

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Greater Barrie Chamber of Commerce

**Co-sponsored by:** Orillia and District Chamber of Commerce, Brockville and District Chamber of Commerce, Greater Sudbury Chamber of Commerce, and the Chatham-Kent Chamber of Commerce

### Issue

Artificial Intelligence is transforming productivity, labour markets and global economic competitiveness. This is at a time when Canada continues to face a well-documented productivity gap relative to peer economies.<sup>100</sup> Jurisdictions that invest early in talent, research capacity, advanced infrastructure and commercialization pathways are poised for sustained economic growth.

Without deliberate provincial action focused on economic positioning, Ontario risks educating exceptional talent only to see it migrate to jurisdictions offering stronger research support, infrastructure and career pathways.

This is not a question of regulating technology itself. Technologies evolve faster than legislative cycles. It is a question of ensuring Ontario has the institutional capacity, workforce readiness and infrastructure necessary to capture the economic value generated by emerging technologies.

Strategic provincial leadership will be essential to ensure Ontario remains a destination for innovation rather than a source of talent for competing economies.

### Background

Data centres and AI computing infrastructure are increasingly recognized as foundational economic infrastructure. This infrastructure is Comparable to broadband, transportation networks and energy systems in its ability to drive productivity and long-term growth.<sup>101</sup>

<sup>100</sup> OECD - Raising Business Sector Productivity – OECD Economic Survey of Canada [https://www.oecd.org/en/publications/oecd-economic-surveys-canada-2025\\_28f9e02c-en/full-report/raising-business-sector-productivity\\_443bcd88.html](https://www.oecd.org/en/publications/oecd-economic-surveys-canada-2025_28f9e02c-en/full-report/raising-business-sector-productivity_443bcd88.html)

<sup>101</sup> Council of Canadian Academies - Waiting to Connect: The Expert Panel on High-Performance Computing <https://cca-reports.ca/reports/high-performance-computing/>

Data centres and high-performance computing systems are expanding globally to support innovation, yet these facilities require significant energy resources.<sup>102</sup> As Ontario expands its data centre and AI capacity, it has an opportunity to lead through environmentally responsible data centre infrastructure. This includes prioritizing energy-efficient design, low carbon power sources and sustainable cooling methods that protect natural resources while supporting economic expansion. This approach advances long-term environmental sustainability while strengthening Ontario's competitive position. Energy-efficient, low-impact infrastructure will be critical to scaling data centre capacity and meeting the growing power demands of AI development, positioning Ontario as a global jurisdiction of choice for sustainable, large-scale AI deployment.

Ontario employs over 400,000 information and communications technology workers, making it one of North America's largest technology labour markets.<sup>103</sup> This workforce supports a dynamic ecosystem of more than 22,000 technology businesses across the province.<sup>104</sup> A workforce of this scale is essential to productivity and long-term economic growth.

Ontario's future economic strength will depend not only on attracting global expertise but also on retaining and deploying the highly skilled talent developed within the province. Postsecondary institutions graduate advanced researchers, engineers and technical professionals each year, representing a significant public investment in human capital. The Ontario Research Fund supports this ecosystem by helping institutions cover operational and infrastructure costs associated with major research activity.<sup>105</sup> While this addresses the need for facilities and equipment, it does not establish a stable, long-term mechanism for attracting and retaining top research talent in Ontario.

The federal Canada Research Chairs program supports the attraction and retention of research talent. However, as a nationally allocated initiative, it is not designed to deliver a scalable, sector-specific talent strategy aligned with Ontario's emerging economic priorities. A complementary provincial program is required to address this gap.

Provinces play a decisive role in shaping research ecosystems, workforce pipelines, applied training and commercialization environments. Coordinated provincial action will influence whether Ontario captures the economic benefits of innovation or sees those benefits realized elsewhere.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Establish a Provincial Research Chairs Co-Investment Program for for Artificial Intelligence and Emerging Technologies. Create a stable and predictable funding stream that is competitive with federal funding streams and enables Ontario institutions to attract globally

<sup>102</sup> International Energy Agency - Data Centres and Data Transmission Networks - <https://www.iea.org/reports/data-centres-and-data-transmission-networks>

<sup>103</sup> Government of Ontario - Ontario's Long-Term Report on the Economy – ICT Workforce - <https://www.ontario.ca/document/ontarios-long-term-report-economy-2024/chapter-5-harnessing-sector-strengths-support-2024>

<sup>104</sup> Invest Ontario - Digital Services and Information Technology Sector Overview - <https://www.investontario.ca/digital-it>

<sup>105</sup> Government of Ontario - Ontario Research Fund - <https://www.ontario.ca/page/ontario-research-fund>

recognized researchers while strengthening opportunities for domestically trained experts to remain in the province. Retention should be treated with the same strategic importance as attraction.

2. Implement a Provincial Talent Retention Strategy for Highly Skilled Graduates. in Artificial Intelligence and data centre infrastructure. Work collaboratively with industry and postsecondary institutions to strengthen pathways from advanced education to employment in AI and data centre infrastructure roles, support industry-embedded research roles and reduce the outflow of top talent. Ontario already produces exceptional expertise in artificial intelligence and related fields. Policy should ensure the province benefits from that investment.
3. Expand AI and Data Centre Infrastructure Using Environmentally Responsible Technologies. Recognize data centre and AI computing capacity as essential economic infrastructure and prioritize development that incorporates: energy-efficient design, low-carbon power sources, heat recovery where feasible, advanced cooling technologies that minimize freshwater consumption. Strategic infrastructure investment will support economic growth, enable scalable expansion of data centre capacity and position Ontario as a global jurisdiction of choice for sustainable, large-scale AI development.
4. Accelerate Modernization of Post secondary and Applied Skills Training in Artificial Intelligence and related technologies. Support institutions in integrating applied AI and data-driven technology competencies across disciplines such as advanced manufacturing, health sciences, logistics, finance and skilled trades to reflect evolving industry needs. Preparing the workforce for technological change is essential to economic resilience.
5. Reform Provincial Procurement to Accelerate Commercialization. Leverage public procurement to pilot Ontario-developed technologies, reduce barriers for small and medium-sized innovators and create clearer pathways for emerging solutions to reach markets. Strategic procurement can serve as a powerful catalyst for homegrown innovation while strengthening public-sector effectiveness.

## 18. Creating Ways to Retain and Attract More Women to Careers in the Skilled Trades

*This is a sunset resolution*

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Cambridge Chamber of Commerce

**Co-sponsored by:** Greater Kitchener-Waterloo Chamber of Commerce, Greater Barrie Chamber of Commerce, Halton Hills Chamber of Commerce, Chamber of Commerce Brantford–Brant, Guelph Chamber of Commerce

### Issue

An acute shortage of skilled workers continues to permeate Ontario's employment landscape, despite ongoing discussions among business, education, and government leaders on how to solve this issue. While part of the focus remains navigating federal and provincial immigration policy changes to attract newcomers with the necessary skills to address these shortages, particularly in construction and infrastructure, continued efforts should also be enhanced to create a conducive environment to encourage and retain more women in the skilled trades sector to help fill these growing gaps.

### Background

Current estimates indicate that more than 700,000 skilled trades workers nationwide are expected to retire by 2028. On the provincial side, BuildForce Canada predicts that Ontario will need to recruit more than 100,000 workers in the construction industry alone by 2030 to replace retiring workers and keep up with demand. This number encompasses a range of trades, including electricians, plumbers, welders, and mechanics.<sup>106</sup>

Immigration policies targeting the introduction of more skilled workers to fill these gaps has been in motion for several years. However, recent changes have created uncertainty. These include the Government of Canada's move to cut the number of provincial nominees' applications in half, as well as the Province's proposed plan to further alter Ontario's Immigrant Nominee Program (ONIP) after cancelling its skilled trades stream over evidence of systemic fraud or misrepresentation.<sup>107</sup>

The move to have more women pursue careers in the skilled trades to help ease shortages has been gaining momentum, thanks in part to a concentrated push by the Province to launch several initiatives (including an \$8.6 million investment through the Skills Development Fund

<sup>106</sup> Why There's a Shortage of Skilled Trades Professionals in Ontario – (ontariocolleges.ca) <https://tinyurl.com/mrxavt9x>

<sup>107</sup> Newcomers seeking permanent residency face uncertainty, frustration over Ontario immigration changes – (CBC, Dec. 2025) <https://tinyurl.com/3pw74mee>

(SDF) last fall) to empower and encourage women to enter this sector. These include mentorship programs and hands-on training opportunities.

There has been a 66% uptick during the past decade of women working in the skilled trades in construction and recent Ontario Government stats show 374,600 women were employed in a skilled-trades-related occupation, which represents 29% of the 1.3 million people working in trades-related roles. Also, in 2024-2025 there was an 11% increase in women enrolling in apprentice programs in the field of HVAC, electrical, carpentry, plumbing and construction.

While there has been positive movement, there are clear indications more needs to be done since an industry survey showed about one-third leave the sector after the first year of their apprenticeship.<sup>108</sup>

The 2025 Recruitment and Retention of Women in the Building Trades survey, compiled by the Ontario Building and Construction Tradeswomen (OBCT), supports this fact and notes that women represent just 5% of on-site trades and occupations in the province's construction sector. This translates into only 14,200 women working directly with tools.

Key findings from this survey, gathered from 342 women across Ontario, showed that 82% of tradeswomen could see themselves working in the industry over the next two to five years. Also, 65% said they were satisfied with their pay and benefits, while another 54% of respondents said they entered the sector after age 25, signaling untapped potential through earlier outreach.

The survey also highlighted serious systemic issues that continue to face women in the skilled trades which have been identified as a catalyst for many to leave the sector.

Survey findings showed 65% of respondents said they needed better-fitting personal protective equipment (PPE) and access to appropriate washroom facilities, while more than half reported childcare issues with 57% reporting this resulted in them turning down work due to scheduling conflicts.<sup>109</sup> Legislative changes to the Employment Standards Act and the Working for Workers Five Act (which received Royal Assent October 2024) to create a new 27-week parental leave, provide properly fitting PPE for women in all trades sectors, and to provide proper washroom facilities for them, are in place to help address these issues.<sup>110</sup>

However, concerns surrounding childcare remain as well as issues pertaining to some job tasks and occupational exposures that could increase risks to a pregnant worker and her fetus, such as chemicals, noise, shiftwork, hot environments, and manual material handling.<sup>111</sup> These health concerns highlight the need for some form of pre-delivery 'bridge' benefit women could access prior to their regular maternity benefits since the Province's EI Sickness Benefits only provides up to 26-weeks of benefits to women who cannot work due to medical reasons related to pregnancy.<sup>112</sup>

There is already some relief available for expectant women in the piping industry who need to take paid time off before the birth of their child due to working conditions that could pose a risk

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<sup>108</sup> Construction Industry Must Boost Number of Women in the Trades – (Rescon, Nov. 2024) <https://tinyurl.com/53pp2r8s>

<sup>109</sup> Advancing Recruitment and Retention of Women in the Building Trades: Results from the 2025 OBCT Tradeswomen Survey - Nov. 2025 <https://shorturl.at/v5jsK>

<sup>110</sup> Ontario Supporting Women and Families in the Trades – (Ont. Gov't. Nov. 2024) <https://tinyurl.com/mphdp56v>

<sup>111</sup> Canada's Building Trades Unions – Developing a pre-delivery/birth maternity benefit <https://shorturl.at/gqkVv>

<sup>112</sup> EI Sickness Benefits – Government of Ontario website. <https://www.canada.ca/en/services/benefits/ei/ei-sickness.html>

to the mother or fetus thanks to the UA Canada National Parental Wellness Benefit program. It provides up to 24 weeks of pay (equivalent to EI amount) during pregnancy, allowing members to stop working before delivery without exhausting their federal EI maternity benefits.<sup>113 11</sup>

Besides child-related issues, the OBCT survey also showed that concerns surrounding worksite culture remains another stumbling block. According to its findings, 52% of respondents reported experiencing harassment, and half were dissatisfied with how their complaints were handled, fueling a continued call from that organization directed at government, employers, unions, training centres, and industry partners to make anti-discrimination and anti-harassment training mandatory to complete an apprenticeship.<sup>114</sup>

Also, 67% of respondents pointed to the importance of having more women in leadership positions and setting specific targets on job sites, as well as encouraging employer organizations and unions to develop and support women's committees.

The survey also showed that 58% of respondents discovered the trades later in life due to a lack of exposure while in secondary school, stressing the continued need to promote opportunities in this sector as viable career options to female high school students.<sup>115</sup>

The Province currently has a variety of programs already in place to address this concern. These include the 'Jill of All Trades' events through Skills Ontario aimed at grades 9-12 students as well the Focused Apprenticeship Skills Training (FAST) program within the Ontario Youth Apprenticeship Program (OYAP) which allows Grade 11 and 12 students to spend up to 80% of their senior courses in co-op education, allowing for more hands-on training and earlier entrance into the skilled trades.<sup>116</sup>

But the need for additional avenues to promote the skilled trades to students remains apparent.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Partner with industry to market careers in skilled trades by continuing to promote or enhance existing programs that target young women, such as 'Jill of All Trades' and Skilled Trades Ontario's 'Level Up!', ensuring intentional outreach is also extended to female secondary school students.
2. Mandate a form of compensation (i.e., tax credit) for employers and industry partners to make anti-discrimination and anti-harassment training mandatory to complete an apprenticeship, as well as ensure this training is included in programs delivered by Skilled Trades Ontario.
3. Instigate a dialogue with employers and industry partner organizations and unions to set specific leadership targets for women on job sites.
4. Work with industry partners to identify and develop childcare solutions that address barriers

<sup>113</sup> UA Canada National Wellness Program. <https://rskalko.wixsite.com/uacanada/wellness>

<sup>114</sup> Advocates push for anti-harassment training on construction sites - (Barrie Today, Dec. 2025) <https://tinyurl.com/9je3yz9k>

<sup>115</sup> Advancing Recruitment and Retention of Women in the Building Trades: Results from the 2025 OBCT Tradeswomen Survey - Nov. 2025 <https://shorturl.at/v5jsK>

<sup>116</sup> Young Women's Initiatives – Skills Ontario <https://tinyurl.com/4xndme4r>

for tradespeople, including prioritizing spots for those in the skilled trades sector.

5. Work with the Federal Government of Canada to identify the potential of sharing costs in the development of a pre-delivery benefit prior to the onset of regular maternity benefits to assist those women in specific skilled trades who face a known criteria of physically hazardous factors (i.e., chemicals, excessive noise, fumes) in their workplace.

## 19. Ensuring the Sustainability of Ontario’s Agri-Food and Life Sciences Workforce through Veterinary Education and Research

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Guelph Chamber of Commerce

**Co-sponsored by:** Greater Kingston Chamber of Commerce, Windsor Essex Chamber of Commerce and the North Durham Chamber of Commerce of Commerce

### Issue

There are concerns over the future of veterinary education and research in Ontario due to proposed regulatory amendments being presented in Bill 75, to amend the *Animals for Research Act*. These amendments could have a significant and devastating impact on Ontario agri-food and life sciences sectors, and on our province’s ability to educate the workforce of our future.

To ensure the long-term competitiveness of Ontario’s agri-food and life sciences sectors, and the security of our food systems, the Province must preserve specific exemptions for veterinary and medical purposes to allow institutions like the University of Guelph’s Ontario Veterinary College (OVC) and the nine colleges around Ontario that offer veterinary technician programs, to continue training the highly skilled workforce required by multiple industries across Ontario.

### Background

The agri-food sector is a cornerstone of Ontario’s economy, and veterinarians are its indispensable guardians. They are responsible for safeguarding animal health, maintaining food safety, and managing biosecurity across farms and processing facilities. The agri-food sector is responsible for over 867,000 jobs, more than \$51 billion in GDP annually and employing one in nine Ontarians<sup>117</sup>. The food and beverage industry also relies on animal wellbeing. Food and beverage processing is the largest manufacturing sector at 17.2% of manufacturing GDP and 17.6% of manufacturing jobs, worth a staggering \$173.4 billion in 2024<sup>118</sup>.

There is only one veterinary college, OVC at the University of Guelph, and nine accredited Veterinary Technician programs throughout all of Ontario<sup>119</sup>. They include Algonquin College

<sup>117</sup> Ontario Federation of Agriculture. <https://ofa.on.ca/local-snapshots/#:~:text=From%20farmers%20to%20our%20diverse,%2451%20billion%20in%20GDP%20annually.>

<sup>118</sup> Government of Canada. <https://agriculture.canada.ca/en/sector/overview>

<sup>119</sup> Canadian Veterinary Medical Association. [https://www.canadianveterinarians.net/public-resources/careers-in-veterinary-medicine/veterinary-colleges/#:~:text=The%20Atlantic%20Veterinary%20College%20\(AVC.Visit%20Site](https://www.canadianveterinarians.net/public-resources/careers-in-veterinary-medicine/veterinary-colleges/#:~:text=The%20Atlantic%20Veterinary%20College%20(AVC.Visit%20Site)

(Ottawa), College Boreal (Sudbury and Ottawa), Georgian College (Orillia), Northern College (Haileybury), Seneca College (King City), Sheridan College (Brampton), St. Clair College (Windsor), St. Lawrence College (Kingston), and University of Guelph (Ridgetown Campus)<sup>120</sup>. These ten locations are responsible for providing talent for the entire province, and beyond. We can not allow the government to deteriorate the quality or scope of the education being provided in these critical programs.

Bill 75, Keeping Criminals Behind Bars Act, 2025, bewilderingly contains significant changes to animal research in Ontario. It seeks to prohibit invasive medical research on cats, dogs and other prescribed animal, subject to “specific exemptions,” and bar all other research on cats, dogs and other prescribed animals “unless specific conditions are met<sup>121</sup>.” Many of the proposed changes go too far, and some are a duplication of the currently existing legislature, and yet they amount to adding layers of bureaucracy and red tape to industries that are already severely regulated. These changes would hinder Ontario’s agri-food sector, and destroy Ontario’s life sciences sector, which employs over 74,000 professionals and exports over \$12 billion annually, according to the Ontario Hospital Association<sup>122</sup>.

Ontario currently operates as a province with “one of the most rigorous animal research oversight frameworks in the world through the Canadian Council on Animal Care,” which provides oversight and enforcement mechanisms to help safeguard animal wellbeing<sup>123</sup>. These amendments were grew from a misunderstanding, which has since been cleared up, and yet, these amendments remain<sup>124</sup>.

The proposed changes add uncertainty, and also risk the integrity and independence of this important research. We can not allow the perception-based opinions of politicians to influence the evidence-based work of scientific research. This form of populism, which harbours mistrust for experts, is dangerous and could fundamentally jeopardize some of the largest and most innovative industries in Ontario.

Without clear exemptions for veterinary education and research, and life sciences, in the amended *Animals for Research Act*, Ontario risks disrupting the pipeline of talent that sustains the provincial food supply chain and agricultural competitiveness.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. **Adopt Proposed Exemptions:** Advocate for exemptions for veterinary purposes, including research and education, and for life sciences research, within the amended *Animals for*

<sup>120</sup> OAVT Accredited Colleges. <https://oavt.org/becoming-an-rvt/accredited-colleges/#:~:text=Fully%20Accredited%20Colleges:,Accreditation%20expires%20October%2031%2C%202026>

<sup>121</sup> Legislative Assembly of Ontario. Bill 75, Keeping Criminals Behind Bars. <https://www.ola.org/en/legislative-business/bills/parliament-44/session-1/bill-75> and [https://www.ola.org/sites/default/files/node-files/bill/document/pdf/2025/2025-11/b075\\_e.pdf](https://www.ola.org/sites/default/files/node-files/bill/document/pdf/2025/2025-11/b075_e.pdf)

<sup>122</sup> Ontario Hospital Association. <https://www.oha.com/Bulletins/OHA%20Submission%20-%20Animals%20for%20Research%20Act.pdf>

<sup>123</sup> Ontario Federation of Agriculture. <https://ofa.on.ca/wp-content/uploads/2026/01/OFA-Submission-re-25-OMAFRA008-Animals-for-Research-Act-Jan-2026.pdf>

<sup>124</sup> “Scientist using dogs in controversial study explains for the first time what was going on.” CBC News. <https://www.cbc.ca/news/canada/london/scientist-using-dogs-in-controversial-study-explains-for-the-first-time-what-was-going-on-9.7071014>

*Research Act* regulations that are being presented in *Bill 75*.

2. **Protect the Workforce Pipeline:** Ensure that any regulatory changes do not inadvertently create barriers for the Ontario Veterinary College, colleges with veterinary technician programs, and other accredited institutions in training the next generation of large-animal and rural veterinarians.
3. **Recognize Agri-Food Security:** Explicitly recognize veterinary education and research as foundational components of Ontario's food security strategy and rural economic resilience.

## 20. Improve Early Childhood Educational Outcomes Through Expanded Education Opportunities and Innovation in Childcare

*This is a sunset resolution*

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Sault Ste. Marie Chamber of Commerce

**Co-sponsored by:** Guelph Chamber of Commerce and the Chatham-Kent Chamber of Commerce

### Issue

Ontario's long-term economic success relies on the strength, resilience, and preparedness of its workforce. As a significant portion of tomorrow's workforce consists of today's children, it is critical that the province ensure all children -- particularly those who are vulnerable -- have access to the supports needed to succeed.

A growing proportion of children in Ontario are entering the education system with developmental vulnerabilities that can negatively impact their long-term educational outcomes, workforce participation, and overall productivity. Without targeted intervention, these challenges will contribute to ongoing labour shortages, reduced economic output, and increased reliance on social systems.

To safeguard Ontario's economic future, the province must prioritize early childhood investments that improve developmental outcomes and ensure every child has the opportunity to reach their full potential.

### Background

Education is a critical pathway to labour market participation and long-term economic prosperity; it is an essential pillar in the creation of a competitive Ontario within the global economy. With approximately 83% of future job growth in Ontario expected to require post-secondary education or advanced skills, early learning outcomes are directly tied to the province's future workforce readiness.

Research consistently demonstrates that early childhood development is a strong predictor of long-term educational attainment, workforce participation, and overall productivity. Developmental challenges in early childhood are closely linked to outcomes such as lower academic achievement, reduced employment opportunities, and increased reliance on social

supports. Later problems such as anti-social behaviour, obesity, high blood pressure, depression, and type-2 diabetes, can also be traced back to early childhood.<sup>125</sup>

For Ontario's business community, this presents a growing risk. A workforce with higher levels of developmental vulnerability leads to reduced productivity, increased training costs, and persistent labour shortages. Economic analyses suggest that failing to address early childhood vulnerability could result in substantial long-term GDP loss, alongside increased demand on healthcare and social systems.

The Early Development Instrument (EDI) is a tool that gathers information about children's development in their early years (between the ages of 3.5 and 6.5 years old).<sup>126</sup> The most recent provincial EDI collection (2022/23) shows that the developmental vulnerability rate amongst young children in Ontario has now reached 31.1% (up from 29.6% in 2017/18). This does not include children who have an identified special need. These high levels of vulnerability at school entry are at least five times higher than the rates of biological vulnerability that are detectable in the postnatal period. The most concerning fact is that the Ontario vulnerability rate is *worsening* rather than improving.

Children who are deemed vulnerable or at risk of being vulnerable on the EDI are less likely to achieve the provincial standards in the Grade 3 EQAO reading, writing and mathematics assessment than those with 118 higher EDI scores. Their education trajectories are likely to be lower, and these children will face more challenges as they grow. Many will remain behind their peers throughout life, be disruptive in school, fail to graduate, and be unable to fully contribute and participate in society and may rely on the social system (such as Ontario Works) for financial support.<sup>127</sup>

There is a high economic cost to vulnerability. A high vulnerability rate will dramatically deplete our future quantity of human capital and will have a negative influence on the quality of our future labour market. Canadian economic analyses reveal that this depletion will cause Canada to forgo 20% in GDP growth over the next 60 years. The economic value of this loss is equivalent to investing \$2.2 trillion to \$3.4 trillion today at a rate of 3.5% interest, even after paying for the social investment required to reduce vulnerability.<sup>128</sup>

Although governments face fiscal constraints, policymakers should prioritize initiatives with high economic and social returns, such as early childhood education.<sup>129</sup> There is a 7:1 return on investment for early childhood programming compared to a 1:1 payback for adult education.<sup>130</sup>

There is evidence that the duration of early childhood education is an important factor in boosting math scores, which in turn leads to higher future wages. With this in mind, the province

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<sup>125</sup> Nishank Varshney, Judy A Temple, and Arthur J Reynolds. Early Education and Adult Health: Age 37 Impacts and Economic Benefits of the Child-Parent Center Preschool Program. J Benefit Cost Anal. <https://pmc.ncbi.nlm.nih.gov/articles/PMC9273114/>

<sup>126</sup> Early Development Instrument (EDI). McMaster University. <https://research.mcmaster.ca/industry-investors/tech/07-066/>

<sup>127</sup> Ruth C. Calman, and Patricia J. Crawford, P.J. Starting Early: Teaching, Learning and Assessment (pp. 1–37). Education Quality and Accountability Office. [https://www.citywindsor.ca/Documents/residents/social-services/childrens-services/community-planning-and-early-years-research/early-years-research/early-development-instrument-edi/EDI\\_StartingEarly\\_EQAO.pdf](https://www.citywindsor.ca/Documents/residents/social-services/childrens-services/community-planning-and-early-years-research/early-years-research/early-development-instrument-edi/EDI_StartingEarly_EQAO.pdf)

<sup>128</sup> Paul Kershaw et al. The Economic Costs of Early Vulnerability in Canada. Canadian Journal of Public Health. <https://pubmed.ncbi.nlm.nih.gov/21416797/>

<sup>129</sup> Craig Alexander et al. Ready for Life: A Socio-Economic Analysis of Early Childhood Education and Care. The Conference Board of Canada. [https://cefa.ca/wp-content/uploads/2022/01/9231\\_Ready-for-Life\\_RPT.pdf](https://cefa.ca/wp-content/uploads/2022/01/9231_Ready-for-Life_RPT.pdf)

<sup>130</sup> Charles Pascal. With Our Best Future in Mind: Implementing Early Learning in Ontario.

<https://childcarecanada.org/documents/research-policy-practice/09/06/our-best-future-mind-implementing-early-learning-ontario>

should focus on expanding licensed early childhood education services in an affordable, equitable way.<sup>131</sup>

The implementation of artificial intelligence (AI) tools could also significantly help early childhood educators provide better and more efficient education to children, especially those who are vulnerable. AI can better monitor learning progress, identify strengths and weaknesses, and even alter content according to the child's unique progress.<sup>132</sup> We strongly suggest that the Government of Ontario search for ways to bring this advanced technology into childcare where applicable.

Investments in early childhood education and intervention yield among the highest returns of any public investment, delivering both economic and social benefits. Expanding access to high-quality, targeted early learning supports -- particularly for vulnerable children -- represents a strategic opportunity to strengthen Ontario's future workforce pipeline.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Expand affordable early childhood education (i.e., licensed childcare) to include 3-year-olds identified as developmentally vulnerable.
2. Place a focus on catching up vulnerable (and at-risk of being vulnerable) children to their peers through targeted programming and early interventions. This may include, but is not limited to: speech and language therapy, social-emotional learning and behavioral supports, early childhood mental health services, tutoring and early literacy and numeracy programs, and family and caregiver support programs
3. Utilize automation technology in childcare spaces to reduce educator preparation and administration time so they can spend more time directly interacting with children. This should include: the use of AI-driven tools to support administrative functions such as documentation, reporting, and developmental tracking, enabling educators to dedicate more time to direct interaction with children; careful and limited application of AI-supported learning tools, where appropriate, to complement -- not replace -- educator-led instruction; the development of clear provincial guidelines to ensure data privacy, security, transparency, and ethical use of AI in childcare settings.

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<sup>131</sup> Craig Alexander et al. Ready for Life: A Socio-Economic Analysis of Early Childhood Education and Care. The Conference Board of Canada. [https://cefa.ca/wp-content/uploads/2022/01/9231\\_Ready-for-Life\\_RPT.pdf](https://cefa.ca/wp-content/uploads/2022/01/9231_Ready-for-Life_RPT.pdf)

<sup>132</sup> Use of AI in Early Childhood Education. CDI College. <https://www.cdicollege.ca/news/use-of-ai-in-early-childhood-education/#gsc.tab=0>

## 21. Ontario SME Training Tax Credit for Paid Release Time

**Submitted by:** Greater Niagara Chamber of Commerce

**Co-sponsored by:** Thunder Bay Chamber of Commerce, Grimsby and District Chamber of Commerce, Hamilton Chamber of Commerce, Windsor-Essex Chamber of Commerce, Lincoln Chamber of Commerce and the Chatham-Kent Chamber of Commerce

### Issue

Ontario consistently emphasizes upskilling, lifelong learning, and productivity, but for small and medium-sized enterprises (SMEs), the biggest barrier is not tuition costs or course availability. Pulling a worker off the floor means lost output, delayed orders, or overtime costs. Existing training supports often reimburse direct costs such as tuition, but ignore indirect costs, such as wages paid while training and lost productivity. As a result, SMEs underinvest in training compared to larger firms, reinforcing productivity gaps and labour shortages. Given Canada's productivity gap and the need to keep up with rapid advancements in technology, lifelong education cannot be ignored in the mission to maintain a skilled workforce competitive on the global stage. Ontario can help close this gap through a refundable corporate income tax (CIT) credit or payroll-based credit targeted to SMEs.

### Background

Research shows that smaller companies invest significantly less in workforce training than larger organizations. In Ontario, employee training activity is heavily concentrated among large businesses, particularly in regulated industries that mandate training.<sup>133</sup>

Nationwide data reinforce this pattern. A 2023 analysis of employer training in Canada noted that Canadian firms spend only about \$240 per employee annually on training, a modest amount that lags international peers.<sup>134</sup> These investments, again, are concentrated in larger enterprises; larger firms are far more likely to offer skills training, leaving a gap at the SME level. This underinvestment by SMEs in Ontario (and Canada generally) highlights a systemic gap that a targeted tax credit could help fill by incentivizing and enabling more training in small workplaces.

SMEs often face a choice between losing valuable employee time during work hours or asking workers to train on their own time, and thus many small firms hesitate to sponsor any training not done on the job. SMEs can rarely afford to pay wages for time spent in external courses, given the immediate productivity hit. The result is a bias toward on-the-job learning (if any) and the neglect of longer-term skills development.

In a 2021 survey-based study on post-pandemic skills needs, most SME respondents reported difficulty finding time for employees to engage in training. The report explicitly recommends

<sup>133</sup> *Moving Forward Together: An Employer Perspective on the Design of Skills Training Programs in Ontario*. Ontario Chamber of Commerce, 2014. [occ.ca/wp-content/uploads/Moving\\_Forward\\_Together-1.pdf](http://occ.ca/wp-content/uploads/Moving_Forward_Together-1.pdf)

<sup>134</sup> *Employer-Sponsored Skills Training: A picture of skills training opportunities provided by Canadian employers*. Future Skills Centre, 2023. [fsc-ccf.ca/wp-content/uploads/2023/02/2023-02-Employer-Sponsored-Training\\_EN.pdf](http://fsc-ccf.ca/wp-content/uploads/2023/02/2023-02-Employer-Sponsored-Training_EN.pdf)

exploring ways for governments and support organizations to support and incentivize investments in training (both in time and money) for small businesses.<sup>135</sup>

The gap is more acute in Ontario's critical industries. In the manufacturing sector, where maintaining production is critical, 34% of Ontario manufacturers surveyed indicated that a busy production schedule limits the time available for training apprentices, making this the most common obstacle to running apprenticeship programs.<sup>136</sup> The same percentage of manufacturers indicated that tax incentives for businesses investing in training would most effectively support them in addressing labour and skills needs in both the short and long term.

A 2023 TIAO report found similar issues in the tourism sector. Leadership training, for example, was found to be in high demand, and yet many SMEs lacked the scale or resources to offer it internally, necessitating external training.<sup>137</sup> However, this returns us to the initial problem: small tourism SMEs are often dealing with labor shortages and high operating costs, so dedicating paid time for employee training is extremely difficult. As a result, front-line workers in hospitality often receive minimal training beyond basic onboarding, which can impact service delivery and productivity.

Studies of the retail sector paint a similar picture. Only 20 percent of retail firms reported offering training to employees to integrate and use new technologies, and only 11 percent reported having plans to provide training to employees to take on new roles in the organization.<sup>138</sup> Many retail businesses also indicated significant resource-related challenges related to training, but, the Future Skills Centre concludes, they appear to have been unable to overcome these constraints.

The evidence from Ontario and Canadian sources is clear: SMEs invest less in training not because they see little value, but because they face greater barriers, especially the immediate cost of lost work time when staff are in training. Ontario SMEs trail larger firms in training investment, and surveys consistently pinpoint "time away" and cost as critical obstacles. Sector-specific reports further illustrate how these barriers play out in practice, from the factory floor to the restaurant and hotel.

While programs to credit employers for training exist, these are narrowly focused and apply to students, apprentices, or individuals, such as Ontario's Co-operative Education Tax Credit or Ontario Jobs Training Tax Credit, or the federal Canada Training Credit.

A refundable SME training tax credit for paid release time directly targets this problem by offsetting wage and productivity costs, thus incentivizing small businesses to upskill their employees.

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<sup>135</sup> *Canada's Small and Medium Enterprises Struggle to Identify the Skills and Talent Needed to Recover and Grow, New Report Shows*. Ryerson University, Public Policy Forum, & Ontario Chamber of Commerce, 2021. <https://www.newswire.ca/news-releases/canada-s-small-and-medium-enterprises-struggle-to-identify-the-skills-and-talent-needed-to-recover-and-grow-new-report-shows-867982415.html>

<sup>136</sup> *Keep Calm and Keep Training*. Canadian Manufacturers & Exporters, 2025. <https://cme-mec.ca/wp-content/uploads/2025/05/CME-2025-Workforce-Report.pdf>

<sup>137</sup> *Tourism SkillsNet Ontario: Workforce Issues, Opportunities & Impact*. Tourism Industry Association of Ontario, Tourism Skillsnet of Ontario, 2023. [https://otec.org/wp-content/uploads/2023/10/TSNO\\_Workforce\\_Issuesx\\_Opportunities\\_and\\_Impact\\_Report\\_July\\_2023\\_Final.pdf](https://otec.org/wp-content/uploads/2023/10/TSNO_Workforce_Issuesx_Opportunities_and_Impact_Report_July_2023_Final.pdf)

<sup>138</sup> Future Skills Centre, *ibid*.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Introduce a refundable SME Training Tax Credit that offsets wages paid during verified employee training hours.
2. Ensure the program is administratively simple, predictable, and accessible to small employers.
3. Evaluate program outcomes based on training uptake, worker retention, and business productivity.

## 22. Removing Barriers to Boost Ontario’s Labour Pool and Creating Opportunities for Businesses to Prosper

*This is a sunset resolution, formerly titled  
“Opening the Job Market for Employers and Employees”*

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Cambridge Chamber of Commerce

**Co-sponsored by:** Greater Kitchener-Waterloo Chamber of Commerce, London Chamber of Commerce, Greater Barrie Chamber of Commerce, Halton Hill Chamber of Commerce, Guelph Chamber of Commerce, Chamber of Commerce Brantford-Brant, and the North Durham Chamber of Commerce

### Issue

Finding solutions to the ongoing shortage of skilled workers Ontario continues to face in several sectors – construction, healthcare, manufacturing, and technology - requires a multi-pronged approach consisting of unique ideas that take into consideration the diversity of labour needs, as changing federal/provincial immigration policies create uncertainty. A potential workforce may already exist among many of those currently accessing the Ontario Disability Support Program (ODSP) and Ontario Works (OW) providing enhanced guidance is provided to better assist them to successfully transition into and function in the workplace. Also, consideration is needed to provide more cost recovery opportunities to employers regarding provincially regulated training, such as employee time spent completing WHMIS and Occupational Health and Safety Act (OHSA) training.

### Background

Ontario’s labour landscape remains in flux as more people continue to actively re-enter the workforce. Thanks to increased competition among full-time job seekers employers looking to fill entry or transitional level positions are well positioned. However, issues continue to persist for employers trying fill labour shortages in trades, healthcare (including nurses) and various technical occupations.

Current estimates indicate that more 700,000 skilled tradespeople will retire by 2028 and that despite a 4% increase in Ontario’s nursing workforce in 2025, at least 26,000 additional registered nurses (RNs) are required just to catch up to the national RN-to-population ratio. Healthcare experts expect this shortage will worsen after an Ontario’s Financial Accountability

Office (FAO) report released last fall indicated that without additional health-care funding, more than 7,200 nurses could be cut by 2027-2028.<sup>139 140 141</sup>

Immigration policies targeting the introduction of more skilled workers have widely been utilized to fill these shortages, but recent changes, including the Government of Canada's move to cut the number of provincial nominees' applications in half and the Province's plan to further alter Ontario's Immigrant Nominee Program (ONIP), have created uncertainty.<sup>142</sup>

It has become apparent a concentrated effort is needed to explore other avenues to cultivate a potential workforce that may already exist, namely among those who access the Ontario Disability Support Program (ODSP) and Ontario Works (OW). In 2024-25, the average monthly number of ODSP cases was 372,681, but the FAO estimates this will increase at an average annual rate of 2.6%, reaching 402,639 in 2027-28. During that same timeframe, Ontario Works cases are expected to increase from 282,011 in 2024-25 at an average annual rate of 5.5% to 330,685 cases.<sup>143</sup>

It stands to reason by sheer volume there are recipients of these benefits who have, or could have, the necessary training or skills to potentially fill some of these labour gaps, despite dealing with mental health and physical disabilities which resulted them in accessing these programs in the first place. There is data indicating that in 2023-2024, approximately 50% of participants in Assisted Employment Services possessed either a university credential or post-graduate education. As well, National Educational Association of Disabled Students' (NEADS) research from 2017 indicated that 42% of the estimated 3.8 million adults with disabilities in Canada had some post-secondary education.<sup>144</sup> Based on data from the 2022 Canadian Survey on Disability (CSD) with projections leading into 2025, approximately 1.58 million people with disabilities over the age of 15 in Canada have completed some form of post-secondary education.

There are ODSP and OW recipients who are employed and earning minimum wage but find themselves still struggling due to the current benefits system administered by the Ministry of Children, Community and Social Services (MCCSS) which oversees both programs.

Currently, single OW recipients receive a maximum monthly rate of \$733 but sees any money they earn clawed back by 50 cents for every dollar earned after the first \$200 a month. Putting this into perspective, a worker earning \$1,600 a month (an equivalent of 22-hours per week at a minimum wage job) would see their full OW amount clawed back and lose access to other financial support and benefits.<sup>145</sup>

The ODSP rate was tied to increases to annual inflation in 2023 which resulted in a 2.8% benefit increase in July 2025 to cover basic needs resulting in a single maximum rate of \$1,408 per month. Recipients who do work are allowed to earn up to \$1,000 net per month without seeing their benefits affected, but anything above that amount results in 75% of every dollar being

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<sup>139</sup> Canada Council on Rehabilitation and Work 2025 trends report: Disability Inclusion in the Skilled Trades: A Blueprint for Change. <https://tinyurl.com/4wkwch8>

<sup>140</sup> Ontario Nurses' Association report / Oct. 2025. <https://ona.org/news/20251028-fao-report-nursing-cuts/>

<sup>141</sup> RAO (Registered Nurses' Association of Ontario) July 2024. <https://tinyurl.com/bdhhm8n6>

<sup>142</sup> Newcomers seeking permanent residency face uncertainty, frustration over Ontario immigration changes – CBC, Dec. 2025. <https://tinyurl.com/3pw74mee>

<sup>143</sup> Ministry of Children, Community and Social Services: 2025 Spending Plan Review - Oct./ 2025 <https://fao-on.org/en/report/estimates-2025-mccss/>

<sup>144</sup> National Educational Association of Disabled Students' (NEADS). <https://tinyurl.com/2hppy826>

<sup>145</sup> 5 things everyone should know about Ontario Works – March 2025/ FeedOntario. <https://tinyurl.com/766w4696>

deducted from their monthly amount which means they wind up trying to survive on a similar, or even lower, income.<sup>146</sup>

Benefit reductions and loss of health benefits are common concerns for OW/ODSP recipients seeking employment opportunities, despite having access to programs like the Extended Health Benefit (EHB), which is available to those who are employed providing coverage for such things as prescription drugs, basic dental care, eyeglasses, hearing aids, diabetic supplies, and transportation for medical appointments.<sup>147</sup>

As well, for those on ODSP who are currently employed the Transitional Health Benefit does provide needed coverage until an employee's health coverage kicks in or is subject to an annual review to confirm ongoing edibility; it can also stay in place if health-related costs remain higher than the money the recipient would be receiving from ODSP income support.<sup>148</sup> Also, the one-time \$500 Employment Transition Benefit covering such things as tools and training, is available to those who leave ODSP for paid work (either full or part-time), providing they are eligible.<sup>149</sup>

Determining eligibility and navigating the current system can be difficult, especially for those seeking to find their way out of the 'poverty trap' through employment, a point outlined in a 2024 report prepared for the Hamilton Roundtable for Poverty Reduction organization by representatives of Toronto Metropolitan University and McMaster University entitled *Survey Analysis of Ontario's Integrated Employment Services: Experiences of Job-Seeking Social Assistance Recipients with OW/ODSP Person-Centered Supports and Employment Ontario Employment Services*.

Of the 1,200 OW/ODSP recipients surveyed for this report between July and December 2024, nearly half said they did not receive a clear explanation of the purpose of the OW/ODSP Common Assessment tool, while two thirds reported not receiving clear steps to even complete the assessment. As well, 95% of the respondents who participated in Employment Ontario (EO) programs reported having no assistance for setting long-term job and career goals.<sup>150</sup>

Nearly two-thirds of respondents also indicated they were conditionally available for work, but only a quarter were employed less than 10 hours a week, with less than 3% working 20 hours or more weekly. While the majority expressed positive views of their caseworkers, they stressed the need for better communication when it comes to understanding the reasons and processes involved why they are placed on one path or another. Having the Province review its current delivery methods when it comes to promoting programs and mechanisms that could help OW/ODSP recipients access employment opportunities may be key to providing the clarity they require to join the workforce and, in the process, fill some of Ontario's skilled labour gaps.

Another way the Province can assist businesses is to provide them with cost recovery opportunities surrounding provincially regulated training programs, like WHMIS or the Occupational Health and Safety Act. While the Province does fund associations like the WHSC (Workers Health & Safety Centre) and WSPS (Workplace Safety & Prevention Services) that offer discounted or free training, these options rarely cover the full legal obligations required of

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<sup>146</sup> Canada Disability Benefit: More action still needed – Wellesley Institute – Aug. 2025. <https://tinyurl.com/yn9k3w4t>

<sup>147</sup> Extended Health Benefit (Gov't of Ontario). <https://tinyurl.com/2n8dz2kp>

<sup>148</sup> Ontario Disability Support Program health and disability benefits (Gov't of Ontario). <https://tinyurl.com/mtu4hsh7>

<sup>149</sup> Employment Transition Benefit (Gov't of Ontario). <https://tinyurl.com/bdn4kxkn>

<sup>150</sup> Survey Analysis of Ontario's Integrated Employment Services. <https://tinyurl.com/459f77v4>

employers, particularly the requirement for site-specific training, which means businesses must cover the cost.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Reform how employment assistance programs and mechanisms (i.e., Employment Ontario and OW/ODSP Common Assessment) are being promoted to skilled OW/ODSP recipients seeking opportunities for employment to ensure potential candidates have the clarity required - especially surrounding potential benefit clawbacks - to make informed decisions for their long-term career goals, effectively enhancing Ontario's labour pool.
2. Investigate a form of remuneration (i.e., tax credit) to employers to provide provincially mandated training, such as WHMIS, and their associated costs as well as covering expenses for on-site training and equipment, like work boots and uniforms.

## 23. Strengthening Ontario’s Workforce Through Improvements to the Ontario Immigrant Nominee Program

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** The London Chamber of Commerce

**Co-sponsored by:** Peterborough & Kawartha Chamber of Commerce, Cambridge Chamber of Commerce, Thunder Bay Chamber of Commerce, and the Brampton Board of Trade

### Issue

Ontario manufacturers depend on skilled workers who hold temporary work permits, yet recent changes and a lack of transparency within the Ontario Immigrant Nominee Program (OINP) threaten employers’ ability to retain this essential talent. The province’s cancellation and mass rejection of applications under the Skilled Trades stream, when done without procedural fairness, puts businesses, operations, and productivity at risk.

### Background

Ontario continues to face chronic labour shortages across the skilled trades. Employers in construction, advanced manufacturing, and other sectors continue to struggle to hire and retain workers with the technical expertise needed to meet operational demands.<sup>151</sup>

Because domestic supply has not kept pace with industry needs, businesses increasingly depend on internationally trained workers, many of whom arrive through temporary work permit pathways. Employers cannot legally differentiate between temporary and permanent immigration status when hiring, meaning temporary permit holders are often hired into full-time, permanent roles and quickly become indispensable members of the workforce.

Employers consistently report:

- A significant portion of their skilled trades workforce holds temporary work permits.
- Sudden loss of these workers, whether due to work permit expiry or immigration program changes, would directly reduce productivity, stall projects, disrupt service delivery, and weaken Ontario’s economic competitiveness.
- The federal government’s recent direction to reduce the number of temporary foreign workers creates uncertainty for workforce planning. Employers need clarity on timelines,

<sup>151</sup> <https://divinosolutions.com/explore-insights/ontario-labour-shortage-2025-key-stats-employers/>

targets, and sector-specific impacts.

- Employers require more information about “implied status” when a worker’s extension or PR application is in progress, as well as clarity on changes to LMIA streams and processing timelines.

Compounding these challenges, the Ontario Immigrant Nominee Program (OINP) recently cancelled the Skilled Trades stream and returned all applications, including those already submitted, selected in draws, and pending for more than 18 months. This decision was justified on the grounds of fraud within the stream but rather than investigating and rejecting fraudulent applications, the program adopted a blanket approach that eliminated legitimate applications alongside the questionable ones.

This broad rejection has devastating consequences. Workers with years of service in Ontario’s manufacturing sector now face the final days of their work permit validity with no viable path to extension or permanent residency. Employers who were depending on these nominations to stabilize their workforce now face renewed uncertainty, elevated recruitment costs, potential downtime, and risk to production schedules.

Employers seek transparency, fairness, and clear communication to ensure that Ontario’s immigration pathways reflect the realities of today’s labour market and support the economic vitality of the province.

We are happy to see the province has provided an update to this program as of March 16 in order to “redesign the OINP by creating or removing selection streams”<sup>152</sup> but we have yet to see exactly how these changes will be implemented.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Advocate for the federal government to extend work permits and facilitate permanent residency options for skilled trades workers who are already employed full-time in Ontario businesses.
2. Reverse the blanket rejection of Skilled Trades stream applications and conduct case-by-case assessments. Fraudulent applications should be investigated and rejected individually, without penalizing legitimate applicants or the employers who depend on them.
3. Ensure OINP nomination allocations reflect the depth and urgency of skilled trades shortages across sectors and geographic regions. The province must strategically prioritize occupations essential to economic growth and infrastructure development, including construction trades, industrial trades, engineering technicians, agricultural technicians, and maintenance roles.

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<sup>152</sup> <https://www.ontario.ca/page/2026-ontario-immigrant-nominee-program-updates>

4. Invest in sufficient staffing to enable rigorous application reviews and swift, effective investigation of suspected fraud.
5. Develop an employer communication protocol for program changes before suspending streams or making significant program adjustments, the OINP should notify and consult with key stakeholders including industry associations, chambers, and municipal partners to ensure employers can prepare and adapt without jeopardizing ongoing operations.
6. Provide clear, accessible information on how OINP draws are conducted, how occupations are selected, how “critical roles” are defined, and what processing timelines businesses should expect. Predictability is essential for effective workforce planning.

## 24. Sustaining the Rural Primary Care Workforce Through Fair and Predictable Compensation for Ministry of Health and Ontario Health Funded Organizations

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Tillsonburg District Chamber of Commerce

**Co-sponsored by:** Simcoe & District Chamber of Commerce and the Woodstock Chamber of Commerce

### Issue

Oxford County and other rural and northern communities across Ontario rely heavily on publicly funded, team-based primary care organizations such as Nurse Practitioner-Led Clinics, Family Health Teams, Community Health Centers, and other Ministry of Health/Ontario Health funded providers. However, these current primary care organizations have reached a critical point, posing a direct threat to regional economic health and community growth, which includes no longer meeting the foundational needs of residents. These organizations are unable to recruit or retain staff because of outdated provincial compensation models. Without a stable workforce, the healthcare "infrastructure" cannot support growing communities, leading to service gaps and economic instability.

### Background

In recent years, the Province of Ontario has made important investments to expand access to team based primary care, particularly in rural and underserved communities. These investments align with Ontario Health's Primary Care Action Plan (PCAP)<sup>153</sup>, which prioritizes improved access and attachment to primary care, and strengthened interdisciplinary teams to meet growing population needs.

At the same time, rural Ontario is experiencing significant physician workforce pressures, including persistent family physician shortages and a wave of planned and anticipated retirements. In Tillsonburg, and across Oxford County, and other areas in Ontario, upcoming physician retirements threaten to increase the number of unattached patients and place additional pressure on remaining providers and team based primary care organizations, with the potential for significant loss of patient attachment if proactive system supports are not in place.

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<sup>153</sup> Ontario Health (2025). *Primary Care Action Plan (PCAP): A Roadmap for Interdisciplinary Excellence*. [ontariohealth.ca/primary-care-action-plan](https://ontariohealth.ca/primary-care-action-plan).

While access focused investments have increased, the sustainability of the primary care workforce has not kept pace. Compensation frameworks for the Ministry of Health and Ontario Health funded organizations have experienced challenges including failing to keep up with inflation, cost of living pressures, and wage growth across comparable public sector and private sector employers.

The summary of these challenges:

- **The Funding Gap:**  
While inflation and broader labour-market wages have risen significantly since 2020, compensation for team-based primary care has increased by only ~2.7% since<sup>154</sup>, resulting in challenges with workforce retention and system capacity.
- **The Retirement Wave:**  
Oxford County and many other communities are facing a surge in family physician retirements. This shifts the entire burden of care onto interdisciplinary teams that are currently understaffed and underfunded.
- **The Safety Net:**  
Team-based care is the only "safety net" left to prevent thousands of residents from becoming "unattached" to the healthcare system. Staff turnover is increasing across interdisciplinary teams, vacant positions remain unfilled for extended periods, or are filled temporarily with high turnover, leading to the remaining staff experiencing higher workloads and burnout. This puts service continuity and patient attachment at risk.
- These issues directly intersect with the **Quintuple Aim**<sup>155</sup> framework which guides Ontario's health system transformation: i) Improved Population Health; ii) Better Patient and Caregiver Experience; iii) Improved Provider Experience; iv) Cost Effectiveness; and v) Health Equity.

Healthcare is Economic Infrastructure. A stable healthcare workforce is a prerequisite for a resilient local economy. When primary care fails, the local economy pays the price:

- **Workforce Productivity:**  
Employees without doctors wait **8+ hours in Emergency Rooms** for routine care. A primary care visit costs the system **66% less** than an ER visit and gets employees back to work faster.
- **Business Attraction:**  
Modern companies will not relocate to regions where their talent cannot access a family doctor.
- **Retention:** Access to healthcare is a top three factor for residents deciding to stay in Oxford County and other rural and northern communities.

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<sup>154</sup> Association of Family Health Teams of Ontario (AFHTO) (2024). *2024 Pre-Budget Submission: Closing the Gap in Team-Based Primary Care* [Association of Family Health Teams of Ontario \(AFHTO\) - 2024 Pre-Budget Submission](#)

<sup>155</sup> Ontario Health (2025). *Ontario's Primary Care Action Plan: Connecting You to a Primary Care Team*. [Ontario's Primary Care Action Plan, January 2025 | ontario.ca](#)

The Economic Reality	The Impact
2.5 Million	Ontarians currently without a primary care provider. <sup>156</sup>
52%	Of family doctors nearing retirement in the next 5 years. <sup>157</sup>
3x Higher	The cost of an ER visit compared to a clinic visit. <sup>158</sup>

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Conduct a comprehensive review of compensation for all Ministry of Health and Ontario Health-funded primary care organizations, with particular attention to rural, northern and underserved areas, and clinical roles such as Nurse Practitioners (NP) working as the most responsible provider, Registered Nurse (RN), Registered Practical Nurse (RPN), Social Worker (MSW) to ensure they are competitive with hospitals and other Ministry of Health and Ontario Health-funded organizations.
2. Implement predictable, multi-year funding compensation adjustments that better reflect inflation, cost-of-living increases, and labor market realities.
3. Address compensation disparities between publicly funded primary care organizations and other health care and public sector employers competing for the same workforce.
4. Incorporate recruitment and retention considerations into primary care funding models, (e.g., expanded scope of practice etc.) recognizing the unique challenges faced by rural and northern communities.
5. Align future compensation and funding decisions with the objectives of Ontario Health's Primary Care Action Plan and the Quintuple Aim, ensuring that workforce sustainability is treated as a core enabler of access, quality and system performance.

<sup>156</sup>Ontario College of Family Physicians (2024). *New Data Shows There Are Now 2.5 Million Ontarians Without a Family Doctor*. [New Data Shows There Are Now 2.5 Million Ontarians Without a Family Doctor - Ontario College of Family Physicians | Ontario College of Family Physicians](#)

<sup>157</sup> Ontario Medical Association (2025). *Ontario's doctors release new data on family doctor shortage*. News Release, December 4, 2025. [Ontario's doctors release new data on family doctor shortage](#)

<sup>158</sup> Government of Ontario (2025). *Ontario's Primary Care Action Plan (PCAP)*. Page 3. Published January 27, 2025.

## Special Issues: Summary of Committee Feedback

Resolution	Organization	PAC Recommendation
25. Addressing the Crown Attorney Shortage to Support Community Safety and Economic Confidence in Ontario	Greater Oshawa Chamber of Commerce and Whitby Chamber of Commerce	<b>No Consensus</b>
26. Addressing the need for a Framework for "Strategic Procurement for Community and Economic Outcomes" in Ontario's Municipalities	Greater Barrie Chamber of Commerce	<b>No Consensus</b>
27. Ensuring Consistent Interpretation of the Ontario Building Code to Support Efficiency in Building Construction & Delivery	Belleville Chamber of Commerce	<b>Support as Amended</b>
28. Modernizing Pre-Start Health and Safety Reviews to Improve Manufacturing Competitiveness in Ontario	Belleville Chamber of Commerce	<b>Support as Amended</b>
29. Small Business Representation on WSIB	Dufferin Board of Trade	<b>Support as Amended</b>

## 25. Addressing the Crown Attorney Shortage to Support Community Safety and Economic Confidence in Ontario

PAC RECOMMENDATION
<b>No Consensus</b>
<p>The Committee was unable to reach consensus due to an insufficient articulation of the business case in the resolution, and a lack of clarity regarding the implications of several recommendations, including associated costs, funding sources, and implementation considerations. PAC noted that greater clarity, specificity and examples to model best practices would strengthen the resolution.</p> <p><b>PAC discussed feedback with the authoring chamber and requested amendments be made at the AGM debate.</b></p>

**Submitted by:** Greater Oshawa Chamber of Commerce and Whitby Chamber of Commerce

### Issue

Ontario's justice system is facing a significant shortage of Crown Attorneys, contributing to court delays, stayed charges, and growing uncertainty around enforcement. These challenges directly affect business confidence, community safety, and the economic health of municipalities across the province. Perceptions of rising crime and weakened justice processes discourage foot traffic, reduce consumer confidence, and undermine investment—particularly in downtown cores and commercial districts that are critical to local economic growth. A stable, well-resourced justice system is a foundational requirement for a strong business environment.

### Background

The administration of justice in Ontario, including criminal prosecutions, is a provincial responsibility carried out by the Ministry of the Attorney General. Crown Attorneys are a core component of Ontario's public safety and economic infrastructure. Their work supports predictable enforcement, protects victims and businesses, and reinforces confidence that laws will be applied consistently and fairly.

Ontario is experiencing a growing shortage of Crown Attorneys driven by workforce attrition, recruitment challenges, and rising workload pressures. A significant portion of the prosecutorial workforce is nearing retirement, while recruitment has not kept pace with attrition, leaving prosecution offices understaffed across the province.<sup>159</sup> At the same time, many early-career lawyers are opting for private practice or federal roles that offer higher compensation and more sustainable workloads.

Workload pressures have intensified as Crown Attorneys manage increasingly complex and high-volume caseloads. These demands contribute to burnout, mental health challenges, and

<sup>159</sup>Canadian Association of Crown Counsel, *A System in Crisis: Rebuilding the Dwindling Crown Attorney's Office* [https://www.cacc-acje.ca/en/index.php/front/news\\_details/a\\_system\\_in\\_crisis\\_rebuilding\\_the\\_dwindling\\_crown\\_attorneys\\_office](https://www.cacc-acje.ca/en/index.php/front/news_details/a_system_in_crisis_rebuilding_the_dwindling_crown_attorneys_office)

turnover, further reducing system capacity.<sup>160</sup> Research and reporting have highlighted alarming levels of trauma exposure among prosecutors, with some jurisdictions reporting rates of post-traumatic stress injury that would be unacceptable in other frontline professions.<sup>161</sup>

These workforce challenges have direct and measurable economic consequences. Court delays undermine confidence in the justice system and, in some cases, result in charges being stayed due to capacity constraints rather than legal merit.<sup>162</sup> For businesses—particularly those in retail, hospitality, tourism, and service sectors—this contributes to concerns around safety, increased operating costs, reduced foot traffic, and hesitation from customers and investors. Downtown revitalization efforts are especially vulnerable when enforcement and justice outcomes appear inconsistent or delayed.

Compounding these challenges are gaps in training, mentorship, and professional development. New Crown Attorneys often report insufficient onboarding and limited access to experienced mentorship, reducing productivity and accelerating burnout and early departure from public service roles.<sup>163</sup> Without sustained investment in talent development, Ontario risks ongoing inefficiencies and loss of institutional knowledge.

Transparency and accountability within prosecution services also affect public and business confidence. Crown Attorneys are bound by confidentiality obligations under the *Public Service of Ontario Act*, which—while essential for protecting sensitive information—also limit the ability to publicly identify systemic challenges related to workplace culture, management practices, or operational inefficiencies.<sup>164</sup> Limited whistleblower protections and public reporting mechanisms reduce opportunities for evidence-based reform, cost containment, and improved return on public investment.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

- 1. Invest in Prosecutorial Capacity as Economic Infrastructure**  
Provide sustained, targeted funding to increase the number of Crown Attorneys and support staff, recognizing prosecution services as essential infrastructure that underpins safe communities, downtown vitality, and business confidence.
- 2. Modernize Compensation to Remain Competitive**  
Review and update Crown Attorney compensation, benefits, and pension structures to remain competitive with private sector and federal legal roles, reducing turnover costs and improving long-term workforce stability.

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<sup>160</sup> Canadian Association of Crown Counsel, *Crown Attorneys Call on Manitoba Government to Help Address Dangerously Heavy Caseloads*

[https://www.cacc-acje.ca/en/index.php/front/news\\_details/crown\\_attorneys\\_call\\_on\\_manitoba\\_government\\_to\\_help\\_address\\_dangerously\\_heavy](https://www.cacc-acje.ca/en/index.php/front/news_details/crown_attorneys_call_on_manitoba_government_to_help_address_dangerously_heavy)

<sup>161</sup> CBC News, *Manitoba Crown Prosecutors Report Alarming Levels of PTSD*

<https://www.cbc.ca/news/canada/manitoba/manitoba-crown-prosecutors-ptsd-1.7454070>

<sup>162</sup> CBC News, *Criminal Cases Stayed in Ontario Due to Court Delays*

<https://www.cbc.ca/news/canada/toronto/criminal-case-outcomes-ontario-delays-1.7378668>

<sup>163</sup> Canadian Association of Crown Counsel, *A System in Crisis: Rebuilding the Dwindling Crown Attorney's Office*

[https://www.cacc-acje.ca/en/index.php/front/news\\_details/a\\_system\\_in\\_crisis\\_rebuilding\\_the\\_dwindling\\_crown\\_attorneys\\_office](https://www.cacc-acje.ca/en/index.php/front/news_details/a_system_in_crisis_rebuilding_the_dwindling_crown_attorneys_office)

<sup>164</sup> *Canadian Lawyer Magazine*, *Crown Attorneys Share Responsibility for Canada's Dysfunctional Justice System*

<https://www.canadianlawyer.com/news/opinion/crown-attorneys-share-responsibility-for-canadas-dysfunctional-justice-system/386783>

- 3. Improve Workforce Sustainability and Productivity**  
Implement workload management standards, trauma-informed mental health supports, and workplace practices that reduce burnout, preserve institutional expertise, and improve operational efficiency.
- 4. Strengthen Training and Talent Development**  
Invest in structured onboarding, mentorship, and continuous professional development to increase early-career retention, improve performance, and ensure a sustainable pipeline of experienced prosecutors.
- 5. Enhance Transparency and Accountability**  
Publish anonymized performance and capacity data and review governance and whistleblower frameworks to support efficient use of public resources, identify operational efficiencies, and restore public and business confidence in Ontario's justice system.

## 26. Addressing the need for a Framework for "Strategic Procurement for Community and Economic Outcomes" in Ontario's Municipalities

PAC RECOMMENDATION
<p style="text-align: center;"><b>No Consensus</b></p> <p>The Committee was unable to reach consensus on the scope of the resolution. Specifically, a coordinated procurement framework may be more appropriately led at the municipal level with limited provincial intervention. This could ensure flexibility with municipal decision-making and better reflect local procurement needs and realities.</p> <p><b>PAC discussed feedback with the authoring chamber and requested amendments be made at the AGM debate.</b></p>

**Submitted by:** Greater Barrie Chamber of Commerce

**Co-sponsored by:** Orillia and District Chamber of Commerce, Georgina Chamber of Commerce, Leamington District Chamber Commerce, Whitby Chamber of Commerce, Chatham-Kent Chamber of Commerce; Belleville Chamber of Commerce, and the Cambridge Chamber of Commerce

### Issue

Municipal procurement represents a significant economic lever that can support local businesses, workforce development, and community outcomes while maintaining value for money.

However, municipalities across Ontario vary significantly in capacity and resources. Without access to shared tools, guidance, and best practices, municipalities must independently design procurement approaches, creating duplication, inefficiencies, and inconsistent outcomes.

There is an opportunity to support municipalities through a coordinated, voluntary approach that enables strategic procurement without increasing administrative burden or compromising fairness, transparency, or trade compliance.

### Background

**What it is.** Strategic procurement integrates social, economic, and environmental outcomes into purchasing decisions while maintaining fairness, transparency, and best value.<sup>165</sup>

**Why Ontario needs a provincial approach.**

<sup>165</sup> City of Toronto – Social Procurement Program: <https://www.toronto.ca/business-economy/doing-business-with-the-city/social-procurement-program/>

Municipalities are at different stages of readiness. Many particularly small and mid-sized communities lack the capacity to design and implement procurement enhancements independently.

A coordinated, optional approach that provides practical tools and guidance can:

- reduce duplication across municipalities
- improve consistency in procurement practices
- support local economic participation
- maintain efficient and competitive procurement processes

### What “good” looks like in practice.

Canadian examples (e.g., City of Toronto) demonstrate that procurement can support broader outcomes when it is:<sup>166167</sup>

- practical and easy to implement
- proportionate to procurement size and impact
- supported by clear templates and evaluation tools

Ontario already has strong building blocks, including:

- Indigenous Procurement Program<sup>168</sup>
- Building Ontario Businesses Initiative (BOBI)<sup>169</sup>

These demonstrate that procurement modernization can be achieved within existing trade and governance frameworks.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

- 1. Support a coordinated, voluntary approach:** Collaborate with municipalities, AMO, and procurement professionals to support the development of a **voluntary, trade-compliant approach to strategic procurement**, enabling municipalities to adopt practices that align with local priorities and capacity.
- 2. Provide optional, ready-to-use tools and resources:** Support the development and sharing of practical resources municipalities can adopt as needed, including: model policy language, sample RFP clauses, simple scoring templates, supplier inclusion approaches (where permissible). All tools should prioritize ease of implementation, minimal administrative burden, maintaining a competitive procurement processes.

<sup>166</sup> Buy Social Canada / Community Benefits – Social Procurement Program page: [https://www.communitybenefits.ca/social\\_procurement\\_program](https://www.communitybenefits.ca/social_procurement_program)

<sup>167</sup> Government of Ontario – Indigenous Procurement Program: <https://www.ontario.ca/page/indigenous-procurement-program>

<sup>168</sup> Government of Ontario – Indigenous Procurement Program: <https://www.ontario.ca/page/indigenous-procurement-program>

<sup>169</sup> Supply Ontario – *Building Ontario Businesses Initiative: A Guide for Buyers* (PDF): <https://www.supplyontario.ca/wp-content/uploads/BOBI-Guide-September-2024-FINAL.pdf>

3. **Encourage proportionate and streamlined measurement:** Promote the use of **simple, optional reporting approaches** aligned with existing municipal processes, focusing on higher-value or high-impact procurements, and avoiding the creation of new reporting requirements.
4. **Facilitate knowledge sharing and best practice adoption:** Work with partners to support a **coordinated knowledge-sharing approach across Ontario**, leveraging existing platforms to share case studies, templates and tools, and lessons learned. This should avoid creating new systems, registries, or administrative layers, and instead focus on accelerating adoption and practical implementation.

## 27. Ensuring Consistent Interpretation of the Ontario Building Code to Support Efficiency in Building Construction & Delivery

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Belleville Chamber of Commerce

### Issue

Inconsistent interpretation and application of the Ontario Building Code (OBC) across (and even within) municipalities has created significant uncertainty for builders and developers. Varying requirements, discretionary interpretations by individual building inspectors, and the ability to override professionally certified engineering designs are contributing to project delays, increased costs, and reduced investment. These inconsistencies are undermining housing delivery, discouraging development in certain jurisdictions, and negatively impacting Ontario's economic competitiveness.

### Background

The Ontario Building Code is intended to provide a standardized, province-wide framework to ensure safety, quality, and consistency in construction. However, in practice, enforcement and interpretation of the Code vary widely among municipalities and, in some cases, among individual inspectors within the same jurisdiction.

By addressing inconsistent interpretation and reinforcing respect for professional engineering approvals, Ontario can remove unnecessary barriers to development, support housing delivery, and strengthen its economic outlook.

Builders and developers routinely report:

- Conflicting interpretations of the same OBC provisions between municipalities
- Additional or modified requirements imposed beyond the Code
- Rejection of plans that comply with the OBC and are stamped by licensed professional engineers
- Repeated redesigns, resubmissions, and delays to approvals

These inconsistencies lead to:

- Extended project timelines

- Increased construction and carrying costs
- Heightened risk and uncertainty for investors
- Builders avoiding certain municipalities altogether

At a time when Ontario faces a critical housing supply shortage and rising construction costs, unpredictable and inconsistent regulatory interpretation is a significant barrier to timely and affordable development.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

- 1. Establish Province-Wide Consistency and Training in Code Interpretation.** The Province should strengthen oversight and guidance to ensure uniform interpretation of the Ontario Building Code across all municipalities. This could include:
  - a. Standardized interpretation bulletins issued by the Ministry.
  - b. A centralized, binding interpretation database accessible to inspectors and industry.
  - c. Mandatory alignment with provincial interpretations.
  - d. Standardized training on complex and evolving Code provisions with mandatory province-wide continuing education
  - e. Cross-municipal collaboration and best-practice sharing.
- 2. Limit Discretionary Overrides of Professional Engineering Approvals.** Building officials should not be permitted to override or reject plans that:
  - a. Are stamped by a licensed professional engineer.
  - b. Clearly demonstrate compliance with the Ontario Building Code.
  - c. Where concerns exist, inspectors should be required to:
    - i. Provide written, code-referenced justification.
    - ii. Engage in a formal technical review process involving qualified professionals.
- 3. Improve Accountability and Appeal Mechanisms.** Introduce quicker, clearer, more accessible appeal processes when disputes arise between building officials and applicants, including:
  - a. Timely, standardized escalation procedures.
  - b. Independent technical review panels.
  - c. Defined service timelines to reduce delays.

## 28. Modernizing Pre-Start Health and Safety Reviews to Improve Manufacturing Competitiveness in Ontario

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Belleville Chamber of Commerce

### Issue

Ontario's Pre-Start Health and Safety Review (PSR) requirements under Regulation 851, Section 7 (Industrial Establishments) are being applied in a manner that creates delays, duplication, and uncertainty for manufacturers installing or upgrading equipment.

While intended to address high-risk industrial hazards, current implementation frequently captures standard, pre-certified equipment, resulting in delayed commissioning, increased costs, and reduced competitiveness relative to other jurisdictions. Without modernization, these requirements risk discouraging investment, limiting productivity improvements, and placing Ontario manufacturers at a structural disadvantage in global markets.

### Background

Ontario manufacturers are committed to maintaining high standards of worker safety. However, regulatory frameworks must be predictable, proportionate, and aligned with real-world risk. Modernizing the PSR system will ensure Ontario maintains strong safety outcomes while enabling manufacturers to invest, innovate, and compete effectively in a global economy.

Manufacturers in Eastern Ontario, including over 110 companies represented by the Quinte Manufacturers Association (QMA), report that regulatory burden remains one of the most significant barriers to investment, modernization, and growth.<sup>170</sup> A key concern is the combined impact of Pre-Start Health and Safety Reviews (PSRs) under Ontario Regulation 851 and Electrical Safety Authority (ESA) inspections under the Ontario Electrical Safety Code, both of which must be completed before equipment can be energized and placed into operation.<sup>171</sup> Although sometimes referred to informally as a "safe start" process, manufacturers must navigate multiple sequential approvals, resulting in production delays even after installation is complete.

In practice, PSRs are often applied to standard, pre-certified equipment that is already operating safely in other jurisdictions, including the United States, Europe, and other Canadian

<sup>170</sup> Quinte Manufacturers Association, *Reducing Regulatory Burden on Ontario Manufacturers*, April 22, 2025.

<sup>171</sup> Ontario Ministry of Labour, Immigration, Training and Skills Development – *Regulation 851 (Industrial Establishments)*; Electrical Safety Authority – *Ontario Electrical Safety Code*.

provinces.<sup>172</sup> This expands the application of PSRs beyond their original intent of addressing high-hazard or non-standard industrial risks. At the same time, both PSR requirements and ESA inspections rely on professional judgment, leading to inconsistent interpretation across sites. Manufacturers report that similar production lines may receive different requirements depending on the inspector or engineer involved, resulting in redesign costs, delays, and uncertainty.<sup>173</sup><sup>174</sup>

Manufacturers must also navigate overlapping regulatory processes, including PSR review by a professional engineer, ESA inspection and approval prior to energization, and municipal permitting. These processes are not always well coordinated, resulting in duplication of effort even where equipment meets recognized standards. The Auditor General of Ontario has identified opportunities to improve coordination between ESA inspections and other approval processes, highlighting inefficiencies in the current system.<sup>175</sup>

These requirements have direct operational impacts. Equipment can remain idle for extended periods while awaiting approvals, leading to delayed production, increased labour costs, and reduced responsiveness to customer demand.<sup>176</sup> For export-oriented manufacturers, these delays create a time-to-market disadvantage relative to competitors in other jurisdictions. Smaller manufacturers are disproportionately affected, as they often lack in-house engineering and compliance expertise and must rely on external consultants to navigate requirements.

Ontario remains the only province requiring a professional engineer-led pre-start review for certain industrial applications, creating a competitiveness gap when compared to other jurisdictions.<sup>177</sup> In some cases, manufacturers are unable to access essential equipment because global suppliers are unwilling to redesign products to meet Ontario-specific requirements, despite safe operation elsewhere.<sup>178</sup>

While there is broad consensus that PSRs have contributed to improved workplace safety outcomes, the Government of Ontario has acknowledged that current requirements can be overly complex and has committed to streamlining and clarifying the process while maintaining strong worker protections.<sup>179</sup>

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

- 1. Implement a Risk-Based PSR Framework to standardize PSR exemptions**
  - a. Introduce standardized documentation to support exemption use and reduce reliance on full engineering reviews.

<sup>172</sup> Industry feedback as reflected in QMA letter and regional manufacturer consultations.

<sup>173</sup> Office of the Auditor General of Ontario – reporting on coordination opportunities between ESA inspections and other regulatory processes.

<sup>174</sup> Quinte Manufacturers Association, *Reducing Regulatory Burden on Ontario Manufacturers*, April 22, 2025.

<sup>175</sup> Office of the Auditor General of Ontario – reporting on coordination opportunities between ESA inspections and other regulatory processes.

<sup>176</sup> Quinte Manufacturers Association, *Reducing Regulatory Burden on Ontario Manufacturers*, April 22, 2025.

<sup>177</sup> Quinte Manufacturers Association, *Reducing Regulatory Burden on Ontario Manufacturers*, April 22, 2025.

<sup>178</sup> Quinte Manufacturers Association, *Reducing Regulatory Burden on Ontario Manufacturers*, April 22, 2025.

<sup>179</sup> Legislative Assembly of Ontario (Hansard) – statements regarding the need to streamline PSR requirements while maintaining safety protections.

- b. Clearly distinguish between low-risk, pre-certified equipment, moderate-risk installations, and high-risk or custom systems.
  - c. Develop clear exemption pathways for equipment that meets recognized Ontario or equivalent international standards.
- 2. Improve consistency in interpretation and enforcement to reduce duplication and delays across regulatory regimes**
- a. Establish a standardized, province-wide “competent person” triage process to determine when a PSR is required.
  - b. Establish a registry of qualified PSR engineers to improve access and transparency.
  - c. Establish province-wide guidance and training to ensure consistent application of PSR requirements.
  - d. Create a formal mechanism to resolve conflicting interpretations across sites.

## 29. Small Business Representation on WSIB

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Dufferin Board of Trade

**Co-sponsored by:** Whitby Chamber of Commerce and the Peterborough and Kawarthas Chamber of Commerce

### Issue

The need for a dedicated small business seat on the WSIB board. In particular we would suggest using the CCC definition of micro or scale businesses (companies with less than 20 employees). We would recommend that WSIB use the screening process that they already have in place for new board members simply dedicating one of these seats for small business.

### Background

Micro and Scale businesses represent 87% of all businesses in Canada according to the Canadian Chamber of Commerce.

We recognize the great strides WSIB has made over the last several years in improving both customer service and keeping premiums low. These fees however still represent a disproportionate amount for small businesses in terms of overhead. Small businesses continue to face a disproportionate administrative burden as well when dealing with WSIB.

Small businesses form the backbone of Ontario's economy, accounting for the vast majority of employers and a significant share of private-sector employment. Unlike larger enterprises, SMEs often operate with limited administrative capacity, fewer human resources professionals, and tighter cash flow margins. As a result, even modest fluctuations in WSIB premiums, classification decisions, or compliance requirements can have an outsized operational and financial impact.

While WSIB has made meaningful progress in modernization and service delivery, governance structures that lack direct small business representation risk unintentionally overlooking the practical realities faced by fee-paying SMEs. Decisions related to premium setting, rate frameworks, claims management processes, and administrative requirements can disproportionately affect small employers, who lack the scale to absorb costs or dedicate staff to navigate complex systems.

Research from business and economic development organizations consistently demonstrates that regulatory and administrative burden is one of the most significant constraints on small

business growth, competitiveness, and job creation. Ensuring a dedicated SME voice at the WSIB board level would strengthen policy development by embedding real-world operational insight into decision-making, leading to more balanced outcomes that support both system sustainability and employer viability.

Importantly, a small business representative would not diminish worker protection or system integrity. Rather, it would enhance governance by ensuring that WSIB policies reflect the diversity of Ontario's employer base and align with the principles of fairness, proportionality, and economic sustainability.

### **Advantages of Dedicated SME Representation**

From a small business perspective, a dedicated WSIB board seat would deliver several strategic advantages:

- **Improved Policy Balance:** Direct SME input would help ensure that premium structures and administrative requirements are proportionate to business size and capacity.
- **Enhanced Compliance Outcomes:** Policies designed with small business realities in mind are more likely to be understood, adopted, and complied with—reducing friction for both employers and WSIB.
- **Stronger Economic Resilience:** Reducing unnecessary administrative and cost burdens supports small business sustainability, protecting local jobs and regional economies.
- **Increased System Trust:** Representation builds confidence among fee-paying employers that governance decisions are informed by lived experience, improving transparency and stakeholder confidence.

### **Recommendations**

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Appoint a dedicated seat on the WSIB board that is a WSIB fee paying small business, representative of micro or scale businesses (companies with less than 20 employees) when considering their matrix of board members.

## Health/ Mental Health & Addictions: Summary of Committee Feedback

Resolution	Organization	PAC Recommendation
30. Modernizing Mental Health Coverage for a Productive Ontario	Timmins Chamber of Commerce	Support as Amended
31. Returning from Crisis to Care: Take Back Responsibility for Ontario's Health and Housing Systems	Belleville Chamber of Commerce	No Consensus

## 30. Modernizing Mental Health Coverage for a Productive Ontario

### PAC RECOMMENDATION

#### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Timmins Chamber of Commerce

**Co-sponsored by:** North Bay Chamber of Commerce, Sault Ste. Marie Chamber of Commerce, Northern Corridor Chamber of Commerce, Cochrane Board of Trade, Thunder Bay Chamber of Commerce and the Muskoka Lakes Chamber of Commerce

### Issue

Ontario's workforce stability is threatened by a mental health crisis that current public coverage gaps fail to address. Excluding psychotherapy from OHIP forces a reliance on high-cost crisis care, shifting the burden from proactive community support to expensive hospital systems. A mental health-related Emergency Department (ED) visit costs roughly \$423 (more than double the average visit) while related disability leaves cost businesses nearly \$18,000.<sup>180,181</sup> This misalignment undermines both healthcare capacity and economic productivity.

### Background

#### The Economic Rationale for Early Intervention

Excluding psychotherapy from OHIP destabilizes Ontario's economy by forcing individuals to face unacceptable choices: paying high out-of-pocket fees, joining lengthy public waitlists, or relying on high-cost emergency departments when needs escalate to crisis.

- Publicly funding psychotherapy yields a net societal return of roughly \$2 for every \$1 invested through reduced hospitalizations, long-term disability claims, and system savings.<sup>182</sup>
- Productivity loss caused by an employee working while experiencing untreated mental health challenges is estimated to be three times greater than the loss caused by an actual absence.<sup>183</sup>
- Mental illness is now the fastest-growing category of disability claims, accounting for 30% of all claims and 70% of all workplace disability costs.<sup>4</sup>

<sup>180</sup> Canadian Mental Health Association. (2023, Jan.). [Maintaining the Momentum](#). (2024 Pre-Budget Submission).

<sup>181</sup> Centre for Addiction and Mental Health. (2010, Sep. 10). [Mental Health Leaves Most Costly Disability to Canadian Employers](#).

<sup>182</sup> Vasiliadis, H. M. et al.. (2017). [Insuring Psychological Services as Part of Medicare for Depression](#). *Psychiatry Services*, 68(9), 899-906.

<sup>183</sup> Conference Board of Canada. (2023, Aug.). [Why Employees Choose Work Over Wellness](#).

## Hospital Strain and the Cost of Crisis Care

Without access to community psychotherapy, the ED has become the default provider of mental health care. This reliance is fiscally unsustainable and contributes to extreme hospital gridlock.

- A mental health-related ED visit costs \$423 on average, more than double the \$165 direct cost of a standard ED visit, due to higher resource intensity required for crisis stabilization.<sup>1,184</sup>
- Nearly half of adults presenting to psychiatric EDs had no outpatient mental health care in the two years leading up to their crisis, indicating a systemic lack of timely, community-based access to care.
- Only 40% of psychiatric ED patients receive follow-up care within 14 days, resulting in a scenario where 10% of these patients return to the ED four or more times in a single year.<sup>185,186</sup>
- Proactive support has already proven effective, as 10 CMHA branches diverted over 17,700 ED visits in two years, saving the hospital system roughly \$7.5 million.<sup>1</sup>

## The Case for Small Business Support

Ontario's small business owners face significant financial barriers to providing mental health care compared to large corporations, creating an uneven playing field for talent.

- A refundable tax credit would empower roughly 500,000 small businesses in Ontario that employ over 2.5 million people but lack the scale to negotiate affordable private insurance.<sup>187</sup>
- Every \$1 an employer spends on mental health yields a median return of \$1.62 within a year, rising to \$2.18 after three years through reduced turnover and disability claims.<sup>188</sup>
- Only 13% of small businesses (under 50 employees) expanded mental health support compared to 50% of large corporations (over 1,000 employees) during economic shifts, leaving the backbone of Ontario's economy structurally under-resourced.<sup>189</sup>
- Failing to support these businesses forces the province to absorb a share of the \$20 billion annual drain on the Canadian economy caused by workplace absenteeism and "presenteeism," which recent data shows now affects 70% of the workforce.<sup>190,191</sup>
- Small businesses that prioritize mental health prevention see a 27% burnout rate compared to 47% for those taking no action, resulting in average savings of \$3,400 per employee per year.<sup>192</sup>

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<sup>184</sup> Office of the Auditor General of Ontario. (2023, Dec.). [Value-for-Money Audit: Emergency Departments](#).

<sup>185</sup> Barker L. C. et al.. (2020). [Urgent Outpatient Care Following Mental Health ED Visits](#). *Psychiatric Services*, 71(6), 616-619.

<sup>186</sup> Canadian Institute for Health Information. (2025, Oct.). [Frequent ER Visits for Help with Mental Health and Substance Use](#).

<sup>187</sup> Ontario Ministry of Economic Development, Job Creation and Trade. (2025, Oct. 22). [Ontario Celebrates Small Business Week](#). Ontario Newsroom.

<sup>188</sup> Kangasniemi, A., Maxwell, L., & Sereneo, M. (2019, Nov. 4). [The ROI in Workplace Mental Health Programs](#). Deloitte Insights.

<sup>189</sup> Canadian Psychological Association & Mental Health Coalition of Canada (MHCC). (2022, May). [Extended Mental Health Benefits in Canadian Workplaces](#).

<sup>190</sup> MHCC. (2018, Feb.). [A Clear Business Case for Hiring Aspiring Workers](#).

<sup>191</sup> TELUS. (2025). [The State of Mental Health and Wellbeing in Canadian Workplaces](#). TELUS Health.

<sup>192</sup> Mental Health Research Canada. (2025, Jun.). [Mental Health in the Workplace 2025](#).

## Demand, Equity, and Regional Capacity

Ontario's mental health infrastructure is failing to keep pace with demand, particularly in Northern and rural regions where the system is most fragile.

- Over 2.5 million Ontarians lack a family doctor, a figure forecasted to hit 4.4 million residents by 2026.<sup>193</sup> This shortage makes traditional 'gatekeeper' referral models for mental health care impossible for 1 in 4 residents.
- This pilot directly supports the *2025 Primary Care Action Plan* by redirecting appropriate mental health care from family physicians to registered therapists based on clinical assessment.
- These challenges are most acute in Northern Ontario, where just 6.5% of Ontario's family doctors serve a population facing mental health hospitalization rates nearly double the provincial average.<sup>194</sup>
- Rural residents face a 131-day wait for mental health support (versus 41 days in urban centres), a delay that keeps workers sidelined as rural crisis calls for issues like Alcohol Use Disorder rose by 9% last year.<sup>195</sup>
- Currently 28,000 children and youth are waiting for community services, with wait times for intensive programs reaching up to 2.5 years.<sup>196</sup> This lack of timely intervention forces parents to miss work, draining an estimated \$421 million from the provincial economy annually in lost productivity.<sup>197</sup>

## Operational Implementation

A fiscally responsible OHIP pilot must be anchored in evidence-based care and low-barrier entry to prevent crises before they occur.

- 50% of clients experience clinically significant improvements by the eighth session, with the most effective short-term models recommending a range of eight to 12 sessions.<sup>198</sup>
- This pilot adopts a Two-Stream Practice Model, enabling registered practitioners to deliver OHIP-funded care alongside existing private-pay or non-profit services, with participation parameters designed to expand access without displacing existing care and existing programs.
- To comply with the *Commitment to the Future of Medicare Act, 2004*, the pilot strictly prohibits "extra-billing" to ensure patients are never charged additional fees for insured sessions.
- Access would be based on practitioner-led clinical assessment and reassessment, with clear referral pathways for individuals requiring higher-intensity or specialized services.
- To bypass physician waitlists, this model implements a multi-point referral system, including self-referral, schools, and agencies, to bridge service gaps and reduce non-acute ED visits.

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<sup>193</sup> Ontario College of Family Physicians. (2023, Nov. 7). [More than Four Million Ontarians Will be Without a Family Doctor by 2026](#).

<sup>194</sup> Mandal, A., & Burella, M. (2021). [Inadequate Mental Health Supports in Rural and Northern Ontario](#). *Ontario Medical Students Association*.

<sup>195</sup> Rural Ontario Institute. (2025, Mar.). [Rural Wellbeing: Mental Health Factsheet](#).

<sup>196</sup> CMHO. (2020, Jan. 27). [28,000 Ontario Children and Youth Are Waiting for Community Mental Health Services](#).

<sup>197</sup> CMHO. (2019). [Annual Report Card: The Burden of Kids Mental Illness on Families and the Economy](#).

<sup>198</sup> Saxon, D., Firth, N., & Barkham, M. (2016). [The Relationship Between Therapist Effects and Therapy Delivery Factors](#). *Administration and Policy in Mental Health*, 44(5), 705-715.

- Therapist-led standardized assessments will ensure clinical accuracy and triage resources towards those with the highest need, preventing system strain from low-acuity cases.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Establish a three-year Psychotherapy Pilot Program under Section 45 of the Health Insurance Act, 1990 structured as:
  - a. Provide up to 12 OHIP-covered psychotherapy and mental health sessions annually delivered by Registered Psychotherapists, Registered Social Workers, and Psychologists, with access guided by clinical assessment and referral pathways to physicians, psychiatrists, or nurse practitioners where medication support is required.
  - b. Operate under a Two-Stream Practice Model allowing OHIP-funded care alongside private/non-profit services, with safeguards to prevent displacement of existing community programs and service rates aligned with provincial regulatory college guidance.
  - c. Implement a phased rollout, beginning with Northern and rural communities facing the greatest access challenges, then expanding to urban and mid-sized regions, and province-wide as capacity grows. Evaluate expansion rollout based on clinical outcomes, community access improvements, workforce capacity, and system cost performance.
  - d. Include investment in awareness and navigation tools to help employers, individuals, practitioners, and system partners understand and promote eligibility, billing procedures, and referral pathways.
2. Finance the pilot through graduated implementation with annual participant caps, Mental Health Social Impact Bonds linking private investor returns to measurable savings in ED visits and disability claims, and federal cost-sharing (50%) under Canada's health accord as an innovative mental health access pilot.
3. Institute a 25% Refundable Mental Health Employer Tax Credit under the Taxation Act, 2007 to enable small- and medium-sized businesses to provide psychotherapy benefits. The credit would provide a maximum annual refund of \$500 per employee, incentivizing a total investment of \$2,000 per worker in services delivered by Registered Psychotherapists, Registered Social Workers, or Psychologists. Eligibility should be limited to Ontario-based employers with fewer than 500 employees.

### 31. Returning From Crisis to Care: Take Back Responsibility for Ontario’s Health and Housing Systems

PAC RECOMMENDATION
<b>No Consensus</b>
<p>The Committee was unable to reach consensus due to:</p> <ul style="list-style-type: none"><li>• Concerns that certain recommendations could introduce additional bureaucracy and may not align with existing ministerial mandates; and</li><li>• Insufficient specificity in several recommendations, including the absence of quantified targets and clear funding sources to support implementation.</li></ul> <p>The PAC noted that clear articulation of scope, costs, and implementation would strengthen the resolution and improve alignment with ministerial roles and fiscal considerations.</p> <p><b>PAC discussed feedback with the authoring chamber and has requested amendments be made at the AGM debate.</b></p>

**Submitted by:** Belleville Chamber of Commerce

**Co-sponsored by:** Brockville & District Chamber of Commerce, Port Hope and District Chamber of Commerce, Peterborough & Kawarthas Chamber of Commerce, Orillia District Chamber of Commerce, Hamilton Chamber of Commerce, Greater Oshawa Chamber of Commerce, Cambridge Chamber of Commerce, Chatham-Kent Chamber of Commerce, Whitby Chamber of Commerce, Barrie Chamber of Commerce, Leamington District Chamber of Commerce, St. Thomas & District Chamber of Commerce, Greater Kingston Chamber of Commerce, and the Greater Sudbury Chamber of Commerce

#### Issue

Communities across Ontario are experiencing escalating community safety impacts linked to unmet mental health and addictions (MHA) needs, homelessness, and housing instability. This has increased reliance on police, paramedics, and emergency departments (EDs), while chronically underfunded community agencies, city councils and local taxpayers absorb expanding responsibilities and costs.<sup>199,200</sup>

Managing the crisis is becoming a structural feature of society that requires budget and resources at the municipal level, diverting taxpayer dollars to support front-line service needs rather than investing in infrastructure and development that support the sustainable growth of their communities.

<sup>199</sup> The Hidden Costs of Community Safety (Loyalist College / Centre for Healthy Communities), scope and impacts overview.

<sup>200</sup> City of Belleville, Understanding Homelessness Task Force Minutes (21 Jan 2026), first responder strain/context.

## Background

The Hidden Costs of Community Safety documents post-pandemic increases in visible homelessness, substance use, public disorder, and crisis behaviours outpacing local capacity and affecting business operations and confidence in shared spaces.<sup>201</sup>

Businesses are increasingly funding community safety responses (e.g., security infrastructure, staffing, access controls), contributing to an inequitable “privatization” of safety—particularly harmful for small business.<sup>202203</sup>

Belleville’s Understanding Homelessness Task Force minutes reflect growing downstream strain: police reported approximately 33,000 incidents annually; paramedic staffing expanded substantially; and front-line workers cite increased risk and compassion fatigue.<sup>204</sup>

Task Force materials also highlight “continuum gaps” (treatment/recovery access, navigation, discharge coordination) that drive repeat crises and recurring emergency response.<sup>205206</sup>

OCC analysis emphasizes the long-tail “echo pandemic” impacts of MHA on workforce participation and business resiliency, and the need for coordinated, cross-system solutions.<sup>207</sup>

OCC work on substance use and overdose cautions against single-track responses and underscores the need for evidence-based collaboration and comparable data to guide interventions and reduce unintended harm.<sup>208209</sup>

As summarized by Sharan Khela following the January Beyond Blue Monday Roundtable, hosted by the OCC, “One of the strongest themes that surfaced was the importance of not working in siloes. Many of you emphasized the need for integrated approaches for a continuum of care, shared responsibility, and ongoing collaboration across sectors”.<sup>210211</sup>

But we should reframe “shared responsibility” and stand as the “indispensable partner of business” to urge the Government of Ontario to fulfill its provincial responsibility to provide adequate health care and housing systems to serve all the people who live here.

Even chambers of commerce and boards of trade have adjusted our advocacy mandate to acknowledge social issues are business issues, because the current crisis has an impact on economic development and growth. The OCC can help by standing up with municipalities, agencies, and front-line workers who have extended their roles for years and built integrated approaches, forced into “shared responsibility” of a problem created by the cumulative damage

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<sup>201</sup> The Hidden Costs of Community Safety, post-pandemic trends and capacity pressures.

<sup>202</sup> The Hidden Costs of Community Safety, business-borne costs / privatization of safety.

<sup>203</sup> The Hidden Costs of Community Safety, examples of costs and operational impacts.

<sup>204</sup> City of Belleville, Understanding Homelessness Task Force Minutes (21 Jan 2026), first responder strain/context.

<sup>205</sup> City of Belleville, Understanding Homelessness Task Force Minutes (07 Jan 2026), discharge/coordination gaps.

<sup>206</sup> Notes (Jan 7), system navigation / wraparound gaps contributing to repeat crises.

<sup>207</sup> Ontario Chamber of Commerce, Mind the Gap (final), MHA “echo pandemic” framing and system solutions.

<sup>208</sup> Ontario Chamber of Commerce, Substance Use and Opioid Overdose Crisis (final), limits of single-track responses.

<sup>209</sup> Ontario Chamber of Commerce, Substance Use and Opioid Overdose Crisis (final), collaboration, intervention review, comparable data.

<sup>210</sup> City of Belleville, Understanding Homelessness Task Force Minutes (21 Jan 2026), first responder strain/context.

<sup>211</sup> The Hidden Costs of Community Safety, post-pandemic trends and capacity pressures.

of decades of insufficient provincial system capacity. This adaptation has also masked the true scale of unmet need.<sup>212213</sup>

There are multiple communities and organizations trying to build solutions around the crisis. As “honest brokers” supporting our members who feel the impact across the spectrum, we are not in a position to identify specific solutions within the recommendations but we can add our voice to those who can.

The following outlines an overview of requests and recommendations as provided through ongoing consultation across the province around multiple tables. There is no one right answer, but all of these should be incorporated into building a crisis management support program.

1. Adopt an integrated continuum-of-care standard for community safety and crisis response across ministries and regions, requiring coordinated planning and joint accountability across health, housing, social services, and justice/community safety partners.<sup>214</sup>
2. Fund integrated crisis response and “warm hand-off” pathways so police/EMS/EDs are not the default entry point for unmet MHA needs (e.g., mobile crisis, rapid access pathways, outreach, navigation, coordinated case management).<sup>215216</sup>
3. Stabilize community MHA and homelessness-serving agencies with multi-year operating funding to support staffing continuity, clinical capacity, navigation, and coordinated supports—reducing reliance on short-term, project-based cycles that do not match sustained demand.<sup>217218</sup>
4. Invest in prevention beginning with access to primary care across the life course, including team-based primary care models with embedded mental health and addictions supports to reduce avoidable escalation into crisis.<sup>219220</sup>
5. Scale housing stability and supportive housing as essential system infrastructure, including operating supports for individuals who cannot live independently, to reduce repeat crisis, justice involvement, and emergency utilization.<sup>221222</sup>
6. Strengthen discharge planning and inter-agency coordination for high-risk transitions (hospital, custody, shelter) with defined notification and service hand-off requirements to reduce “revolving door” crises.<sup>223</sup>
7. Standardize “no wrong door” coordination and shared data systems by expanding Coordinated Access and ensuring consistent use of shared information systems (e.g., HIFIS), enabling communities to plan, track outcomes, and reduce duplication.<sup>224225</sup>

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<sup>212</sup> The Hidden Costs of Community Safety, business-borne costs / privatization of safety.

<sup>213</sup> City of Belleville, Understanding Homelessness Task Force Minutes (21 Jan 2026), front-line risk/strain supporting extended roles.

<sup>214</sup> The Hidden Costs of Community Safety, integrated approach requirement (multi-pronged responses).

<sup>215</sup> City of Belleville, Understanding Homelessness Task Force Minutes (21 Jan 2026), first responder strain/context.

<sup>216</sup> Notes (Jan 7), system navigation / wraparound gaps contributing to repeat crises.

<sup>217</sup> The Hidden Costs of Community Safety, systems-scale solutions beyond short-term fixes.

<sup>218</sup> Ontario Chamber of Commerce, Mind the Gap (final), recommendation set supporting multi-sector capacity building.

<sup>219</sup> Ontario Chamber of Commerce, Mind the Gap (final), MHA “echo pandemic” framing and system solutions.

<sup>220</sup> Ontario Chamber of Commerce, Mind the Gap (final), recommendation set supporting multi-sector capacity building.

<sup>221</sup> Ontario Chamber of Commerce, Mind the Gap (final), supportive housing scale and system infrastructure framing.

<sup>222</sup> City of Belleville, Understanding Homelessness Task Force Minutes (04 Dec 2025), peer examples emphasizing housing-with-supports and operating constraints.

<sup>223</sup> City of Belleville, Understanding Homelessness Task Force Minutes (07 Jan 2026), discharge/coordination gaps

<sup>224</sup> City of Belleville, Understanding Homelessness Task Force Minutes (17 Dec 2025), Coordinated Access / HIFIS emphasis.

<sup>225</sup> City of Belleville, Understanding Homelessness Task Force Minutes (17 Dec 2025), by-name list data.

8. Reduce red tape that delays integrated solutions, including streamlining approvals and aligning provincial funding timelines with real-world implementation for treatment/recovery infrastructure, supportive housing, and integrated hub models.<sup>226</sup>
9. Create a consistent outcomes framework and comparable reporting across ministries and communities to measure crisis diversion, time-to-access, housing stability, repeat interactions, and community/business impacts—supporting evidence-based scaling and reducing unintended harm.<sup>227 228</sup>
10. Modernize and align funding administration to reduce bureaucracy overload, including harmonized applications, reporting, and audits across ministries—so smaller communities and capacity-limited organizations are not disadvantaged or diverted from service delivery.<sup>229 230</sup>
11. Reduce the privatization of community safety costs borne by business by investing in shared public-system capacity and integrated responses, improving safety without requiring businesses to self-fund essential public functions.<sup>231</sup>

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. **Single Ministry Accountability and System Leadership.** Appoint one responsible ministry—with the funding, authority, and mandate—to lead the full continuum of housing, mental health, addictions, and community safety. This includes setting province-wide standards, coordinating cross-ministry action, and reporting publicly on outcomes so accountability is clear and action is measurable.
2. **Restore Prevention Systems and Long-Term Infrastructure.** Deliver long-term, upstream investments that reduce crisis pressure at the source, including:
  - a. **Massive capital investment** in affordable and supportive housing supply (e.g., the scale identified by municipal advocates to build tens of thousands of units over a decade).
  - b. **Income support reform** to reduce housing instability as a root cause, including higher social assistance rates and modernization of the social assistance system.
  - c. **Integrated health services** with sustained investment in community-based mental health and addictions services, including supportive housing with operating supports.
  - d. Rebuilding access to **primary health care across the life course** as a core prevention mechanism.

<sup>226</sup> OCC AGM Proposed Policy Resolutions Compendium, precedent language for streamlining approvals/reducing barriers to building supports.

<sup>227</sup> Ontario Chamber of Commerce, Substance Use and Opioid Overdose Crisis (final), data consistency limitations across jurisdictions.

<sup>228</sup> Ontario Chamber of Commerce, Substance Use and Opioid Overdose Crisis (final), collaboration, intervention review, comparable data.

<sup>229</sup> The Hidden Costs of Community Safety, business-borne costs / privatization of safety.

<sup>230</sup> City of Belleville, Understanding Homelessness Task Force Minutes (04 Dec 2025), smaller-community implementation/capacity realities.

<sup>231</sup> The Hidden Costs of Community Safety, impacts of privatized safety and need for shared public-system capacity.

3. **Support Communities Managing the Crisis Now.** Provide near-term crisis capacity so communities can stabilize conditions while long-term systems are rebuilt, including:
  - a. Encampment-specific funding to transition people into appropriate supports and housing options.
  - b. Funding integrated crisis response and safe hand-offs so police/EMS/EDs are not the default entry point.
  - c. Strengthening discharge and transition coordination (hospital/custody/shelter) to reduce “revolving door” crises.
  - d. Reducing administrative barriers (streamlined approvals, aligned funding timelines, simplified reporting) so frontline partners spend time delivering services—not navigating bureaucracy.

## Energy/ Natural Resources: Summary of Committee Feedback

Resolution	Organization	PAC Recommendation
32. Improve Electricity Price Predictability and Affordability for Ontario Businesses	Leamington District Chamber of Commerce	<b>Support</b>
33. Modernizing Ontario's SO <sub>2</sub> Framework for Petroleum Facilities: Aligning Environmental Protection with Operational Reality	Sarnia-Lambton Chamber of Commerce	<b>Support as Amended</b>
34. Secure Affordable, Reliable and Lower-Carbon Natural Gas Infrastructure for Ontario's Competitiveness	Leamington District Chamber of Commerce	<b>No Consensus</b>

## 32. Improve Electricity Price Predictability and Affordability for Ontario Businesses

**Submitted by:** Leamington District Chamber of Commerce

**Co-sponsored by:** Chatham-Kent Chamber of Commerce

### Issue

Electricity is a foundational input for Ontario businesses across all sectors. Rising demand—driven by electrification and increasingly frequent and prolonged extreme-weather peaks—combined with system constraints can increase exposure to price volatility and complicate long-term investment decisions. While Ontario has taken steps to strengthen market efficiency and predictability, businesses still require clear, stable price signals and rate structures to plan multi-year investments. Predictable, affordable, and reliable electricity pricing is essential to sustaining Ontario’s industrial base, supporting food security, enabling digital infrastructure, and driving economic growth across all regions of the province.

### Background

Ontario is entering a period of sustained electricity demand growth driven by electrification, population growth, industrial expansion, greenhouse development, and growing interest in data centre investment and connections.<sup>232</sup> Demand peaks are also increasingly shaped by extreme weather events (winter cold snaps and summer heat waves), which can stress the system and intensify price volatility. Ontario has recently implemented wholesale market reforms through the IESO’s Market Renewal Program, including the launch of a day-ahead market, to strengthen price formation and improve predictability.<sup>233</sup> The Independent Electricity System Operator forecasts that Ontario will require more than 12 gigawatts of new electricity capacity over the next 20 years to maintain system adequacy.<sup>234</sup> At the same time, nuclear refurbishments, asset retirements, and transmission constraints are tightening supply conditions, increasing exposure to price volatility.

Electricity pricing and reliability are particularly critical for Ontario’s industrial and manufacturing sectors, which compete in increasingly complex global markets shaped by trade realignment and re-shoring pressures. Jurisdictions offering stable and predictable electricity pricing are better positioned to attract and retain investment. Electricity price volatility can erode margins, discourage capital investment, and weaken Ontario’s competitiveness for advanced manufacturing and value-added processing.<sup>235</sup> Ontario’s existing programs (including the Industrial Conservation Initiative) provide important incentives for many large users to reduce

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<sup>232</sup> Ontario Chamber of Commerce. Policy Primer: Addressing Ontario’s Growing Electricity Needs (February 2022).; Independent Electricity System Operator (IESO). Annual Planning Outlook and Electricity Demand Forecasts.

<sup>233</sup> Independent Electricity System Operator (IESO). Market Renewal Program / Renewed Market Launch Readiness (Day-Ahead Market launch, April 24, 2025).

<sup>234</sup> Independent Electricity System Operator (IESO). Annual Planning Outlook and Electricity Demand Forecasts.

<sup>235</sup> Ontario Chamber of Commerce. Policy Primer: Addressing Ontario’s Growing Electricity Needs (February 2022).; Ontario Chamber of Commerce. Letter to the Minister of Energy and Mines: Ontario Business Imperative – Energizing Ontario’s Economy (April 15, 2025).

peak demand, but long-term price predictability remains essential across the broader business community.

Electricity affordability and predictability are equally vital for Ontario's greenhouse and controlled-environment agriculture sector, which supports sustainable agriculture, food security, and import displacement. Greenhouse operations are electricity-intensive, relying on electricity for grow lighting, ventilation, pumps, climate control, and automation. Because peak system conditions are often driven by extreme weather, volatility during winter and summer peak periods can be difficult to manage—particularly for operations that cannot readily shift load or reduce peaks through existing programs. These pressures can constrain sector growth and investment.<sup>236</sup>

These challenges are amplified in Northern and rural Ontario, where colder climates, longer heating seasons, and limited infrastructure significantly increase baseline energy costs. Stable and predictable electricity pricing would support greater year-round greenhouse food production over time, strengthen food security, help reduce reliance on imported fruits and vegetables, lower transportation costs and emissions, and improve access to fresh and nutritious food for northern and remote communities.<sup>237</sup>

Growing interest in new data centre development represents an emerging and potentially material pressure on Ontario's electricity system. Data centres are among the most electricity-intensive facilities in the economy, requiring continuous, high-reliability power to support cloud computing, artificial intelligence, financial services, health systems, and public sector operations.<sup>238</sup> The IESO notes that many operational data centres in Ontario are distribution-connected and around 10 MW or less, but new AI-driven facilities can require hundreds of megawatts (and in some cases up to a gigawatt), driving transmission-level connection requests.<sup>239</sup> For comparison, the IESO's Greenhouse Energy Profile Study reported approximately 300 MW of current demand and about 1,300 MW of customer connection requests in the Kingsville–Leamington area by 2025.<sup>240</sup> As global demand for digital infrastructure accelerates, jurisdictions with reliable, predictable, and competitively priced electricity are increasingly favoured for new data centre investment.<sup>241</sup>

Unmanaged or poorly coordinated data centre growth could exacerbate system congestion, increase costs for existing electricity users, and place additional strain on generation, transmission, and distribution infrastructure. Building on work already underway, continued strategic planning, transparent cost allocation, and appropriate rate design are needed to ensure that data centre investment supports system efficiency while protecting affordability and reliability for Ontario businesses and households.<sup>242</sup>

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<sup>236</sup> Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA). Greenhouse Sector Profiles and Energy Use.; Independent Electricity System Operator (IESO). Greenhouse Energy Profile Study – Summary Report (2018).

<sup>237</sup> Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA). Greenhouse Sector Profiles and Energy Use.

<sup>238</sup> Innovation, Science and Economic Development Canada. Data Centre Infrastructure, Digital Sovereignty, and Cybersecurity Considerations.

<sup>239</sup> Independent Electricity System Operator (IESO). Demand & Conservation Planning Technical Paper: Large Step Loads (July 2025)

<sup>240</sup> Independent Electricity System Operator (IESO). Greenhouse Energy Profile Study – Summary Report (2018).

<sup>241</sup> Innovation, Science and Economic Development Canada. Data Centre Infrastructure, Digital Sovereignty, and Cybersecurity Considerations.

<sup>242</sup> Ontario Energy Board (OEB). Electricity Rate Design, Cost Allocation, and System Planning Materials.

Electricity reliability is also a foundational requirement for data sovereignty and economic security. Ensuring that critical data infrastructure is located within Ontario supports domestic control over data, enhances cybersecurity resilience, and reduces reliance on foreign jurisdictions. A competitive and reliable electricity system is therefore integral not only to economic growth, but to Ontario’s digital sovereignty and public interest.<sup>243</sup>

Indigenous communities are essential partners in Ontario’s energy future. Many Indigenous communities, particularly in Northern Ontario, face infrastructure gaps, higher energy costs, and reliability challenges that constrain economic development. Expanding and modernizing electricity infrastructure in partnership with Indigenous Communities and First Nations can unlock opportunities for local ownership, workforce participation, and long-term revenue, while supporting reconciliation and regional prosperity.<sup>244</sup>

Meaningful engagement with Indigenous communities is as critical as new generation, transmission, and data-related infrastructure during planning and development. This includes fulfilling the Crown’s Duty to Consult, supporting Indigenous leadership in planning, and enabling opportunities for equity participation and local benefits. Incorporating Indigenous perspectives into electricity planning helps ensure projects are socially sustainable, regionally inclusive, and aligned with broader objectives for energy security, affordability, and economic reconciliation.<sup>245</sup>

The Ontario Chamber of Commerce, through its Energy Policy Council, has consistently emphasized that electricity affordability, predictability, and reliability must remain central considerations in energy planning, rate design, and infrastructure investment to support long-term economic competitiveness.<sup>246</sup>

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Review and modernize electricity rate structures and associated programs for business customers to improve price predictability and reduce exposure to short-term volatility, while encouraging cost-effective conservation and demand management (e.g., efficiency upgrades, controllable/tunable lighting, and load shifting), and maintaining fair cost allocation for all ratepayers.
2. Expand voluntary tools that allow businesses to manage electricity price risk—building on day-ahead and other market mechanisms—such as optional fixed-rate, multi-year, or

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<sup>243</sup> Innovation, Science and Economic Development Canada. Data Centre Infrastructure, Digital Sovereignty, and Cybersecurity Considerations.

<sup>244</sup> Crown-Indigenous Relations and Northern Affairs Canada. Indigenous Infrastructure, Energy Partnerships, and Economic Development.

<sup>245</sup> Crown-Indigenous Relations and Northern Affairs Canada. Indigenous Infrastructure, Energy Partnerships, and Economic Development.

<sup>246</sup> Ontario Chamber of Commerce. Policy Primer: Addressing Ontario’s Growing Electricity Needs (February 2022).; Ontario Chamber of Commerce. Letter to the Minister of Energy and Mines: Ontario Business Imperative – Energizing Ontario’s Economy (April 15, 2025).

hybrid pricing offerings, with transparent terms that clearly allocate risk when market prices rise or fall.

3. Continue strengthening the coordinated framework for large-load customers (including data centres), building on recent reforms to connection and capital contribution approaches, to ensure transparent planning, fair cost allocation, and timely investment in generation, transmission, and distribution infrastructure, while protecting system reliability and affordability for existing users.
4. Assess Ontario's electricity cost competitiveness relative to key competitor jurisdictions for investment and trade, and incorporate competitiveness benchmarks into electricity policy, procurement, and rate-setting decisions.
5. Strengthen engagement with the business community and Indigenous partners, including through the Ontario Chamber of Commerce's Energy Policy Council, when designing or modifying electricity pricing programs and electricity infrastructure investments.

### 33. Modernizing Ontario's SO<sub>2</sub> Framework for Petroleum Facilities: Aligning Environmental Protection with Operational Reality

#### PAC RECOMMENDATION

##### Support as Amended

The submitting chamber amended the resolution based on suggestions made by PAC and/or OCC staff. The committee supports the resolution as amended.

**Submitted by:** Sarnia-Lambton Chamber of Commerce

#### Issue

Certain provisions of Ontario Regulation 88/22 (Air Pollution – Discharge of Sulphur Dioxide from Petroleum Facilities) create a risk of unavoidable non-compliance during non-routine operating conditions, even when facilities are operating safely and in accordance with good engineering practices.

No commercially or technically proven solution exists to fully control sulphur dioxide (SO<sub>2</sub>) emissions during emergency or malfunction flaring events. The unpredictable timing, magnitude, and duration of these events make it infeasible to design control systems capable of capturing and treating all flared gases under all scenarios.

Flares are critical safety devices that must remain available at all times to prevent process safety incidents and uncontrolled releases. During emergencies, process upsets, or equipment malfunctions, the priority is to stabilize operations and protect workers, the public, and the environment. Flaring is minimized wherever possible; however, its use is sometimes necessary to maintain safe operations.

While industry continues to invest in emissions reductions and comply with regulatory requirements, the current framework can create situations where compliance obligations do not reflect operational realities. This introduces regulatory uncertainty and risk, particularly when safe and necessary actions result in temporary emissions exceedances.

The intent of proposed amendments is to improve clarity, predictability, and enforceability — not to weaken environmental protection.

#### Background

Ontario's petroleum refining sector is a critical component of the province's energy security, manufacturing base, and regional economy. Refineries in Sarnia-Lambton and Nanticoke supply approximately 93% of Ontario's transportation fuels, petrochemical feedstocks, asphalt, aviation fuel, and other essential products.

These facilities compete directly with refineries in the United States and other Canadian provinces for both market share and global capital investment. Regulatory frameworks that are unclear, technically impractical, or inconsistent with other jurisdictions can increase operating costs, discourage investment, and impact the long-term viability of refining capacity in Ontario.

Maintaining refinery capacity in Ontario supports:

- Reliable fuel supply for consumers, industry, and aviation
- Competitiveness of Ontario manufacturing and petrochemical production
- Employment across the province, including approximately 17,000 direct and indirect jobs
- Continued investment in emissions reduction and modernization projects

Regulatory certainty is a key factor in determining where companies invest capital for maintenance, upgrades, and environmental improvements. When requirements cannot be met in practice, or when compliance obligations exceed those in competing jurisdictions, there is increased risk that future investment will occur outside Ontario.

Comparable jurisdictions, including the United States and other Canadian provinces, provide clearer regulatory frameworks for emissions during non-routine operating conditions such as startup, shutdown, and malfunction events.

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

### **1. Amend O. Reg. 88/22 to Establish a Clear and Practical Framework for Non-Routine Operating Conditions**

Develop a regulatory framework that explicitly addresses emissions during unplanned events (e.g., malfunctions, emergencies, process upsets) and planned activities (e.g., startup, shutdown, and maintenance turnarounds). This framework should:

- Define distinct operating states and event categories
- Allow temporary emissions where necessary to maintain safety, prevent uncontrolled releases, and support essential maintenance activities
- Require timely notification, transparent reporting, and root-cause or corrective-action analysis
- Focus enforcement on cases involving negligence, avoidable emissions, or failure to implement corrective actions

### **2. Align Ontario's Regulatory Approach with Comparable Jurisdictions**

Ensure that Ontario's requirements are broadly aligned with those in the United States and other Canadian provinces to maintain competitiveness and support continued investment in the sector.

### **3. Maintain Strong Environmental Accountability and Transparency**

Ensure that any regulatory amendments continue to uphold high environmental standards by:

- Requiring robust monitoring and reporting of SO<sub>2</sub> emissions
- Supporting continuous improvement in emissions performance
- Maintaining transparency with regulators and the public

### 34. Secure Affordable, Reliable and Lower-Carbon Natural Gas Infrastructure for Ontario’s Competitiveness

PAC RECOMMENDATION
<b>No Consensus</b>
<p>The Committee was unable to reach consensus due to:</p> <ul style="list-style-type: none"><li>• Broad scope of the recommendations, which could require significant provincial resources without sufficient specificity added to support implementation; and</li><li>• Concerns regarding duplication with existing resolutions within the compendium and misalignment with key sector priorities.</li></ul> <p>PAC noted that the resolution would benefit from a narrower focus, clearer differentiation from existing policy positions, rationale to justify any action with fiscal impact, and stronger alignment with the sector’s primary challenges - including infrastructure bottlenecks.</p> <p><b>PAC discussed feedback with the authoring chamber and requested amendments be made at the AGM debate.</b></p>

**Submitted by:** Leamington District Chamber of Commerce

**Co-sponsored by:** Chatham-Kent Chamber of Commerce

#### Issue

Ontario’s economic, housing, and electrification growth imperatives are increasing demand for reliable, affordable energy. Natural gas remains widely used by manufacturing, agriculture (i.e., greenhouses), commercial businesses, and millions of homes. Additionally, it is a flexible fuel source that enables generation, supporting grid resiliency at peak demand. Yet Ontario would benefit from consistent, long-term, region-by-region planning and regulatory clarity for natural gas capacity, modernization, and integration of lower-carbon gaseous fuels. The resulting uncertainty can delay projects, raise costs, and reduce investor confidence for multi-decade decisions in sectors central to Ontario’s competitiveness.

#### Background

Natural gas is a major part of Ontario’s energy system. The province reports that about 3.8 million residential customers use natural gas for home heating, water heating, and cooking, supported by approximately 114,000 km of transmission and distribution pipelines across Ontario.<sup>247</sup>

Natural gas also supports electricity system reliability, especially during peak demand and extreme weather events. The Independent Electricity System Operator (IESO) reported that

<sup>247</sup> Government of Ontario. “Ontario energy snapshot.” <https://www.ontario.ca/page/ontario-energy-snapshot> (accessed 2026-02-05).

outages associated with ongoing nuclear refurbishments, combined with reduced supply from imports, contributed to gas generation's higher contribution to overall electricity output in 2024.<sup>248</sup> As extreme heat or cold weather conditions persist capacity demand can be unanticipated resulting in system capacity stressors.

In agriculture and agri-food, natural gas remains central to Ontario's greenhouse sector. Ontario government guidance (Ministry of Agriculture, Food and Agribusiness) notes that supplemental carbon dioxide (CO<sub>2</sub>) is widely used to support plant productivity in greenhouses, and common sources include combustion-based systems.<sup>249</sup> Applied research in Ontario further confirms that the greenhouse industry relies heavily on natural gas for supplemental heating and, in many cases, for CO<sub>2</sub> production which is critical to photosynthesis and plant development.<sup>250</sup>

Regional capacity constraints are already emerging. In its May 14, 2024 Decision and Order (EB-2022-0157), the Ontario Energy Board (OEB) granted Enbridge Gas Leave to Construct (LTC) to expand approximately 19 km of 36-inch diameter steel pipeline as part of the Panhandle System Expansion Project. The OEB found need was demonstrated by forecasted load growth (including large-volume commercial greenhouse demand), found no viable alternative to meet the demonstrated need over the relevant period, and found the estimated capital cost of \$358 million to be reasonable.<sup>251</sup>

Ontario has begun formalizing longer-term, cross-fuel planning through Energy for Generations, its first integrated energy plan to 2050, which brings together electricity, natural gas, hydrogen, storage, and other energy sources.<sup>252</sup> The Province has also advanced a Natural Gas Policy Statement process, including direction on maintaining electricity reliability and clarifying the Ontario Energy Board's role, and has restored a 40-year revenue horizon for many new natural gas connections through the Keeping Energy Costs Down Act, 2024 and related regulation—while noting that authority to set the revenue horizon returns to the OEB after January 1, 2029.<sup>253</sup>

Ontario's approach must also align with Canada's net-zero by 2050 commitment.<sup>254</sup> Federal and provincial planning recognizes that emissions reductions from gaseous fuels can be achieved through efficient, low-carbon gaseous fuels like renewable natural gas (RNG) and hydrogen, in addition to carbon capture and storage, provided these pathways are implemented safely and credibly.<sup>255</sup>

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<sup>248</sup> Independent Electricity System Operator (IESO). "2024 Year in Review (Year-end data)." <https://www.ieso.ca/corporate-ieso/media/year-end-data> (accessed 2026-02-05).

<sup>249</sup> Government of Ontario. "Supplemental carbon dioxide in greenhouses." <https://www.ontario.ca/page/supplemental-carbon-dioxide-greenhouses> (accessed 2026-02-05).

<sup>250</sup> University of Guelph – Ontario Agri-Food Innovation Alliance. "Decarbonizing Ontario greenhouse heating and CO<sub>2</sub> production." <https://www.uoguelph.ca/alliance/projects/decarbonizing-ontario-greenhouse-heating-co2-production> (accessed 2026-02-05).

<sup>251</sup> Ontario Energy Board. "Decision and Order – EB-2022-0157 – Enbridge Gas Inc. (Panhandle System Expansion Project) – Background (May 14, 2024)." <https://www.oeb.ca/sites/default/files/ENBRIDGE%20GAS-LTC-EB-2022-0157-PANHANDLE-BG-FINAL-14-05-24.pdf> (accessed 2026-02-05)

<sup>252</sup> Government of Ontario. "Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7." <https://www.ontario.ca/page/energy-generations> (accessed 2026-02-05).

<sup>253</sup> Environmental Registry of Ontario. "Consultation to support the important role for natural gas in Ontario's energy system and economy" (ERO No. 019-9501). <https://ero.ontario.ca/notice/019-9501> (accessed 2026-02-05).

<sup>254</sup> Government of Canada. "Canadian Net-Zero Emissions Accountability Act." <https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/net-zero-emissions-2050/canadian-net-zero-emissions-accountability-act.html> (accessed 2026-02-05).

<sup>255</sup> Environmental Registry of Ontario. "Consultation to support the important role for natural gas in Ontario's energy system and economy" (ERO No. 019-9501). <https://ero.ontario.ca/notice/019-9501> (accessed 2026-02-05).; Natural Resources Canada. "Roadmap for the Decarbonization of Canada's Oil and Gas Sector" (background, Dec 2023). <https://www.canada.ca/en/natural-resources-canada/news/2023/12/roadmap-for-the-decarbonization-of-canadas-oil-and-gas-sector.html> (accessed 2026-02-05).

## Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario to:

1. Publish a region-by-region natural gas and low-carbon gases capacity outlook (transmission, distribution, storage) within Ontario's integrated energy planning, aligned with IESO planning regions (including Windsor–Essex and Chatham-Kent), with priority upgrades and timelines.<sup>256</sup>
2. Direct the OEB to decide capacity reinforcing projects on a timely basis using standardized Integrated Resource Planning, and continue to require early, transparent engagement with Indigenous communities and landowners, consistent with the Duty to Consult and Ontario's environmental assessment requirements for major builds.<sup>257</sup>
3. Extend and stabilize the 40-year revenue-horizon approach for new connections beyond Jan. 1, 2029, and require transparent impact analysis and adequate notice before major changes to connection policy or cost recovery.<sup>258</sup>
4. Enable, through provincial and federal infrastructure funding partnerships, gas-network decarbonization by establishing clear, safety-first pathways for renewable natural gas (RNG) approvals and injection (including cost-recovery treatment), issuing guidance for safe hydrogen blending and hydrogen-ready infrastructure, and coordinating Carbon Capture, Utilization and Storage (CCUS) planning with Canada and industry.<sup>259</sup>
5. Expand targeted incentives and financing so industrial, commercial, and agricultural users (including greenhouses) can adopt high-efficiency equipment, hybrid electric-gas systems, Combined Heat and Power (CHP), and other commercially available options that cut emissions while protecting competitiveness.<sup>260</sup>

<sup>256</sup> Government of Ontario. "Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7." <https://www.ontario.ca/page/energy-generations> (accessed 2026-02-05).

<sup>257</sup> Ontario Energy Board. "Decision and Order – EB-2022-0157 – Enbridge Gas Inc. (Panhandle System Expansion Project) – Backgrounder (May 14, 2024)." <https://www.oeb.ca/sites/default/files/ENBRIDGE%20GAS-LTC-EB-2022-0157-PANHANDLE-BG-FINAL-14-05-24.pdf> (accessed 2026-02-05). ; Environmental Registry of Ontario. "Consultation to support the important role for natural gas in Ontario's energy system and economy" (ERO No. 019-9501). <https://ero.ontario.ca/notice/019-9501> (accessed 2026-02-05). ; Government of Ontario. "Energy for Generations: Ontario's Integrated Plan to Power the Strongest Economy in the G7." <https://www.ontario.ca/page/energy-generations> (accessed 2026-02-05). ; Ontario Energy Board. "Natural Gas Integrated Resource Planning (IRP)." <https://www.oeb.ca/consultations-and-projects/policy-initiatives-and-consultations/natural-gas-integrated-resource> (accessed 2026-02-05).

<sup>258</sup> Environmental Registry of Ontario. "Consultation to support the important role for natural gas in Ontario's energy system and economy" (ERO No. 019-9501). <https://ero.ontario.ca/notice/019-9501> (accessed 2026-02-05).

<sup>259</sup> Environmental Registry of Ontario. "Consultation to support the important role for natural gas in Ontario's energy system and economy" (ERO No. 019-9501). <https://ero.ontario.ca/notice/019-9501> (accessed 2026-02-05). ; Natural Resources Canada. "Roadmap for the Decarbonization of Canada's Oil and Gas Sector" (backgrounder, Dec 2023). <https://www.canada.ca/en/natural-resources-canada/news/2023/12/roadmap-for-the-decarbonization-of-canadas-oil-and-gas-sector.html> (accessed 2026-02-05).

<sup>260</sup> Government of Ontario. "Supplemental carbon dioxide in greenhouses." <https://www.ontario.ca/page/supplemental-carbon-dioxide-greenhouses> (accessed 2026-02-05). ; University of Guelph – Ontario Agri-Food Innovation Alliance. "Decarbonizing Ontario greenhouse heating and CO2 production." <https://www.uoguelph.ca/alliance/projects/decarbonizing-Ontario-greenhouse-heating-CO2-production> (accessed 2026-02-05).