



Compendium of Policy Resolutions 2023-2026

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COMPETITIVENESS

A. Support for Ontario's Steel Industry and its Supply Chain Clusters

Submitted by: The Hamilton Chamber of Commerce and the Sault Ste. Marie Chamber of Commerce

Issue

The Ontario steel industry includes steel producers as well as manufacturing industries within its value chain and geographical clusters and has long been a cornerstone of the provincial economy. Recently, a combination of protectionist economic policies, instability in the global market economy, and foreign competition from industries benefiting from unfair economic advantages has led to a sharp decline in their ability to compete globally. As we collectively pursue net zero emissions nationally, it will be imperative for the provincial government to ensure the successful energy transition for our most carbon intensive industries as their operational costs are projected to increase. The Ontario government needs to focus public policy and investment efforts towards supporting this important industry, clusters and the innovation it creates.

Background

Steel is a versatile material whose local production is essential to supporting local industries, consumer products, building and maintenance of our transportation and physical infrastructure. Ontario is home to more than 70% of Canada's steel production capacity. Our steel industry directly employs 16,000 and indirectly employs about 53,000 Ontarians.¹ Ontario's steel industry thereby has a multiplier of approximately 3.3:1; that is, there are 3.3 jobs outside of the steel industry for every direct job within the industry. Beyond contributing to overall employment, Ontario steel makers contribute to supply chains within the broader manufacturing sector in the province. In particular, steel makers play a crucial role in Ontario's 400-km automotive corridor, with direct impacts on the province's auto assemblers, and over 1,200 auto parts suppliers.² Challenges faced by this industry have a notable ripple effect across the province on related SME companies, suppliers, and manufacturers.

The rise of the steel industry was integral part of Canada's development as a world-class economy in the 20th century. From Algoma in Sault Ste Marie to Dofasco and Stelco in Hamilton, Ontario firms especially distinguished themselves as centers of excellence and advancement in new varieties of steel. Steel producers by principle agree to compete against imports on a fair commercial basis but are in global competition against foreign government subsidies, state-owned enterprises, and other forms of support that run counter to the trade rules. Moreover, Canada finds itself in a unique position where our domestic firms are subject to increasingly stringent carbon emissions reductions targets that pose significant existential threats to many of our existing manufacturing industries unless governments step in to support energy transition and to level the playing field between domestic and foreign produced products.³ Market conditions are even further jeopardized by ongoing violations of WTO practices, the ineffectiveness of trade remedy laws and lack of full reciprocation within trade treaties.

While the majority of media coverage has focused on the decline of the industry, tariffs, foreign competition and oversupply in the existing market, experts remain optimistic that fundamental forces, which if harnessed, will continue to support the prosperity and global demand for Ontario steel. While challenges related to international markets remain a federal issue, the province can still play a critical role in:

¹ Ontario Newsroom <https://news.ontario.ca/medg/en/2018/04/ontario-supporting-4700-jobs-in-hamiltons-steelindustry.html>

² Ontario Newsroom <https://news.ontario.ca/medg/en/2018/04/ontario-supporting-4700-jobs-in-hamiltons-steelindustry.html>

³ Global Affairs Canada https://international.gc.ca/trade-commerce/controls-controles/steel_alumacier_alum.aspx?lang=eng

1. Supporting investments for organizations in new technologies under various funding envelopes;
2. Working with the federal government to negotiate more equitable trade regimes and adjudications processes, as well as studying the potential remedies a border carbon adjustment regime could enable;
3. Incentivizing the development of a skilled workforce equipped to participate in the transition to advanced manufacturing;
4. Easing goods movement infrastructure bottlenecks, especially near trading hubs;
5. Incentivizing the development and participation of steel industry clusters and value chains.

Recommendations

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

1. Taking inspiration from the European Steel Technology Platform, work with the federal government to develop a coordinated steel manufacturing strategy that especially prioritizes investment in trade enabling infrastructure near major clusters.
2. Explore the legislated and voluntary expansion of procurement tools to include fair and preferential treatment for Canadian steel products where the exported alternative doesn't meet or exceed Canadian and provincial environmental, health and safety regulations and does not allow similar, fair and equal access to their markets for the same product.
3. Given their role as suppliers of high-performance material in the manufacturing supply chain and in flowing down R&D improvements,⁴ prioritize allocation of the newly announced Ontario Carbon Trust funds to help energy-intensive businesses like steel industry to invest in low-carbon processes, technology and innovation and other capital investments.⁵
4. Work with the Government of Canada to study a border carbon adjustment regime that would protect our domestic industry from international firms not subject to the same climate change targets.
5. Strongly encourage that local suppliers and domestic steel content be used in all provincially and federally funded projects if the materials can be supplied from domestic sources.

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Sunset Date: April 30, 2025

⁴ Birnbaum, Cohen, Harris and Warrian (2009) Ontario Manufacturing, Supply Chains and Knowledge Networks: A Report to the Toronto Regional Research Alliance (TRRA), Toronto: TRRA October 2009

⁵ Government of Ontario <https://prod-environmental-registry.s3.amazonaws.com/2018-11/EnvironmentPlan.pdf>

B. Investment in Mining Innovation to Support the Critical Minerals Strategy

Submitted by: The Greater Sudbury Chamber of Commerce. Co-sponsored by: North Bay & District Chamber of Commerce, Thunder Bay Chamber of Commerce and the Timmins Chamber of Commerce.

Issue

Mining is a capital-intensive industry. New technologies are currently in development that have the potential to reduce the initial capital burden on mining organizations. Supporting the adoption of innovative new technologies will accelerate their development, eventually reduce their costs, strengthen the industry and increase competitiveness. This will increase mining reserves and support the province in its effort to continue mining critical minerals that are in global demand.

Background

Mining is a competitive advantage for the province. According to the Ontario Mining Association, there are currently 40 mine sites operating in Ontario along with significant opportunity for exploration and future mine development⁶. Ontario's mineral production, including indirect and induced impacts, provides more than \$12 billion in Canadian GDP and creates 78,800 jobs⁷. The Ontario Mining Association also estimates that there are over 1,400 mining supply and service sector companies in Ontario⁸. Although "the number fluctuates with various commodity price changes, mining in Ontario produces revenues of around \$10 billion per year."⁹ The City of Toronto is the mining finance capital of the world, and Ontario's expertise in mineral production, mining supply and services, finance, and innovation are in global demand.

With the provincial government now focused on its critical minerals strategy, it is more important than ever that we continue to invest in mining innovation. The province has developed its first ever-critical minerals strategy to help generate investment, increase the provinces competitiveness in the global market and create jobs and opportunities in the mining sector.¹⁰ New technologies and high growth sectors such as information and communications technology, electronics, energy, aerospace and defense, health and life sciences, and transportation rely on critical minerals. Ontario is well positioned to become a global supplier, producer and manufacturer of choice for certain critical minerals, including but not limited to nickel, copper, cobalt and platinum group elements, however it requires a sustainable pipeline of attractive mining projects.

It is generally understood that the average new mine project will require an investment of \$1.0-2.0 billion depending on the depth of the ore body and the amount of development required. Furthermore, project execution will take several years before reaching first ore and generating any cash inflow to return on the investment. This poses not only a significant challenge for mining organizations with respect to developing an ore body that ultimately generates a net present value, but also for the province of Ontario to support its critical minerals strategy. New technology exists that has the potential to reduce the capital burden of mine development, attract a new generation of workers, reduce emissions and improve the operating efficiency of the mine once in production, however in some cases, this requires significant testing to mitigate risk before becoming widely accepted.

Generally, Ontario mining companies and the government contribute research and innovation funds on a 1:1 ratio. Matching investments are provided regardless of the type of project. With fewer resources available from industry, this skews investments towards cheaper and lower risk research projects, and away from the innovation and commercialization projects that are necessary to realize productivity gains in the sector. In order to attract funds and partnerships from global mining companies, the Government of Ontario needs to consider

⁶ https://oma.on.ca/en/ontario-mining/facts_figures.aspx

⁷ <https://oma.on.ca/en/ontario-mining/EconomicContribution.aspx>

⁸ https://oma.on.ca/en/ontario-mining/facts_figures.aspx

⁹ <https://oma.on.ca/en/ontario-mining/EconomicContribution.aspx>

¹⁰ <https://news.ontario.ca/en/release/60622/ontario-developing-first-ever-critical-minerals-strategy>

adjusting its funding ratios to provide incentives to support larger-scale, longer-term, visionary provincial mining innovation projects given that the ventures have a strong business case and a high return on investment.

For innovation to work, it must be adopted. Mining innovations need to be demonstrated and implemented as workable beyond the theoretical, but also show commercial viability. The lack of commercialization is one of the reasons why so little of the funding for mining research has impacted mine operations. The Research, Demonstration and Implementation (RD+I) approach to focus on practical applications, distinct from academic research, was developed by the Centre for Excellence in Mining Innovation (CEMI), and is aimed at addressing this very important issue. Mining service and supply firms also make significant contributions to the commercialization process and the provincial government has recently supported their efforts via selective funding. That said, mining organizations themselves are typically left to take on the risk associated with adoption. While new equipment or technology has been developed and tested to some extent, this does not guarantee that it will endure the harsh mining environment and meet production demands over the long term.

Perhaps, the best example of such technology is the development of battery electric mining equipment. Battery electric mining equipment has the potential to reduce the amount of capital required to build a new mine along with its future operating cost. The volume of rock excavation required for the mine ventilation system is reduced as a result of eliminating heat and emissions from traditional diesel equipment. While the cost of diesel fuel is exchanged for the cost of recharging batteries, the net operating cost of the mine is reduced given the size of the ventilation system is smaller, drawing less electricity to supply fresh air and keep the mine at temperature. The challenge with battery electric equipment starts with its initial cost. For example, the average battery electric underground loader is roughly three times the price of traditional diesel equipment given it is still in the early states of its development and far from mass-produced. Furthermore, while a number of mining organizations have chosen to trial one or two vehicles within their mine, they are not necessarily ready to change their entire mobile fleet. The benefit to current operations resides on other factors (health and safety, reduction in carbon footprint, attraction of an environmentally and health and safety conscious workforce) as opposed to the immediate financial benefits.¹¹ The financial opportunity exists more so in relation to new mine development, taking advantage of the reduction in capital for mine development. However, a significant risk remains for mining organizations when deciding to purchase and entire fleet of battery electric equipment, particularly loaders and haulage trucks that carry a larger volume of material on incline grade. This equipment has yet to prove it can reliably meet production demands over the longer term. A further step forward in adoption is required to work through remaining challenges and for mining organizations to gain confidence in product.

Several other technologies also have the potential to influence both current mining operations as well as new mine development such as continuous mining machines or tunnel-boring machines, which would transition mining from a batch process of drilling, blasting, mucking and hauling material to a continuous process where material is cut, then fed at smaller particle size up to surface. Ore sorting technologies are also under development that will allow for pre concentration of mill feed, reducing the amount of tailings produced and ultimately reducing processing costs. Autonomous mining equipment, or remote mining equipment, also serves to remove the worker from certain dangerous parts of the mining operations making it much safer and more productive given that the time required to move workers above and below surface is eliminated. The increase in safety may also attract a new generation of professionals to the mining industry. Technological advancement in mining will remove traditional barriers to underrepresented populations wanting to join the industry and allow them to benefit from well paying jobs offered by the industry.

In face of the current economic environment and competition from jurisdictions with lower wages, operating costs, and less stringent environmental regulations, Ontario has little choice but to innovate. New, expensive, and complex mining equipment technologies are being developed as a result of the depth of Ontario's significant identified mining resources and reserves, which are a challenge to exploit. The new technologies will result in a new paradigm of worker safety and productivity that will ensure that Ontario remains the leader

¹¹ <https://electricautonomy.ca/2021/02/18/bevs-in-mining-non-financial-benefits/>

in both mineral supply and mining technology supply and services. However, for innovation to work, it must be adopted. Investment needs to follow the entire process, starting with research, then development and last but not least, implementation.

Recommendations

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

1. Increase the relative government-to-industry funding ratio for mining innovation and ensure that it supports the entire project lifecycle.
2. Engage the mining industry through OMA, the supply and service industries and groups such as MineConnect, and other cross-sector industries as well as First Nations and Indigenous communities in discussions that aim to support implementation and commercialization requirements.
3. Work closely with mining organizations to develop and implement new technologies such as battery electric vehicles that have the potential to improve mine project economics, increase mine reserves, and support the province in developing future mines to fulfill its critical minerals strategy.

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C. Capturing The Battery Value-Chain

Submitted by: Sault Ste. Marie Chamber of Commerce. Co-sponsored by: Timmins Chamber of Commerce, and Greater Sudbury Chamber of Commerce.

Issue

The transition to a net-zero economy will be metal-intensive. New technologies will require base metals—for example, copper for electrification and nickel for battery EVs. The economic impacts for Ontario are significant but time is running out to compete in battery-cell manufacturing, the part of the value chain that holds most of the value-creation and macroeconomic opportunities. Ontario is well positioned to support investment in mining innovation that amplifies the provincial Critical Minerals Strategy and takes advantage of the quickly evolving battery value-chain.

Background

The Ontario Chamber of Commerce report *The Climate Catalyst, Ontario's Leadership in the Green Economy* demonstrates the significant opportunity that exists for Ontario to lead the global movement to decarbonizing every aspect of daily life, commercial and industrial activity, natural resource extraction, consumption, and value-added activity.

Green technologies will need hefty amounts of rarer metals, such as lithium and cobalt for batteries, tellurium for solar panels, and neodymium for the permanent magnets used both in wind power generation and EVs. The required pace of transition means that, for some of these commodities, we will soon need ten times or more than is available today. This resource demand and Ontario's abundance of supply to support decarbonization gives Ontario the potential to generate significant economic opportunity and first mover competitive advantage in the battery value chain if action is taken immediately.

The McKinsey & Company report: *Capturing the battery value-chain opportunity* by Nicolò Campagnol, Alexander Pfeiffer, and Christer Tryggstad estimates that a new battery-manufacturing plant with a total capacity of 30 to 40 gigawatt hours (GWh) per year could directly create as many as 3,200 jobs. A similar number of jobs could be added indirectly through suppliers and construction as well as through the food and basic-services sectors. As a result, battery manufacturing could generate significant growth in GDP, especially if an ecosystem of related industries develops. This comes at a time when the automotive industry's move to EVs has raised fears of lost jobs in car manufacturing and in the production of internal-combustion engines.

Winning companies and regions will be those that act in the next few years. Governments can play an important role in facilitating industry growth in their respective countries, particularly through direct financial incentives but also by encouraging the development of local battery ecosystems.

Cell manufacturing, the most important step in the battery value chain, is estimated to account for up to 40 percent of battery-industry value creation by 2030. Manufacturers are investing billions of dollars in new battery-cell plants. If demand for battery cells grows at about 30 percent per year, the equivalent of about 90 additional gigafactories, as we know them today, will be needed in the next ten years worldwide.

Challenges include securing funding, carrying out a billion-dollar project on budget, recruiting the right talent, and training hundreds of workers. Other potential issues include securing capacity of capable machinery producers as well as qualifying and developing a supply chain.

There are already six or seven at-scale cell manufacturers with ten or more years of track record and significant volumes and plants in several countries. Customers want options for sourcing batteries, but generally no more than three or four, so ten to 15 suppliers should suffice to supply the global market. Since more than 15 players

have already announced their intention to begin cell manufacturing in Europe alone, we expect the industry to consolidate.

Companies face a variety of obstacles in the race to scale, but they can overcome those challenges using the following strategies.

- Become a low-cost producer
- Recruit skilled workers
- Secure raw-materials supply
- Improve product sustainability
- Form partnerships with customers

Batteries are emerging as a critical ingredient in the transition to a more sustainable future because of their role in electrifying transportation and balancing power grids. Battery use is more than an opportunity to eliminate vehicular CO₂ and NO₂ emissions in a world grappling with climate change; scaling up production of battery-cell manufacturing capacity also offers significant value-creation opportunities for manufacturers, creates new jobs that pay well, and supports economic growth.

Battery ecosystems can be powerful tools for economic development, and governments that wish to capture the value-creation opportunity of batteries should consider moving quickly and forcefully to build them. Embracing the battery ecosystem and supporting Ontario's critical mineral strategy will become a powerful economic development tool for the province.

Recommendations

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

1. Facilitate value-chain collaborations through industry forums, and encourage talks between the mining sector, electric vehicle producers and cell manufacturers.
2. Invest in research and educational institutions to develop talent and advance technology.
3. Attract cell manufacturers by establishing proactive public policies, and working with the federal government and Municipalities, to develop a fast-track process for permitting and land leasing.
4. Work with the federal government, lending institutions, venture capital markets and angel investors to make investments, loans, grants, and guarantees to overcome capital limitations.
5. Encourage and facilitate effective cross-border collaborations and trade with other suppliers and partners in the value chain.

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D. Supporting Ontario's Supply Chain by Establishing a Focal Point Within the Provincial Government and Investing in the Manufacturing Workforce

Submitted by: the Vaughan Chamber of Commerce and the Newmarket Chamber of Commerce

Issue

The supply chain in Ontario lacks sufficient direction and planning to operate a modern and secure supply chain despite the high demand present in the manufacturing sector.

Background

The manufacturing industry faced immediate impact when COVID-19 hit and Canada launched its lockdown measures at all levels of government. In particular, 72% stated their company's supply chains are being disrupted by COVID-19¹². They are experiencing workforce impacts, supply shortages, reduced access to PPE, project shutdowns, unplanned spending, and layoffs. As the pandemic and lockdown measures continue to hit Ontario, manufacturers face high demand with virtually no supply readiness and reliable government support.

At the same time, the manufacturing sector has been experiencing delays in receiving inbound containers, and dealing with increased global shipping costs up to 50-80%. Although some manufacturers turned to airfreight to access critical components that were produced offshore, the airfreight capacity constraints and expensive costs did not withstand the continuation of this solution.¹³

With the impacts of the lockdowns and long global supply chains for many manufacturing components, York Region manufacturers face countless challenges, with many forced to rethink production and supply in order to survive. The Government of Ontario recognized the benefit of this support by announcing the Supply Chain Management Act in the beginning of the pandemic, to make sure the demand for crucial suppliers are visible and trackable¹⁴. The regulations allowed the collection of key data on inventories, orders and supply constraints, and the development of a virtual inventory tool.

The launch of this act and Ontario Together, a new website that is bridging some gaps between the private and public sector, showcases the potential steps necessary to protect the province's supply chain and make sure businesses have the support they need. Notwithstanding the steps to protect the province's supply chain and make sure the front lines have the essential goods and services, this strategy needs to be developed beyond its capacities by fully executing a solution for all sectors impacted by the supply chain issues.

Similarly, with respect to advancing the coordination of all regulation, this can also mean providing the manufacturing sector with a strategy that provides investments in tech operations, nearshoring opportunities, and reskilling and upskilling in the workforce. Reshoring the manufacturing sector has popular interest. However, offshoring has introduced cheaper labour and environmental standards offered in the global market. Since the 1980s, Canadian manufacturing has been significantly declining and many manufacturers have benefited from high profit margins.

For Ontario, the real challenges are in responding and recovering from the risky supply chain, and increasing its global competitiveness. By responding to protectionist policies, tech advancements, the need to upskill and reskill, York Region could become a provincial hub for advanced manufacturing and prepare for the unexpected global market.¹⁵ The provincial government must support career pathways programs to connect young people

¹² <https://www.supplychaincanada.com/coronavirus-covid19-resources>

¹³ https://www.supplychaincanada.com/media/reports/Supply_Chain_Resiliency_Report.pdf

¹⁴ <https://news.ontario.ca/en/release/56488/ontario-protecting-supply-chains-to-support-covid-19-emergency-response>

¹⁵ <https://www.emerald.com/insight/content/doi/10.1108/IJPDLM-05-2013-0128/full/html>

to the endless career options in supply chain. For businesses to respond quickly and effectively to the supply chain issues, building skills will be important for the supply chain to recover.

The provincial government needs to consider the necessary steps to invest in technology and people, in order for companies to operate and produce, while being competitive in the economy. Developing a modernized strategy is vital for the manufacturing sector. The government should coordinate and oversee the regulations that manage the supply chain, and establish specific measures that address reduction from financial harm and lessen barriers from major global disruptions. This proactive approach can make it faster to respond to global markets and interprovincial transportation networks¹⁶.

Recommendations

The Ontario Chamber of Commerce calls on the Government of Ontario to:

1. Implement a supply chain department within the provincial government tasked with the coordination and oversight of all regulations that directly manages the efficiency of the supply chain.
2. Invest in educational programs aimed toward future economic activity to introduce students to the importance of supply chain to our economy, and to the many career opportunities that exist in logistics, data protection, risk management to support security against cybercrime, customs brokerage, distribution, and sea, air and land transportation.
3. Develop a two-year pilot project to provide funding and resources to encourage greater research and development in the areas of supply chain logistics, and the safe adoption of cutting-edge technologies. Sufficient use of technologies will be vital to support a resilient supply chain that is increasingly digitized and vulnerable to cyber attacks in hardware, services, or software from third-party providers.
4. Work with businesses to explore opportunities for nearshoring and investments in supply chain resilience.

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¹⁶ <https://ppforum.ca/publications/revitalizing-canadas-manufacturing-economy-for-a-post-covid-world/>

E. Building Ontario Back Through a New Advanced Manufacturing and Industrial Strategy

Submitted by: Sault Ste. Marie Chamber of Commerce. Co-sponsored by: Greater Kitchener-Waterloo Chamber of Commerce, North Bay & District Chamber of Commerce, Windsor-Essex Regional Chamber of Commerce, Guelph Chamber of Commerce, Brampton Board of Trade, Orillia District Chamber of Commerce, Tillsonburg District Chamber of Commerce, and Burlington Chamber of Commerce

Issue

The emergence of the Covid-19 pandemic has brought to light the erosion of the industrial and advanced manufacturing capability of Ontario. Over the past decades, the growing reliance on imports of goods and the decline of domestically produced goods has exposed the vulnerability of our economic underbelly and an ability to aggressively respond to health crisis like the Covid-19 pandemic.

Furthermore, President Biden's executive action to enforce the 1933 Buy American Act and a series of executive actions to enforce Buy American rules places Ontario's economy at great risk.

Ontario must reverse the decline in its ability to produce high skilled, high earning jobs and the economic benefits that come from a strong and growing advanced manufacturing and industrial sector. Moreover, government must provide the appropriate conditions and support to assist industry, particularly those in Energy Intensive Trade Exposed (EITE) industries, in decarbonization efforts. Ontario needs a long-term strategy to advanced manufacturing and industrial capabilities and competitiveness.

Background

One of the by-products of the COVID-19 pandemic is that suddenly people are paying attention to where things are actually manufactured. Ontario was left scrambling for medical equipment, relying on goods that are manufactured halfway around the world, an approach that has mobilized a temporary shift in production in many manufactures to meet domestic need.

Like many regions in the world, Ontario shut down large parts of their economies to contain the COVID-19 virus, and while economic activity stopped, most manufacturers continued to operate. In some cases, many manufacturers ramped up or shifted production in response to the crisis to make more food, personal protective equipment, and other health care products. But because firms have also had to contend with implementing physical distancing measures and weaker than normal demand, the industry's overall production has still declined sharply and have yet to return to pre-pandemic levels.

Manufacturing remains a key part of Ontario's economy. The sector has experienced structural changes in recent decades but is still a major driver of investment, innovation, and employment in the province. The government will need a strategy to support manufacturing and industrial competitiveness and the sectors continued role in opportunity and prosperity in Ontario. An effective manufacturing strategy will need to tackle (1) costs, (2) market access, and (3) talent.

Ontario firms are growing less competitive and thus missing out on the opportunities that expanding local and global economies provide. Canadian manufacturers and industrials are losing market share at home and abroad. Our foreign competitors are taking an increasing share of new and existing customers and as the US expands the Buy America policy and reduces exceptions Ontario must seek remedies and build a strong strategic direction or as a result lose opportunities to create jobs and grow shared economic prosperity in Ontario.

Related to these challenges, Canadian industry will experience significant competitiveness issues due to Canada's carbon pricing regime, if left unmitigated. Carbon prices will increase from \$30 per tonne in 2021 to up to \$170 per tonne by 2030, which will substantially drive up the cost of final industry products. Direct capital

support, investment in industrial carbon mitigation research and transition support are necessary to balance competitiveness and achieve Canadian carbon reduction targets.

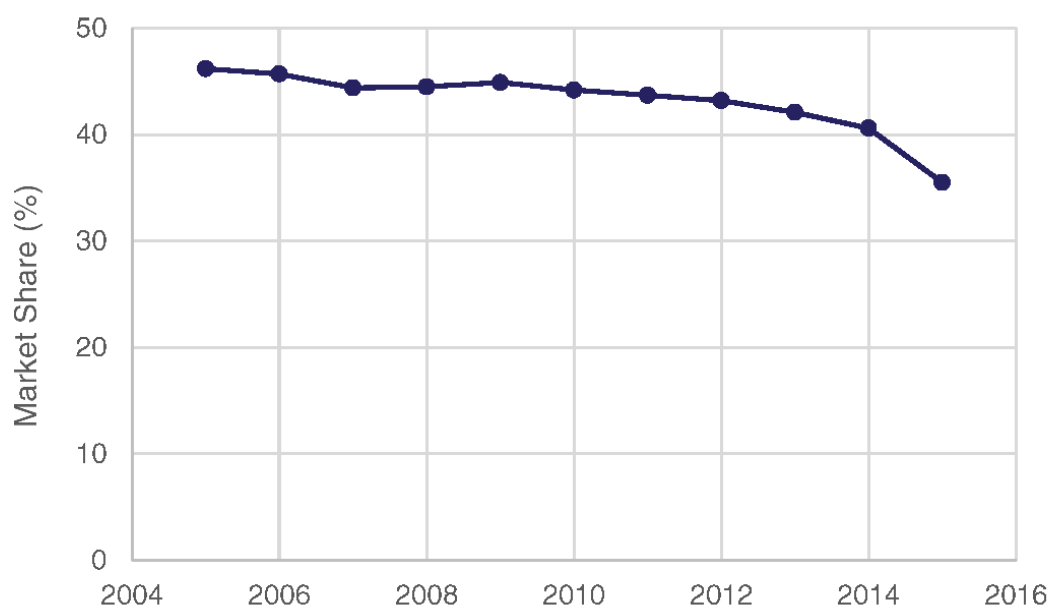


Figure 1. Canadian share of Canadian manufacturing market from 2005-2015. Source: CANSIM Table 304-0014 and Innovation, Science and Economic Development Canada and Trade Online

To reverse this trend Ontario must develop a next generation advanced manufacturing & industrial strategy that would include aligning policy and spending priorities. In consultation with stakeholders, the strategy should focus on encouraging those investments that will increase productivity and innovation, encourage growth of firms, and diversify exports.

Recommendations

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

1. In collaboration with stakeholders, develop and implement a long-term modern advanced manufacturing and industrial strategy, founded on the principles of continuous improvement, that focuses on increasing investment through reducing production costs, supports innovation and technology adoption with the goal of increasing value-added exports.
2. Introduce a trade strategy that targets reshoring of manufacturing capacity to Ontario and strengthens North American competitiveness.
3. As part of the long-term strategy, work with academic institutions, public and private, to develop advanced manufacturing and industrial curriculum to address the skills shortages.
4. Leverage areas of competitive strength and Ontario's value proposition.
5. Continue to build the "Ontario Made" brand by modernizing the legislated and voluntary expansion of government and public-private partnership procurement tools to evaluate and consider selection of Ontario suppliers.
6. Promote with the Federal Government the concept of adopting a "Buy North American" plan, to avoid complicating supply chain linkages between the two countries and Mexico to ensure government procurement markets do not seriously hurt our precarious economic recovery.

7. Reinforce the historically strong diplomatic relations between Ontario and the United States to maintain open market access.
8. Provide the appropriate conditions and support to assist industrial decarbonization efforts in collaboration with all levels of government to establish Canada's clean industrial advantage.
9. Provide support for the manufacturing sector's automation initiatives, which allows manufacturers to compete with offshore production, as well as grow their operations and create more domestic jobs.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

F. Making Ontario a Leader in Circular Economy

Submitted by: Guelph Chamber of Commerce

Issue

COVID-19 has highlighted the importance of increasing Ontario's economic resiliency. The circular economy model offers a way to build back our economy inclusively while helping the private sector transition to more sustainable approaches. Building on the provincial government's [Ontario Made](#) program and producer responsibility waste diversion strategies, we need to build an economy that maximizes value from our natural and produced resources, promotes innovation, reduces waste, and lowers costs for taxpayers. Ontario has a tremendous opportunity to lead North America in the creation of a robust circular economic ecosystem with the potential to revive our manufacturing sector, disrupt legacy industries or create new ones.

Ontario should make the development of a circular economy a priority of our economic recovery to ensure Ontario businesses can maximize the value from our resources while leading the way in environmental responsibility.

The government should make it a priority to support the development of circular businesses approaches in the following sectors, which are believed to hold the greatest potential for circular business models:

- Agriculture and AgriFood
- Plastics and manufacturing
- Construction

Background

Looking beyond the current take-make-dispose extractive industrial economic model, a circular economy aims to transform how we manage resources from design to manufacture to primary use to repurposing of materials afterwards.

The key objectives of the circular model are to preserve and enhance natural capital, optimize resource yields and foster system effectiveness by revealing and designing out waste.¹⁷ Circular economies invite businesses to capture waste streams for one industry and turn them into value streams for others. Circularity has the added bonus of driving business efficiency, value creation and innovation while reducing environmental impacts.

Circular economy solutions are being adopted internationally by governments and businesses to help reboot economies after the COVID-19 pandemic and transition to a more resilient system with social and environmental accountability. Some of the lasting benefits include substantial net material savings and reduced exposure to price volatility; increased innovation and job potential; as well as increased resilience in both the ecological and economic systems.¹⁸ Circular principles can be applied to just about every sector of the economy, from clothing to computers, compostable packaging to cars.

Canada's federal government is taking cues from international circular success and is promoting circular economic policy as an approach to bolster the transition to a cleaner economy.¹⁹ In 2019, the City of Guelph

¹⁷https://www.ellenmacarthurfoundation.org/assets/downloads/government/EllenMacArthurFoundation_Policymakers-Toolkit.pdf (p22)

¹⁸https://www.ellenmacarthurfoundation.org/assets/downloads/government/EllenMacArthurFoundation_Policymakers-Toolkit.pdf (p. 23)

¹⁹ <https://www.canada.ca/en/services/environment/conservation/sustainability/circular-economy.html>

and the County of Wellington were awarded \$10 million through Infrastructure Canada’s Smart Cities Challenge to develop Our Food Future, Canada’s first circular food economy. Guelph-Wellington is one of the first industrialized communities in the world to apply a circular approach to the food system. A circular food system aims to eliminate waste by keeping as much energy, nutrients and materials as possible cycling through the system—and generating value as a result. It looks at everything from how we produce food to how we distribute, sell and consume it. The Our Food Future initiative brings together approximately 127 core stakeholders, including local government, community groups, businesses, industry associations, NGOs, academia, institutes, public agencies and utilities. In its first year, Our Food Future helped launch almost 50 innovative circular companies, with dozens of additional entrepreneurs from across the province looking for support to launch circular businesses. In 2021, collaborators in the Our Food Future initiative are piloting and testing a suite of programs and technologies to support businesses that can help Ontario become a leader in the sustainable economy of the future.

Circular Economy (CE) principles and policies have clear and compelling contributions to make in rebuilding Ontario’s economy in resilient, sustainable, and inclusive ways.

Recommendations

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

1. Leverage existing CE programs to attract new business and investment by marketing Ontario globally as a centre for CE innovation.
2. Mandate an existing provincial agency or Ministry to lead both provincial government Ministries and agencies as well Ontario municipalities to set the right conditions that enable CE opportunities to flourish. Empower the provincial lead to create, implement, and promote province-wide standards, goals, benchmarks, and best practices on the implementation of the CE. Among the said goals should be:
 - Promote the development of business models, circular business clusters and resource management systems that keep products and materials in the economy at their highest possible value.
 - Create economic incentives that reward innovation.
 - Invest public money and stimulate private sector investment to develop the skills required to create CE opportunities.
 - Foster responsive public-private collaboration across value chains to remove regulatory barriers, develop new policies and align existing ones.
3. Commit to providing stable funding and/or tax incentives for CE initiatives both at a provincial and municipal level. Such funding should, when possible, be reasonably tied to outcome-based measurements.
4. Promote the adoption of those initiatives and technologies which have been proven to be replicable and scalable throughout the province.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

G. Supporting Smaller (local) Vendors: Embed community benefits clauses into public contracts and remove irrelevant disqualifiers

Submitted by: Belleville Chamber of Commerce. Co-sponsored by: the 1000 Islands Gananoque Chamber of Commerce, Carleton Place & District Chamber, the Greater Kitchener/Waterloo Chamber of Commerce, Prince Edward County Chamber of Commerce and the Quinte West Chamber of Commerce

Issue

In Ontario, there is a legal precedence to exclude preferential treatment to local suppliers by public sector organizations (including municipalities). This supports the open bidding process, transparency and generally optimizes a “lowest bid” award that benefits the taxpayer and is fiscally responsible and recognizes the public sector must minimize costs to achieve modest budgets and keep taxpayer increases low. However, RFPs for public sector organizations may include inadvertent disqualifying conditions that impede or exclude smaller, local companies from submitting proposals to projects they are inherently qualified to compete with. The plea has been to argue legal precedence and support local, though it may be more practical to open the bidding process based on a review of pre-qualifying conditions.

Background

Community benefits clauses require suppliers contracting with a public sector body to meet specific conditions or criteria, such as local hiring, subcontracting to social enterprise or paying a living wage to secure the contract. Contracting authorities can develop the criteria on their own, request that a potential supplier propose what it can reasonably deliver or work together to determine what community benefits will be imposed through the contract. In some cases, communities impacted by the project are also consulted in developing the criteria, though few jurisdictions have publicly released materials that demonstrate to what extent this occurs in a consistent way across departments and projects. In a few cases, jurisdictions set thresholds at which the clauses must be considered in the pre-procurement stage (e.g., Initial RFI and RFQ necessary), which helps to provide additional direction and clarity for contracting authorities. Generally, higher-value contracts — which are typically awarded to large suppliers with greater capacities — are targeted for community benefit clauses. Or abstract pre-qualifying criteria are placed within the RFI that limit the ability of a local supplier to even present a proposal or bid.

The pandemic has created an increased sensitivity to moving between regions and has emphasized an interest in supporting local. This may also be an opportunity to revisit the regulations and legislation that prevent overt local favoritism in addition to ensuring discriminating pre-qualifying conditions are removed.

Primarily, a local company that has shown a real effort to re-invent itself during the trying times of COVID-19 should be afforded a boosted seat at the table when it comes to local request for proposals. Sustainable and responsible business builds resiliency into every role in the industry – creator, distributor and advertiser. Sustainable and responsible business encompasses both environmental considerations (e.g., minimizing operational waste, energy and water use) and social considerations (e.g., human rights, labour rights, inclusion and diversity). Even before COVID-19, the industry’s commitment to sustainability left much to be desired. (Source Building Back Better: An Action Plan for the Media, Entertainment and Culture Industry WHITE PAPER JULY 2020)

Recommendations

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

1. Allow municipalities (and any public sector organization) to adopt the evidence of the impact of community benefits and social procurement policies in awarding points to businesses who value and include these tools in RFP proposals.
2. Allow municipalities (and any public sector organization) to consider a “tie-breaker” analysis in the event of two identical bids to favour the local bidder.
3. Allow Pre-qualifications to be reviewed to ensure they do not favour non-local suppliers or disqualify a local supplier from bidding on non-related conditions.
4. Develop more regional contracting “portals” that can help larger bidders who win the work look for local contractors to assist the project.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

H. The Case for Levelling the Field

Submitted by: 1000 Islands Gananoque Chamber of Commerce. Co-sponsored by: Greater Kitchener Waterloo Chamber of Commerce and Belleville Chamber of Commerce

Issue

In the province of Ontario, we have been seeing an increase in the amount of bonusing that is offered to attract employees into public sector positions; limiting the capacity of small private businesses to hire accordingly and provide affordable services to their clients/customers. This is having a significant impact on private suppliers in health & childcare services and has been exacerbated amid a pandemic as both sectors are stretched beyond capacity.

Background

In the private sector, costs are passed on to the end user; in the public sector, these are passed on to the taxpayer. When skills are required by both public and private sector for similar services, the public sector has an unfair competitive advantage in terms of attracting employees with their compensation packages – often supported by collective agreements. Signing bonuses in the public sector, ultimately paid for by the taxpayer, jeopardize the ability of private organizations to attract similarly skilled employees because the cost must be passed on directly to the end user. This is particularly prevalent in areas of child & health care where both public and private services are critical to economic stability, health and welfare.

There are many cases where public services have been privatized and many others where public and private sectors work together. For example, smaller municipalities contract out duties such as snow removal, waste collection and recycling while their public works crews can concentrate on other frontline infrastructure.

Labour shortages continue to impede the capacity of both public and private sectors to serve their communities and clients/customer's needs. Competition for both skilled and unskilled workers impact every sector but there is a looming challenge where these skill sets are required in both public and private sectors. While the idea of providing incentives and signing bonuses is often appreciated by prospective employees and represents profitability in private companies – when this tactic is used by publicly funded organizations, it puts private business in direct competition for employees that are also often compensated at levels driven by collective agreements with hourly rates beyond the capacity of smaller, private companies.

During the pandemic we have seen small steps taken by our provincial government to assist in certain sectors such as Personal Support Workers. In September of 2020, the Ministry of Health and Ministry of Long-Term Care launched a new Personal Support Worker (PSW) Return of Service Program in partnership with Ontario Health.

The objective was to help Ontario's Long-Term Care and Home and Community Care sectors recruit newly graduated PSWs as they were and are greatly needed. The sector has seen a workforce shortage as the aging population is growing, however the pandemic has made the situation more challenging. The PSW Return of Service Program will provide a \$5,000 incentive to PSWs who graduated on or after April 1, 2020 in exchange for a six-month commitment in a Long-Term Care home or Home and Community Care agency.

Although progressive in nature, this is but a drop in the bucket when it comes to municipally funded long-term care homes and hospitals. Personal health and childcare support workers have not been considered essential and this impact both the public and private sectors. These jobs are generally lower paying positions in the private sector, because the costs for services are passed on directly to the end user. With both home and

childcare critical to support seniors living at home or young parents in the work force, this puts extreme pressure on the private sector to keep their fees affordable.

Often, we are witnessing a shortage of workers not just at private care homes but in the local home building associations, skilled trades and policy and marketing sectors. As the need for individuals to pivot to a new normal of assisting the growing government bureaucracy, we are seeing many small private employers left with an uneven playing field with regard to the amount of hiring bonuses that they can offer to compete for the best workers. The past “brain-drain” we used to see with skilled people leaving Canada for better-paying jobs in Europe and the U.S, we are now seeing a dynamic shift of people abandoning private jobs to join the public service. Although we want the best at all positions to serve our community, we should always look for ways to ensure our private businesses do not have to compete.

Fair competition provides the best service across all economic sectors. It has been generally unacceptable for government to compete with private industry to provide cost-subsidies to consumers that have been funded through taxpayer dollars. It is now time to consider bonusing within the public sector an element of unfair competition.

Recommendations

The Ontario Chamber of Commerce urges the Ontario Government to:

1. Connect incentives to scholarships, bursaries, or repayment of loans to the graduate upon proof they’ve been hired in their field.
2. Strike a task force to study best practices in closing the wage gap within certain segments in the private sector and what’s driving recruitment and retention within industries to encourage people to enter into a sector for career options.
3. Direct the Ministry of Labour, Training, and Skills Development to increase their grant offers for potential funding support for:
 - Dependent Care
 - Travel (certain distance away from in-class training)
 - Living Away from Home (only when required)

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

I. Vaccine Manufacturing in Ontario

Submitted by: Greater Kitchener Waterloo Chamber of Commerce and Cambridge Chamber of Commerce

Issue

The procurement of COVID-19 vaccines for the residents of Ontario is a major challenge. Increasingly, medical experts and other stakeholders are advancing the argument that Canada urgently requires domestic development and manufacturing capacity.

Background

On January 8, 2021, the Wall Street Journal reported that while Canada was quick to order vaccines, the nation was falling behind many developed-country peers in terms of distribution. On January 6, Canada had vaccinated 0.5 percent of the population compared to the United States at 1.6 percent.

By February 19, the Bloomberg Vaccine Tracker reported Canada ranked 41st globally when measuring vaccines per capita, behind not only the U.S. and U.K. but also Serbia, Poland, Morocco, Germany, Romania and Spain. While Canada is still ahead of Japan, that country has not begun its vaccination rollout. Contrary to Canada, Japan plans to produce 90 million doses of the AstraZeneca vaccine domestically.

Even when accounting for population size, the U.S. had inoculated five times more people per capita than Canada and administered nearly 60 million doses of vaccines, compared to just over a million in Canada.²⁰

Dr. Alan Bernstein, a prominent member of the federal government's COVID-19 Vaccine Task Force, told numerous Canadian media outlets in late January that the pandemic should be a wake-up call to create our own domestic manufacturing capacity. Emerging variants of the novel coronavirus provide prospects for second and third-generation vaccines which could be required for several years.

Campbell Clark, a regular columnist with the Globe and Mail, wrote in early February that we now know why Canada needs a domestic vaccine manufacturing industry. He cited explicitly the experiences of Providence Therapeutics, a Calgary-based firm that last spring was at the same stage of vaccine development as Moderna. They did not get the financial backing to "run the same race" with the firms that are now in production. Clark also agreed with Bernstein that a new pandemic or new strains of COVID-19 will require new vaccines.

At one time Canada and other leaders in the global economy could depend on the normal flow of goods across international borders and subsequently secure vaccines. However as noted above our vaccination rate is falling behind our peers and both the federal and provincial levels of government are asked to be accountable on procurement practices and policies. Scarce vaccines do not move freely across borders.

Multiple strains of COVID-19 and the potential for other viruses present the scenario that vaccine manufacturing may not only be an economic and health care option but rather an imperative. On January 21, 2021, Next Generation Manufacturing Canada (NGen), the advanced manufacturing supercluster, announced that Providence Therapeutics will receive significant funding for vaccine research and support of manufacturing capabilities.

Sir John Bell, Oxford University professor of medicine supervising the development of the AstraZeneca-Oxford vaccine, noted to CTV News that the United Kingdom went from zero to their current manufacturing strategy of repurposing facilities in less than ten months. They started from nothing and are in a strong position as some countries decided to depend on others, a strategy that was perhaps proven wrong. Bell, a Canadian,

²⁰ <https://www.bloomberg.com/graphics/covid-vaccine-tracker-global-distribution/>

indicated Canada should consider vaccines as a health security issue and suggested we are overly dependent on the United States.

On February 2, 2021 Prime Minister Trudeau announced an agreement with Maryland-based Novavax to produce vaccines at a facility in Montreal potentially starting at the end of 2021. Asked if Canada missed an opportunity, Dr. Bell stated the reality is if you do not have enough vaccine, you know it and you need to get on with it.

On February 3, 2021, Premier Ford noted that “with the uncertainty surrounding a steady supply of vaccines, it’s clear we need to start production of COVID vaccines right here in Canada. We have some of the best pharmaceutical companies in the world, yet we are relying on foreign vaccine manufacturers. This needs to change.”

There are more pharmaceutical companies in Ontario than any other Canadian province with approximately 1,900 life sciences firms that employ 60,000 people and generate over \$38 billion in annual revenues. The pharmaceutical sector alone is responsible for \$25 billion and 28,000 employees.

Recommendation

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

1. Immediately appoint a Task Force, composed of officials from the Ministries of Health and Economic Development, Job Creation and Trade, academia, and a majority of members in senior executive positions at Ontario-based pharmaceutical manufacturers and research firms, to expeditiously develop a strategy for provincial vaccine development and manufacturing.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

J. Fostering Electric Vehicle Success in Ontario

Submitted by: Windsor-Essex Regional Chamber of Commerce. Co-sponsored by: the Woodstock Chamber of Commerce and Leamington Chamber of Commerce

Issue

As countries continue to grapple with the global climate crisis and gas prices have set all-time record highs, more and more people are turning to electric vehicles (EVs) as part of the solution. At the same time, the Government of Canada is pushing to eliminate the sale of gas-powered passenger vehicles by 2035. Canada and Ontario possess everything necessary to develop the world's most Environmental Social Governance (ESG) friendly electric vehicles, batteries, and components. Key in unlocking that potential will be a strong EV market that promotes growth in the sector. Now is the time to put in place the necessary support to help build that market. Ontario must maintain momentum with recent historic investments. The province cannot fall behind other jurisdictions in Canada or the United States and must develop a comprehensive plan including infrastructure to foster EV growth in the province.

Background

The reason many are so enticed to transition over to EVs is because they are seen as the future of the auto sector. It is not enough for Ontario to adopt the advancements that come from EVs and their development. Rather, it needs to lead the charge from developing new technologies and innovations to commercializing and integrating these exciting new technologies into the marketplace. Ontario has the opportunity, resources, and technology to develop into a hub for research, innovation, and development for the auto sector in its transition to EVs. A comprehensive strategy is needed for research and development to attract additional investors and partners to bolster the growth of Ontario's EV sector from the mining stage to the manufacturing stage. This strategy will need support from industrial partners, Ontario's colleges and universities, and labour groups involved in the sector. Canada has the potential to be the leading source of the most ESG batteries and raw source materials in the world. Canada has a strong record of promoting ESG resource extraction in the world, which needs to be used to develop the Canadian and Ontario mining sector that is essential to produce the batteries needed to fuel the EV revolution. There is no place with more potential to provide raw materials than Ontario, with the mining potential located in the north and the Ring of Fire. Ontario is well positioned to solidify its position as an internationally recognized leader in developing the mining of raw materials that will support the production of ESG batteries and other EV components. However, a coordinated strategy and plan that will align this opportunity with the needs of industry will be critical to ensure Ontario's ongoing success and leadership in the automotive sector.

The most significant hinderance to consumer adoption of EV's is the upfront cost. Consumers can save thousands of dollars over the long-run with powering EVs versus traditional internal combustion engines, but the initial sticker shock for many turns them away. Many other jurisdictions across North America and the globe have recognized this barrier to adoption and have put in place programs to incentivize consumers to make the switch to EVs. Whether done to reduce greenhouse gases, improve local air quality, or just to be innovative, the lack of any financial motive to convince consumers to migrate to EVs leaves Ontario lagging behind our continental and global competitors.

Across Canada, consumers qualify for a rebate of up to \$5,000 on zero-emissions vehicles, or a rebate up to \$2,500 for plug-in hybrid vehicles.²¹ However, unlike other provinces, Ontario lacks any provincial

²¹ Transport Canada, "Incentives for Purchasing Zero-Emission Vehicles," Transport Canada (/ Gouvernement du Canada, November 22, 2022), last modified November 22, 2022, accessed September 26, 2023, <https://tc.canada.ca/en/road-transportation/innovative-technologies/zero-emission-vehicles/light-duty-zero-emission-vehicles/incentives-purchasing-zero-emission-vehicles>.

compensation for consumers to make the switch. Ranging from \$2,500²² in Newfoundland and Labrador to \$7,000²³ in Quebec, other provinces are developing programs to encourage consumers to embrace innovation in an industry that is essential to Ontario's economy. Ontario had been the leader in EV subsidization previously offering up to \$14,000 in rebates for consumers choosing electric until the program was cancelled in 2018.²⁴ Now is the time to consider re-introducing some form of rebate to incentivize the transition from gas-powered, internal combustion vehicles to EV vehicles. An EV incentive could be a simple method to encourage consumers to adopt EVs and make Ontario a stronger market for additional EV investment.

Any potential incentive program needs to be inclusive of businesses so that they can move their fleets away from traditional gas-powered, internal combustion vehicles. Businesses know that EVs are the future of the auto sector and want to take advantage of their low cost of fueling as well as their environmental benefits. But businesses have to evaluate and make decisions based on return-of-investment. Thus, any subsidy scheme needs to go beyond the personal consumer and be inclusive of businesses and their transition into EVs.

The other major component from the consumer end that has limited the growth of the EV market is "range anxiety." The current EV models have larger travel ranges than ever before, with some exceeding the range offered by full tanks of gas. However, the convenience of a five-minute fill-up is hard to move away from, and without the necessary infrastructure it becomes impossible to compete.

To support the consumer and commercial adoption of EVs, the Government of Ontario needs to develop a comprehensive EV infrastructure plan that will enable a strong EV sector and market. The infrastructure that will be needed to support the increasing consumer and commercial adoption will be crucial to meet the growing demand for EV's. Level 1 chargers that connect straight to a standard 120-volt home outlet can take hours to fully charge an EV. Slow charging can be very challenging for those who routinely work on the road or have long commutes.²⁵ Therefore, many EV owners choose to invest in a level 2 charger. Many of the same jurisdictions that are providing consumers with subsidies to convert also provide subsidies for level 2 chargers. For example, the Province of New Brunswick provides those who receive the provincial electric vehicle rebate, an additional rebate of up to \$750 to offset the cost of the purchase and installation of a level 2 charger.²⁶ If the province is going to foster a strong EV sector then it needs to provide consumers, both personal and commercial, the means to reduce range anxiety while ensuring they have the full use of their vehicles.

The province also needs to start moving beyond personal home chargers in the garages of suburban communities and limited charging spots at commercial outlets. Any comprehensive plan must include the following elements for EV infrastructure:

- Increasing access to EV Chargers in rural and remote areas of the province, including in provincial parks, recreation areas, and along vital transportation arteries.
- Expanding access to EV Chargers in municipally owned parking facilities as well as on-street public parking in downtown cores, and other business areas.

²² "Electric Vehicle Rebate Program - Newfoundland & Labrador Hydro," accessed January 13, 2023, <https://nlhydro.com/electric-vehicles/ev-rebate/>.

²³ "New Electric Vehicle Rebate | vehiculeselectriques.gouv.qc.ca," accessed January 13, 2023, <https://vehiculeselectriques.gouv.qc.ca/english/rabais/ve-neuf/programme-rabais-vehicule-neuf.asp>.

²⁴ "Ontario Cancels EV Rebate Program, Wants to Lower Gas Prices Instead," accessed December 22, 2022, <https://www.guideautoweb.com/en/articles/47389/ontario-cancels-ev-rebate-program-wants-to-lower-gas-prices-instead/#:~:text=Ontario%20Cancels%20EV%20Rebate%20Program%2C%20Wants%20to%20Lower,gas%20prices%20down%20by%2010%20cents%20a%20litre>.

²⁵ "What Are The Different Levels Of Electric Vehicle Charging? - Forbes," accessed January 4, 2023, <https://www.forbes.com/wheels/advice/ev-charging-levels/>.

²⁶ "Electric Vehicle Incentive Program Announced," accessed December 15, 2023, https://www2.gnb.ca/content/gnb/en/news/news_release.2021.07.0522.html.

- Implementing a strategy to ensure that residents in older neighbourhoods with a lack of private parking have access to public charging stations with on-street parking.
- Develop guidelines around multi-unit residential buildings so that residents can have access to adequate charging infrastructure for EVs and have a framework for installing and operating chargers.

Furthermore, there needs to be a plan so that businesses can adequately transition their workplaces to supporting EVs and adopting EVs as part of their standard fleet of commercial vehicles. Businesses must be part of the movement towards EVs for any market to develop and the sector to be strong in the province.

Ontario's competitors are not waiting for the province to make the first move. The United States (US) has developed the National Electric Vehicle Infrastructure Formula Program (NEVI) that commits \$5 Billion over five years to fund the strategic development of EV Infrastructure.²⁷ Under this plan, many US states are receiving funding to push forward with infrastructure development that will foster and enhance the adoption towards EVs within their state. For example, the state of Michigan will receive approximately \$110 million over the five years of the program.²⁸ Ontario cannot afford to sit by and let regional competitors take the lead on EV infrastructure.

The physical infrastructure needs to be combined with human capital necessary to be a leader in the sector. This means working with post-secondary institutions to lead technological development that maintains and attracts high quality personnel in Ontario to further the field of research. Additionally developing the training and skill sets needed by Ontario's workforce to further the transition towards EVs with the ability to grow to meet increased demand for skilled workers. Without the skilled and trained workforce, investment in the sector will look elsewhere.

If Ontario is going to attract investment in the EV sector, the province must show that it is committed to the furtherance of EV technology. The Government of Ontario needs to show a commitment to making EVs work everywhere in the province with accessibility for all consumers including businesses. If other jurisdictions including regional competitors in the United States are seen as leaders over Ontario, then we risk losing out on further EV investment opportunities and partnerships that could bring thousands of jobs to the province.

Recommendations

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

1. Introduce a rebate program comparable to other Canadian jurisdictions to subsidize the cost of transitioning consumers, both for individuals and businesses, from traditional gas-powered vehicles to Electric Vehicles.
2. Develop a comprehensive plan around Electric Vehicle infrastructure that is inclusive of rural, remote, and core urban areas.
3. Develop a plan to help address the needs of businesses to adapt to the growing use of EVs so that their employees, consumers, and operational fleets have access to the necessary infrastructure to make a smooth transition away from traditional gas-powered vehicles.
4. Develop a comprehensive strategy to bolster research and develop talent through Ontario's colleges and universities as well as workplace training programs to develop the workforce needed to foster growth in the EV sector.

²⁷ "National Electric Vehicle Infrastructure Formula Program Bipartisan Infrastructure Law," accessed December 22, 2022, https://www.fhwa.dot.gov/environment/alternative_fuel_corridors/nominations/90d_nevi_formula_program_guidance.pdf.

²⁸ "National Electric Vehicle Infrastructure Formula Program," accessed January 5, 2023, <https://www.michigan.gov/egle/about/organization/materials-management/energy/transportation/nevi>.

Effective Date: April 29, 2023
Sunset Date: April 29, 2026

K. Ignite the development of the Ring of Fire

Submitted by: Greater Sudbury Chamber of Commerce. Co-sponsored by: Thunder Bay Chamber of Commerce, Sault Ste. Marie Chamber of Commerce, North Bay & District Chamber of Commerce, Timmins Chamber of Commerce

Issue

The Ring of Fire is a transformative project for Canada. Provincial action is required to expedite the development of the Ring of Fire and ensure the economic and social potential of this multi-generational project is realized.

Background

The Ring of Fire is a mineral-resource-rich area in the James Bay Lowlands region of Northern Ontario. Located on approximately 5,000 square kilometres of land, significant deposits of critical minerals like copper, zinc, nickel, platinum, palladium, vanadium, and gold, along with the first and largest deposit of chromite in North America, have been discovered since the early 2000s. Based on current projections, the Ring of Fire is estimated to hold more than \$117 billion in geological riches with deposits being significant enough to sustain activity for a century.

The Ring of Fire is certainly significant to Northern Ontario, but it should be a priority for the whole province, as it will have far-reaching impacts across the entire country. The critical minerals found within the Ring of Fire will help create unprecedented economic prosperity across the Far North.

The Ring of Fire holds billions of dollars' worth of high-quality chromite, an essential metal in stainless steel production, demand for which is expected to increase in the years to come. China, the largest importer of chromite, accounting for 60 percent of global demand, has already demonstrated significant interest in the Ring of Fire.

In March 2022, Australian-based Wyloo Metals purchased Noront Resources' mineral assets in the Ring of Fire in a \$616.9-million deal. Now called Ring of Fire Metals, the company owns the rights to the high-grade Eagle's Nest deposit, which contains nickel, copper, platinum and palladium deposits.

Ring of Fire Metals is in discussions with the United States government about possible funding for its project.²⁹ The U.S.'s Department of Defence said it is willing to help fund feasibility studies for early-stage mining companies in North America with promising projects that could help alleviate shortages in some critical minerals.

As the world continues to develop more sophisticated technology, the need for these critical minerals will only escalate. In the first 10 years of the Ring of Fire production, all levels of government stand to increase their tax revenues by nearly \$2 billion, with the provincial government projected to accrue between \$870 to \$940 million. In the long term, the provincial government is expected to receive \$2.89 billion to \$3.25 billion in taxes from the Ring of Fire. Long-term benefits to Ontario's GDP have been forecasted to range between \$16.8 billion and \$27 billion.

The Ring of Fire is also estimated to sustain over 5,500 full-time equivalent jobs annually within its first 10 years, along with significant GDP increases and economic activity in multiple sectors. Benefits will impact the

²⁹ <https://republicofmining.com/2022/11/15/u-s-government-considering-funding-for-ontarios-ring-of-fire-by-naill-mcgee-globe-and-mail-november-15-2022>

mining and mining supply sectors, but will also generate economic opportunities within the manufacturing, construction, utilities, wholesale/retail, trade, and financial services sectors, among others.

While there is still a long way to go before any mining can actually take place in the region, there has been some progress, and there have been several key milestones reached within the development.

Revenue sharing agreements and equitable partnerships with Indigenous communities in the region will be critical to ensuring the Ring of Fire generates benefits for Indigenous procurement, employment, and economic development.

In April 2022, the chiefs from Webequie and Marten Falls First Nations submitted terms of reference for an environmental assessment for the Northern Road Link project, the third and final road necessary to complete the all-season connection to the province's highway system. These two First Nations are co-leading the planning of the Northern Road Link project, with Ontario committing close to \$1 billion to support critical legacy infrastructure, such as the planning and construction of an all-season road network, as well as investments in high-speed internet and road upgrades.

Connecting the mineral-rich opportunities in the Ring of Fire with manufacturing sectors in the rest of the province would help the province become a leading producer across North America of the critical minerals needed for electric vehicles and a clean economy.³⁰

Premier Doug Ford said the Province will continue to work with Indigenous communities towards the development of the Ring of Fire. Ford says the minerals extracted from the Ring of Fire will make the province a “resource powerhouse,” allowing Ontario to become a leader in electric vehicle production in North America.³¹

For example, a joint venture between LG Energy Solution Ltd. (LGES) and Stellantis N.V. will invest more than \$5 billion to build a facility in Windsor, Ont., to manufacture batteries for EVs in Canada, representing the largest automotive manufacturing investment in the history of the province. Such green technology requires significant amounts of rarer metals, and Canada's abundance of supply gives this country the potential to generate significant economic opportunity.

Also in 2022, the Province named newly elected Timmins MPP George Pirie as the new Minister of Mines. Part of his mandate will be to develop the Ring of Fire, and he will focus on ensuring Ontario has the federal government on board as a “willing and full partner” in funding roads studies.³²

The Ring of Fire has been referred to as a “game changer,” and “the most promising mining opportunity Canada has seen in a century.” The Ring of Fire also offers a unique opportunity to be a template for the development of natural resources in remote and isolated locations alongside Indigenous communities. This type of framework can serve to help inform resource development across the country.

Recommendations

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

1. Continue to promote the development of the Ring of Fire as a project of provincial and national economic and social significance across all sectors so both levels of government can realize their goals set out in their respective Critical Minerals Strategies.

³⁰ <https://news.ontario.ca/en/release/1002031/ontario-and-first-nations-celebrate-historic-milestone-for-the-ring-of-fire>

³¹ <https://toronto.ctvnews.ca/progressive-conservative-leader-doug-ford-touts-party-s-progress-in-ring-of-fire-plan-1.5893230>

³² <https://www.timminstoday.com/local-news/george-pirie-takes-the-helm-as-mines-minister-5653730>

2. Continue to work with the federal government, industry, and community partners to build capacity and community readiness of Indigenous communities so that they may take full advantage of resource development in the Ring of Fire.
3. Actively promote the Ring of Fire, along with other mining projects, in the global arena as a trade and investment opportunity.
4. Strengthen the partnerships with the federal government, the private sector, and Indigenous communities to explore innovative technologies and R & D opportunities to reduce energy costs and create efficiencies in the Ring of Fire.
5. Ensure Indigenous communities are active participants and proponents of these long-term projects.
6. Support mutually beneficial partnerships with Indigenous communities and businesses, including equitable opportunities for Indigenous procurement, employment, and economic development.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

L. Changes to Alcohol Retail in Ontario Need to Support Local Industry and Jobs in the Wine and Grape Sector

Submitted by: The Windsor-Essex Regional Chamber of Commerce. Co-sponsored by: The Amherstburg Chamber of Commerce, Leamington Chamber of Commerce, and Prince Edward County Chamber of Commerce

Issue

As the Ontario government considers new retail for wine in the province, it is essential that the government uses this opportunity to ensure Ontario grape growers and wineries can grow their businesses, contribute to provincial and regional economies, and create local jobs. Key to ensuring the future growth of the Ontario grape and wine sector is:

- Eliminating the 35% import tax currently imposed on local Ontario wineries;
- Eliminating the 6.1% retail store tax on domestically produced wine; and,
- Not trading the current retail monopoly for a grocery-led oligopoly.

Background

In 2015, the Ontario wine and grape industry contributed \$4.4 billion to the Ontario economy, supported 18,000 jobs, and hundreds of small family-owned businesses accounted and attracted over 2.4 million tourists to wine country every year.³³ This accounted for nearly half of Canada's wine and grape industry. An average bottle of Ontario wine sold generates \$29.69 of business revenue, \$5.23 of tax revenue and \$8.71 of wages. For every \$1.00 spent on Canadian wine in Ontario, \$3.95 in GDP is generated across the province.

In 2015, there were approximately 456 grape growers operating in Ontario with a combined acreage of 18,383 grape-bearing acres. There were also approximately 180 wineries in Ontario that sold over 8.3 million nine litre equivalent cases of wine. Total winery revenue representing wine sales, wine kit sales and non-wine revenue such as merchandise, events, etc. was \$562.9 million.

The wine and grape industry is a key economic driver in Ontario but is especially important to the Niagara, Lake Erie North Shore and Prince Edward County areas. Windsor-Essex County alone has 17 wineries due to its unique maritime climate which allows it to have longer sun hours and greater heat units than any other area in Canada. This unique climate contributes to the production of award-winning wines created from the finest locally grown vinifera and French hybrid wine grapes.³⁴

Ontario is already one of the most open wine jurisdictions in the world. At the LCBO, Ontario wines hold only a 24 percent market share. Other wine producing nations around the world dominate their own market. Spain, South Africa, Argentina and Chile each own over 90% of their domestic market. Italy owns over 80%, Australia over 75%, the USA over 60% and even Russia is at 50% ownership of their own market. Major wine producing countries such as Spain, Italy, France, America and Australia provide hundreds of millions of dollars in subsidies, particularly for marketing abroad. These subsidies are often directed by the foreign wineries at maintaining and growing market share in Canada and Ontario.

³³ <https://wgao.ca/economic-impact/>

³⁴ <https://www.epicwineries.com/wineries/>

Alongside limited market share, Ontario wineries pay the 35% import tax that is also levied against foreign wineries. The elimination of this tax would allow Ontario wineries and grape growers to create more jobs in rural Ontario, maintain protection of the Greenbelt, and continuously invest in the Ontario economy.

Recommendations

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

1. Eliminate the Import Tax on Domestic Wines: Ontario wineries currently pay a 35% import tax through the LCBO markup structure. Ontario wineries are seeking a 35% permanent tax credit that is predictable.
2. Eliminate the Alcohol Manufacturer Retail Store Tax. No other Ontario business has a tax (6.1% for wine, 61% for spirits) on top of the other sales taxes the government collects.
3. Prevent private oligopolies from rising: Ensure market is accessible to retailers of all sizes, including independent licenses for specialty wine shops i.e., a license enabling independent stores with no chains or ability to consolidate.
4. Work with other provinces to enable Ontario wineries to better serve their customers. Enable cross-border shipping so Ontario wineries can ship purchased products to customer's homes in provinces including Quebec, Saskatchewan, and Alberta.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

M. In the Spirit of Business

Submitted by: The Prince Edward County Chamber of Commerce

Sponsored by: Peterborough and the Kawarthas Chamber of Commerce, 1000 Islands Gananoque Chamber of Commerce, Brockville and District Chamber of Commerce, Guelph Chamber of Commerce, Port Hope and District Chamber of Commerce, Belleville Chamber of Commerce, Quinte West Chamber of Commerce

Issue

Currently, the policy regime applied to craft brewery and winery industries is not aligned with the one applied to the craft distillery industry, resulting in challenges for growth and sustainability of the sector as an integral part of Ontario's economy.

Background

Craft distilling is an industry in rapid growth. Distillers are creating jobs and boosting economies in large and small centres. The segment supports 6000 jobs in Ontario and annually contributes \$1.5 billion to Ontario's Gross Provincial Product, while craft distillers and the spirit industry generate over \$2.5 billion in annual sales.

The spirits industry works closely with local farmers, connects to tourism and hospitality industries, and contributes to the economic growth of rural areas across Ontario.

However, significant challenges still need to be addressed, *i.e.*, **tax at craft distillery tasting rooms is 61.5%, which is 10 times what Ontario wineries pay**. Additionally, craft distilleries do not receive recognition for using ingredients produced in Ontario.

For these reasons the craft distillery industry should be considered in policymaking.

In its 2019 report, "Refreshing the Sale of Beverage Alcohol in Ontario", the Ontario Chamber of Commerce (OCC) identifies several positive economic results from the industry that would only be enhanced by parity with the other sectors of beverage alcohol, including:

- The spirits industry and craft distillers in Ontario generate over \$2.5 billion in annual sales.
- The spirits industry supports 6,000 jobs across the province and contributes \$1.5 billion to Ontario's Gross Provincial Product every year.
- Ontario is currently home to 45 spirit distillers (as of December 2021). There has been an increase in the number of small and artisan distillers that specialize in niche products across Canada.
- The spirits industry works closely with local farmers and contributes to the economic growth of rural areas across Ontario.

The report also connects the beverage alcohol industry to several adjacent industries, including farming, tourism, and hospitality. The power of beverage alcohol to be a force for economic development – particularly rural economic development – should, therefore, be reflected in policymaking.

The province of Nova Scotia continues to be a leader in the spirits industry since the government opened the door to growth in 2014 by reducing the mark up by 60-80% with another 10% mark down if distillers use provincially grown agriculture products. The government cut the license fee from \$2000 to \$500, increased production threshold, and introduced a graduated mark up based on annual production. These measures allowed craft distillers to thrive. In British Columbia, since the introduction of a graduated tax system, the industry has grown from 17 to 48 distilleries in the province.

Craft spirits are considerably more laborious to produce than large-scale industrial spirits and are also marketed at higher prices. Any short-term revenue reductions from lower LCBO mark ups and tasting room taxes will be surpassed by the increased revenue from higher employment and consumers supporting local premium spirits that will come from a thriving craft distillery industry.

In the past few years there has been some movement towards parity with other craft alcohol industries, such as:

- Allowing craft distillers to distribute their products to bars and restaurants.
- Allowing craft distillers to open “Pop-up” retail stores via Special Occasion Permits; and
- The continuation of “The Small Cidery and Small Distillery Program” for a three-year commitment (expires in 2025).

Craft distillers believe these changes are a step in the right direction, but additional changes are required to reach parity with other craft alcohol industries in Ontario. For example, the update to “Canada’s Guidance on Alcohol and Health” recognizes that the consumption of beverage alcohol is equivalent across different categories, therefore craft distillers believe it is possible to have all regulations regarding alcohol align to the same standards.

This call for change is not only coming from the chambers of commerce and boards of trade but also from Craft Spirits Ontario.

Recommendations

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

1. Approve the continuation of “The Small Cidery and Small Distillery Program” until 2027 and that both industries be considered in tandem moving forward.
2. Remove the LCBO fees applied to sales from Craft Distilleries and craft ciders directly to licensees and by-the-glass sales.
3. Align the craft distiller's regulations with the craft beer and wine industry by applying a graduated rate to the current spirits basic tax, with a zero percent mark-up on the first 50,000 litres sold.
4. Lower the LCBO markup on spirits and ciders made primarily with Ontario ingredients by Ontario facilities to be equivalent to microbreweries, graduated by production method and volume.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

N. Addressing the Challenges of Ontario's Largest Economic Sector: Small Business

Submitted by: Greater Sudbury Chamber of Commerce. Co-sponsored by: Thunder Bay Chamber of Commerce, Sault Ste. Marie Chamber of Commerce, North Bay & District Chamber of Commerce, Timmins Chamber of Commerce, Guelph Chamber of Commerce, Port Hope and District Chamber of Commerce

Issue

The cumulative regulatory burden, constant legislative changes, and reporting requirements present a disproportionate impact on small businesses and are an obstacle to prosperity, growth and competitiveness.

Background

Businesses throughout the province have repeatedly highlighted the cost of regulatory compliance as a barrier to investment and growth. Business owners have said they find it incredibly difficult to navigate the regulatory framework – especially when that framework is frequently changing due to new and/or updated legislation. When new and/or updated legislation unwittingly introduces hidden costs, the problem is only exacerbated. The Government of Ontario needs to take steps to reduce red tape for small businesses and make it easier for them to understand and comply with regulations.

Recent years have seen significant changes implemented or proposed to WSIB, labour relation, the minimum wage, and pension plans. Businesses saw many changes as a result of Bill 148, the Fair Workplaces, 2017 Better Jobs Act, and the subsequent introduction of Bill 47, the 2018 Making Ontario Open for Business Act, which repealed or rewrote many of Bill 148's changes. Businesses continue to see many changes due to environmental regulations and the federal carbon tax. While regulatory change is not necessarily “bad” – in fact, updating and modernizing regulations should be a priority for all governments – it can have a lasting, negative impact on businesses, if they are implemented haphazardly, or if the government does not make compliance easy. The cost of such changes disproportionately burdens small businesses that often do not have dedicated human resource departments or dedicated personnel to manage the complexities of the requirements.

According to Innovation, Science and Economic Development Canada, Ontario had 439,694 small businesses in December 2021³⁵. Statistics Canada defines a small business as one with fewer than 100 employees.³⁶ The Ontario government has shown its commitment to broad, structural red tape reduction. The province created the Ministry of Red Tape Reduction to modernize legislation, regulations and policies that can be burdensome, inefficient and inflexible.

The Ontario government recognizes that reducing unnecessary red tape will save businesses time and money and that such reduction is an integral part of growing Ontario's economy. The province has introduced its Less Red Tape, Stronger Ontario Act (Bill 46), which includes 28 legislative, regulatory and policy measures designed to improve competitiveness, strengthen our local supply chains, and make government services easier to access.³⁷ We applaud the government's efforts to reduce red tape thus far. However, there is still much work to be done.

The Government of Ontario can ease the regulatory burden by establishing a regulatory concierge service for small businesses in Ontario. A concierge service would be a single-access point for information, support and expertise on regulatory compliance in Ontario. The concierge service would offer one-on-one support to small

³⁵ <https://ised-isde.canada.ca/site/sme-research-statistics/en/key-small-business-statistics/key-small-business-statistics-2021>

³⁶ <https://www.statcan.gc.ca/o1/en/plus/1253-small-and-medium-businesses-driving-large-sized-economy>

³⁷ <https://news.ontario.ca/en/backgrounder/1002504/reducing-red-tape-to-build-a-stronger-ontario>

businesses so that they can successfully navigate regulatory frameworks and achieve compliance with greater ease and so they could devote their limited resources to growing their businesses and the economy.

Such a concierge service is nothing new. The federal government has its Business Benefits Finder, which is a single access point to funding, expertise, facilities, and global opportunities for small- and medium-sized enterprises (SMEs) seeking to grow through innovation.³⁸

Other jurisdictions have understood the benefit of one-stop support for businesses:

- Greater Sudbury's Regional Business Centre
- Hamilton's One-Stop for Business
- The British Columbia Business Registry
- One Stop Business Registration Portals in Wisconsin and Virginia

While certain single-window initiatives in Ontario exist, such as Service Ontario's ONE-Key, these are 'self-serve' initiatives rather than concierge services, and they do not address the regulatory burden that weighs on Ontario's small businesses.

Creating a team of industry experts to guide business owners through regulations in Ontario will make Ontario attractive for investment and allow existing businesses to spend their resources more efficiently.

Recommendations

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

1. Create and promote a provincial concierge service to provide single-window, one-on-one, customized access for small businesses to guide them through regulatory compliance processes and help them achieve compliance obligations.
2. Develop interconnectivity between municipal, provincial, and federal concierge services to enable knowledge-sharing and to ensure that each is able to provide the best guidance and expertise to its clients.
3. Continue to work with the Ontario Chamber of Commerce, Ontario's business community, and with small businesses in order to reduce red tape.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

³⁸ https://innovation.iscd-isde.canada.ca/s/?language=en_CA

O. Supporting Ontario Craft Beverage Alcohol Producers By Updating AGCO Liquor License Rules

Submitted by: Hamilton Chamber of Commerce. Co-sponsored by: Guelph Chamber of Commerce

Issue

A series of recent Alcohol & Gaming Commission of Ontario (AGCO) changes to the liquor control act have facilitated more opportunities for Ontario breweries, wineries, distilleries and cideries to reach customers than ever before. Largely in part due to the COVID-19 pandemic with an interest in facilitating local diversification of alcohol distribution outlets, the Ontario government has instituted a series of changes that now permit all Ontario liquor license holders the ability to sell to-go or take- out alcohol.

This has created a significant opportunity for growth for Ontario craft beverage producers that may have previously had limited exposure to audiences beyond their local geography. However, there remains uncertainty around the legal functioning and requirements for to-go alcohol sales, particularly from the perspective of the variety of types of organizations that hold liquor licenses in the absence of a formal update to the licensing regime.

Liquor license holders can vary from alcohol producers themselves, to restaurants and bars, and to small retail operations. These operators are often subject to varying rules across jurisdictions, and Ontario craft beverage producers currently are forced to navigate the various rules unique to each jurisdiction they wish to sell their products in. There is a need for uniform provisions across the province that would simplify compliance for all liquor license holders and Ontario craft beverage producers alike.

Background

The COVID-19 pandemic significantly altered Ontarians' lives in permanent ways as all levels of government were forced to adopt rules and regulations across sectors of our economy to accommodate pandemic-related operating restrictions and respond to a potentially disastrous economic climate. There are dozens of examples of governments adapting existing legislation to permit the functioning and survival of many Ontario-based businesses at the peak of the pandemic, and many of these changes have been good for the long-term health of our economy.

One such series of policy changes pertaining to alcohol distribution in Ontario may seem minor at first glance but have in fact significantly altered the economic landscape for alcohol retailers and producers alike, creating new opportunities to access more customers than ever before. However, these changes are not without their challenges, and it is time that the provincial government evaluate these policy changes to further support the Ontario craft beverage industry and small retailers alike.

Historically, Ontario has one of the most centralized, borderline monopolistic alcohol distribution frameworks in the country. The model dates to the prohibition era where alcohol distribution was tightly regulated and relegated to LCBOs and Brewers Retail/The Beer Store. This was in response to the perceived need to control the consumption of alcohol as much as possible and to limit its negative societal impacts. In doing so, the government established a rigid policy framework that limited alcohol availability, consumer options, means of distribution, and overall accessibility to the public. Over several decades, Ontario's alcohol distribution model remained largely unchanged, despite changing public opinions and perceptions over the use of alcohol and the government's authority over its use. The negative health impacts of alcohol overconsumption are not to be ignored, but most users do so in a recreational and non-harmful manner.

When COVID-19 struck Ontario and our province entered a lockdown, the provincial government had to quickly adapt operating rules and procedures for nearly all sectors of our economy. This was done in a rapid-fire manner and often in iterations, tinkering with policy based on experiences, to land on the best option that

would preserve public health and safety, while still creating enabling conditions for private enterprise to operate and prosper. For the hospitality and alcohol beverage industries, these included significant changes to the Liquor Control Act that now permitted to-go alcohol sales for restaurants, bars, and other small retailers for the first time in the history of the province of Ontario.

This was seen as a major boon to both the hospitality and alcohol beverage industries, finally liberalizing nearly one hundred-year-old policies that significantly restricted not only access to alcohol for consumers, but also access to market share for alcohol producers. Now, rather than be subject to extensive lines and limited operating hours at LCBO and Beer Store locations, consumers had the option to purchase alcohol directly from their favourite restaurants or through newly established retail bottle shops. Simultaneously, this change created a major opportunity for Ontario craft beverage producers – whether they be a brewery, winery, distillery, or cidery – to access new customers via new channels that the previous model focused on listings in LCBOs and Beer Stores could not provide.

While the LCBO and Beer Store remain the primary source of alcohol for most Ontarians, it can be very difficult, expensive and competitive to be listed at those retailers. Moreover, there's not a guarantee that your large order listing will sell, creating significant risk and reward decisions for small to medium-sized craft alcohol beverage producers. By permitting alcohol sales through new channels, the provincial government made it easier than ever for small to medium-sized craft alcohol beverage producers to list their products at potentially hundreds of outlets across the province, with a significantly lower risk, focusing on lower inventory numbers and rapid sales reporting between the producers and retailers.

Now, residents in Hamilton can go to their local licensed retail shop or order from their favourite restaurant and have access to a unique selection of craft alcohol beverage products from across Ontario that are otherwise unlisted at traditional alcohol retailers. These changes have created new opportunities for Ontario craft breweries, wineries, distilleries and ciders to get their products to market in a fairer manner and have created significant economic opportunities for these operators that were previously unavailable to them.

With these changes, however, have come some challenges. Primarily, given the relatively recent changes to alcohol distribution options and the lack of detail within those legislative provisions, hospitality operators, retail bottle shop operators, and beverage alcohol producers are reporting a diversity of experiences when it comes to enforcement and application of the legislation by law enforcement. There seems to be multiple interpretations of the rules among agents enforcing the regulations under the Liquor Control Act between jurisdictions that have complicated an otherwise rich opportunity for all parties involved. This creates uncertainty in the market when there are competing interpretations of the legislation and in fact serves to undermine the economic opportunity created by legislation in the first place. Where craft beverage alcohol producers quickly realized market growth through the liberalization of alcohol distribution, it was pulled from under their feet when enforcement agencies began to interpret legislation in different ways, creating dozens of different interpretations of rules and regulations between jurisdictions, complicating their ability to sell their products to new markets across the province.

While the legislative changes to permit more diverse options for purchasing Ontario craft beverage alcohol are welcome, it is time for the provincial government to evaluate these changes and measure their successes and shortcomings. The provincial government ought to conduct a review of these changes with a lens of understanding the varying experiences between jurisdictions, with enforcement of the rules with a goal of creating a unified approach to enforcement and application of these Ontario liquor license new rules. A comprehensive review for to-go alcohol sales ought to be explored, creating certainty for those selling alcohol to-go about the application of its rules and to provide clarity to those producing beverage alcohol products, with an eye to getting their products to market in a fairer manner than historically seen in Ontario.

This evaluation and ultimate policy implementation will create a more stable market for all hospitality and retail businesses interested in to-go alcohol sales, support local Ontario businesses, diversify consumer options, and help to support main street economies.

Recommendations

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

1. Consult with Ontario craft beverage alcohol producers, hospitality establishments and licensed retail operators to document the varying application of applicable rules under the AGCO between jurisdictions and the experiences of each, with an eye to;
2. Inform the development of a province-wide liquor licensing review that would provide clarity to local enforcement agencies, hospitality operators, retail operators, and Ontario craft beverage producers interested in selling their products in outlets across the province.
3. Build into any new legislation an evaluation mechanism that would require a review of the performance of the licensing regime every three to five years with an eye for both economic and social performance monitoring.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

FISCAL/TAXATION

A. Increasing Mine Stimulus Through the Ontario Flow-Through Share Tax

Submitted by: Timmins Chamber of Commerce

Issue

Mining is fundamental to northern Ontario's economic and social health. The industry provides jobs that anchor Northern Ontario communities. Maintaining the health of the mining industry requires mineral exploration. Lack of exploration for new and expanded resources limits or eliminates future mine development.

Background

Programs that encourage mineral exploration are paramount to the economic wellbeing of our province and mining communities. The mining industry has played an essential role in the economic growth and sustainability of many communities. Ontario is one of the largest mining regions globally, producing more than 25 different minerals and metals and directly employs 480 people, creates more than 1,100 indirect jobs in the supply and service sector and about 700 induced jobs in the retail industry for a total of 2,280 jobs.³⁹ This industry provides some of the highest weekly earnings in the economy, and exports of minerals and mineral-based products contribute close to \$12 billion a year to the provincial gross domestic product.⁴⁰

The Ontario Focused Flow-Through Share (OFFTS) Tax Credit is intended to stimulate mineral exploration in Ontario and improve access to capital for small mining exploration companies. Currently, the OFFTS for shareholders is 5 percent, which is the lowest in Canada.⁴¹ In comparison, the British Columbia Mining Flow-Through Share Tax Credit is 20 percent, the Saskatchewan Mineral Exploration Tax Credit is 10 percent, and the Manitoba Mineral Exploration Tax Credit is 30 percent.⁴² On average, 68 percent of the funds for exploration in Canada on the Toronto Stock Exchange were raised through flow-through share financing. Currently, public offerings on Canadian exchanges are deteriorating. There was a 23 percent decline in 2018 and a 10 percent decline in 2017.⁴³ Public offerings have presently hit a decade low, while the proportion of private transactions reached a high in 2018.

Flow-through share agreements help raise equity by enabling mining corporations to issue shares with particular tax benefits favouring their subscribers at a premium. In a flow-through share agreement, the issuing corporation agrees to incur certain expenses eligible for tax breaks, such as those mentioned above, in an amount equal to the consideration received and to renounce to those same eligible expenses in favour of their subscribers. This renunciation is most alluring to investors since it allows eligible expenses to be deemed, for income tax purposes, the investor's expenses, not those of the mining corporation. As a result, investors pay a higher price for flow-through shares than would have been otherwise willing to pay for ordinary, non-flow-through common shares. Depending on the general market and the miner's prestige, flow-through share

³⁹ Dungan, Peter and Murphy, Steve. Ontario Mining: A partner in Prosperity Building, The Economic Impacts of a 'Representative Mine' in Ontario. Institute for Policy Analysis, University of Toronto, 2007.
<https://www.oma.on.ca/en/ontariomining/resources/RepMineFinalReportDec07.pdf>

⁴⁰ Economic Contribution <https://www.oma.on.ca/en/ontariomining/EconomicContribution.asp>

⁴¹ Flow-through Shares <https://www.miningtaxcanada.com/flow-through-shares/>

⁴² Ibid.

⁴³ Lortie, Pierre. Entrepreneurial Finance and Economic Growth: A Canadian Overview. C. D. Howe Institute, Commentary No. 536, 2019.

offerings can be priced at a considerable premium to the corporation's ordinary non-flow-through common share price.⁴⁴

But let's focus on Quebec and the principal tax incentive schemes available to mineral exploration activities in the province, as well as the costs and intricacies associated with flow-through share financing by operating mining corporations. To help mining corporations jumpstart their often risky operations, the federal and Quebec governments have set out tax incentives for mineral exploration and mine development. However, we will limit our comments to those available with respect to Canadian exploration expenses (CEE) incurred by mining corporations.

Similarly, the extension of the spending timelines for the British Columbia Mine Flow-Through Shares tax credit aligns with the proposed temporary federal timelines extension to incur expenses for flow-through shares.⁴⁵ Flow-through shares provide an attractive mechanism for mining companies to raise funds for their projects.⁴⁶

Quebec and British Columbia have successfully created jobs in the mining sector by providing tax incentives that work, are successful, and verifiable.⁴⁷ In Quebec's case, fully refundable tax credits of 38.75 percent are provided, and British Columbia provides a fully refundable credit of 30 percent. Otherwise stated, if a mining exploration company spends \$1 million in exploration, these governments will reimburse the company \$387,500 and \$300,000, respectively.⁴⁸ The refund must be reinvested in exploration activities, creating additional jobs, as exploration activities are primarily labour expenses. As an alternative, Quebec and British Columbia mining exploration companies can issue flow-through shares under the Income Tax Act, in which case individual investors access both federal and provincial tax credits. In Quebec's case, the net investor incentive is about 38.75 percent, and in British Columbia, it is 20 percent and is considering an increase to this credit.

However, at this juncture, we are not recommending incentives that are fully refundable even though Natural Resources Canada (NRCan) has proven that there are three dollars of taxable activity in the North for every dollar of tax expenditure.⁴⁹

Increasing the Ontario Flow-Through Tax Credit from 5 percent to 25 percent would allow for additional credit to the flow-through regime in which private individuals fund exploration activities. It is recommended that a pilot project on flow-through financings be undertaken. If tracked, this government can be assured that exploration tax credits are a net tax gain to the Treasury while creating jobs in the North while using this data to determine whether additional credits are warranted to accelerate mining exploration and development further.

⁴⁴ <https://www.northernminer.com/regulatory-issues/commentary-deciding-whether-or-not-to-use-flow-through-shares-in-quebec/1003768265/>

⁴⁵ <https://www2.gov.bc.ca/gov/content/taxes/income-taxes/personal/credits/mining-flow-through>

⁴⁶ The Use of Flow-through Shares in the Canadian Mining Sector Amidst Covid-19 www.airdberlis.com - <https://www.airdberlis.com/insights/publications/publication/the-use-of-flow-through-shares-in-the-canadian-mining-sector-amidst-covid-19>

Ontario communities are consistently competing against other global jurisdictions for mineral exploration investment, and in the global marketplace, it is imperative to have an edge.⁵⁰ With mineral reserves reaching an all-time low, it is critical for the survival of many communities that an abundance of exploration activity takes place now to be able to find and mine viable deposits.⁵¹ It is vital to keep the momentum going while investors are supporting this cyclical industry. On average, it takes eight to fifteen years of work to bring a new mine into production; therefore, we need to encourage as much exploration as possible during this upswing. We need a continuum in the mining industry to further bring economic prosperity to communities that rely on this means for developmental sustenance. What Ontario, especially Northern Ontario, needs now is an increase to the Flow-Through Tax Credit.

Recommendation

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

1. To accelerate mining exploration and development further, immediately increase the Ontario Flow-Through Tax Credit from 5 percent to 25 percent.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

⁵⁰ The Canadian Minerals and Metals Plan: Proposed Government Actions to Address Canada's Declining Mineral Industry Competitiveness A brief to the 76th Energy and Mines Ministers' Conference Cranbrook, British Columbia, July 2019

⁵¹ Burkhardt, Rike, Rosenbluth, Peter, Boan, Julee. Mining in Ontario: A Deeper Look, 2017.
<https://ontarionature.org/wp-content/uploads/2017/10/mining-in-ontario-web.pdf>

B. Raise tax credits for Ontario charities to a competitive level

Submitted by: Greater Niagara Chamber of Commerce

Issue

Ontario relies heavily on its charitable sector for a vast array of social services, yet the province supports its charities through tax incentives at the lowest level of any province in Canada, which inhibits their ability to deliver those services in the quantities and of the quality that the province requires. The tax credits for charitable contributions in Ontario should be raised to a level at least comparable with other Canadian provinces.

Background

Charities in Ontario provide many indispensable social goods and services. Charities and qualified donees able to issue tax receipts for gifts received from individuals and corporations include universities, food banks, journalism organizations, amateur athletic associations, museums and art galleries, theatres, immigrant services, women's shelters, mental health services, low-cost housing corporations, municipal bodies, community health services, researchers, and many others. Ontario's non-profits and charities employ over a million workers and contribute \$50 billion in economic impact.⁵²

Unfortunately, like many economic sectors, charities have been devastated by the COVID-19 pandemic. The Ontario Nonprofit Network estimates the sector's losses in the first three months since emergency closures took effect to be in the range of \$1.8 billion.⁵³ Even before the pandemic, the percentage of Canadians giving to charity, and the size of their gifts, were in decline. Between 2007 and 2017, the percentage of tax filers making a charitable contribution fell from 23.8% to 19.9%, while the amount of aggregate income donated to charity fell from 0.75% to 0.54% (it should be noted that the 2008-2009 recession did not have a large impact on these rates, which continued to fall afterwards). For comparison, 24.9% of American tax filers gave to charity in 2017, and they donated 1.52% of their aggregate income. Larger American tax credits may be at least a partial explanation for the greater generosity of Americans.

Ontario has the lowest donation tax credit rate in the country. At 5.05% for the first \$200, Ontario grants the lowest credit rate of any Canadian jurisdiction barring Nunavut (although this comparison is unfair to Nunavut, as rates in the territories are lower than in the provinces due to other tax incentives offered to residents and government supports given to service providers in those regions); at 11.16% for amounts over \$200, it is the lowest in the country, bar none. The provincial tax credit in Ontario for a gift of \$1,000 would be \$99.38, compared to \$160.80 in Manitoba, \$188 in Alberta, and \$232 in Quebec.

To encourage more charitable giving and to revitalize the charitable sector on which Ontario depends, we propose that the tax credit rates in Ontario be raised to the same level as that granted in Alberta, i.e. 10% on the first \$200 and 21% on amounts over \$200.

⁵² Ontario Nonprofit Network, *About the Sector* (<https://theonnn.ca/about-the-sector/>) (retrieved on 2021/02/08)

⁵³ Ontario Nonprofit Network, *Stabilize the nonprofit sector to rebuild Ontario* (<https://theonnn.ca/our-work/covid-19-stabilization/>) (retrieved on 2021/02/08)

	First \$200	Amount over \$200	Highest Tax Credit Rate	Tax Credit for donation of \$1,000	Combined Fed/Prov Tax Credit for donation of \$1,000
Federal	15.00%	29.00%	33.00%	\$262.00	n/a
AB	10.00%	21.00%	n/a	\$188.00	\$450.00
BC	5.06%	16.80%	n/a	\$144.52	\$406.52
MB	10.80%	17.40%	n/a	\$160.80	\$422.80
NB	9.68%	17.95%	n/a	\$162.96	\$424.96
NL	8.70%	18.30%	n/a	\$163.80	\$425.80
NS	8.79%	21.00%	n/a	\$185.58	\$447.58
NT	5.90%	14.05%	n/a	\$124.20	\$386.20
NU	4.00%	11.50%	n/a	\$100.00	\$362.00
ON	5.05%	11.16%	n/a	\$99.38	\$361.38
PE	9.80%	16.70%	n/a	\$153.20	\$415.20
QC	20.00%	24.00%	25.75%	\$232.00	\$494.00
SK	10.50%	14.50%	n/a	\$137.00	\$399.00
YT	6.40%	12.80%	n/a	\$115.20	\$377.20

Recommendation

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

1. Raise the provincial donation tax credit rate to 10% of the first \$200 donated and 21% thereafter.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

C. Review transfers of responsibilities between the provincial and municipal governments to improve efficiency, service delivery, and cost

Submitted by: Greater Niagara Chamber of Commerce

Issue

The downloading of provincial government services and costs onto municipal governments has resulted in a multi-billion-dollar funding gap as revenue streams were not downloaded to match. This has resulted in many programs being severely underfunded as municipal governments cannot effectively finance them. Those that are still running are often run inefficiently as municipal governments lack the human capital, economies of scale, experience, or market power to run them as cost-effectively as the provincial government. Although downloading has saved money for the provincial government, the net effect to the taxpayer has been higher costs and cuts to services.

Background

To balance the provincial budget, the Ontario government began a program of “downloading” its responsibilities onto municipalities in 1995, including programs such as child care, transit, housing, public health, and the Ontario Disability Support Program (ODSP). Even municipal total revenue growth of 1.6 per cent above nominal GDP has not been enough to prevent the appearance of a \$3.3 billion funding gap.^{54 55}

The Province did not give municipalities any additional tools for revenue generation.⁵⁶ The Provincial-Municipal Fiscal and Service Delivery Review resulted in \$1.9 billion being re-uploaded, but this has narrowed the gap, rather than closing it.⁵⁷ While ODSP has been re-uploaded, for instance, municipal governments still fund transit services that used to be provincial, and Ontario is still the only province in Canada where property taxes fund provincial income redistribution programs such as Ontario Works.

Collecting only 7-8 cents of every Ontario tax dollar, municipalities are simply unable to fund these programs adequately.⁵⁸ Factoring in education costs, 50 cents of every 2016 property tax dollar went to running provincial programs.⁵⁹

The necessity of spending such a huge amount of municipal tax revenue on provincial programs is that spending in other areas, such as infrastructure, has not kept up. In 2012, the infrastructure backlog alone had reached over \$60 billion.⁶⁰

⁵⁴ Pat Vanini, Association of Municipalities of Ontario Executive Director, quoted in “The property tax crunch,” Brodie Fenlon (*The Globe and Mail*, March 27, 2017) (retrieved from <https://www.theglobeandmail.com/incoming/the-property-tax-crunch/article1083881/> on January 26, 2018)

⁵⁵ Livio Di Matteo, “Beware of Ontario municipalities asking for ‘revenue tools’” (Vancouver: Fraser Institute, August 18, 2016) (retrieved from <https://www.fraserinstitute.org/blogs/beware-of-ontario-municipalities-asking-for-revenue-tools> on January 26, 2018)

⁵⁶ The City of Toronto has been granted special taxing powers and the 2017 Budget allowed municipalities to levy a per-room hotel tax, which cannot help municipalities which are not tourist hotspots outside Toronto

⁵⁷ Ontario Ministry of Municipal Affairs & Ontario Ministry of Housing, *Provincial Uploads*

⁵⁸ Pat Vanini, *ibid.*

⁵⁹ *Ibid.*

⁶⁰ Association of Municipalities of Ontario, *Towards a New Federal Long-Term Infrastructure Plan, AMO's Submission to Infrastructure Canada* (Toronto: AMO, 2012)

The level of government at which taxes are paid is immaterial for Ontario's businesses. Transfers of responsibilities should aim at efficient service delivery, not at saving one level of government's budget at the expense of another's.

This is a sunset resolution. The submitting chamber believes that this issue has not been addressed and will continue to be relevant until a solution is enshrined in law.

Recommendations

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

1. Commission an independent review of all transfers of responsibilities since 1995 to assess, in terms of absolute cost and service delivery, whether residents and taxpayers are better served by said responsibilities residing with the provincial or municipal governments. This review should be completed by the end of 2025.
2. Accompany all transfers of responsibilities with sufficient and sustained funding adequate to service delivery.
3. Consult with municipal governments before embarking on provincial services reviews or cuts that would impact municipal government services.
4. Ensure representation from the Ontario business sector on the review panel.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

D. Achieving Property Tax Fairness Across Ontario

Submitted by: Sault Ste. Marie Chamber of Commerce

Issue

Commercial and industrial payers contribute significantly to Ontario's property tax base, which is the primary source of revenue for municipal government. However, real concerns about the benefits received by businesses versus residential taxpayers, and the rationale for the notable disparity in tax treatment between residential and non-residential ratepayers, continue to persist. Put plainly, the proportion of property value and the resulting tax contributions made by these two distinct groups of property owners relative to the overall tax revenue collected by municipalities for the services they consume are vastly different and inequitable. This trend affects commercial and industrial enterprises of all sizes and across all sectors and is pervasive in communities across the province.

Background

Ontario's Property Tax system has not been fully reviewed since the new Ontario Fair Assessment System (OFAS) was first introduced by the former Harris government approximately 25 years ago.

Since that time, significant changes have occurred across Ontario's economic landscape influencing global and local competitiveness, and fundamentally altering traditional economic paradigms. This trend has been further compounded by increasing demands placed on municipalities as they are confronted with new and evolving challenges such as: social housing, the opioid crisis, climate change, rapidly evolving technology, and the growing infrastructure deficit. This list goes on.

While municipalities are alive to such concerns and as pressure on the property tax increases, the municipality community is faced with the daunting task of attempting to balance their fiscal realities against growing and competing demands for local and regional services. This is against the backdrop of significant budgetary demands caused by inflation, raising interest rates and upward wage pressures on both non-unionized and unionized positions. With municipalities considering budget increases in the ranges of 4-8%, the impact to business will be significant, and in some circumstances, businesses may be paying upwards of 8.5 times that of a residential property.

This situation is compounded by the limited revenue tools available to municipalities to meet their financial obligations and an antiquated system of property tax mitigation programs and relief mechanisms to achieve locally sensitive tax policy priorities that have not been comprehensively revisited or reformed since the mid-1990's.

It is also important to note that property tax bills in Ontario include a substantial portion of the total levy that is directed toward the province to fund our education system. In many cases, this share of the property tax bill (known as the provincial education tax) exceeds the amount collected for municipal purposes. While the province has taken measures to reduce the "Education Tax", the disparity in terms of tax rate treatment between non-residential and residential property owners for municipal purposes remains extreme when the education tax rate is considered, further exacerbating the disproportionate property tax burden shouldered by commercial and industrial property owners and their tenants.

When property tax is unfavourably biased against the business community, the province's economic competitiveness, its ability to attract and retain talent and investment, create jobs, and to position Ontario for growth and prosperity, are undermined.

In acknowledging the shortcomings of Ontario's current property tax system, the province made a promise in its 2019 Spring Budget to develop an action plan to *Respect Ontario Property Taxpayers*, underpinned by a comprehensive review to explore opportunities to:

- Enhance the accuracy and stability of property assessments;
- Support a competitive business environment;
- Provide relief to residents; and
- Strengthen the governance and accountability of the Municipal Property Assessment Corporation (MPAC) to ensure better representation for Ontario property taxpayers.

To support a meaningful and informed review process, the government committed to seek input on these issues through consultation with residents, businesses, municipalities and other stakeholders.

Thus far, no plan has been revealed to fulfill this promise. However, recognizing that 2023 or 2024 are potential years in which MPAC will undertake a comprehensive province-wide reassessment (re-evaluation) of all property to provide the basis for property taxation in 2021 through 2024, the timing of a thorough and thoughtful review of Ontario's property tax system, with a focus on modernization to ensure competitiveness, is crucial to inform transparent, stable and equitable property tax treatment for the future.

Recommendations

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

1. Honour its 2019 Budget Commitment to ensure a modern and competitive property tax system, and to develop an action plan to respect Ontario's property taxpayers based on meaningful and thoughtful consultation and collaboration with affected stakeholders which includes: residents, businesses, industries, municipalities, and field experts.
2. Consider providing new revenue and/or property tax mitigation tools with flexibility to municipalities in order to manage property tax burdens in a fair and equitable manner, address new economic paradigms, and to target relief to business property owners/tenants in response to local tax policy priorities and objectives.
3. Continue to address the significant disparity between residential and non-residential tax rates for education tax purposes.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

E. Extend exemptions for the Non-Resident Speculation Tax

Submitted by: Greater Sudbury Chamber of Commerce. Co-sponsored by: Thunder Bay Chamber of Commerce, Sault Ste. Marie Chamber of Commerce, North Bay & District Chamber of Commerce, and Timmins Chamber of Commerce

Issue

Businesses in Ontario that need to hire foreign talent to fill specific roles face even greater challenges with the Non-Resident Speculation Tax, which is an additional tax placed on foreign nationals and foreign corporations purchasing a home in the province. While there are exceptions for the tax, it needs to be reconsidered in its entirety.

Background

The Non-Resident Speculation Tax (NRST) is applied to the purchase or acquisition of an interest in residential property located anywhere in Ontario by individuals who are foreign nationals or by foreign corporations or taxable trustees.⁶¹ Implemented in 2017 under the Kathleen Wynne Liberal government, it was intended to quell the trend of foreign speculators looking to turn a quick profit.

Originally, the NRST applied to properties purchased in the Greater Golden Horseshoe Region at a rate of 15%. However, as part of the More Homes for Everyone Act, the NRST was expanded provincewide in March 2022 and the rate was increased to 20 per cent. Then, on October 24, 2022, the Province raised the tax to 25 per cent.⁶²

The Minister of Finance told Ontarians in March 2022 that the province was adopting “the most comprehensive Non-Resident Speculation Tax in the country,” because young families, seniors and workers are desperate for housing that meet their needs. However, a lack of housing supply and rising costs have put the dream of home ownership out of reach for many families.

While it is understandable that the NRST is meant to discourage foreign speculation, the Ministry of Finance has failed to see the extenuating impact its expansion to the rest of the province, particularly Northern and rural Ontario, has had on a company’s ability to attract skilled foreign workers.

Attracting labour is already a significant provincial issue for many businesses, but it is even more difficult for those businesses in Northern and rural Ontario. The shortage of skilled workers is well documented. It has been historically difficult for companies in northern and rural communities to find strong Canadian or foreign national candidates for a wide variety of positions. While most companies prefer to hire Canadian candidates whenever possible, they are sometimes left with no other option than to hire international talent.

For example, a prominent employer in Greater Sudbury said it is experiencing its own issues with the NRST, stating the tax will have ongoing and serious implications on the company’s ability to attract international applicants with specialized skills in the mining industry. Exacerbating the situation is the long processing time for immigration and permanent residency.

That company is adamant the NRST will deter candidates from accepting offers of employment in Northern Ontario communities. This mining company states there is an overall demographic problem that exists in Canadian mining today whereby the mining industry continues its aggressive expansion, resulting in fierce competition between large and small organizations for experienced professionals. This means that any potential

⁶¹ <https://www.ontario.ca/document/land-transfer-tax/non-resident-speculation-tax#section-6:~:text=the%20Act%20applies,-Exemptions%20from%20the%20NRST,-An%20exemption%20from>

⁶² https://www.pentictonherald.ca/space_news/article_b93c99de-f0a8-596d-b2ed-27d8a30ed417.html

candidates have multiple career options at their disposal. Despite the company's best efforts, extensive recruitment efforts do not always result in sufficiently strong Canadian or Permanent Resident candidates to fill important mining roles.

There are few exemptions to this tax. The Ontario Immigrant Nominee Program (OINP) affords an exemption to all foreign applicants seeking gainful employment in Ontario. The province also offers exemptions if the foreign national has refugee status or is purchasing property with a Canadian spouse.⁶³

Five communities in Northern Ontario have been successful in working with the federal government to implement the Rural and Northern Immigration Pilot (RNIP), which allows eligible employers to make full-time, permanent job offers to skilled foreign workers who can help fill identified labour shortages in the community.⁶⁴ Successful RNIP candidates are also fast-tracked for permanent residency. Purchasing a home without the added burden of the NRST will support retention in these communities. Since 2020, these five communities have recruited hundreds of skilled workers, who bring their family members with them. These new immigrants are not provided the same exemption as foreign nationals under the OINP.

Recommendation

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

1. Immediately expand the exemption to the NRST to include participants in the Rural and Northern Immigration Pilot, as well as those awaiting permanent resident status (e.g., Afghan Initiative and Ukrainian Initiative arrivals) and post-graduation work permit holders living in Ontario communities.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

⁶³ <https://www.ontario.ca/document/land-transfer-tax/non-resident-speculation-tax#section-6:~:text=the%20Act%20applies.-,Exemptions%20from%20the%20NRST,-An%20exemption%20from>

⁶⁴ <https://www.canada.ca/en/immigration-refugees-citizenship/services/immigrate-canada/rural-northern-immigration-pilot/pr-eligibility.html>

F. Tax Rebates for Home Care

Submitted by: Peterborough and the Kawarthas Chamber of Commerce. Co-sponsored by: Brockville and District Chamber of Commerce, and Belleville Chamber of Commerce

Issue

Receiving healthcare at home is the preferred route for most people where feasible, saving both them and the government money, compared to staying in institutions. However, upfront capital costs are a major barrier to home care. Lack of access to a hospital bed and patient lift limit peoples' access to home care.

Background

Our population is quickly getting older. The Government of Canada's Action for Seniors report states one in seven Canadians were seniors in 2021 with that number expected to jump to 1 in 4 by 2030. The Canadian Institute for Health Information is predicting a 68% increase in Canada's senior population from 2017 to 2037, accounting for 10.4 million people.

When it comes to aging, most Canadians want to stay in their own homes as long as it is feasible. The same goes for those with ongoing healthcare needs due to illness or injury.

The National Home Modifications Survey, commissioned by March of Dimes Canada in April 2021, found 78% of Canadians want to age in their current homes, but only 26% predict they'll be able to do so. The survey found 50% of adults and seniors identified costs of home modifications as a barrier.

For many, the decision to move into long-term care is complicated, even if it's the best way to meet their healthcare needs. The National Institute on Ageing (NIA) estimates some 40,000 Canadians were on waitlists for nursing homes at any given time in 2019. Meanwhile, they estimated a further 430,000 Canadians have unmet homecare needs. The NIA estimates 22% of people currently in nursing homes would be better served at home with the appropriate support.

Our municipal, provincial and federal governments spend billions of dollars every year on assisting people with long-term healthcare needs with the majority going to long-term care homes and subsidies for institutional care. The NIA estimates that in 2018, public spending on long-term care in Canada included \$20 billion for nursing home care and \$4 billion for home and community-based care.

Most Canadians in need of regular healthcare are getting it at home whether by choice or lack of available institutional space. Some require a moderate level of support while others need several hours of daily care. Regardless, the costs are cheaper for care at home than in an institution.

Based on a 2011 study, Home Care Ontario estimates that the costs for care is \$842/day for a hospital bed, \$126/day for a long-term care bed, and \$42/ day for home care.

Home care allows Ontarians to get the care they want at a much lower cost to the public and, depending on the subsidies they are eligible for, a lower cost to themselves.

Receiving care at home has challenges and significant expenses. Many people's homes need renovations and special equipment from beds to lifts. There are costs for private services, including medical care, housekeeping,

transportation, physical therapy, cooking, and personal care. The role of family caregivers can only offer so much and is dependant on a senior's family situation.

Home Care Ontario found that families fund more than 20 million hours of home care annually for 150,000 people at an average cost of \$17,600 per year per family.

People with mobility challenges have a major barrier to home care if they do not have a hospital bed and patient lift. Due to the risk of injury in lifting patients out of bed, some home care providers will not provide services to people without adequate lifting devices.

Some people would be able to look after themselves for routine tasks but end up bed ridden for most of the day due to lack of a hospital bed and patient lift. They may be limited to being mobile only while the homecare worker is on site due to challenges getting in and out of bed.

The Ontario Seniors Care at Home Tax Credit does provide incentives for hospital beds and other homecare needs, but at \$1,500 the amount is not enough for all of the services it aims to assist with and is only available to residents age 70 and older. While seniors are a large part of the home care demographic, there are many younger Canadians with long-term healthcare needs.

Offering subsidies to receive care at home will save Ontarians money when it comes to healthcare spending and relieve pressure on our overburdened healthcare system.

Recommendations

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

1. Create a refundable tax credit of up to \$10,000 in a five-year period toward special medical equipment and renovations, including hospital beds and patient lifts, for people of all ages requiring home care services.
2. Expand funding for virtual home monitoring programs through Ontario Health Teams and other health care providers, to help seniors live safely in their homes and reduce the burden on the hospital system.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

INFRASTRUCTURE/TRANSPORTATION

A. The Expansion of Electric Vehicle (EV) Infrastructure and Market in Ontario

Submitted by: The Oakville Chamber of Commerce

Issue

Automotive technology and improvements in electric vehicles continue to evolve at a rapid pace, however consumer demand remains low. Provincial government measures that address key areas of support such as the expansion of EV charging infrastructure as well as increased purchase incentives would spur both consumer confidence as well as demand.

Background

In October 2020, the federal and provincial governments jointly announced their support to transform Ford Motor Company of Canada's Oakville Assembly Complex (OAC) from an internal combustion engine (ICE) plant to a battery electric vehicle (BEV) plant. This project, valued at \$1.8 billion, will help secure the future of Ford's Oakville Assembly Complex and thousands of well-paying direct and indirect jobs to be derived from this transition into electrification. This transformation of OAC into a BEV assembly plant is in line with the Government of Canada's commitment to sustainable growth and greening the economy, and will help support the auto supply chain, mainly located in Ontario. Electrification will allow us to position the innovative Canadian automotive industry as a global leader in BEV manufacturing.⁶⁵

Furthermore, the federal government's "Greening Government Strategy" outlines its goal to reduce greenhouse gas emissions (GHGs) from the atmosphere. The proposed Canadian Net-Zero Emissions Accountability Act, introduced in Parliament on November 19, 2020, will formalize Canada's target to achieve net-zero emissions by the year 2050, and establish a series of interim emissions reduction targets at 5-year milestones toward that goal.

The transportation sector contributes 25% of Canada's emissions, of which 12% is from light duty vehicles.⁶⁶

The Government of Canada has also set a mandatory target for all new light-duty cars and passenger trucks to be zero-emission by 2035, accelerating Canada's previous goal of 100% sales by 2040. Additionally, they have set an interim target of 50% by 2030. These are ambitious targets. (Today, we are sitting at approx. 5% of sales are ZEVs.)

Key impediments to higher consumer uptake of ZEVs including cost and lack of sufficient public infrastructure. By prioritizing EV charging Infrastructure as well as purchase incentives the government will support its goal to reduce GHGs, and will support the province's auto sector in this rapid shift to electrification.

To remain globally competitive the provincial government must remain competitive with its global counterparts. For example, the Biden Administration introduced a \$2-trillion "American Jobs Plan" to rebuild the economy and revitalize infrastructure. A key pillar of the plan is a \$174-billion investment to "win the EV market." This includes supporting automakers as they transition to electrification, offering consumer incentives to buy EVs, building 500,000 new EV chargers by 2030, and using the power of federal procurement to electrify the federal fleet.⁶⁷

⁶⁵ <https://pm.gc.ca/en/news/news-releases/2020/10/08/new-commitment-battery-electric-vehicle-manufacturing-ontario>

⁶⁶ <https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/reduce-emissions.html>

⁶⁷ <https://ipolitics.ca/2021/05/12/canada-must-act-fast-to-benefit-from-americas-shift-to-electric-cars/>

Ontario has a history of excellence as a top auto-producing jurisdiction in North America. For generations, the auto sector has supported the livelihoods of Ontario workers and has remained an essential part of Ontario's economy. In 2019, the sector contributed \$13.9 billion in GDP to the provincial economy and employed 100,000 people in auto assembly and parts manufacturing. Despite this, Ontario has seen investment dollars go to competing jurisdictions. There is intense global competition for auto investments, and a major driver of this shift is that southern U.S. states and Mexico offered lower costs and less red tape.⁶⁸

According to a recent analysis by Electric Autonomy, Canada needs to invest \$4.7 billion in charging infrastructure if we are to keep pace with the U.S. This is far more than the \$376 million the federal government has promised to spend on charging stations.⁶⁹

Research demonstrates that consumers continue being cautious of making the switch to electric vehicles due to price, a shortage of charging infrastructure, concerns about EVs' range, and a lack of awareness of electric vehicles and their benefits.

According to a recent Leger poll, the top reasons Canadians cite for not buying an EV are: their limited driving range (55 per cent); their higher purchase price (54 per cent); a shortage of public charging stations (47 per cent); and the time it takes to charge an EV (45 per cent).

However, there is widespread support for government subsidization of EV purchases. The poll found that the most popular policies and programs to support EV adoption are: tax (GST/HST) deductions (51 per cent); free public charging stations (45 per cent); government incentives (45 per cent); preferential insurance rates (43 per cent); and free annual registrations for EV owners (39 per cent).⁷⁰

Canada's vast geography, and 1.1 million km of public roads, present another challenge that needs to be met by any measures. With only 1,000 publicly accessible fast charger stations available to Canadians right now, most in densely populated areas, we have a long way to go before consumers are assured there is no inconvenience associated with going electric.⁷¹

Recommendations

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

1. Prioritize funding and make incentives available for public and business charging infrastructure.
2. Encourage increased adoption of Electric Vehicles (EVs) by consumers and businesses by offering EV incentives for the purchase of EV vehicles in Ontario.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

⁶⁸ <https://files.ontario.ca/medjct-driving-prosperity-ontario-automotive-plan-phase-2-en-2021-11-23.pdf>

⁶⁹ <https://ipolitics.ca/2021/05/12/canada-must-act-fast-to-benefit-from-americas-shift-to-electric-cars/>

⁷⁰ <http://www.cvma.ca/press-release/new-survey-underscores-need-ambitious-government-efforts-convince-canadians-purchase-electric-vehicles/>

⁷¹ <https://ipolitics.ca/2021/05/12/canada-must-act-fast-to-benefit-from-americas-shift-to-electric-cars/>

B. Investing in Northern Ontario's Highway Infrastructure

Submitted by: Greater Sudbury Chamber of Commerce. Co-sponsored by: Timmins Chamber of Commerce.

Issue

Northern Ontario suffers from an infrastructure deficit. Continuing investment to complete the four-laning of Highway 69 (Highway 400 North) should be the first step to rectifying a critical infrastructure shortage that has limited Ontario's economic potential, ability to attract and retain workers, and connectivity both within the province and across Canada.

Background

Highway 69 is the main connective road between Northern and Southern Ontario. It connects Highway 400 North with the City of Greater Sudbury (the largest municipality in Northern Ontario), where it meets Highway 17 West headed toward Sault Ste. Marie and further on to Western Canada. It acts as the funnel for Southern Ontario residents, businesses, and tourists heading north and vice versa. Moreover, it is an integral link in the Trans-Canada Highway, connecting the Greater Toronto Area and Northern Ontario to Western Canada.

Plans to expand Highway 69 were originally announced in 1991. Despite its importance as a trans-Canada highway, Highway 69 and other northern highways still suffer from a lack of timely and adequate investment. From April 2021 to March 2022, the Ontario government is committing \$2.6 billion to repair and expand provincial highways and bridges of which only 0.24% is earmarked for Northern Ontario.⁷²

In late December 2021, the four-laning of a 14-km stretch of Highway 69 from Highway 607 to Highway 522 was completed with plans to complete the final roadside remediation on this section by the summer of 2022. Ontario's Ministry of Transportation (MTO) states that the remaining two-laned 68-kilometre section of the highway from Parry Sound to French River is still in the engineering and property acquisition phases and that construction on the remaining section depends on the acquisition of lands and environmental approvals. There is no way to predict the length of time that it will take to complete this section of the highway.

The provincial government should commit to completing the four-laning of Highway 69 to:

- Unlock Ontario's economic potential;
- Reduce highway closures due to accidents (often with fatalities) and inclement weather;
- Help businesses who depend on this highway get their goods to market;
- Improve Ontario's inter- and intra-provincial connectivity;
- Support regional economic development to reverse Northern Ontario's declining population trends.

Unlocking Ontario's Economic Potential:

Investment in highway infrastructure has long been recognized as a viable method of creating good-paying, middle class jobs. Investing in Northern Ontario's highway infrastructure would create well-paying jobs that would contribute not just to local communities, but to the province's economy as a whole, during the project and for many decades after.

Most economic growth in the province remains contained in Southern Ontario and has not been realized in the North. Between 2000 and 2020, Northern Ontario has seen 9 years of negative real GDP growth since 2000, while Southern Ontario only saw 3 years of the same.⁷³ Investing in Northern Ontario's highway infrastructure can help revitalize regional economies, which in turn can help unlock Ontario's economic

⁷² <https://www.ontario.ca/page/ontarios-highway-programs>

⁷³ Email from Northern Policy Institute Staff – 11 January, 2022

potential.

Whether due to weather conditions or fatal collisions on the narrow, undivided road, Highway 69 is often closed for extended periods of time, adding hours to commutes and disrupting reliable access to and from Northern Ontario for businesses, residents, and tourists. According to the MTO, there were a total of 38 closures due to accidents on Highway 69 in the Sudbury area from 2019 to 2021 and of these, the highway was fully closed a total of 16 times.⁷⁴

A safer and more reliable Highway 69 would have a positive impact on regional and provincial productivity by improving ease of access and mobility and reducing the time it takes to transport materials or finished goods, especially for businesses reliant on “just in time” delivery to achieve maximum productivity efficiencies. Four-laning Highway 69 would have a positive cascading effect on not just the economies around the Highway, but all of Ontario.

Improving Ontario’s Inter- and Intra-Provincial Connectivity:

Successful inter- and intra-provincial trade is foremost dependent on the existence of a safe, reliable, and convenient highway network that allows passengers, heavy transports, and tourists to travel across the province and country. The highway was originally designed at a time when the majority of freight traffic was still being transported by railway, and the two-lane highway cannot accommodate the increased heavy transport traffic. Frequent highway closures due to accidents, which often result in fatalities, can have a significant adverse impact on commercial activity, act as an economic and tourist deterrent, and are unsafe for drivers. Completing the four-laning of Highway 69 will help improve traffic flow, safety, and reliability for drivers and improve access for passengers driving on the highway. In its current partial two-lane state, the highway negatively impacts residents, businesses, and the supply chain of the entire province.

Reversing Northern Ontario’s Declining Population Trends:

A 2020 Come North Conference report showed that all 11 census districts in Northern Ontario, are experiencing labour shortages, population decline, or population aging.⁷⁵ Investments in northern highway infrastructure will serve to attract and retain residents and workers to northern and rural regions.

It is difficult to attract and retain people and investment to Northern Ontario when safe and convenient transportation to Southern Ontario and other parts of Canada is inadequate. With the federal government’s changes to aviation regulations risking reduced flight service in Northern Ontario, and little to no passenger rail service, building a robust highway connecting Northern and Southern Ontario is not only critical to the region’s economy but to the sustainability of Northern Ontario’s communities as well. The province cannot afford to neglect such alarming trends in Northern communities, as they are critical to Ontario’s economy.

Recommendations

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

1. Expedite investments in Northern Ontario's transportation infrastructure by planning and funding the completion of Highway 69 to four lanes; and
2. When highway upgrades and improvements are studied, consider traffic volumes in relation to the rate of accidents, injury, deaths, economic advantage, as well as the potential for increased traffic volumes and economic benefits of increased volumes.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

⁷⁴ Email from Ministry of Transportation Northeast Operations Staff – 06 December, 2021

⁷⁵ <https://www.northernpolicy.ca/upload/documents/come-north/en-come-north-conference-report-20-12-11.pdf>

C. Encouraging Municipal Government Collaboration to Address Transit Needs and Gaps

Submitted by: Halton Hills Chamber of Commerce. Co-sponsored by: Milton Chamber of Commerce

Issue

The lack of adequate or any transit options in small and rural communities impacts business competitiveness and the mobility of residents. Greater collaboration between adjacent municipalities with and without adequate transit solutions could help address transit gaps by extending or building on existing transit systems.

Background

Public transit in small towns and rural communities is often either insufficient or non-existent. Limited mobility negatively impacts business productivity by hindering its talent pool and potential for growth. Limited and/or insufficient transit puts communities at a disadvantage when it comes to attracting and retaining industry and investment. Access to affordable, public transit would allow local businesses to remain competitive, and residents to maintain independence with access to healthcare providers, employment and community hubs.

For example, Toronto Premium Outlets, located in Halton Hills, is a very popular shopping destination, attracting tourists from around the world. Located directly off of Highway 401, they employ over 900 full-time workers. During peak seasons, Toronto Premium Outlets employs over 2000 workers, the majority of which reside in the neighbouring municipalities of Brampton, Milton and Mississauga. At any given time, as many as 50% of all employees at the mall are part-time workers, many of whom are students. Transit from both Brampton and Milton terminate approximately five kilometers from Toronto Premium Outlets. Consequently, workers must drive to work, be dropped off, take a taxi or a ride hailing service like Uber, which is costly and contributes to congestion on the 401, Steeles Avenue, and the Trafalgar Road.

Since it is not feasible for every municipality, especially more rural and/or remote communities to invest in community-wide public transit nor for the province to directly subsidize every municipality's transit needs, the Government of Ontario is encouraged to put in place the necessary policies, infrastructure and/or funding to make it feasible for neighbouring municipalities to develop and implement innovative solutions that address transit challenges and gaps that exist across municipal boundaries.

Encouraging or building on existing cross-municipal collaboration adjacent municipalities may opt to extend existing transit systems to service a wider geographic region, specifically into regions that lack transit options and service key employment zones. Addressing cross-municipal transit needs has spillover benefits for surrounding municipalities and economies as workers, commuters, and residents of both, can travel more seamlessly between regions and be significantly better connected.

Municipal government collaboration on current transit gaps in regions lacking transit options, would address the last-mile problem facing residents and commuters, and provide a more cost-effective alternative to owning a personal vehicle.

Recommendations

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

1. Put in place the necessary policies to encourage and streamline transit project collaborations between municipalities, First Nations, and regions, Example: Work with insurance companies to understand and support extensions of transit service into adjacent municipalities.
2. Put in place the necessary infrastructure and/or funding that make it feasible for municipalities and/or regions to identify transit gaps, and build on or extend existing transit service across municipal

boundaries in adjacent municipal boundaries into adjacent municipalities that lack adequate transit options.

3. Urge the federal government to invest in multi-municipalities or regional transportation plans]
4. Expand the Community Transportation Grant Program (announced January 25, 2019) to encourage and specifically support this kind of municipal collaboration.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

D. Addressing the Carbon Footprint of Ontario's Post-Secondary Institutions

Submitted by: Vaughan Chamber of Commerce, Belleville Chamber of Commerce, 1000 Islands Gananoque Chamber of Commerce, and Quinte West Chamber of Commerce

Issue

As Ontario's businesses and industry move toward a carbon-neutral future, the province will need to train the next generation of workers and entrepreneurs with the skills to work and innovate within a zero-carbon environment.

Background

Renewable energy technology – from battery technology, solar power and smart grids to tall mass timber construction and smart buildings – is evolving quickly, affecting the trades in utilities, construction, automotive, truck and heavy equipment servicing, and maintenance occupations.

College vocational education, including the trades, is central to building, managing and maintaining clean energy systems, net-zero structures, affordable, clean, safe and efficient transportation options, including zero-emission vehicles and charging or fueling stations, public transit, and strategic trade corridors, including roads, bridges, rail, and airports.

In an effort to support Ontario's transition to a zero-carbon economy, Ontario's public colleges will be a critical player.

Ontario's post-secondary institutions can promote carbon zero initiatives both by retrofitting existing facilities to reduce their carbon footprint and investing in technology. And, as colleges develop clear paths to carbon-free heating and cooling, they provide unparalleled opportunities for local businesses and organizations to follow suit. Local businesses can also work with college researchers on zero carbon products and services and, with by retrofitting colleges to house zero carbon infrastructure, Ontario's SMEs can innovate in spaces that are carbon-neutral.

Seneca's Centre for Innovation, Technology and Entrepreneurship (CITE) is a 274,000 square foot building that brings applied research and commercialization, specialized training and student and business-led entrepreneurial activities under one roof. The building is LEED Gold certified and incorporates the latest technology to reduce its carbon footprint which includes 438 solar panels @ 375W per panel at full sunshine on its roof.

Another example is the Joyce Centre for Partnership and Innovation at Mohawk College in Hamilton, is at 96,000 square feet the city's first zero-carbon institutional building which produces onsite, or procures carbon-free, renewable energy in an amount sufficient to offset the annual carbon emissions associated with operations.

Most Ontario colleges were established 50 years ago and many of their 700 buildings are aging, preventing these institutions from housing the technology needed to train the next generation of workers. This aging infrastructure also has a substantial environmental footprint that will need to be addressed as industries work to move to a carbon net-zero status and align with on-going initiatives to cut greenhouse gasses.

By training the next generation of workers in modernized facilities with green technology, Ontario can help establish the foundation required to implement a zero-carbon economy.

Recommendations

The Ontario Chamber of Commerce urges the Ontario Government to:

1. Assess the cost and resource requirements to replace training facilities in Ontario's post-secondary institutions with infrastructure that is modernized to train graduates and SMEs to implement a zero-carbon economy.
2. Work with the federal government to advocate for funding to support retrofitting initiatives to promote carbon-zero facilities in Ontario's post-secondary institutions.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

E. Bridging the Digital Divide by Supporting Rural, Remote, and First Nations Communities Broadband Accessibility Through Coordinated *Dig Once* Policies

Submitted by: Timmins Chamber of Commerce. Co-sponsored by: Sault Ste Marie Chamber of Commerce.

Issue

Rural, Remote, and First Nations Communities have historically lacked access to reliable broadband connectivity. With broadband infrastructure becoming increasingly expensive to provide to communities with smaller populations, compounded by the great distances between them, more efficient strategies are needed to ensure that all Ontarians have equitable access to reliable, affordable broadband services. Current policies focus less on the direct deployment of fiber to communities which poses challenges for remote and First Nations communities. By increasing the available conduit through sound P3 partnerships, telecommunications providers can move into a previously disadvantaged region more easily. By coordinating with municipalities, a provincial "Dig Once" strategy could significantly reduce costs for future fibre deployments, particularly when coupled with infrastructure-sharing provisions that can benefit these isolated communities.

Background

"Dig Once" is a policy that reduces broadband deployment costs by placing conduits (plastic pipes that hold fiber-optic cable) during road construction when access to the trench is easy. Using this method, a conduit can be placed while minimizing the need and cost of excavation and restoration. Later, the fiber-optic cable can then be pulled through the conduit without any excavation.

Digging Once facilitates the installation of conduits in more and more locations in the public right-of-way, encouraging competition among regions with access to modern technology. Ideally, by Digging Once, conduit is being installed in more and more locations in the public right-of-way, encouraging competition, thus lowering the cost of broadband internet. A more robust network also increases economic development, encourages community growth, and creates a more qualified and connected workforce. While other initiatives are in place to close the digital divide, Dig Once policies work to deploy more conduit and fiber at a lower cost in more locations, thus getting Ontario closer to allowing everyone access to reliable internet networks.

As identified in the Ontario Economic Report released by the Ontario Chamber, population decline and other significant economic barriers can clearly be tied to inadequate broadband, an essential driver of intra-provincial migration thanks to the pandemic's push towards digital adoption and work from home. Additionally, many rural, remote, and Far North communities—many of them First Nations, continue to be severely impacted by a lack of access to reliable, affordable broadband, which leaves many of them at risk of falling behind the rest of the province. Providing this vast, expansive resource to these far-reaching "last mile" communities can be costly to both the provider and end-user and would urge governments to consider legislation to alleviate the cost of laying broadband infrastructure to these regions, encouraging investment.

A key means of reducing the cost of future broadband deployments is to have "Dig Once" policies that require the construction of fiber-optic conduit as part of any public works project. Proponents of these policies see this as a crucial part of an enabling framework to empower rural and remote communities to advance broadband connectivity at the local level. Some reasons to implement a Dig Once policy include reducing deployment costs, encouraging competition among internet service providers, and working to close the digital divide.

If reliable, affordable access to broadband technology continues to dampen economic prosperity in rural, remote, and First Nations communities, then the Provincial Government, in partnership with the Ontario Municipalities, must look to coordinated Dig Once strategies to promote investment from the private sector to encourage the expansion of broadband infrastructure.

Recommendations

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

1. Coordinate with Ontario Municipalities, in partnership with telecommunications and broadband companies, to develop a uniform Dig Once strategy to increase the accessibility of broadband and fiber assets to rural, remote, and First Nations communities.
2. Along with the Municipalities, create regulations that make the laying of conduit/fiber assets mandatory for public infrastructure builds.
3. Through consultation with municipalities and broadband companies, identify best practices for constructing telecom networks in rights-of-way to ensure that municipal assets are protected, including, for example, through the use of permitting and Municipal Access Agreements.
4. Consult with the Federal Government to identify how financial tools can be leveraged to offset investment and provide affordable, equitable access to underserved communities.
5. Where ground-based infrastructure is unattainable, develop accessible alternative solutions.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

F. Developing Infrastructure for the Expansion of Electric Vehicle Market in Ontario

Submitted by: Vaughan Chamber of Commerce and Newmarket Chamber of Commerce

Issue

Ontario's current infrastructure and rate-base classification is ill-equipped to manage the growth of the Electric Vehicle (EV) market. The lack of Local Distribution Company (LDC) involvement in any electrification strategy may cause unintended system consequences and delays in meeting the provinces' electrification goals.

Background

While EVs currently consist of a limited portion of vehicles sold in Ontario, their worldwide share grew by 40% between 2018 and 2020.⁷⁶ The Government of Ontario has already signaled its intentions to support the growing EV market by agreeing to work with the Federal Government to co-fund the production of these vehicles at the Ford and GM plants in Oakville and Oshawa⁷⁷ respectively.

Ontario will need to increase its public charging network to support the growth of this market. While private charging would be ideal for EV ownership, this is likely more difficult in densely populated areas including the GTHA⁷⁸.

Currently, there are just 1300⁷⁹ publicly available charging stations available across Ontario. Comparatively, BC has almost 1000 charging stations despite purchasing half as many EVs; as demonstrated in figure 1⁸⁰.

The Government will need to engage electrified infrastructure cost-effectively, reliably, and expediently to support the industry's growth. By allowing LDCs to manage the charging infrastructure, it enables the local grid to be more responsive and nimbler to the significant growth in demand that will undoubtedly result in electrification and an increased uptake of EVs.

Further consideration should be given towards the rate-base classification for charging EVs, with at least one alternative rate needed for EV charging. This is also technical advice that LDCs can provide through an understanding of the kW requirements for different charging classes. Failure to effectively plan for the expanding EV market will result in the Province having to play catch-up, to the detriment of both the Government and customers.



Fig 1: Canadian EV sales

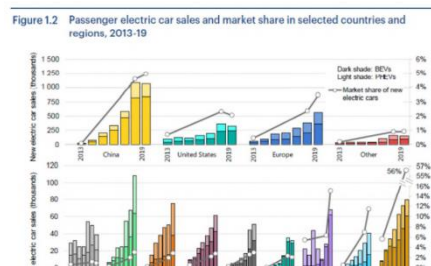


Fig 2: Global Sales of EV

⁷⁶ International Energy Agency Global EV Outlook 2020 - <https://www.iea.org/reports/global-ev-outlook-2020>

⁷⁷ <https://news.ontario.ca/en/release/58736/historic-ford-canada-investment-transforming-ontario-into-global-electric-vehicle-manufacturing-hub>

⁷⁸ <file:///C:/Users/adamsoppelsa/Downloads/EV-Charging-Infrastructure-Guidelines-for-Cities.pdf>

⁷⁹ <https://www.nrcan.gc.ca/energy-efficiency/energy-efficiency-transportation-and-alternative-fuels/electric-charging-alternative-fuelling-stationslocator-map/20487#/find/nearest?country=CA&fuel=ELEC>

⁸⁰ <file:///C:/Users/adamsoppelsa/Downloads/Charging%20Ahead%20EDA%20Position%20Paper%20on%20Electrified%20Transportation.pdf>

Recommendations

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

1. Enable and encourage LDCs to support electrified transportation through infrastructure developments. While the contracts for these individual stations can be optioned out to private companies, LDCs should be consulted regarding the locations of these proposed EV charging stations to ensure they are compatible with the current grid.
2. Give LDCs the ability to rate-base strategic investments in electrification technologies, such as EV and transit-oriented charging stations, where the LDC business case balances customers' needs, government policy objectives, and supports the Province's robust electricity systems.
3. In coordination with the OEB, allow LDCs to review existing customer rate classes and establish a specific rate class for public fast charging.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

G. Enbridge Line 5 and Ontario Energy Supplies

Submitted by: Greater Kitchener Waterloo Chamber of Commerce. Co-sponsored by: Chatham-Kent Chamber of Commerce, Leamington District Chamber of Commerce, London Chamber of Commerce, Sarnia Lambton Chamber of Commerce, St. Thomas & District Chamber of Commerce, and Windsor-Essex Regional Chamber of Commerce

Issue

Interventions by the Governor of Michigan are seriously threatening energy supplies and economic activity across Ontario.

Background

Enbridge Line 5 transports western Canada oil and natural gas liquids from Superior, Wisconsin through Michigan into Sarnia.

In November of 2020 Michigan Governor Gretchen Whitmer (D) commenced proceedings to revoke a 1953 permit that allows a crossing under the Straits of Mackinac, providing notice to Enbridge for terminating Line 5 by May 2021. Enbridge has challenged that order and indicated they will continue with current operations while seeking permits and approvals to replace the crossing with a tunnel at a cost of approximately \$500 million.

Opposition to Michigan's intervention is relatively extensive across Canada however is heavily focused in Sarnia and Lambton County, the location for three of Ontario's four major refineries as well as several chemical plants. Farmers across southwestern Ontario have cited significant concerns with the impact of a pipeline shutdown on local propane supplies manufactured from feedstock transported through Line 5.

Many farmers and agricultural-related business operations cannot access alternatives such as natural gas. Another major component of the current frustration was the impact of a CN Rail strike in November 2019 on provincial propane supplies. The Michigan Line 5 decision and a subsequent closure will be exponentially worse.

Plains Midstream Canada indicates Line 5 supplies all the feedstock for its plant in Sarnia, which produces about 1,200-million gallons of propane and butane annually with approximately 200-million gallons shipped to Michigan. The company has warned Governor Whitmer that closing the pipeline will terminate all Sarnia operations.

Conservative Party of Canada Leader Erin O'Toole has asked Prime Minister Justin Trudeau to attempt some form of resolution with President Biden. O'Toole has claimed that Line 5 is the safest option for meeting energy requirements on both sides of the border. The Canadian Chamber of Commerce has warned there will be significant disruption to fuel supplies across Ontario and Quebec if Line 5 shuts down.

Ontario Premier Doug Ford has written to Governor Whitmer indicating the potential disruption will threaten 1,000 unionized jobs in the United States and will result in a major fuel shortage, along with nearly 5,000 direct jobs at risk in Sarnia-Lambton. Ontario Energy Minister Greg Rickford has indicated Line 5 is a key artery supplying the province with oil and warned of the economic disaster that will result if the system is turned off.

The State of Michigan has approved Enbridge's application for permits to build a tunnel under the Straits of Mackinac. A review concluded the proposed construction can be completed in compliance with state environmental laws and regulations.

Recommendations

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

1. Continue constructive advocacy through all relevant channels including:
 - a) to the State of Michigan for ensuring Enbridge Line 5 continues to operate without interruption; and
 - b) to the Government of Canada for ensuring Line 5 is resolved as a top Canada/United States priority for Prime Minister Trudeau and President Biden.
2. Maintain current stated position, supported by the Ontario Chamber of Commerce and other stakeholders across Canada, to protect jobs and Canadian energy supplies.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

H. Leveraging digital infrastructure to spur economic recovery

Submitted by: Oakville Chamber of Commerce. Co-sponsored by: Burlington Chamber of Commerce

Issue

As part of the plan for recovery, the Oakville Chamber believes that governments at all levels will need to enhance digital connections and e-services amongst business, employees, citizens and government to create an attractive climate for business investment and job creation for economic growth. The ability for us to adapt so quickly under these unprecedented conditions only underscores the critical need for governments to continue to invest in digital technology, robust, high-speed communication networks, innovation, and a connected infrastructure.

Background

For the better part of a decade, Digital Transformation has been the core driver of organizational change. The transition from legacy IT to cloud computing; the expansion of retail and banking into the mobile space; the rise of machine learning, artificial intelligence, and smart automation; improving safety and reliability of public transit through predictive maintenance; and the growth of the Internet of Things (IoT) were, among other massively transformative technologies, at the heart of a generational forward evolutionary leap. And it is therefore not surprising that these very technologies have enabled businesses, governments, healthcare systems, tech companies, students, and workers to adapt to the turmoil of disruption caused by the pandemic.⁸¹

Digital and Data Infrastructure are an important pillar to create an engine of innovation and wealth creation. COVID19 has accelerated the transformation to Digitalization and highlighted the many benefits in a short period.

To build a stronger position in the near term, we can build on the COVID lessons turning around the negative impacts from the pandemic to fast track the use of technology and communication networks. We have seen how fast people can adapt and how productive hundreds of millions of people ramped up the use of digital tools to remain connected, productive and healthy.

Digital infrastructure allows us to connect people and places, improve productivity, increase economic growth, create healthy and safer communities through valuable insights gained from data analytics and new technologies.

This will result in our ability to solve complex problems, improve the sustainability of our cities, build new businesses create new jobs and create a step-change for competitiveness for our region.

An increasingly digital economy will require major investments in sophisticated networks, cybersecurity and electronics. It will also force business to adopt new technologies and business models to interact with customers, clients and employees.

About 2.5 billion people are connected to the internet today, a third of the world's population; there are projected to be about 4 billion users by 2020, or more than half the global population.

Continuous access to information, commerce and communication has become a daily fact of life for billions and will soon become a reality for billions more. As the internet makes its full weight felt in more high-impact areas such as healthcare, education and government services, access to digital services will only become more essential for everyone in the years to come.

⁸¹ World Economic Forum

The digital economy is growing at more than 10% a year, significantly faster than the economy as a whole. In emerging markets, the internet economy is growing at 12-25% per year, and it is having a far-reaching social and political, as well as economic, impact. Around the world, it is an increasingly important source of growth and, frequently, jobs.⁸²

Governments, businesses, and other stakeholders including post secondary institutions should commit to near, mid and long-term actions that promote growth of digital services and the digital economy.

All stakeholders can establish comprehensive, aspirational plans that lay out a path to broadband connectivity for all. Making expanded connectivity a reality requires a continuing commitment to investment and innovation by the private and public sectors – and an understanding of the importance of keeping digital traffic flowing. Governments in particular need to recognize the broader role that digital services can play in economic development and growth; the digital economy is much more than a potential source of tax revenues.⁸³

The COVID19 Pandemic has also accelerated businesses' digital transformation. It also showed us how quickly work itself can change. Adaptability, flexibility, and a commitment to lifelong learning will be vital, especially as companies and entire industries reposition themselves in a highly digital, data-driven world and search for the talent that will help them succeed.

For business and government, the way to remain competitive lies in upskilling to enable them building a future-ready workforce; for individuals, it's a way to keep their skills relevant and stay future-ready. Making deliberate, significant investments in learning will ensure organizations and employees alike have the knowledge, skills, and capabilities needed to work effectively in a digitized, automated world.⁸⁴

Oakville's Sheridan College's Centre for Mobile Innovation (CMI) is a technology research, commercialization, and knowledge dissemination hub focussed on mobile computing, with a strong emphasis on mobile health (mHealth). CMI was established to respond to industry and community needs, while fostering technical and entrepreneurial training of the next generation.

Recommendations

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

1. Provide targeted support to help businesses become more adaptable, productive and responsive through the increased use of digital technologies.
2. Commit to actions that promote the long-term growth of the digital economy including removing impediments to the expansion of digital infrastructure and modernize policies to encourage investment and innovation throughout the internet ecosystem.
3. Encourage municipalities to use stimulus funds for digitization efforts in line with the digital needs of their communities.
4. Create funding mechanisms for public post secondary institutions to establish digital literacy programs to ensure workforce is future ready, as well as investing in research and digital skills training to meet the future labour demands.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

⁸² [World Economic Forum](#)

⁸³ [World Economic Forum](#)

⁸⁴ [COVID-19 The upskilling imperative - Building a Future Ready Workforce for the AI Age](#)

I. Lowering our Carbon Footprint through Energy-Smart Building

Submitted by: Guelph Chamber of Commerce Co-sponsored by: Greater Barrie Chamber of Commerce, Brantford-Brant Chamber of Commerce, and London Chambers of Commerce

Issue

Ontario homebuilders face barriers leveraging their innovative capacity to maximize their business and economic output towards a reduced carbon footprint.

While opportunities to mitigate the costs of energy efficient programs for retrofits exists, there is no comprehensive approach for new builds. A new build is far more likely to achieve 'Net-Zero' status if it starts out that way and will be far less expensive to achieve as an afterthought. A retrofit is nearly impossible to achieve that 'Net-Zero' status without spending a large fortune to do so, and yet, it is here that Ontario has decided to focus its energy efficiency program spending.

Given the massive number of new built homes we have seen constructed and planned for in communities across the province, Ontario is missing a huge opportunity to reduce our carbon footprint.

Background

There exists considerable debate about the term Net-Zero and the feasibility of achieving it. Commonly used by governments and the private sector alike, the term Net-Zero does present problems. Prevailing wisdom defines a net-zero energy home as one that produces as much energy as it uses on an annual basis. However, there are numerous variables depending on the occupants' behavior and issues like orientation of house (south facing roof, ensuring the property next door (or trees) don't shade the roof), having 4 exterior walls rather than 2 or 3, the fact that the average home's roof top is likely not big enough/strong enough for all the solar panels, etcetera. These considerations are above and beyond the work that is done with the house construction to make it more "energy" tight.

In terms of technology, materials and efficiency standards, net-zero homes are built at least a decade ahead of where the building industry is today. They include features such as advanced heating, cooling, ventilation, high-efficiency windows, superior levels of insulation and air tightness and solar panels that should feed the electrical grid. Net-zero homes have been around for many years, but they have typically been custom-built and at an enormously higher expense than regular homes.

The build expense impacts the price of net-zero homes and they are therefore not affordable options for most Ontarians. Furthermore, most Ontarians are not familiar with the benefits (long-term savings) of purchasing net-zero homes.

Net-zero homes offer the potential to save money on energy costs year-round as well as protect homeowners from future energy price increases. Most importantly, they lower greenhouse gas emissions, conserve resources, reduce pollution, and minimize the household's ecological footprint.

With well over 100,000 new home starts in Ontario in recent years, it makes it increasingly crucial that builders of net-zero homes receive the support needed to build these homes on a larger scale in a cost-effective manner.

For its part Canada's Climate Plan (the CCP) has very little to offer by way of help for the construction of new Net-Zero home builds:

"Accelerating action on home retrofits will create new demand for jobs". Provides \$2.6 billion over 7 years for homeowners. Provides \$700,000 in grants of up to \$5,000 to help homeowners make energy efficient improvements to their homes. And working with

provinces and territories on low income retrofit programs to increase the number of low-income households that benefit from energy retrofits. (CCP - Page 11 Home Retrofits).

The CCP never mentions how to address supporting builders of new homes.

To have a meaningful impact in reducing our carbon footprint, Ontario needs a critical mass to make Net-Zero work. Presently, the market does not have that mass as it is just too expensive to get there. The province requires a comprehensive a something far less daunting and more likely to succeed over the short to medium term.

Recommendations

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

1. Incentivize homebuilders to use energy efficient technology and materials for the first 3-5 years, gradually reducing those incentives until they terminate in 2030. This allows time for builders to adjust their business plans while at the same time incrementally improving our carbon footprint. Incentives can take the form of, but not limited to, grants, subsidies, tax breaks or a reduction in municipal DCs (development charges).
2. Increase the HST rebates for primary residence purchasers of homes greater than \$450,000 (current only applies for homes less than this figure) – if homes can meet certain criteria for sustainability in the OBC and be verified by a simple checklist from existing inspection program (minimizing increase in red tape). The onus is placed on the developer to demonstrate compliance, and the margins remain the same for the developer.
3. The Province should encourage municipalities to encourage net-zero home building by offering PACE (Property Assessed Clean Energy) financing that are connected to the units built not the homeowner.
4. Develop Energy Smart Building education campaigns/programs for builders (trades), and buyers using local distribution companies and organizations like IESO (Independent Electricity System Operator) and CHPA (Corporate Housing Providers Association) to disseminate and distribute materials.
5. To further reduce Ontario's carbon footprint, establish regional pilot programs where a district-based energy system is established as the central plant for a specific building or an entire subdivision such as the Telus Tower in Toronto.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

J. Building Rural Transportation and Transit Infrastructure

Submitted by: Greater Kitchener Waterloo Chamber of Commerce

Issue

Employers in rural areas of Ontario are increasingly dependent on adequate transportation systems for sustaining workforce requirements.

Background

As labour and skills demands are increasingly challenging for Ontario employers, reliable transportation options for employees are critical across all sectors.

Ontario's Minister of Transportation Caroline Mulroney noted in *Connecting the Southwest: A Draft Transportation Plan for Southwestern Ontario* (January 2020) that people need services that work for them, most notably a safe and reliable system that connects smaller communities to larger centres, which improves access to jobs, and supports an open and competitive business environment. The report further states that employees need to be able to access jobs where they are available, whether they are in the agricultural sector, financial centres, automotive plants, schools or hospitals.

A 94.1 FM in St. Thomas report on January 20, 2023, noted that local Mayor Joe Preston planned a meeting with Ministry of Transportation officials at the upcoming Rural Ontario Municipal Association (ROMA) conference to discuss regional transit options. Preston emphasized that connecting St. Thomas to London with convenient transit was vital for growth and enhanced connectivity will improve the movement of people, goods and services. His municipality would be requesting increased funding which is urgently required through the imminent opening of an Amazon facility near Talbotville and the Maple Leaf Foods processing plant in south London.

The London Free Press further noted on January 17, 2023, that a transit system linking St. Thomas and London would offer a more convenient and accessible option for students travelling to and from Fanshawe College and Western University. Mayor Preston indicated his city would operate the transit system dependent upon financial support from the provincial government. An hourly bus is planned from downtown St. Thomas to south London.

A November 29, 2022, report in The Brantford Expositor indicated that Brant County and Brantford are drafting a regional transportation plan. Brant Mayor David Bailey noted that bus service is desired to link communities in his municipality with Brantford, Woodstock and Cambridge.

Currently, Brant Transit offers a shared ride service within the county and into Brantford. Riders are required to book in advance. Ride Norfolk, a project funded by the provincial government, operates daily weekday service between Brantford and Simcoe along with other communities including Port Dover, Delhi, Tillsonburg and Turkey Point.

In Perth County, PC Connect operates five routes with services into London and Waterloo Region. The system was launched in November 2020 with funding from the Ontario Community Transportation Grant Program. The objective is moving passengers from Perth County into larger urban centres where connections are established with local transit systems.

Recommendation

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

1. Increase funding for inter-municipal transit services to assist employers in responding to escalating workforce demands.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

K. Ontario's Readiness for Urban Mobility – Smart cities and digital transformation

Submitted by: Milton Chamber of Commerce. Co-sponsored by: Oakville Chamber of Commerce, Burlington Chamber of Commerce, and Halton Hills Chamber of Commerce

Issue

The province has a role to support the application of data and innovative technologies that enable municipalities to establish intelligent transportation networks and optimize urban mobility. The future efficient movement of both people and goods and services will depend on the effective management of a connected infrastructure.

Background

A reliable transportation network is essential for trade, the movement of goods and services as well as people. It is also integral to our province's economic competitiveness. As our communities become more connected through the collection of data, artificial intelligence and technology, it is vital that we are prepared for the business climate of the future and that we remain competitive with other jurisdictions. The market for automated and connected vehicles is growing rapidly and large economic benefits are expected. According to McKinsey, investors have spent over \$200 billion USD on autonomous-vehicle technologies and smart mobility in the last decade.⁸⁵

Population growth as well as increased employment growth is positive for our local economy; however, it also underlines the need for building a resilient transportation network that works for all modes of transportation to supply the movement of goods and people.

Ontario has taken steps towards becoming a leader in the development, commercialization and adoption of advanced mobility technologies, like Connected Vehicles/Autonomous Vehicles (CA/AV). Ontario was the first Canadian province to permit on-road testing of autonomous vehicles in 2016, updating its pilot regulation to match other global AV testing jurisdictions in 2019.⁸⁶ Since then, Ontario has launched the Ontario Vehicle Innovation Network (OVIN), which funds collaborative research projects, supports SMEs to commercialize technologies, and aims to develop a strong mobility workforce and talent pipeline through skills development and training.⁸⁷ Moreover, Ontario has begun investments in intelligent transportation system (ITS) technologies along provincial highways, in order to support mobility innovations like connected and automated vehicles.⁸⁸

The creation of a dedicated program could further incentivize municipalities to invest in infrastructure/technological updates within their local jurisdictions, thereby creating a healthy environment for emerging transportation technologies.

It is vital that municipalities engage in the development of a technological transportation system where data from smart infrastructure, transportation networks, and connected vehicles can empower planners, transit agencies, and other municipal leaders to make advancements in urban mobility. The future efficient movement of both people and goods and services will depend on the effective management of a connected infrastructure. As the industry evolves and becomes a reality, it will become a competitive economic advantage for municipalities that embrace it—and a disadvantage for communities that don't.

⁸⁵ <https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/mobilitys-future-an-investment-reality-check>

⁸⁶ <https://files.ontario.ca/auto-strategy-en-final.pdf>

⁸⁷ <https://news.ontario.ca/en/release/1001266/ontario-launches-flagship-initiative-to-lead-development-of-ev-and-smart-transportation-technologies>

⁸⁸ <https://www.ontario.ca/page/connected-and-automated-vehicles>

The creation of a dedicated program could further incentivize municipalities to invest in infrastructure/technological updates within their local jurisdictions, thereby creating a healthy environment for emerging transportation technologies.

Recommendations

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

1. Encourage municipalities to include adoption of emerging transportation technologies in their short- and long-term “Transportation Master Plans (TMPs)” to ensure that they are prepared for the inevitable adoption of new modes of transportation (such as Connected and Autonomous Vehicles and related transportation infrastructure).
2. Create a dedicated program (e.g., matching funds) that encourages municipalities to invest in infrastructure/technological updates within their local jurisdictions, thereby creating a healthy environment for emerging transportation technologies.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

L. Reducing Traffic Congestion On Ontario Highways Due to Vehicular Accidents

Submitted by: Tillsonburg District Chamber of Commerce. Co-sponsored by: Chatham-Kent Chamber of Commerce, and Woodstock District Chamber of Commerce

Issue

Traffic congestion negatively affects the economy in numerous ways. People are frequently late to work when they are stuck in traffic, resulting in lost productivity and stress. It prevents deliveries from arriving on time, which can delay production, and congestion wastes fuel and causes vehicle emissions, thus increasing the cost of transporting goods and overall pollution levels.

Background

While vehicular accidents occur everywhere, they cause less traffic delays and highway closures in some jurisdictions than others based on the response systems that governments have in place. The state of Georgia's Department of Transportation (GDOT) has implemented measures to minimize closures and delays on metro Atlanta highways. Since 2008, GDOT has paid private wreckage companies in metro Atlanta a \$3,500 bonus to clear truck accidents in 90 minutes or less. Since the Towing and Recovery Incentive Program (TRIP) was launched, the average time to clear an accident plummeted by 80 percent, prompting GDOT to consider expanding the program across the state of Georgia.⁸⁹

The agency also works to keep traffic moving by using cameras to monitor highway conditions, and dispatches Highway Emergency Response Operators (HERO) units to help drivers, clear debris, and direct traffic after accidents occur. These efforts have a measurable impact because at least 50 percent of traffic congestion in the Atlanta region is caused by accidents.⁹⁰

Florida has similar programs in place under its Open Roads Policy, which sets the goal of clearing major highway incidents and truck crashes across the state in 90 minutes or less. Rapid Scene Clearance (RISC) is a program put in place under this policy which, like Georgia's, provides financial incentives to qualified and participating heavy duty towing service providers. In addition to financial incentives of a \$600 to \$3500 bonus for meeting response and clearance deadlines, the program is successful because its tow operators must meet equipment and training standards to be eligible to participate. This contrasts with systems in use elsewhere, where heavy-duty tow operators are called without consideration of their capabilities. The operators do not participate in a RISC-type program and so are not contractually obligated to meet training and equipment standards.⁹¹

Such efforts are part of Traffic Incident Management (TIM) quick clearance programs, which is the practice of rapidly and safely removing temporary obstructions from roadways in order to increase the safety of incident responders by minimizing their exposure to adjacent passing traffic, reduce the probability of secondary incidents, and relieve overall congestion. 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;

⁸⁹ Georgia Department of Transportation's (GDOT) Towing and Recovery Incentive Program (TRIP) Can Reduce Clearance Times by 80 Percent, *U.S. Department of Transportation*, [Georgia Department of Transportation's \(GDOT\) Towing and Recovery Incentive Program \(TRIP\) Can Reduce Clearance Times by 80 Percent.](https://www.gdot.ga.gov/transportation/trip) | ITS Deployment Evaluation.

⁹⁰ David Wickert, 2019, The Atlanta Journal-Constitution, <https://www.ajc.com/news/state--regional-govt--politics/gdot-tackles-truck-accidents-metro-atlanta-highways/ZXuWYCvFpBb9aaJihOixjL/>.

⁹¹ CAA, 2021; Traffic Incident Management, Florida Department of Transportation, <http://www.floridatim.com/Overview.htm>.

- response time to traffic incidents and other emergencies;
- vehicle fuel consumption;
- vehicle emissions;
- motorist stress levels;
- aggressive driving behaviour;
- freight movement impacts in the region;
- regional economy impacts;
- local tourism impacts; and
- future potential land use impacts.⁹²

While major urban areas in Canada typically have TIM practices in place, such as Ontario's COMPASS Transportation Management Centre, they are often not used to their full potential. A 2021 [CAA report](#) highlights additional solutions for non-recurrent traffic congestion based on examples of TIM programs in other jurisdictions. A key example is:

- **Freeway service patrol**, such as Florida's Road Rangers program and Maryland's Coordinated Highways Action Response Team (CHART). Freeways are routinely patrolled by personnel who are trained and equipped to perform minor repairs, assist motorists, remove debris, provide fuel, provide first aid, push vehicles out of travel lanes and assist emergency services. Such programs reduce incident duration and prevent secondary crashes, thus decreasing congestion. For every dollar spent, freeway patrol systems bring in \$6 to \$28. A similar program, the Highway 407 ETR Highway Safety Patrol is in place in Ontario on a smaller scale.⁹³

Ontario could therefore benefit from similar practices given the high traffic volume on its highways, especially in the Oxford County area. Approximately 60,000 trucks pass the 401/403 junction in Woodstock each day. Additionally, Drumbo/Innerkip Exit 250 is among the worst stretches on the 401 for accidents. Inspector Tony Hymers, Oxford OPP Detachment Commander, has articulated a need for an accident reporting centre in Oxford County, similar to those in the City of London, Chatham-Kent, and the Collision Reporting Centres of Toronto, which are used to report property damage-only accidents. This gets cars off the road quickly.⁹⁴

Recommendations

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

1. Implement a proof-of-concept vetting program to create a pool of qualified towing. Companies that can be called to accidents, as well as an incentive program for contractors to clear accidents in 90 minutes or less. Test this program along the 401 from Oxford County to the westerly termination of the 401 in Windsor for 18 months and report on its effectiveness. If it proves to greatly reduce congestion, implement the program for all 400 series highways.

⁹² Traffic Incident Management Quick Clearance Laws: A National Review of Best Practices, 2022, US Department of Transportation, https://ops.fhwa.dot.gov/publications/fhwahop09005/role_relevance.htm; Traffic Incident Management. FHWA, https://ops.fhwa.dot.gov/eto_tim_pse/about/tim.htm.

⁹³ Traffic Incident Management: Volume 1, 2018, CAA, https://www.caa.ca/wp-content/uploads/2018/07/18-CAA-Infrastructure_Papers-TrafficIncidentMgmt-ENG-.pdf.

⁹⁴ Traffic Services Collision Reporting Centres, Toronto Police Service, <https://www.torontopolice.on.ca/traffic/crc.php>; Collision Reporting, Chatham-Kent Police Service, <https://ckpolice.com/collision-reporting/>.

2. Create a proof-of-concept accident reporting centre in Oxford County covering the areas in Oxford along the 401 and 403. After 18 months report on its effectiveness. If it proves to be effective, establish reporting centres in jurisdictions along the 400 series highways.
3. Implement a temporary highway patrol service, through which roving vehicles patrol. Congested and high incident areas and provide direct service to motorists in distress, from Toronto to Waterloo Region along the 401 for 18 months and report on its effectiveness. If it proves to reduce congestion, implement the program permanently.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

M. Regional Transportation Fare Integration

Submitted by: Ajax-Pickering Board of Trade, Toronto Region Board of Trade and Vaughan Chamber of Commerce. Co-sponsored by: Newmarket Chamber of Commerce and Mississauga Board of Trade

Issue

Connectivity in modes of transit is essential to the success of the Greater Toronto and Hamilton Area Regional Transit Plan. A crucial element of this connectivity is a one-card fare integration system for the Greater Toronto and Hamilton Area.

Although progress has been made in the process of fare integration, there is still more that must be done. To ensure a seamless transportation network, and to build further momentum across the wider region for fare integration, GO Transit needs to be integrated with the Toronto Transit Commission, Durham Region Transit, and other municipal transportation services. This issue must be addressed as soon as possible, to keep up with the needs of the growing population and visitors to the Greater Toronto and Hamilton Area (GTHA).

Background

We applaud the federal, provincial and municipal governments for making their largest-ever investments to help fund transit infrastructure within the GTHA. The present transportation system is widely viewed as inadequate and traffic congestion is now a cross-regional issue that affects all municipalities and residents in the GTHA and beyond. The ability of businesses to move people and goods, of commuters to get to work and home, of visitors to travel in and through the GTHA, and the vitality of the regional economy are dependent upon an efficient regional transportation network. This is important to both the region and the province: GO Transit and the municipal transit agencies that connect to it serve two-thirds of Ontario's population (approximately 10 million people).

Network connectivity needs to be the backbone of the regional transportation plan; transfers between municipal transit systems should be easy and efficient. Connectivity must not stop at any particular municipal boundary; rather, it should be continuous throughout the GTHA and be based on an integrated fare system which incorporates "smart" card technology.

GO Transit and the nine municipal transportation agencies in the GTHA have already made progress on fare integration. Currently, GO Transit has signed co-fare agreements (allowing for discounting of fares when transferring from one transit agency to another) with eight municipal agencies. The PRESTO fare card allows users of more than one transit agency to get an immediate discount when they transfer between GO and one of the participating agencies. In addition, all the 905 transit operators (except Milton) have agreed to accept each other's transfers without additional fares.

While the TTC previously offered a co-fare funded by the provincial government, that discounted rate for PRESTO users expired in 2020.

To illustrate the cost implications to commuters: A trip from Rexdale in Etobicoke to Toronto's financial district is 26 KM and costs riders \$3.20, while a trip from Rexdale to an industrial job in Vaughan is only 4 KM, but costs riders \$7.08. From Markham and Steeles in North Scarborough to Union Station downtown takes about 92 minutes by bus and subway, or 52 minutes by bus and GO. Most still crowd onto the overloaded Yonge subway rather than using available space on the GO Train because the bus + subway fare is \$3.20 each way while the bus + GO fare is \$12.25.

The implementation of a regional fare integration system is integral to the creation of a sustainable, attractive and efficient transportation network. The benefits of the move to a smart card system will support the

development of further infrastructure and will make the regional transportation network more customer friendly, leading to greater use of the network and ultimately assisting in the alleviation of regional congestion and gridlock.

Recommendations

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

1. Through Metrolinx, implement a fully integrated fare system at the earliest possible opportunity for the GTHA regional transportation system including GO Transit and all municipal agencies, which will make for a more customer-friendly, seamless, and affordable transit network, and help alleviate wider-region traffic congestion and gridlock.
2. Facilitate the equitable distribution of fare dollars collected by an integrated fare system among the participating regional transit operators and Metrolinx.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

N. Support for Metrolinx Big Move and ‘Next Wave’ Priority Projects

Submitted by: Richmond Hill Board of Trade. Co-sponsored by: Vaughan Chamber of Commerce and Newmarket Chamber of Commerce.

Issue

Over the past 25 years, there has been tremendous population and business growth throughout the Greater Toronto – Hamilton Area (GTHA), particularly in the 905. In fact, York Region is now one of Canada’s fastest-growing large urban municipalities with nearly 1.2 million people, with a growth rate of 5.7% (Source: York Region). Notwithstanding the many positive results from urban intensification, increased traffic congestion typically accompanies population growth if infrastructure investments do not keep pace, as they have failed to do in the GTHA and beyond.

Starting 2025, Canada will welcome 500,000 new immigrants annually with ~50% of those immigrants settling in the GTHA (Source: IRCC). With the need for post-COVID working-from-home and inflationary pressures, immigrants and the mainstream population are looking to affordable larger living spaces. As a result, larger volumes of the population are looking at regions connected to Toronto for housing, work and business opportunities, resulting in the need for expanded transit infrastructure that connects the GTHA to York and other regions. The current lack of public transit options leads to less choice for commuters and ultimately increased vehicular traffic, which results in costs to business supply chains such as movement of goods delays.

The failure of our transportation infrastructure to keep pace in the face of unprecedented growth also affects tourists and visitors to the wider region and contributes to air pollution and carbon emissions. Recent investments by all levels of government in public transit, including the extension of the Toronto-York-Spadina subway extension to Vaughan and construction of VIVA-YRT bus rapidways, are welcomed additions to the transportation network in York Region. To maximize these investments in public transit infrastructure, support must be given for the Metrolinx Big Move transportation plan and ‘Next Wave’ priority projects including the construction acceleration of Yonge North Subway Extension.

Background

Transportation and transit infrastructure is critical to the success of our region, our province and our country. For that reason, we must focus on the bigger picture. Municipal boundaries act as transit boundaries that prevent effective movement of passengers. Transit policies and routes should be planned based upon population growth and need, not on municipal boundaries. York Region is one of the fastest growing areas in Canada contributing to some of the longest commute times in North America, with no subway line connecting York Region to the GTHA. To entice people to use public transportation and alleviate traffic congestion, the Yonge North Subway Extension is a top priority of the regional municipality of York and each of the nine municipal governments in York Region. In fact, transportation is the top local issue for the vast majority of York Region residents.

The Yonge subway extension will complement investments made in our existing transit network and help connect the GTHA by integrating with neighboring transit options. They will also maximize the recent investments in GO Transit, VIVA-YRT, Eglinton Crosstown LRT, UP Express connectivity to Pearson Airport, and the Toronto-York-Spadina Subway Extension. They will ensure for greater connectivity with surrounding communities.

Already included in the Metrolinx Big Move and identified as ‘Next Wave’ Priority Projects, developments of this magnitude will lead to new business and job creation, intensification, and the attraction of more affordable housing as well as significant environmental benefits. In fact, by eliminating the need for 2,500 bus trips that

currently service a stretch of Yonge Street each weekday, the Yonge North Subway Extension has significant potential to reduce carbon emissions and eliminate up to 28 tonnes of Greenhouse Gas (GHG) emissions each day.

In June 2019, the Ontario government unveiled a new transit plan for the Greater Toronto Area which included several new subway projects such as the Yonge North Subway Extension. However, no significant construction milestones have commenced other than upgrades to the Finch station contract which was awarded in September 2022. The Metrolinx website does not specify any future project timelines beyond September 2022.

As populations continue to grow and densities rise throughout the GTHA and beyond, there is an urgent need to create connected infrastructure for future generations that ensures for the greatest range of mobility options. Projects of this size and scope require the financial support of all levels of government over an extended duration of time. The longer we wait, the more expensive projects of this magnitude become.

Recommendations

The Ontario Chamber of Commerce urges the Government of Canada, the Government of Ontario, the Regional Municipality of York and the City of Toronto to:

1. Continue to prioritize construction for the Yonge North Subway Extension.
2. Maintain an open and transparent line of communication with the business community in the region with project information, status updates, construction timelines, and economic and environmental impacts with construction.
3. Maintain transparency by providing relevant information and project updates for *all other* Metrolinx projects currently underway in various municipalities.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

O. Support for the renewal of the Billy Bishop Toronto City Airport Tripartite Agreement

Submitted by: Toronto Region Board of Trade

Issue

In 10 years, the Tripartite Agreement which governs the operation and existence of Billy Bishop Toronto City Airport will expire. As the province continues to recover from the pandemic, we need to double-down on our competitive advantages. The time is now to modernize and renew the agreement under which the airport operates to ensure Billy Bishop Airport can continue to offer connectivity that drives trade and tourism, facilitate vital support for provincial healthcare, create thousands of jobs, and embrace technology that will make the airport cleaner, greener and quieter in order to achieve climate change goals.

Background

Around the world, downtown airports like Billy Bishop Toronto City Airport support businesses, provide connectivity and unlock opportunities that make a city world class. These airports play an important role in the economy and are critical in building knowledge economies that rely heavily on the circulation of people and ideas.

Ontario is fortunate that its capital, Toronto, has one of the closest downtown airports in the world. Located roughly 3 km from the downtown core, Billy Bishop Toronto City Airport has a unique competitive advantage. It links Ontario to important economic and trade centres in eastern Canada and northeastern United States. With connections today to Windsor, Ottawa, Sault St. Marie, Timmins and Thunder Bay, the airport makes investment, trade, tourism, and development opportunities possible for businesses and workers in these communities and the communities around them.

Prior to COVID-19, Billy Bishop Airport supported the movement of nearly 3 million people, making it one of Canada's top 10 busiest airports and Ontario's 3rd busiest passenger airport. Additionally, its connectivity to the United States makes it the 5th busiest Canadian-U.S air border. This supports the movement of people and goods that result in a positive environment in Ontario for trade, investment, talent attraction and retention, as well as rebuilding the visitor economy.

The airport is a convenient, reliable, and valuable connection point that is strongly supported by the local community and overwhelmingly supported by the local business community for its role in unlocking bilateral trade and facilitating convenient travel for business and leisure. The airport has a bright future and is set to increase its value and impact for Toronto and Ontario's economy through the addition of US preclearance. This investment will:

- Increase economic opportunity with a net impact of C\$4.8 billion in annual GDP (up from \$2.1B in 2019), 32,400 jobs (up from 14,000 in 2019) and \$28M in monetized time savings for travelers and Canadian businesses;
- Generate an additional \$60 million in direct on-site tax revenues across federal, provincial, and municipal levels;
- Support Toronto's waterfront revitalization efforts, which will create approximately 40,000 new residences and 40,000 new jobs in the city;
- More generally, Ontario has an entrenched trade relationship with the United States. In fact, if Ontario were a country, it would be the U.S.'s third largest trading partner.

In addition to the economic benefits and value of the airport, it also has an important function connecting Ontarians to some of the best health care facilities and services. As the Toronto base for ORNGE, Ontario's air ambulance and medical transport, more than 3,600 life-saving flights were recorded in 2021.

In 10 years, Tripartite Agreement which governs the operation and existence of Billy Bishop Toronto City Airport will expire. As the province continues to recover from the pandemic, we need to identify, secure, and optimize our competitive advantages.

The time is now to modernize and renew the agreement under which the airport operates.

Recommendation

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

1. Declare their support for Billy Bishop Toronto City Airport as a critical transportation link for Ontario and a key piece of infrastructure for the province's economic future, including by working with the City of Toronto, Government of Canada, and their counterparts to advance modernizing and renewing the Tripartite Agreement for the airport with urgency.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

P. Supporting Accurate Mapping Layers That Bolsters Reliable Broadband Accessibility for Ontarians

Submitted by: Paris and District Chamber of Commerce. Co-sponsored by: Timmins Chamber of Commerce, Peterborough and Kawartha Chamber of Commerce, Huron Chamber of Commerce, Leamington District Chamber of Commerce and Simcoe and District Chamber of Commerce

Issue

The importance of high-speed broadband to residents is self-evident and the necessity of accurate broadband mapping information is critical to ensuring all residents receive high-speed service. The Provincial Government has committed to providing high speed internet of 50 Mbps/10 Mbps to all premises by the end of 2025, and funding is being provided to internet service providers (ISP) towards achieving this goal. Municipalities have a responsibility to ensure taxpayer funds allocated to this task are spent efficiently so identifying the areas that are currently unserved or underserved will help to direct resources and build out the infrastructure needed to support the work being done by the ISPs.

The United States government has directed all internet service providers in the USA to provide accurate mapping information twice a year to the FCC for public viewing via the Broadband DATA Act.

Background

The Federal and Provincial governments have been gathering mapping information from internet service providers and the Federal Government recently updated the ISED mapping data to provide a more accurate picture of the locations of ISP services.

The current mapping information provided is done in a hexagonal pattern with each hexagon representing an approximate geographic area of 25 square kilometres. More granular data of serviced areas is displayed on the "Rural Road Coverage" layer, but only once the user has zoomed to or beyond "level 11". The current average user may not understand this needs to be done and could miss the benefit from this more accurate information layer. There is also a lack of transparency as to where this data comes from. Although it is shown that service is available at a specific location, there is no way to learn which ISP(s) the "Rural Road Coverage" data represents. Users would have to engage all of the ISPs listed in their area in order to discover which one(s) service their specific location.

ISED currently only accepts data from larger internet service providers so smaller providers, which tend to operate in more rural and remote areas, are not necessarily reflected in the mapping data.

Businesses are reluctant to locate in more rural areas due to the lack of, or slow internet, and residents are considering moving for the simple fact that their broadband cannot keep up with their employment needs and their kids' schooling requirements.

In July 2021, The United Nations Human Rights Council proposed a resolution, which included a sponsorship from Canada, that supported an addition to Article 19, which declared access to the internet as a catalyst for the enjoyment of human rights, most notably, the right to freedom of expression.⁹⁵

If reliable, affordable access to broadband technology continues to dampen economic prosperity in rural, remote, and Indigenous communities, then the Provincial Government, in partnership with the Ontario

⁹⁵ Article 19: <https://www.article19.org/resources/un-hrc-maintains-consensus-on-internet-resolution/>

Municipalities, must look to require better asset mapping information from the private sector to encourage the expansion of broadband infrastructure.

Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario:

1. To ensure that all Ontarians have equitable access to reliable broadband connectivity at competitive rates by:
 - a. Working with the Federal Government to provide municipalities with accurate mapping layers that represents and provides a level playing field and equitable opportunities to ALL ISP services.
 - b. Is provided in a format that is user friendly, and whose sources of data are transparent and informed with best available information.
 - c. allows municipalities the option (if so desired) to extract the granular data relevant to their region and incorporate it into their own mapping resource.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

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

Submitted by: Timmins Chamber of Commerce. Co-sponsored by: Trent Hills Chamber of Commerce, Sault Ste. Marie Chamber of Commerce, Branford-Brandt Chamber of Commerce, Windsor-Essex Chamber of Commerce, North Bay and District Chamber of Commerce, Greater Sudbury Chamber of Commerce, and Thunder Bay 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.⁹⁶ However, contractors and developers who submit a locate request through Ontario One Call are being subjected to up to a three (3) month wait time to have a locate come and do the initial assessment process to allow the dig to move ahead, which is currently one of three steps. The backlog of locate submissions to Ontario One Call has further compounded the already growing barriers to completing projects on time—including workforce shortages, permitting and planning delays, which hinder our region's ability to remain competitive.

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. The backlog of locate requests in the Ontario One Call system has grown to unacceptable levels, causing delays and increasing the risk of damage to underground infrastructure and potential harm to the public. Uniquely, Northern Ontario has a very narrow window of opportunity to complete critical infrastructure projects vital to our region's economic growth and development, given our short summer season. Furthermore, the massive financial burden these delays bring to our firms can heavily impact the outcome of the project and our community's ability to encourage new investment in the future.

It was encouraging to see the passing of Bill 93: Getting Ontario Connected Act, 2022. The legislation facilitates major changes to how locates are delivered in Ontario, including a much broader use of Dedicated Locator services. It supports several operational improvements meant to remove barriers to timely locate delivery. The legislation also improves and streamlines the compliance system, enhancing Ontario One Call's powers in this area. However, the challenge with the five-day turnaround exists not through legislation but in a lack of human resources to facilitate to a short window. In the ever-growing workforce deficit that does not discriminate by sector, the Province must consider how p3 partnerships or automation can fill in the gaps.

A city in British Columbia has recently adopted automation to resolve the locates shortages that provide tangible cost and time-saving measures. The City of Burnaby has been recognized with the Municipal Information Systems Association BC's Spirit of Innovation award for successfully automating its BC 1 Call "Dial Before You Dig" process, providing faster, 24-hour service to customers while saving staff time and money. Burnaby received over 10,000 requests through BC 1 Call in 2021, a vital resource for contractors and homeowners which provides schematic information on underground utilities prior to breaking ground on construction and

⁹⁶ Contractors. Ontario One Call. (n.d.). Retrieved July 19, 2022, from <https://www.ontarioonecall.ca/contractors/>

renovation projects. By automating this service, the City expects to save an estimated \$500,000 over a 5-year period while freeing up staff to work on other important projects.

Before automating this service, each request took approximately 15 minutes of staff time to process. Now, callers are provided with information within 3 to 5 minutes, and the service is available 24 hours a day, 365 days a year.

Recently, Premier Doug Ford noted that Ontario doesn't have to reinvent the wheel and that we can look to other successful sub-sovereign nations and municipalities that have found innovative solutions to backlogs and challenges. In the case of the ongoing backlogs from Ontario One Call, it is prudent that the Government of Ontario looks to models that can be scaled for use in the Province while leveraging the private sector.

Recommendations

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

1. Work with Ontario One Call to address the severe accumulation of requests for locates and consider how partnerships with independent contractors who can provide locate services can assist in moving these projects forward in a mutually beneficial way to all involved.
2. Explore ways in which adaptive and innovative technology, including the use of augmented reality and algorithmic-based response systems, further expedite infrastructure projects like what the City of Burnaby, British Columbia, has implemented.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

HOUSING

A. Act to Increase the Stock of Affordable Housing in Ontario

Submitted by: Greater Niagara Chamber of Commerce

Issue

The lack of affordable housing in Ontario has reached crisis levels, and the cost of housing continues to grow far in excess of inflation. The 2022 Ontario Economic Report identified this cost as a major pressure point for the economy and businesses. Disproportionate income spent on housing siphons consumer dollars out of the rest of the economy, while the growing number of Ontarians on core housing need place an increasing burden on the government and on the charitable and non-profit sector charged with assisting them. Rising house prices translate into upward pressure on wages and encourage speculative action in the housing market.

Background

Average house prices increased 22.8% in Ontario in 2021, during a year which saw a 4.4% increase in the price of goods and a 2.2% increase in the price of services.^{97,98} This is considerably higher than the already-sizeable national average increase of 17.7%.⁹⁹

A Scotiabank report of 2021 showed that Ontario had the greatest insufficiency of housing stock out of all Canadian provinces, and would have to build 650,000 new units in order to meet the Canadian average. Even reaching that level would likely be insufficient, as the national housing stock per capita is the lowest in the G7, and the country as a whole would need an additional 1.8 million units to reach parity.¹⁰⁰

The latest report from the Auditor General of Ontario on social and affordable housing, in 2017, found that the province's social housing wait list, at 481,000 people, was the largest relative to overall population in Canada. This waitlist has grown by 36% in the last 13 years for which data were available.¹⁰¹ In the two decades before the report, only 20,000 new affordable units were built in Ontario, making the stock of affordable housing to population 2% (compared to 8% in Denmark and 11% in the UK).¹⁰²

The problem of affordable housing in Ontario is inexplicably linked to the lack of housing stock. Available housing has already fallen far behind the needs of the population. While CMHC recorded 86,586 housing starts in the province in 2021, the population grew by 80,564 people, and that growth, it should be noted, was 120,447 less than in 2019/2020 (before border restrictions necessitated by the COVID-19 pandemic dramatically slowed immigration).^{103,104}

⁹⁷ Ontario Real Estate Association, "Ontario MLS® home sales set new all-time high in 2021," December 2021. Retrieved from <https://creastats.crea.ca/board/orea-on-2022-01-26>.

⁹⁸ Bank of Canada, "Keeping Our Eyes on Inflation," 2021-12-09. <https://www.bankofcanada.ca/2021/12/keeping-our-eyes-on-inflation/> on 2022-01-26.

⁹⁹ Ontario Real Estate Association (Ibid.).

¹⁰⁰ Scotiabank, "Which Province Has the Largest Structural Housing Deficit?" January 22, 2022. Retrieved from <https://www.scotiabank.com/ca/en/about/economics/economics-publications/post.other-publications.housing-note.housing-note--january-12-2022-.html> on 2022-01-26.

¹⁰¹ Office of the Auditor General of Ontario, "Social and Affordable Housing: 2017 Value-for-Money Audit," 2017. Retrieved from https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1_314en17.pdf on 2022-01-26.

¹⁰² Ibid.

¹⁰³ Ontario Home Builders Association/Canada Mortgage and Housing Corporation, "Housing Starts," retrieved from <https://www.ohba.ca/housing-starts-ontario/> on 2022-01-26.

¹⁰⁴ Statistics Canada, "Annual Demographic Estimates: Canada, Provinces and Territories, 2021," retrieved from <https://www150.statcan.gc.ca/n1/pub/91-215-x/2021001/sec1-eng.htm> on 2022-01-26.

As long as Ontario does not have sufficient housing stock to meet the needs of the population, initiatives such as the Canada-Ontario Housing Benefit will not succeed in increasing housing affordability in the long-term. Government funds used to pay rent will bid up rental prices so long as supply remains dramatically less than demand; assistance thus offered will be temporary.

Current action items for the Government of Ontario, such as reducing red tape, investing in infrastructure, or freeing up provincial land, are unlikely to result in the construction of more affordable housing because they are not targeted, and developers have no financial reason not to use these initiatives to construct more executive homes or luxury condominiums.

A solution to the affordable housing crisis requires not just publicly-funded housing but the involvement of the private-sector. The government must seek to untangle the economic factors which have effectively incentivized the construction of expensive housing, and make it more economically rewarding for developers to construct affordable housing and units for rent.

This approach should be mirrored at the municipal level, and the Government of Ontario can require municipal governments to require and approve more development of affordable housing, multi-unit construction, and purpose-built rental dwellings. The Government of Ontario can also help municipalities overcome the resistance of current homeowners to the development of affordable units and high-density land use by mandating it at the provincial level, thus effectively removing the decision-making power from municipalities (and neutering resistance at the municipal level).

Recommendations

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

1. Create financial incentives that make the construction of affordable units more economically rewarding for developers.
2. Require municipalities to intensify development and approve more multi-unit and affordable rental buildings as part of their official plans.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

B. Tiny Home Construction Strategy

Submitted by: Peterborough & the Kawartha Chamber of Commerce. Co-sponsored by: 1000 Islands Gananoque Chamber of Commerce

Issue

Housing in Ontario has become difficult to attain for many people due to both price and availability. Creating a strategy to encourage tiny homes will help increase housing stock and address issues relating to housing insecurity.

Background

Housing is becoming increasingly out of reach for many Ontarians, both in terms of home ownership and rental. The average house price in Ontario has increased by more than 47 per cent over the last two years, with the price of the average home nearing \$1 million at the end of 2021.

This is no longer a big city affordability issue. Small cities and rural communities across Ontario are not far behind big city real estate prices.

Access to rental homes has challenges as well. Residential vacancy rates have remained low in many communities for a number of years with the price of rentals increasing as demand for all types of housing outpaces supply.

Ontario is going to need 1 million new homes over the next 10 years, according to the report *Baby Needs A New Home: Projecting Ontario's Growing Number of Families and Their Housing Needs*. The report is from the Smart Prosperity Institute, funded by the Ontario Homebuilders' Association. According to the report, we're already 65,000 homes short of what is needed.

For some, the lack of access to housing within their price range has driven them to other provinces that offer a lower cost of living. According to Statistics Canada, our country hasn't seen this level of interprovincial migration in more than 30 years, with Ontario taking the biggest hit. In the second quarter of 2021, nearly 12,000 more people left Ontario for other provinces than moved here. Many of the people leaving are younger, first-time home buyers — the very people our labour market is desperately in need of.

Others have been left with no home at all. This has been especially evident in the downtown cores of many Ontario communities as years of housing insecurity issues have become much more visible.

With many businesses across sectors struggling to attract sufficient talent to meet their economic potential, housing access has become a significant business competitiveness issue.

A large portion of our need for housing can be met through traditional housing, though the pace of the creation of traditional housing stock needs to increase to meet demand.

One growing niche solution is tiny homes. These homes are typically less than 32 m² (400 ft²) and are required by the Ontario Building Code to be more than 17.5 m² (188 ft²). Tiny homes are popular both for people looking to downsize and people who have otherwise been priced out of the housing market. The Province has created allowances within the Ontario Building Code to accommodate these type of residences; however, that has not been incorporated into many municipal zoning bylaws. The rules in municipalities across the province vary widely. This is a particular issue when it comes to minimum size and parking requirements, all of which make it a costly and a highly customized endeavour to create tiny homes either as independent or secondary dwellings.

Encouraging and incentivising municipalities to modernize zoning bylaws in a standardized way that makes it easier to build tiny homes would add to our affordable building stock. This will help make our communities more competitive in attracting and retaining talent and address local housing insecurity issues.

Additionally, there is a growing need for temporary shelter. Non-profit and charitable organizations have been trying to find stopgap housing for the housing insecure. Homelessness and housing insecurity are complicated issues that require a multifaceted approach. Shelter beds are the go-to for many municipalities, but that solution doesn't work for everyone due to shelter capacity, hours of operation, privacy conditions, sobriety requirements, and interpersonal conflicts. There is an opportunity to amend the Ontario Building Code to use a type of minimalist tiny home as a stopgap shelter for those with no other options. While not an ideal housing situation, temporarily residing in a minimalist tiny home could provide people who would otherwise be sleeping rough with the safety, security, and dignity of a roof over their head, four walls, and a lockable door.

Tiny homes offer opportunities to address some of the housing issues our province is dealing with by improving access to affordable housing options and shelter for our most vulnerable. A provincial tiny home construction strategy is needed to further explore and develop this niche while ensuring basic living standards are met.

Recommendations

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

1. Create a strategy for the construction of tiny homes as a tool for increasing housing stock.
2. Encourage and incentivize municipalities with the use of existing government programs to incorporate a standard set of guidelines, in alignment with the Ontario Building Code, for tiny home construction.
3. Amend the Ontario Building Code to allow for minimalist tiny homes as a stopgap shelter for people who might otherwise be living rough.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

C. Ending Exclusionary Zoning to Address Ontario's Housing Affordability Crisis

Submitted by: Toronto Region Board of Trade. Co-sponsored by: Ottawa Board of Trade and Timmins Chamber of Commerce

Issue

With Ontario's current land use planning policies, nearly all residential growth is either low-rise subdivisions of detached homes or high-rise towers, with very few options for modest forms of density such as triplexes or small apartment buildings. These building types represent a 'missing middle' of residential housing stock. The current policy makes it too expensive and difficult to build this kind of gentle density, thereby restricting supply, driving up the cost of housing and making it more difficult for businesses to attract and retain workers.

Background

Ontario is growing. Our population is expected to increase to over 20 million people by 2046, a 36% increase from 2020, with the GTA expected to see the fastest rate of growth.¹⁰⁵ Recent reports have also shown that over the past decade, key provincial forecasts have underestimated our rate of population growth and overestimated how much new housing would be built.¹⁰⁶ And according to one estimate, one million new homes are needed in Ontario to meet current and projected demand over the next decade.¹⁰⁷

In Ontario, municipalities are responsible for zoning sufficient land for different uses, including residential and employment. In all municipalities, most of the residential land is reserved for detached houses – traditionally for one family (although recent provincial changes have required municipalities to permit two units in the main home and one ancillary dwelling for all detached, semi-detached and row houses¹⁰⁸).

This type of zoning is referred to as “exclusionary zoning” because it is intentionally designed to prevent lower-income people – and, sometimes explicitly, racial minorities – from living in certain neighbourhoods.¹⁰⁹ This was often done by requiring large lot sizes and only permitting single detached homes, blocking more affordable multi-family buildings that are similar in size and design.

This policy has had broad societal implications, including:

- Contributing to housing shortages that impede the ability of cities to both house its existing talent and attract new talent, impacting business competitiveness.
- Creating environmental impacts by requiring more people to “drive until they qualify”.
- Driving up the cost of housing by arbitrarily limiting a more affordable form of supply, resulting in disproportionate impact on BIPOC communities, newcomers and first-time homebuyers who do not have financial support from their families.

Recommendations

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

1. Enable as-of-right permissions for at least four units in a building in all residentially zoned areas, and consider designating a higher baseline (e.g., eight units and/or four to five storeys) for properties near transit stations.

¹⁰⁵ <https://www.ontario.ca/page/ontario-population-projections>

¹⁰⁶ <https://institute.smartprosperity.ca/publications/forecast-for-failure>

¹⁰⁷ <https://institute.smartprosperity.ca/publications/growing-number-households>

¹⁰⁸ Ontario Planning Act, s. 16 (3), <https://www.ontario.ca/laws/statute/90p13#BK31>

¹⁰⁹ <https://tcf.org/content/facts/understanding-exclusionary-zoning-impact-concentrated-poverty/>

2. Set minimum standards for building setbacks, lot sizes, parking requirements, front doors, height, building depth, landscaping, and floor space index, ensuring that municipalities do not use other tools to prevent missing middle housing.
3. Require that development charges and fees for missing-middle buildings up to four units match the charges and fees for single-unit homes.
4. Apply these changes to all medium (30,000+) and large (100,000+) municipalities across Ontario, while allowing that different standards could be set for each size category and giving municipalities the opportunity to customize the regulations while meeting or exceeding the minimum standards.
5. Introduce strata ownership tools (i.e. a 'condo-lite' structure) while continuing to support co-ownership, shared ownership models and community land trusts, in order to allow more individuals and families to share in the opportunity to own a home.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

D. Protecting The Economy, Jobs and Housing Affordability By Eliminating The Expansion of Municipal Land Transfer Taxes

Submitted by: Sault Ste. Marie Chamber of Commerce. Co-sponsored by: Timmins Chamber of Commerce, Thunder Bay Chamber of Commerce, and Greater Sudbury Chamber of Commerce.

Issue

Currently, Toronto is the only municipality in Ontario that charges a second, municipal, land transfer tax (MLTT). Over the last year, several municipalities have passed motions asking the Province to amend the Municipal Act to give all municipalities the power to charge their own MLTT. Municipalities are looking for additional revenue sources while in some circumstance reporting record surpluses, due to the differences in Budget setting and Generally Accepted Accounting Principles and for Municipalities, Public Sector Accounting Standards.

Implanting a Provincewide Municipal Land Transfer Tax will effectively and unjustly remove billions of dollars from the economy and have severe effects on job substantiality, housing affordability and economic recovery.

Background

Ontario is in the middle of a housing affordability crisis. Home prices in Ontario have risen at historic rates in the last ten years. Year-over-year price growth in Ontario was over [30% in December 2021](#).

A recent poll by [Abacus Data](#) shows that Ontarians see high home prices and the rising cost of living as top issues facing the province. The rising cost of living (50%) and housing affordability (39%) are critical for Ontarians, ahead of June's election.

High cost of living and an inability to enter the housing market will result in families leaving their communities and even the province further exacerbating the labour shortages plaguing economic recovery and sustainability. Research conducted this past summer by [Abacus Data on behalf of the Ontario Real Estate Association](#) found nearly half of prospective home buyers were considering leaving the province to find an affordable home elsewhere.

As of December 2021, the average price of a home in Ontario is [\\$922,735](#). That is up 22.8% from the same time in 2020 when the average was \$751,655. While affordability has historically been primarily a GTHA phenomenon the past few years have seen rural and remote communities succumb to the affordability issues.

An additional land transfer tax would cost Ontario families almost \$15,000 on an average priced home. A new MLTT will make it more difficult for Ontario to attract young talented workers, hurting the Province's long-term competitiveness. Our communities, residents, and businesses simply cannot afford this tax.

Recently released key insights from the Ontario Chamber of Commerce 2022 Ontario Economic Report included:

- Most sectors (62 percent) are facing labour shortages and expect to continue facing them over the next year.
- The business community's main policy priorities this year are business taxes and electricity costs. Small businesses are more preoccupied with financial support such as commercial rent relief, while larger businesses are more focused on long-term infrastructure, regulatory, and workforce development issues.
- Remote work arrangements are expected to partially continue in 2022. While most organizations are optimistic about technology, capital costs and access to digital skills are pervasive barriers to technology adoption at the organizational level.

There is considerable concern that while Municipalities currently focus on the residential tax class, potentially migrating workers to other provincial jurisdictions and removing disposable income from the economy reducing profitability and capital investment, that once the Municipal Act is open to amendment the MLTT will result in tax policy creep to the commercial and industrial tax classes further burdening investment in economic growth and recovery.

In 2014 research was conducted by Altus Group Economic Consulting for Ontario Real Estate Association demonstrating significant loss of jobs and economic activity in Mississauga, London, Hamilton, Ottawa and Thunder Bay would occur if a municipal land transfer tax is imposed in those cities. A provincial wide municipal tax is levy would be added on top of the existing provincial land transfer tax and would be therefore a double or second tax.

The economic impact of a new tax of this kind in the five Ontario cities studied would total more than \$1 billion and a loss of more than 10,000 jobs. These results are part of a study, Potential Economic Implications of the Municipal Land Transfer Tax in the Selected Ontario Municipalities. The effects in each city are predicted as follows:

- Mississauga: Loss of \$482 million in economic activity; loss of 3,157 jobs; loss of \$163 million in wages and salaries.
- London: Loss of \$270 million in economic activity; loss of 1,771 jobs; loss of \$92 million in wages and salaries. (2014)
- Hamilton: Loss of \$342 million in economic activity; loss of 2,240 jobs; loss of \$116 million in wages and salaries. (2014)
- Ottawa: Loss of \$543 million in economic activity; loss of 3,558 jobs; loss of \$184 million in wages and salaries. (2014)
- MLTT ad in Thunder BayThunder Bay: Loss of \$60 million in economic activity; loss of 392 jobs; loss of \$20 million in wages and salaries. (2014)

Compounding the concerns are related issues to Municipal budgeting and the presentation of financial statements as governed by Generally Accepted Accounting Principles for Municipalities, Public Sector Accounting Standards. A full report is available from the C.D Howe Institute Commentary 460, Two Sets of Books at City Hall? Grading the Financial Reports of Canada's Cities, <https://www.cdhowe.org/public-policy-research/two-sets-books-city-hall-grading-financial-reports-canada%E2%80%99s-cities>.

“In nearly all Canada’s larger cities, obscure financial reports – notably inconsistent presentations of key numbers in budgets and end-of-year financial reports – hamper legislators, ratepayers and voters seeking to hold their municipal governments to account.

The differences in accounting methods in most cities’ budgets as compared to the presentations of their financial results are large and have real-world consequences. By using cash rather than accrual accounting, cities exaggerate the costs of investments in infrastructure, hide the cost of pension obligations, and make it hard to match the costs and benefits of municipal activities to taxpayers and citizens. Moreover, many cities present their budgets late, after significant money has already been committed or spent, do not publish their financial results in a timely way, and bury key numbers deep in their reports.”

In a follow up document the Solving the Municipal Budget Mystery: Fiscal Accountability in Canada's Cities, 2021. <https://www.cdhowe.org/public-policy-research/solving-municipal-budget-mystery-fiscal-accountability-canadas-cities-2021> the authors William Robson and Miles Wu conclude that:

“Canada’s cities are central to the lives of most Canadians and absorb commensurately large shares of Canadians’ incomes. City councilors, taxpayers and voters need clear information about their finances if they are to hold officials and elected representatives to account for the quality 16 Ontario’s Municipal Act prevents municipalities from approving a budget for the year following an election in the same year as the election. As a result, municipal elections in October 2018 prevented Ontario municipalities from presenting their 2019 budgets until January 2019. Many did not present until February, March or even April – not consistent with legislative control of public funds. and cost of municipal services. Cities will be under financial stress in the post-COVID era, elevating the importance of good understanding of, and intelligent debate about, municipal finances.

The budgeting practices of most major Canadian municipalities are not up to the mark. Municipalities should present budgets that are consistent with PSAS and that readers can compare easily with their subsequent financial statements. Municipalities should produce information that is more accessible and timelier. Before Canadians grant their cities more taxing powers or increase the support they receive from senior governments, they should insist on better transparency and accountability for cities’ use of public funds. The recommendations in this Commentary would help raise the financial management and fiscal accountability of Canada’s municipalities to levels more in line with their importance in Canadians’ lives.”

Municipalities should look elsewhere, not to a Municipal Land Transfer Tax on local homeowners that they and businesses cannot afford. Ontario is in the middle of a housing affordability crisis and struggling to secure a footing for sustainable economy recovery an growth, this where all levels of government need to collaborate to make home ownership more affordable, stimulate economic prosperity and not introduce a new tax that will add thousands of dollars to the cost of living.

Recommendations

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

1. Not impose new taxes, including municipal land transfer taxes, on Ontario homeowners and business, that will restrict housing supply by limiting sales volumes and make the housing affordability crisis worse.
2. Support a review with the inclusion of stakeholders of the Municipal Act to update the municipal taxation system to better align with modern municipal economies, promote access to housing, and simplify the system.
3. Use all the tools at their disposal to help municipalities build more affordable homes for families and foster an environment for economic stability, sustainability, and growth.
4. Work with Municipalities to amend the property tax regime and modernize the transparency of budget setting and financial reporting.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

E. Maximizing Growth in Built Areas

Submitted by: Greater Peterborough Chamber of Commerce. Co-sponsored by: Kawartha Chamber of Commerce and Tourism, and Chamber of Commerce Brantford-Brant

Issue

In many Ontario communities, historic downtowns are a source of pride and joy. However, these downtown buildings often leave unused space on the table. This resolution offers a potential solution to help property owners, municipalities, and the province to maximize the use of second story and above spaces in historically commercial and mixed-use areas in Ontario.

Background

There is potential that there will be no complete agreement on how to accomplish this goal as many of the buildings are in private ownership. That said, the ability of the municipality and an owner to understand the full scope of a renovation or upgrading required of a building is imperative as cost, or the potential not to see a return on investment can be high.

In the Places to Grow Act, there is great focus on density requirements. For a downtown such as Peterborough the requirement is 150 residents per hectare. Yet with older, sometimes heritage-designated, buildings in Ontario downtowns there are unique challenges to realizing redevelopment and infill of these spaces.

The Community Improvement Plans provide an incentive framework to address some of these concerns, however in many cases these programs tend to be overextended or see limited uptake because costs of renovations can easily outpace the incentive. Many communities have façade improvement programs, brownfields tax assistance programs, energy efficiency programs and, in Peterborough, there is even a Residential Conversion and Intensification Grant Program that provides property owners with a grant of \$10/square foot renovated as part of a Community Improvement Plan.

These programs do not adequately address the challenges most commonly faced by businesses in these core areas with regulatory requirements that are substantially higher than when the buildings were first constructed. Restoring older buildings to current safety standards by meeting Ontario's Building Code, the Fire Code, the Ministry of the Environment, and the Municipal by-laws can be too expensive for many developers to be able to make the renovation profitable. Knowing how expensive upgrades can be, many businesses fear seeking advice.

Creative approaches require architects, engineers, planners, and municipal officials to work with businesses to derive viable solutions for redevelopment. This is not something that should be done on a piecemeal basis, but as an extensive program that involves systematic analysis of the key challenges and a targeted response from each municipality.

The benefits of upgrading or development of these types of units are numerous, in that, they could be used for commercial space, housing diversity, help infill urban areas and become economic catalysts for continued development. Reuse of existing buildings is also an effective way of fighting climate change. The challenge is encouraging development with an economically feasible mode that results in buildings that are safe and occupied.

In order to strengthen our built areas, there needs to be a good understanding of the current infrastructure needs and capabilities. Ideally, grants for investments like common fire escapes across the rear of multiple buildings to create an efficient second means of egress would assist developers to make good use of space and finances.

The Government of Ontario has used the Downtown Revitalization Program to strengthen the economic heart of rural communities across the province since 2018. As such, this resolution proposes that the Downtown Revitalization Program be used for a pilot project that allows private building owners and municipal officials to assess, without punitive action, the needs of a building or series of buildings in a downtown core.

Recommendations

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

1. Designate the Downtown Revitalization Program be used for a pilot project that allows private building owners and municipal officials to study and assess, using an independent consultant and without punitive action, the needs of a building or series of buildings in a downtown core.
2. Allow for a renovation plan or commitment to be worked out that is agreeable to the property owner and the municipality.
3. Allow for a coordinated approach to intensification and heritage preservation that takes into consideration a community's current building stock and its ability to function in a contemporary economy.
4. Allow for intensification districts just outside the core, but within the designated built-up area that can be developed in tandem with the Urban Growth Area and not impact the current intensification numbers.
5. Study the effect of the Accessibility for Ontarians with Disabilities Act has on the viability of the intensification projects of existing buildings.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

F. Permitting Municipalities to Use Building Permit Reserves to Encourage Affordable Housing Development

Submitted by: Hamilton Chamber of Commerce

Issue

Ontario currently experiences a significant shortage of available affordable housing units, leaving thousands of low-income and vulnerable Ontarians on years-long municipal affordable housing unit wait lists. This requires these populations to live beyond their means, live paycheque-to-paycheque and potentially force them and their families into homelessness. Access to safe, affordable housing is a key social determinant of health that correlates directly to an individual's ability to contribute to their community socially and economically. The provincial government should explore giving municipalities more local authority over incentives for affordable housing development.

To improve the lives of and expand opportunities for thousands of Ontarians while spurring significant development activity and job creation, it is imperative to grow and protect Ontario's affordable housing supply. Changes to the Ontario Building Code Act would allow municipalities to offset the cost of affordable housing development-related Building Permit Fees by using existing municipal Building Permit Reserve funds.

Background

According to the Ontario Building Code Act (BCA), Section 7.1 (c), municipalities are permitted to "requir[e] the payment of fees on applications for and on the issuance of permits, requir[e] the payment of fees for maintenance inspections and prescribing the amounts of the fees." These various fees ensure that all direct and indirect costs associated with the Building Permit Application Process are covered. The fees are calculated differently for residential and commercial projects, but essentially rely upon multiplying a fixed rate on a total square footage for residential developments, or total cost of project for commercial developments.

Additionally, under the same section of BCA, municipalities are allowed to establish by-laws such as a Building Permit Reserve where additional funds not utilized in the permitting process can be added to a specifically created municipal reserve. This reserve fund is intended to ensure that even if building activity in a municipality undergoes a temporary downturn, municipal building department services can continue to be funded without impact on the municipality's finances. Money in the reserve fund can only be used for the costs of delivering services related to the administration and enforcement of the BCA. As a consequence, the reserve fund is not accessible for councils to fund other municipal activities.

Herein lies the opportunity to allow municipalities to utilize these building permit reserve funds that otherwise largely go unused to provide incentives for affordable housing development projects. Similar to the authority Toronto municipal council exercises over exemptions to fees and charges for affordable housing developments as per its *Open Door Affordable Housing Program*,¹¹⁰ the province ought to allow other municipalities to exercise some, if not all, of the same flexibility. These could include exemptions from Planning Application Fees, Development Charges, Building Permit Fees and/or Parkland Dedication Fees.

¹¹⁰ City of Toronto Open Door Affordable Housing Program Guidelines: https://www.toronto.ca/wp-content/uploads/2020/09/97c9-2020_OpenDoorGuidelines_FINAL.pdf

Recommendations

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

1. Make amendments to the Ontario Building Code Act, Section 7.1, that would allow municipal discretion over the use of existing Building Permit Reserve funds to offset costs associated with future affordable housing developments.
2. Determine province-wide project eligibility criteria by explicitly defining what constitutes an “affordable housing development” under the Act.
3. Establish strict parameters about whether Building Permit Reserve funds will be permissible to offset exclusively Building Permit Fees or expand to also include incentives towards Planning Application Fees, Development Charges, and Parkland Dedication Fees.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

G. Supporting Ontario's Construction Sector by Streamlining the Approvals Process

Submitted by: Vaughan Chamber of Commerce and Newmarket Chamber of Commerce

Issue

Regional variances throughout Ontario and an outdated paper-based development approvals process are impacting the supply of housing availability throughout the Province.

Background

The Province and municipalities provide a comprehensive development approvals process which requires new developments to comply with technical regulations that manage the built environment while protecting the health and safety of the public. Municipalities have the delegated responsibility for the enforcement of multiple provincial regulations in their jurisdictions. The number of development applications continues to increase to meet housing demands yet limited resources at the municipal approvals level act as a bottleneck in the ability of the private sector to deliver much needed housing. Moreover, historically, municipalities have relied on antiquated paper-based submissions and review, leading to further inefficiencies in the approvals process. This reliance on paper-based submissions in the development and building approvals process has further exacerbated approval timelines as the COVID-19 pandemic has pushed municipal staff to work remotely without the necessary tools in place to do their jobs efficiently. This has led to calls from several organizations in the development industry for a more digital process for development approvals to increase efficiency.

A Fall 2020 Canadian Centre for Economic Analysis (CANCEA) [report](#) commissioned by the Residential Construction Council of Ontario (RESCON) detailed the economic and social benefits to speeding up the development approvals process by adopting a comprehensive and centralized planning and development e-permitting system across Ontario. Specifically, [regions in Ontario](#) could see thousands of additional housing units and attract millions of dollars in additional jobs and investment. The GTA alone could see an additional 100,700 housing units by 2040, and the City of Toronto seeing 21,100 additional units by 2025 if there was a reduction in delays to the approvals process by only six months and a 10-per-cent increase in investment.

While digitization of the approvals process (e-permitting) is occurring in a limited and ad-hoc fashion in various Ontario municipalities, existing programs are siloed, fragmented, and typically only focus on the processes within a municipal building department, rather than a holistic look at the entire depth of other applicable law agencies, provincial ministries, and other commenting authorities. While the efforts of certain municipalities to digitize is a step in the right direction, e-permitting systems within a municipality need to be able to seamlessly interact with all necessary approval agencies and authorities to make the overall approvals process truly more seamless.

One Ontario, an initiative through the AECO Innovation Lab, is a proposal for a common Development Approval Data and Information Exchange Standard, a Central Review Platform and Central Analytics and Reporting Platform to be used by municipalities, Provincial Ministries, and other approval agencies in Ontario for the development and building permitting processes. A fully integrated system proposed by One Ontario would enable data exchange between applicants, municipalities, and provincial applicable law agencies. A fully integrated system would considerably improve workflow efficiencies, increase transparency, and defragment the process and create a secure central source of reliable data for all permitting processes.

The One Ontario proposal has the support of organizations such as (but not limited to): RESCON, RCCAO the Ontario Building Officials Association, the Ontario Professional Planners Institute, Ontario Home Builders' Association, BILD, Ontario General Contractors Association, Association of Consulting Engineering Companies, Ontario Structural Wood Association, Home Construction Regulatory Authority, Taron, Conservation Ontario, City of Toronto, and City of Windsor.

Recommendation

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

1. Implement the One Ontario concept which will create a common Development Approval Data and Information Exchange Standard, a Central Review Platform and Central Analytics and Reporting Platform to be used by municipalities, Provincial Ministries, and other approval agencies in Ontario for the development and building permitting processes.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

H. Addressing Housing Shortage by Updating the Approvals Process

Submitted by: The Vaughan Chamber of Commerce and Newmarket Chamber of Commerce. Co-sponsored by: Aurora Chamber of Commerce

Issue

The current approvals process for housing developments is inefficient and directly contributes to the housing shortage in the province.

Background

Successive governments have underinvested in Ontario's infrastructure, with the expected total investment over the next five years at 2.65% of provincial GDP – less than half the target investment (5.4%) for long-term growth.¹¹¹

The trend of underinvestment in infrastructure has been a consistent trend going back to the 1960s and 1970s, at the same time as Ontario's population had been growing by 1.5 per annum since 1970.¹¹²

Compounding the current housing issues is the fact that Provincial housing developments have stagnated.¹¹³

This underinvestment has been exacerbated by a slow approvals system, with over 100,000 proposed housing units across Ontario are waiting for development.

Some of the most prominent reasons for these flawed approvals process are:

- Outdated processes: Including areas such as zoning and building and planning permits.
- Poor communication and transparency, specifically pertaining to the relationship between municipalities and the Provincial government.
- No repercussions for municipalities missing targets for updating out of date zoning, resulting in a lack of accountability and no internal direction to solve the issue.

The government has taken steps to resolve these concerns through Bill 23; *More Homes Built Faster Act, 2022*, which includes provisions to develop more housing and mandates a reduction in decision making time. While these steps may address some of the issues, they do not provide the fundamental alterations required to fix the process.

Recommendations

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

1. Work closely with municipalities to streamline housing development approval processes, including by supporting municipalities in implementing changes and accelerating the adoption of digital platforms (e.g., e-permitting).
2. Develop a shared common data platform that will help the province to establish a comprehensive e-permitting system where agencies and municipalities can link together. This can be used to streamline the application and approvals process to ensure there is no miscommunication between the Provincial and Municipal governments, while simultaneously allowing all parties to track applications.
3. Promote greater transparency in the process, possibly by legislative means or by commissioning a body in place of the Ontario Land Tribunal. At minimum, there should be the aforementioned web-based

¹¹¹ <https://rccao.com/research/files/RCCAO-CANCEA-Infra-Bulletin-May-22-2019.pdf>

¹¹² <https://rccao.com/research/files/Investing-in-Ont-Infra-PAR-Oct-2015.pdf>

¹¹³ <https://rccao.com/research/files/RCCAO-CANCEA-Infra-Bulletin-May-22-2019.pdf>

system which gives both developers and buyers sufficient information to understand the process.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

I. Empower the development of housing in Ontario

Submitted by: Greater Niagara Chamber of Commerce. Co-sponsored by: London Chamber of Commerce, Greater Kingston Chamber of Commerce, Guelph Chamber of Commerce, and Lincoln Chamber of Commerce

Issue

The lack of attainable housing in Ontario has reached crisis levels, and the cost of housing continues to grow far in excess of inflation. The 2022 Ontario Economic Report identified this cost as a major pressure point for the economy and businesses. The *More Homes Built Faster Act* (2022) will assist in speeding up the pace of development and shows the Government of Ontario's willingness to tackle this issue and make tough decisions to solve the housing crisis. However, this issue has been decades in the making, and solving it will be an ongoing and evolving process for many years to come.

Background

A 2021 Scotiabank report showed that Ontario had the greatest insufficiency of housing stock out of all Canadian provinces and would have to build 650,000 new units in order to meet the Canadian average. That average is itself at the bottom of the G7.¹ There is no permanent solution to Ontario's housing shortage and rising house prices that does not include a massive increase in available housing stock.

The housing shortage has a notable impact on Ontario's economy and its employers. Individuals make their choices on where to live and work based on a trade-off between wages, house prices, and commuting costs.¹¹⁴ With commuting costs rising with energy, and vehicle prices, transit fares, and house prices and rents increasing, employers must either accept a smaller and shrinking pool of talent (especially with the current low unemployment rate) or be forced to increase their wages and labour costs.

As-of-right building of up to three units as now granted in the Act is an excellent tool to counteract the effect of "NIMBYism" on municipal governments, who may be tempted to give in to alarmist concerns of local residents regarding housing density. However, this should be seen as the start of a process. Building more housing without infringing on agricultural and employment lands necessitates increased density, and the Government of Ontario has an opportunity to lay out a framework for future development by introducing plans and a timeline to further expand the building envelope for denser development.

Removing development charges on attainable developments is a positive policy step towards incentivizing this type of construction. However, there are concerns from municipal governments that this shortfall in revenue will result in an increase in property taxes, sometimes substantially. A third of GTA municipalities recently surveyed by the CBC said they planned to raise property taxes as a direct result of this policy, in one instance by 100%.¹¹⁵ This will have the effect of transferring development costs onto existing residents and businesses at a time of rising expenses for both.

The Association of Municipalities of Ontario (AMO) has raised concerns that these charge waivers may slow the pace of development in the long-term.¹¹⁶ If development charges cannot be assessed on a cost-recovery basis but must come entirely out of a fixed budget, it is entirely possible that that budget may be exhausted

¹¹⁴ Kim So, Peter Orazem, Daniel Otto: *The Effects of Housing Prices, Wages, and Commuting Time on Joint Residential and Job Location Choices*. American Journal of Agricultural Economics 83(4).

¹¹⁵ "Property tax hikes loom in wake of provincial housing rule changes, GTA municipalities warn." CBC News, January 9, 2023. Retrieved from <https://www.cbc.ca/news/canada/toronto/development-charge-property-tax-survey-1.6706263> on January 11, 2023.

¹¹⁶ "Unpacking Bill 23 – More Homes Built Faster Act, 2022." Association of Municipalities of Ontario, November 2, 2022. Retrieved from <https://www.amo.on.ca/advocacy/health-human-services/unpacking-bill-23-more-homes-built-faster-act-2022> on January 11, 2023.

while developers are still attempting to build. This could ultimately reduce the total amount of construction in a given fiscal year.

This problem is particularly acute when governments are seeking to increase the rate of construction, meaning that previous permit issuances may no longer be an accurate forecast of future construction, and municipal governments are at increased risk of mis-estimating future growth. The Government of Ontario has an opportunity to dispel uncertainty in municipal budgeting by clarifying its plans to compensate municipalities so that these costs can be borne from the much wider array of financial tools and revenue sources available to the province.

Recommendations

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

1. Introduce plans and a policy framework for the implementation of an increase of the building envelope and a timeline to expand inclusionary zoning, as-of-right building for more units, and greater densification in urban residential areas, while also ensuring investments are made in infrastructure and services that support densification.
2. Clarify their intent in regard to addressing the loss of municipal revenue from development charges and set a fiscal policy to address this impact and ensure the loss of this revenue will not result in any slowdown of construction.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

J. Ontario's Residential Tenancies Act

Submitted by: Tillsonburg District Chamber of Commerce. Co-sponsored by: Chatham-Kent Chamber of Commerce, Port Hope & District Chamber of Commerce, and Quinte West Chamber of Commerce

Issue

Regulations under Ontario's Residential Tenancies Act (RTA) do not provide sufficient safeguards for landlords in the rental housing system. Other provincial legislation governing residential tenancies is more equitable, thereby making it more attractive for investment in those provinces. At the same time, limited capacity at the Landlord and Tenant Board (LTB) continues to delay access to timely dispute resolutions.

Background

It is our view that the RTA should be changed to make it more equitable for all parties: tenants, landlords, and property managers. The existing Act could be strengthened to better hold tenants to their rental responsibilities and reduce unnecessary financial burdens and excessive delays on landlords and property managers and at the LTB. Areas for improvement in the RTA and at the LTB include: 1) Reducing Statutory Delays; and 2) Implementing a 15-minute, remote mediation process, which could reduce backlogs and eliminate the need for an in-person hearing in many cases.

We also understand that a major deterrent for real estate investors to create purpose-built affordable rental units is the inequity of the RTA and inefficiencies at the LTB. Making the Act more equitable for landlords, property managers, and tenants, will go a long way in attracting investment in our province in this sector and encourage more investors and homeowners to rent out their properties, which could also lead to the elimination of the need for the Vacant Homes Tax that is creating an extra burden for investors and homeowners.¹¹⁷

Landlords and Property Managers are currently taking extra precautions and tightening up their tenant vetting processes, because they are concerned that if a tenant stops paying rent or destroys their property, it could delay the eviction process to a year or more. In the midst of record low rental vacancy rates, this is making it harder for people to find a place to live. A more equitable and efficient system would increase landlord confidence and would create stronger landlord-tenant relationships. For example, if landlords were confident in the system, tenants with poor credit scores could be allowed in more properties. In turn, this would help guard against the increasing homelessness and affordable housing crises.

In Alberta, for example, once a lease has ended the Landlord has the right to non-renewal. A landlord does not have to continue dealing with problematic tenants and ongoing delays.¹¹⁸

Reducing Statutory Delays: Currently in Ontario if a tenant has not paid their rent, it is the landlord's responsibility to pay a \$170 filing fee and schedule a hearing after waiting 14 days before being able to file with the board. In British Columbia, if the rent is not paid, the onus is on the tenant to pay a \$100 filing fee to dispute an eviction. It is our opinion that British Columbia's Act places the responsibility in the right place: by making the tenant accountable for the expenses incurred to schedule a hearing with it is THEIR rent that has not been paid. Ontario's current process places unnecessary financial burdens on landlords and wastes valuable administrative time and associated costs for example: a tenant often doesn't attend a hearing and when they do attend, they are often only seeking to delay the process and have no actual proof of payment. Reducing statutory

¹¹⁷ <https://www.canada.ca/en/services/taxes/excise-taxes-duties-and-levies/underused-housing-tax.html>

¹¹⁸ "Ending a Tenancy," Government of Alberta, [Ending a tenancy | Alberta.ca](#).

delays would reduce administrative burden on landlords, while also speeding up necessary mediation between tenants and landlords, which currently sits at 61 days to evict a tenant. In the best-case scenario, a landlord needs to wait 14 days to file with the board, 30 days to get a hearing date, 3 days after the hearing to get the order, 11 days before filing with the sheriff and 3 days before the sheriff evicts the tenant. This amounts to 61 days and the landlord losing 1 to 2 months of rent (assuming the tenant paid a last month's rent deposit).

While the number of LTB adjudicators in Ontario jumped from 43 to 82 in 2020-2021, only two of those were full-time hires. The rest were only part-time, and they often split their caseloads between several different tribunals. Some split their time between as many as 6 different tribunals. Accordingly, despite the recent increase in adjudicator numbers there are still backlogs.¹¹⁹

Following a pause on evictions and hearings during the height of the COVID-19 pandemic, the LTB says it aims to give hearings within 25 days. However, in summer 2022, the wait time averaged 8 months.¹²⁰

Remote Mediation Process: Recent changes at the LTB to allow applicants to submit relevant forms online as well as the option for an online dispute resolution process are welcome improvements. However, in cases where a hearing is still needed, the process in Ontario could be greatly improved. Instead of requiring an adjudicator to hear each case at the tribunal, many applications could be solved within 15 minutes through a remote process with a mediator (where sufficient broadband infrastructure and connectivity are available). This step would take place before an application is scheduled for a hearing, and in many cases could eliminate the need for a hearing altogether. This type of resolution process would take far less resources from both landlords and tenants, as well as the LTB.

Using teleconferencing or video conferencing for this process not only avoids scheduling a hearing in cases where it is not needed, thus saving valuable court time and tax dollars, it benefits employers because employees don't need to take time away from work for a lengthy court process. Implementing a 15-minute mediation process where relevant would be an effective way to improve the backlog the LTB is currently facing.

Recommendations

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

1. Amend the RTA to reduce statutory delays in the following ways:
 - a. To place the focus on ensuring sufficient resources are available to meet the timelines that are in place.
 - b. Allow landlords to file with the sheriff 5 days after an order is issued, instead of the current 11. Amend provincial laws (the Courts of Justice Act and the RTA) to explicitly allow private bailiffs to enforce Landlord Tenant Board orders, and to require orders that have been previously stayed to be placed in priority sequence.
2. Shorten the dispute process by introducing a remote, 15-minute mediation process where possible; this scheduled slot will allow both landlords and tenants to reduce their time away from their workplace commitments. It will also avoid unnecessary court hearings and reduce backlog.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

¹¹⁹ Jon Woodward, 2022, "Most New Landlord and Tenant Board Adjudicators in Ontario are Part-Time," [Ontario's Landlord and Tenant Board delays: Review shows most new adjudicators are part time | CTV News](#).

¹²⁰ Stu Mills, 2022, "Ontario's Landlord and Tenant Board has Collapsed, Landlord Says," [Ontario's Landlord and Tenant Board has collapsed, landlord says | CBC News](#).

SKILLS

A. Principals to Assist the Unskilled Workforce

Submitted by: London Chamber of Commerce

Issue

For those who are chronically unemployed or underemployed, some of the current provincial government programs supporting that market can appear too rigid in areas of: reporting metrics, targeted skill sets, and focused on immediate wins. We are suggesting that programs be introduced or adapted in partnership with business, broadly oriented (not tied to narrow industry or role definitions) and have long term incentives for formerly displaced employees to stick with it.

Background

The Chamber Network recognizes that the Ontario government has made great strides in the area of skills development and applauds the November 22, 2021 announcement from the Premier in respect of their intention to expand the Second Career Program.

Unfortunately, there are still many left behind. According to the October 2021 Labour Force Study prepared by Statistics Canada, there were at that time over 380,000 jobseekers that were unemployed for a period of 27 weeks or more. Often the unskilled unemployed have limited resources and this acts as a further barrier to accessing government programs that are essentially co-funded (i.e., courses where tuition and living expenses are not fully funded by government support during the term). In these cases, upskilling may need to occur in more gradual stages to be effective.

The OECD in their abstract Active labour market policies and COVID-19:

(Re-)connecting people with jobs noted “When (Active Labour Market Policy) ALMP design is set in several regulations, amending the design to meet the changing need of the labour market can be a cumbersome process.” For this reason, the engagement of employers in the process and the ability to flexibly address the broad needs of employers is key to creating opportunities for job seekers.

Recommendations

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

1. Embed the following three core principles in developing programs geared to transitioning an unskilled workforce to semi-skilled workforce:
 - a. **Employer driven** – The funding should be allocated in partnership with local employers that help to drive and deliver skills training that is directly tied to in-demand jobs in the area with a view to have government facilitating the program and employers driving the curriculum.
 - b. **Broad based** – While extra energy should be provided to support those with explicit barriers to gaining employment, there should be programs that are open to all people that are displaced from a full-time job or working part time and looking to upskill.
 - c. **Long-term results focused incentives** – To incentivize the transition from long-term unemployment to gainfully employed. There should be incentives for employees that maintain long term employment coming out of the program (e.g., a tax credit at the 2 and 5 year mark sufficient to drive an incentive to remain part of the work force after an extended period of absence and with safeguards to avoid abuse). The incentive should not be tied to a specific

employer, but rather a period of continued employment (allowing for reasonable industry driven work patterns).

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

B. Strengthen Connectivity Between Businesses and Post-Secondary Institutions

Submitted by: Belleville Chamber of Commerce. Co-sponsored by: 1000 Islands Gananoque Chamber of Commerce, and Quinte West Chamber of Commerce

Issue

Skills and workforce development remains a top issue for a thriving business climate. Ontario businesses require access to job ready and experienced graduates with the right credentials who meet their needs in order to scale up and grow. The provincial government can support stronger linkages between post-secondary institutions and businesses to ensure the supply of skilled employers meets the demand of businesses.

Background

Upon hire, small businesses require new graduates to have the right skills and experience in order to hit the ground running and to contribute to the business as quickly as possible. Ensuring students in college and university receive hands-on learning opportunities while still attending school presents a huge advantage to both parties and the economy as a whole.

Many small and medium-sized enterprises (SMEs) perceive barriers to providing these experiential learning opportunities to students, such as, costs of student compensation and training and other administrative and operational requirements.

As a result, these barriers limit the number of opportunities for experiential learning to be gained, thereby limiting the potential for businesses to have access to the experienced talent they otherwise could.

On the one hand, businesses benefit from new post-secondary graduates being adaptable and prepared for the unknown jobs of the future, and armed with a skillset that includes critical thinking, problem solving, communication and teamwork. These skills help workers thrive in changing environments and are seen as critical to success in any business.

A greater number of small businesses, in particular, stand to benefit from new thinking and ideas based on emerging research gained through deeper ties with post-secondary institutions. These initiatives also provide small businesses with access to high quality employees and strengthen their ability to recruit graduates equipped with the skills they are looking for.

On the other hand, a post-secondary education that offers both rigorous academic programs and hands-on experiential learning[1] has been proven to help develop the adaptable skills employers need. Eighty-six per cent of current students and recent graduates in Canada have said experiential learning led to an easier transition from post-secondary to a successful career.[2]

While public and publicly assisted universities and colleges have developed vital services and programs to engage employers and students in experiential learning, providing an adequate supply of these opportunities to meet student demand is a continuing challenge.

That is why early and strong collaboration between public post-secondary institutions and business will help ensure students graduate with the skills necessary for today's employers and the jobs of tomorrow.

Increasing the supply of experiential learning opportunities is also an opportunity for small businesses. Small businesses make up 98 per cent of total businesses and two-thirds of private sector employment in Ontario.[3] Their involvement is particularly critical, as the SME category includes a growing number of start-ups arising from innovation and entrepreneurial activities across the province.

There is an opportunity for government to facilitate more linkages between small businesses and postsecondary institutions to create more hands-on learning opportunities for students.

This can be achieved by building upon existing programs that incentivize small businesses to hire students and recent graduates, as well as exploring new programs that encourage employers to work with universities and colleges to offer additional experiential learning initiatives.

There is also an opportunity for the government to prioritize the marketing of existing programs to employers to help raise awareness of these opportunities.

Recommendations

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

1. In collaboration with small businesses and public post-secondary institutions, explore new programs to incentivize greater employer participation in experiential learning initiatives, including, but not limited to, co-op education, paid work placements, internships, industry-recognized in-class projects, mentorship programs and incubators, accelerators and innovation hubs.
2. Expand the Co-operative Education Tax Credit.
3. Introduce a tax credit available to employers who hire graduates of co-operative education or equivalent programs that allows employers to claim a percentage of wages and salaries for the first year of full-time employment.
4. Direct business-facing Ministries to prioritize communicating new and existing opportunities to support experiential learning opportunities and the associated benefits.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

C. Addressing Ontario's Labour Gaps Through Industry and Post-secondary Partnerships

Submitted by: Newmarket Chamber of Commerce

Issue

In order to ensure Ontario's ongoing prosperity and a strong economic recovery from COVID-19, Ontario requires access to a highly skilled, adaptable workforce.

Background:

With the shortage of skilled talent facing the province, a recent [Stokes Economics](#) report found that the demand for occupations requiring university education will continue to increase. Between now and 2030, Ontario will require a total of 928,700 workers to fill new job openings for roles that require a university education, including:

- 233,000 positions for jobs in STEM
- 148,000 positions for jobs in health care
- 128,000 positions for jobs in business, finance, and administration

Over the same period, Ontario will also need more than 950,000 positions in skilled trades and apprenticeships to meet Ontario's growing economy. Given these critical skills shortages, both colleges and universities will be called upon to continue to produce the skilled workforce that Ontario needs to grow and prosper.

University graduates are job ready and resilient. For example, according to the Ministry of Colleges and Universities' Ontario's Universities Graduate Survey of 2017 graduates, university graduates have a 95.6 % employment rate after two years, 89.6 % are employed full-time and have found work that is either closely or somewhat related to the skills they developed at university.

Universities have adapted to meet the growing demand for programs in new and emerging fields including healthcare and STEM (science, technology, engineering, and math) and meet Ontario's workforce needs. For example, Ontario's universities are developing innovative nursing programs to graduate nurses faster to help address the health-care sector's growing patient backlog and staffing concerns resulting from COVID-19.

The need to ensure a stable supply of highly trained, adaptable workers has been raised as an issue by industry to York University in their regular consultations and at their recent employer roundtables to inform their planning of their Markham campus. The concerns shared with York regarding this issue had also been voiced by industry to Ontario universities across the province.

Universities are also actively collaborating with the business community to provide work integrated learning opportunities, including co-op placements, internships and other industry-university student workplace partnerships. These partnerships are critical to ensuring students graduate with job ready skills and employers are able to identify and recruit talent. At this time however, demand for these programs outstrips the sectors ability to provide them.

High Demand Programs: The job market in Ontario continues to evolve and respond to changes in the environment requiring skilled trades as well as growing demand for a university educated workforce. In order for Ontario's businesses to succeed in these conditions it is essential employers have access to a stable supply of highly skilled, adaptable workers. Ontario needs to secure a talent "pipeline" that is future-proofed with the foundational skills and innovative learning experiences for the jobs of today and tomorrow.

Raising the enrolment corridor to allow universities and students to better respond to labour market demands will assist industry and the economy in recovering from the pandemic and help build stronger, more resilient communities.

Ontario's universities are continuing to adapt and meet the growing demand for programs in health care and STEM to ensure students have the skills they need to enter high-growth fields:

- As such, universities are prepared to increase capacity in high-demand programs by more than **53,000 funded domestic student spaces** over the next five years, including 17,000 in health professions.

This work, integrated into a multi-year framework with financial flexibility will allow for effective, long-term financial planning and a stable supply of highly skilled, adaptable workers in all sectors of the Ontario economy.

Work Integrated Learning: Ontario employers require a stable supply of new, university educated graduates with the right skillset and experience needed to adapt and contribute as quickly as possible. Ensuring university students have access to workplace centered, hands-on learning opportunities while still in school creates a significant opportunity for students and employers alike.

Many small and medium-sized enterprises in particular perceive barriers to providing these experiential learning opportunities to students, such as, costs of student compensation and training and other administrative and operational requirements. Working with government to further streamline access to these opportunities, remove barriers and develop further incentives for employers will benefit students, business and local economies across Ontario.

Recommendations

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

1. Work with Ontario post-secondary institutions to identify high demand programs of study where a current or anticipated labour shortage exists such as engineering, health professions, AI and other STEM programs. Post-secondaries and government should work to expand enrollment in these areas to ensure the necessary workforce needed for regional economic development.
2. Work with post-secondary institutions to ensure that course content is up-to-date and reflects the needs of industry.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

D. Establishment of Small Vessel Marine Trades in Ontario to include Marine Electrician, Service Technician, and the overall expansion for Marine Training Certifications across Ontario

Submitted by: The Prince Edward County Chamber of Commerce. Co-sponsored by: Quinte West Chamber of Commerce, Brockville and District Chamber of Commerce, Napanee and District Chamber of Commerce, 1000 Islands Gananoque Chamber of Commerce, and the Sarnia Lambton Chamber of Commerce

Issue

Ontario boasts many waterways, as such, there is a large and thriving marine industry in the province, but the industry lacks support, resources and safety regulation that is afforded to land-based vehicles. Although there are specific certifications for electrical, engine, etc. technicians for other industries, skilled trades for recreational boats apprenticeships are limited. Not only would the safety of residents and tourists on Ontario's waterways be improved, but also an increase in the current number of technicians and the creation of two new skilled trade designations would strengthen this industry to build the skilled workforce necessary to meet this sector's growing demands.

Background

Ontario has a thriving marine industry with dealerships, marinas, and is home to manufacturers of small vessels for both personal and commercial use. While construction standards exist (see TP1332E, TC), there is no standardization or oversight to ensure the safety of vessels on the water except as applies to their engines (Marine technician is effectively a mechanic trade – Trade Code 435B). As with Recreational Vehicles (RVs) on land, there is more to a boat than its engine, but unlike an RV, if there is a fire, leak, or other issue on a boat, it cannot as easily be moved to the side of the road for repair. Luckily, there are few major safety incidents involving small vessels, but many of the incidents and insurance claims are preventable by improving the general service technician and electrician standards (for construction and maintenance not related to engines). Through expanding marine apprenticeship opportunities, Ontario could lead the way for boating safety and supporting the marine industry.

Transport Canada recognizes training from the “American Boat & Yacht Council (ABYC), a non-profit, member organization that develops voluntary global safety standards for the design, construction, maintenance, and repair of recreational boats.”¹²¹ Courses offered by the ABYC are taught in Ontario by certified instructors, but these classes are not required for technicians to work in the recreational boat sector within the province.

Currently, Georgian College is the only post-secondary institution in Ontario that offers the Marine Engine Technician apprenticeship program. Boat dealership owners and staff are required to receive/attend mandatory training to sell specific companies' products, for example “Legend Boats”.¹²² But, not all boats are purchased new and serviced/repared at dealerships with company certified technicians, especially in emergency repair situations. With cars, all repair shops must have mandatory certified licensed repair personnel.

Recreational boating is an important past time and sector for Canada. According to Pat's Boating in Canada, “‘The Economic Impact of Recreational Boating in Canada Report’ prepared by the National Marine Manufacturers Association Canada (NMMA) tells us that that about 12.4 million adult Canadians go boating every year. Recreational boating adds \$5.6 billion to Canada's GDP with over \$10 billion in revenues. About 75,000 Canadian are employed by the core of the recreational boating industry while boaters themselves spend

¹²¹ <https://abycinc.org/page/About>

¹²² <https://boatingindustry.com/top-100/2018/01/03/2017-best-in-class-best-training-benefits/>

\$1.4 billion annually in boat trips.”¹²³ According to Rick Layzell, the CEO of Boating Ontario “47% of all boats sold in Canada are sold in Ontario”¹²⁴

Other mandatory certified skilled trades, such as electricians, millwrights, have specific training levels (year 1, year 2, etc.) pay scales that reflect this training ensuring standardization of knowledge and a path to completion. A clear-cut path with earning opportunities is used to attract talent to specific occupations. Work within the recreational boating industry’s ability to attract a skilled workforce is limited with only a handful of seats available in Midland Ontario, a location that is inconvenient to attend the required in-class training. According to Boating Ontario, over two-thirds marine technicians are offered year-round employment paying up to \$40 an hour. Although the industry works to promote these opportunities, many companies and individuals do not have access to local apprenticeship training. The current model assumes that people are purchasing new boats that can be serviced, winterized, and stored by local dealerships and marines. To attract talent interested in this industry with to growing opportunities, Ontario needs to provide better access to apprenticeship training/certifications across the province.

To protect recreational boaters, the Canadian government has established training and guidelines for people to receive licenses. As boat safety for the operators is a priority, it is logical that the Ontario government would extend these standards to establish certifications under Skilled Trades in more than one location for those responsible for repairing recreational boats ensuring consumer safety.

Supporting organizations for this Policy Resolution include:

- Swiftsure Vessel Solutions, Ltd., Consecon, Ontario
- Hartzel Marine and Auto, Thorold, Ontario

Recommendations

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

1. Work with the marine industry, their associations, and post-secondary institutions to:
 - a. Review opportunities to expand marine apprenticeship training programs to meet the growing and changing needs of the sector.
 - b. Research American Boat and Yacht Council (ABYC) courses that are recognized by Transport Canada.
2. Develop programs for voluntary marine certifications to include small vessel technician and marine electrician through Ontario’s Ministry of Labour, Training and Skills Development.
3. Expand/improve access to marine apprenticeships across Ontario (technician, small vessel technician, and electrician).
4. Continue to work with industry and partners to develop and improve certifications as required.
5. Upon successful implementation of more marine certifications, work with other provinces to adopt similar programs to lead to these trades achieving the recognized certification/training standards.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

¹²³ <https://boating.ncf.ca/stats.html#links>

¹²⁴ <https://boating.ncf.ca/buyaboat.html#:~:text=%E2%80%9C47%25%20of%20all%20boats%20sold,Canada%20are%20sold%20in%20Ontario.%E2%80%9D>

E. Prevention - The Need for a Workplace Health and Safety Strategy to Support Small Business

Submitted by: London Chamber of Commerce

Issue

The Covid-19 Pandemic has created more awareness of the need for strong health and safety policies in the workplace yet research shows that small businesses having 1-19 employees are less likely to be aware of their responsibilities under Ontario's *Occupational Health and Safety Act* thus are less likely to adopt the necessary policies to create and maintain safe workplaces both now and in the event of future health calamities.

Background

Data compiled from workers' compensation boards across Canada showed that 951 provincially regulated workers were killed due to their work in 2017¹²⁵. In 2017, Ontario witnessed 59,529 lost time injuries, 76 injury related fatalities, and 215 people killed by occupational disease¹²⁶. Ontario workers and business owners share in the belief that the 7.2 million Ontarians that go to work each day expect, and have the right, to return home safely at the end of the day. Every injury and fatality in this province underscores a need for greater collaboration between government and private industry, particularly small business to educate and facilitate business owners to adopt and consistently deliver workplace health and safety programs.

It is a fact that a small business owner can incorporate, obtain access to capital, hire employees, pay taxes, operate, and never once hear of their workplace health and safety obligations under the *Act*. With small business owners likely being their own human resources department, there is no one, at any point from start-up to operation that will advise the owner of their duties and responsibilities under the *Act*¹²⁷.

With the staggering amount of administrative work placed on an entrepreneur, they may not realize they are not only an employer, but in some scenarios also a supervisor under the *Act*. A new business owner with a new workforce is not advised to ensure their employees are trained¹²⁸ on the core mandatory programs - *Accessibility for Ontarians with Disabilities Act* (AODA), Workplace Violence and Harassment (WVH), worker awareness/supervisor competency (WA/SC), and WHMIS 2015 nor is that process in any way facilitated to ensure compliance. As the employer may also be the supervisor¹²⁹ in a start-up business, it is unlikely the owner/employer has any of the above qualifications, nor a proper understanding of what also being a supervisor entails under the *Act*. It is also unlikely that the small business owner has been notified that they face financial penalties or even criminal prosecution if one of their workers is injured or killed in an accident¹³⁰. Small business is clearly a prime area of focus for prevention in this province. With 73.4% of the small businesses in Canada having 1-9 employees¹³¹, this is a market that is clearly underserved. Given Ontario alone makes up roughly

¹²⁵ Tucker, Sean, and Anya Keefe. *2019 Report on Work Fatality and Injury Rates in Canada*. N.p.: University of Regina, 2019. https://www.uregina.ca/business/faculty-staff/faculty/file_download/2019-Report-on-Workplace-Fatalities-and-Injuries.pdf.

¹²⁶ Ibid.

¹²⁷ Ministry of Labour, Training and Skills Development. *Expert Advisory Panel on Occupational Health and Safety*. N.p.: Ministry of Labour, Training and Skills Development, 2019. <https://www.ontario.ca/document/expert-advisory-panel-occupational-health-and-safety/small-business>.

¹²⁸ e-Laws. *Occupational Health and Safety Act, R.S.O. 1990, c. O.1*. N.p.: Ministry of Labour, Training and Skills Development, 2020. <https://www.ontario.ca/laws/statute/90o01#BK44>.

¹²⁹ Ibid.

¹³⁰ Ibid.

¹³¹ Innovation, Science and Economic Development Canada. *Key Small Business Statistics - January 2019*. N.p.: Innovation, Science and Economic Development Canada, 2019. https://www.ic.gc.ca/eic/site/061.nsf/eng/h_03090.html.

36% of all Canadian small businesses¹³², the figures speak for themselves. Now is the time to develop a full and comprehensive prevention strategy for small business that must not come with repercussions and costs, but rather with encouragement, education, and easy to use tools together with incentives and grants to comply.

Employers need their workforces healthy, and safe to operate efficiently. In fact, healthy and safe workplaces are a real plus for recruitment and retention of employees. A London-Middlesex research study of employer needs found that 112 of the 302 survey respondents identified free health and safety training as being most useful to hire or rehire employees.¹³³ Employers recognize that working in a safe environment is key to returning people to the workforce.

While a small business should have an internal responsibility system and a health and safety management system to operate as safely as possible, it all starts with informing them of their obligations and facilitating access to easy to use and affordable tools that deliver the core mandatory programs (AODA, WVH, WHMIS 2015, WA/SC). Once the core four are in place, businesses can expand into other required training and will already have established an understanding of the steps and processes required to access that training. By working with approved, private-sector providers of Joint Health and Safety Committee Part I/II/e-learning, high-quality programs that already exist can be made readily accessible. An online resource should be integrated into the business registration process to help inform employers of their obligations under the Act while providing them access to courses which may be completed online by employees. Not unlike pilot programs currently underway, approved providers would receive a subsidy for each license used within the core programs.

The result is if a small business owner has ten employees, all are trained at no or little cost to the entrepreneur, and ten more Ontarians are now working safely. The modest cost to the Ministry to provide such training would be offset by savings from less claims to WSIB. Unlike the current \$3 million pilot programs¹³⁴, a business owner is in a place to ensure current employees complete the training paid for by the province. This is a clear win for small business, it is a clear win for approved providers (also small businesses), and a clear win for the MLTSD, as up to 25,000 workers are trained and have ongoing support without further MLTSD involvement and job seekers are more confident that small businesses will provide a safe workplace that they seek from employers. Sounds like a safe bet.

Recommendations

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

1. Promote and facilitate access to an online resource which informs small business owners of their rights and obligations under the *Occupational Health and Safety Act*. This resource should be integrated into the business registration process.
2. Through the Ministry of Labour, Training and Skills Development (MLTSD), and in partnership with chambers of commerce and boards of trade throughout Ontario, and through approved third-party health and safety providers promote and provide subsidized information sessions to small business owners in order to inform them of their obligations under the *Act*, and provide them with tools and

¹³² Ibid.

¹³³ Adeyemo, Bashir et al. *Change Matters – Employer Needs Assessment for COVID-19 Recovery*. Workforce Planning and Development Board. 2020. <https://workforcedevelopment.ca/wordpress/wp-content/uploads/2020/11/Employer-Needs-Assessment-For-COVID-19.pdf>

¹³⁴ Employment Ontario. *Health and Safety Training Pilot Program*. N.p.: Ministry of Labour, Training and skills development, 2020. <https://www.ontario.ca/page/employment-ontario>.

templates to assist in ensuring all workers have training on the core mandatory programs (*Accessibility for Ontarians with Disabilities Act* (AODA), Workplace Violence and Harassment (WVH), worker awareness/supervisor competency (WA/SC), and WHMIS 2015).

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

F. Address Ontario's labour shortage through reforms of the immigration system

Submitted by: The Vaughan Chamber of Commerce & Newmarket Chamber of Commerce. Co-sponsored by: Aurora Chamber of Commerce

Issue

The industries in Ontario are facing a critical shortage of skilled labour. The shortage is particularly dire in the construction sector. This decade will see the anticipated retirement of more than 86,000 construction workers in Ontario. Considering the projected volume of work, industry will need to hire, train, and retain almost 100,000 additional workers by the end of the decade. The labour supply shortage is one of the single biggest challenges facing the Ontario construction market today and threatens our ability to build the critical core infrastructure and homes Ontarians need.

Background

Historically the construction industry in the province has relied on immigration to fill a significant percentage of its ranks. New immigrants to the province have played a critical role in building this province over the last few decades. However, beginning in the mid-90s, the immigration system changed to value educational attainment and language requirements over specific, practical skill sets.

At the time, our economy was in a much different place than it is today, with much higher unemployment in the construction industry and much less public and private investment in infrastructure and land/commercial development. Times have changed and, economically, we have returned to a place where we are in much greater need of specific skills sets (particularly those that would fall under National Occupational Classification (NOC) level C and D in the immigration system) to fill the demand in our province, especially for infrastructure and residential construction. NOC level C refers to occupations that may require a high school diploma, while NOC level D occupations generally call for on-the-job training.

The issue is that many of the jobs that are in critical demand do not require certification or a particular level of educational attainment. As such, there are serious limits for construction companies to access the immigration system. For example, the in-demand jobs in infrastructure and residential construction are not prioritized in our express entry system; there are serious limits for how our small and medium-sized enterprises can participate in the temporary foreign worker program; the Ontario Immigrant Nominee Program (OINP) is incredibly onerous and expensive for smaller companies to participate in.

Recommendations

The Vaughan and Newmarket Chamber of Commerce urges the Government of Ontario to:

1. At least double the allocations for the National Occupational Classification-Level C (NOC C) Pilot that aims to increase permanent resident pathways for in-demand workers with Ontario job offers. Industry is ready and able to get more people working if the people are allowed to enter.
2. Ensuring that the application process for various OINP streams, particularly the In-Demand Skills stream, is not overly onerous as to disincentivize employers, especially small and-medium sized ones, from participating.
3. Continue working collaboratively with the federal government to ensure that Ontario benefits from any immigration reforms that take place.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

G. Addressing Mental Health Restrictions to Allow a Positive and Safe Return to Work

Submitted by: The Ajax-Pickering Board of Trade

Issue

After a workplace injury and to allow the worker return to work, their health care provider normally prepares and submits to the Workplace Safety and Insurance Board a Functional Abilities Form. This form is then used by the employer to develop a positive and safe return to work plan, with appropriate accommodations. Unfortunately, the current form is limited to detailing only the worker's physical health restrictions (e.g., lifting, carrying, etc.). As a result, the employer is left without knowledge of any mental health restrictions (e.g., concentration restrictions, memory restrictions, stress restrictions, etc.). This is particularly of concern where the worker is employed in a safety sensitive position. Accordingly, the form needs to be updated to also address mental health restrictions.

Background

When a worker is injured at work in Ontario, insurance coverage is often provided by the Workplace Safety and Insurance Board (WSIB). Furthermore, a claim is filed with the WSIB, the WSIB then provides wage-loss benefits, medical coverage, and support to help the worker return to work. As part of returning the worker to work, the worker's health care provider completes the WSIB's Functional Abilities Form (FAF). This form has clear and specific checkboxes to be completed to allow the WSIB and the employer to understand any restrictions. Unfortunately, the FAF is limited to only physical restrictions. In particular, the FAF asks the health care provider about lifting restrictions, standing restrictions, sitting restrictions, etc. The FAF does not ask health care provider about mental restrictions, such as concentration restrictions, memory restrictions, and problem-solving restrictions. As a result, a worker may return to work with proper accommodation for their physical restrictions, but without proper accommodation due to their mental restrictions. This is particularly of concern where the worker is employed in a safety sensitive position (e.g., log truck driver, swing-stage operator, pilot, electrician, etc.).

The WSIB acknowledges that workplace injuries not only result in physical health issues, but also mental health issues. As of January 2018, the Workplace Safety and Insurance Act was amended to allow for workers to make claims regarding chronic mental stress. In 2022, over 2,000 workers filed claims with the WSIB, requesting the need to be off from work because of mental health harms. For employers to properly support these workers to positively and safely return to work, the employer needs to understand the worker's mental health restrictions. Does the worker need to receive instructions in writing, or verbally? Does the worker need to have certain tasks removed from their responsibilities? With an updated FAF, both the WSIB and the employer would be properly informed, helping the worker return to work.

Recommendation

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

1. Update the Workplace Safety and Insurance Board's Functional Abilities Form, not only addressing physical restrictions, but also mental health restrictions.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

H. Attracting and Retaining Highly Skilled Talent

Submitted by: Greater Kitchener Waterloo Chamber of Commerce. Co-sponsored by: Cambridge Chamber of Commerce

Issue

Expanding access to highly skilled workers and ensuring regions throughout Ontario can retain this talent is essential to the province's economic recovery. Ontario's post-secondary institutions play a critical role in developing a robust workforce and fostering an innovation ecosystem which attracts investment to urban and rural communities.

Background

As businesses and industry across Ontario continue to rebuild and recover, they are looking to address local challenges, such as talent retention and adapting to new ways of working. Ensuring these businesses have access to highly skilled talent who can address these challenges and fuel local workforces throughout Ontario's regions is critical to their success.

Ontario's post-secondary institutions have vital roles to play in developing, attracting and retaining the talent needed throughout the province's communities and regions. For example, due to higher human capital development of post-secondary alumni, post-secondary graduates contributed at least \$50.6 billion to the province's GDP in 2018, according to the Conference Board of Canada. The additional income of post-secondary graduates, equivalent to more than six per cent of Ontario's GDP (Conference Board), enables them to make significant economic contributions to regions across Ontario by supporting local jobs and economies.

Ontario post-secondary institutions are actively supporting local businesses by developing and attracting local talent. This is achieved by providing support for international students seeking to learn and work in Ontario, ensuring the talent post-secondary institutions attract have accessible places to live, as well as supplying modern equipment and facilities to accommodate the research that will fuel Ontario's economic future, while bringing in students and researchers from around the world.

The Ontario Chamber of Commerce urges the Government of Ontario to support post-secondary institutions in contributing to a highly skilled and innovative workforce throughout the province to drive growth and prosperity.

Attracting International Talent to Support Ontario: International talent will play a key role in Ontario's social and economic recovery as students and workers support their local communities by volunteering, and by boosting regional economies through spending activities and filling in-demand jobs across the province.

More than 38 per cent of all international students in Canada are studying in Ontario, according to Statistics Canada. In addition, more than 101,100 international students enrolled at Ontario post-secondary institutions during the 2021-22 academic year, according to the Ministry of Colleges and Universities.

The Ontario Nominee Program is one initiative that provides a streamlined avenue for those seeking to study and work in Ontario, with additional benefits for institutions, students, local communities, and the province. Nominees provide substantial contributions to local labour markets and the skills they develop in post-secondary institutions help expand Ontario's highly skilled labour force.

However, more can be done to ensure international students, business owners and entrepreneurs can arrive in Ontario and form meaningful connections to the places in which they work, live and learn.

Providing Housing for Students, Staff and Faculty: Ensuring access to housing is critical in attracting high-quality talent to regions throughout Ontario. Providing spaces to live in proximity of places of work and study enable a range of economic and social benefits as newcomers visit local businesses and engage with their communities.

Over the past 10 years, enrolment in Ontario's post-secondary institutions has increased significantly from roughly 456,000 full-time-equivalents in the 2012-13 year to more than 539,000 in 2021-22. In order to support these students, as well as the staff and faculty who facilitate their education, it is critical that adequate housing is provided. While it cannot address these issues alone, post-secondary housing is one tool among many necessary to provide adequate space for students to live.

Building housing comes with several challenges – especially for post-secondary institutions which are not funded as housing providers and operate within limited space. The regulatory mechanisms in place to manage development are often costly, restrictive and impede the ability of institutions to adequately provide necessary housing arrangements. This results in increased pressure on local housing supplies as student housing demand grows into the wider market.

The government of Ontario has an opportunity to assist by working with post-secondary institutions to reduce regulatory barriers associated with the development of housing on and near post-secondary campuses, with benefits for students, institutions and local communities.

Ensuring Access to Modern Infrastructure for Ontario's Talent: Access to high-quality learning environments and modern facilities for individuals to learn and work is critical in attracting talent and fostering Ontario's position as a thriving, attractive market for investment.

These assets also provide direct benefits to local economies, as many small businesses and community members can access innovative facilities where they can test ideas and scale operations, providing communities and local industry with necessary resources to grow.

Ensuring post-secondary institutions have the tools to build, maintain, retrofit and modernize their infrastructure will help surrounding communities and regions attract talent, while creating jobs in construction, maintenance and more, fueling local workforce and associated supply chains.

Avenues to secure funding for post-secondary infrastructure, such as through the Facilities Renewal Program and the Ontario Research Fund help ensure talent can learn in modern classrooms that will prepare them for in-demand jobs, while working in facilities where they can make discoveries that push the boundaries of knowledge and ultimately improve quality of life.

Recommendations

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

1. Double student nomination allocations to expand opportunities for international students and help address local labour needs.
2. Work with post-secondary institutions to reduce regulatory barriers hindering the construction of new post-secondary housing, on and off campus.
3. Match federal investments in post-secondary infrastructure projects, particularly research infrastructure through the Ontario Research Fund – Research Infrastructure stream, to facilitate research that drives innovation in the Ontario economy.
4. Increase funding allocations to post-secondary institutions for Facilities Renewal Program-eligible projects to maintain and modernize post-secondary infrastructure projects, including retrofits for existing buildings and addressing the backlog of deferred maintenance.

Effective Date: April 29, 2023
Sunset Date: April 29, 2026

I. Improving Skilled Trades in the Secondary Schools

Submitted by: Mississauga Board of Trade

Issue

Many businesses cite lack of workers in the skilled trades to fill positions within their companies today and into the future. There is a general concern that young people are not getting encouragement and opportunity to participate and learn about skilled trades at an early age so they can give serious consideration to a career in the skilled trades while in high school.

Background

The Mississauga Board of Trade (MBOT) authored a report entitled “Review of Skilled Trades in the Secondary School System” which looked at the current state of skilled trades training and curriculum in high schools and made recommendations that can improve and support this going forward.

MBOT met with representatives of all four local school boards and teachers in the Regional Skilled Trades program and found great support and interest in supporting and expanding skilled trades courses in the secondary schools.

Recommendations

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

1. Allow for the engagement of outside skilled trade expertise to support the teaching of curriculum segments of classes where this involvement is either warranted or required. The School Boards should be able to compensate these instructors working along with the designated Teacher for the class.
2. Ensure that School Boards have the budget and resources to obtain the proper, up-to-date equipment to teach skilled trades. The Ministry should encourage companies to donate equipment to the schools and be eligible for a tax receipt for the donation.
3. Continually assess co-op placement programs to ensure the rapid pace of technological change and industry requirements is met.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

J. Industry, educational institutions, and government working collaboratively in developing and advancing Ontario's skilled labour workforce with the skills required to meet industry needs.

Submitted by: Oakville Chamber of Commerce

Issue

Attracting and retaining a skilled workforce is a challenge for employers. The aging demographic, retiring workforce will add continued pressure on the business community. Government needs to work collaboratively with post-secondary institutions and industry to ensure that graduates are equipped with the skills and talent that meets future workforce demands.

Background

One of the biggest hurdles for many Oakville businesses is renewing their workforce. According to the Canadian Chamber of Commerce Canadian Survey on Business Conditions Report, Q3 2022, 39% of respondents identified recruiting skilled employees as an obstacle to business over the next three months, 37% listed a shortage of labour force, and 31% identified retaining skilled employees.

Uncertainty persists around the labour market, and it is putting pressure on organizations and their employees. As such, organizations are increasingly pursuing qualified professionals to fill all types of roles. These organizations look for talent that can deliver immediate and long-lasting contributions. So, they are likely to pursue candidates with extensive industry skills and experience.

For job seekers, now may be an ideal time to enroll in courses and training programs in their respective industries. By earning certifications and building their skill sets, these job seekers are well-equipped to stand out to potential employers. Plus, these job seekers can boost the likelihood of landing the best jobs and maximizing their earnings.¹³⁵

The business community will benefit from a plan to create an environment that is conducive to new investment, talent attraction and opportunity creation. This includes adapting and evolving to a changed business landscape. Consequently, all levels of governments need to work collaboratively with the business community and support the work of economic development to attract the next generation of talent to Oakville.

Attracting and retaining new talent to Ontario is of critical importance. By prioritizing the attraction of new talent to Oakville, we can minimize the potential challenges associated with a skills gap as a large portion of our labour force and knowledge base retires.

The Oakville Chamber and the business community understand the need for collaboration to address job vacancies. Policymakers need to take action to address skills mismatches and future workforce needs. This should include working with employers and post-secondary institutions to narrow the digital skills gap, advance skilled trades and tap into youth and immigrant talent pipelines.

Furthermore, over the next few decades, the Greater Golden Horseshoe is expected to experience incredible growth. Ontario has been, and continues to be, one of the fastest growing jurisdictions in North America. By 2041, the population is projected to grow by 50 percent, to 13.5 million, in the GGH alone. Similarly, the number of jobs in the region is expected to grow from 4.5 million to 6.3 million.¹³⁶

¹³⁵ [Employment Professionals Canada](#)

¹³⁶ Brad Graham and Tom McCormack, "Improving the Growth Plan: A commentary," September 2015
http://ohba.ca/system/documents/documents/340/original/improving_the_Growth_Plan_PDF.pdf?1441817423

Locally, the Region's population is forecast to grow from nearly 600,000 today to 1,000,000 by 2041. Similarly, Halton's strong economic growth—particularly in trade-oriented and high skilled service industries—is anticipated to continue: the Region is forecast to grow from about 264,000 jobs today to 470,000 jobs by 2041.¹³⁷

Therefore, the business community, industry, education and government need to work collaboratively to be responsive to employers' input in developing and advancing Ontario's labour workforce.

Recommendations

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

1. Develop a workforce strategy that is responsive to industry needs in advancing Ontario's labour workforce.
2. Increase capital and operational funding and expand eligibility to colleges for skills training programs and infrastructure like the Skills Development Fund.
3. Continue advocating for greater control over immigrant nominations in the province and strengthening Ontario's nominee program.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

¹³⁷ [Integrated Growth Strategy](#)

K. Investing in Ontario's International Undergraduate Student Entrepreneurs

Submitted by: Windsor-Essex Regional Chamber of Commerce. Co-sponsored by: Chatham-Kent Chamber of Commerce, Hamilton Chamber of Commerce, Leamington Chamber of Commerce, Sault Ste. Marie Chamber of Commerce, Thunder Bay Chamber of Commerce

Issue

Ontario attracts an increasing number of international students each year. The Ministry of Advanced Education has estimated international students will account for 20 per cent of all Ontario post-secondary enrolments by 2022.¹³⁸ These students have an incredible impact on the local economy.

With an increasing talent shortage across the province coupled with a significant business succession issue, it is vital that international students are encouraged to remain in Ontario to continue their positive effect on the economy.

The Ontario Government can support international undergraduate student entrepreneurs by creating a nominee program to provide a more expedient pathway to permanent residency. Both Nova Scotia¹³⁹ and Saskatchewan¹⁴⁰ have implemented such pathways in recent years.

Background

International student enrollment in Canada is on the rise. Since 2014 there has been a 73 per cent increase in enrolments bringing the 2018 total to 572,000.¹⁴¹ The total number of post-secondary international students in Canada as of December 31, 2018 was 435,415, a 17 per cent jump over 2017 (370,975).¹⁴² In 2017, Ontario hosted 48 per cent of the nation's international students.¹⁴³

The positive impact of international students to the economy is remarkable. Approximately 170,000 jobs were created nationally as a result of international student spending in 2017.¹⁴⁴ International students contributed \$21.6 billion to the Canadian economy in 2018 with international student tuition surpassing government grants as a revenue source for many colleges and universities across the province.^{145,146}

¹³⁸ [Proportion of UWindsor international students more than doubled since 2006](#) (CBC News · Posted: Jun 17, 2019)

¹³⁹ [International Graduate Entrepreneur, Nova Scotia Immigration](#)

¹⁴⁰ [Sask. Government aims to make immigration easier for entrepreneurial international students](#) (Global News – Posted December 3, 2019)

¹⁴¹ [International education in Canada is booming – but the system is flawed. Here's how to fix it](#) (The Star – September 28, 2019)

¹⁴² [Another record year from Canadian international education – Canadian Bureau for International Education](#)

¹⁴³ [International Students in Canada](#) (Canadian Bureau for International Education, August 2018)

¹⁴⁴ Semotiuk, A. J. (2018, NOV 16). [International Students Pour into Canada While the U.S. and Others Lag Behind](#). (Forbes – November 13, 2019)

¹⁴⁵ [Ibid, International education in Canada is booming.](#)

¹⁴⁶ [The University of Toronto noted that international student fees accounted for 30 percent of revenue, more than provincial grants \(25 percent\).](#) (University Affairs – May 6, 2019). At St. Clair College in Windsor-Chatham, the 2019-20 budget shows for the first time that international student tuition is the largest source of revenue, with a projected \$71.8 million. By comparison, operating grants are \$41.3 million, and tuition for its budgeted 7,600 domestic students is about \$24.3 million. This fall, the college, which has seen its population of international students grow from 500 in 2014 to 4,200 in 2018, increased tuition for new international students by 15 per cent.

Some of these students come from entrepreneurial families who wish to expand their family business into Canada. Others may have the desire to purchase established businesses which would address the nation's growing business succession issue.¹⁴⁷

Currently, international students must find an eligible work position before applying for permanent residence status.¹⁴⁸ This puts their entrepreneurial ambitions on hold. If they could commence their business plans after graduation, they would become not an employee, but an employer, boosting the local economy even further.

The Nova Scotia International Graduate Entrepreneur program is a model program that can be adopted and implemented by the Ontario government to encourage settlement, investment, and entrepreneurship for International Students. The immigration stream requires an applicant to own at least one-third of a business with active ownership and management for a period of one year prior to application. The applicant must also have completed a degree or diploma from a Nova Scotia post-secondary institution and have a post-graduation work permit.¹⁴⁹ This program can facilitate the transition of international students into active workforce participants with a vested interest in their local economy.

Needing to find employment often means these students move to larger city centers. When eligible, the majority will choose to start their new business in the city of their employment – not the city where they completed their studies leading to a huge economic loss for the smaller cities of Ontario.

Ontario does currently have an Ontario Immigrant Nominee Program (OINP) in place, but most international students will not meet the requirements of this program.¹⁵⁰

Recommendation

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

1. Emulate Nova Scotia's International Graduate Entrepreneur program that allows international students who start or operate their own company in Ontario and meet the eligibility requirements to apply for Permanent Residency

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

¹⁴⁷ 2006 data shows that 60 per cent of the Canadian population works for a small business, with approximately 45 per cent of Canada's economy coming from small-medium size businesses (Bruce, D., & Picard, D., 2006. Making succession a success: Perspectives from Canadian small and medium-sized enterprises. *Journal of Small Business Management*, 44(2), 306-309.). Only 20 per cent of these businesses have a succession plan in place (Motwani, J., Levenburg, N. M., Schwarz, T. V., & Blankson, C. (2006). Succession Planning in SMEs. *International Small Business Journal: Researching Entrepreneurship*, 24(5), 471-495.). Matching eligible international student entrepreneurs with successful businesses seeking a successor could help address this growing issue.

¹⁴⁸ [OINP Employer Job Offer: International Student Stream.](#) and [Ontario Immigration Nominee Program: Masters Stream.](#) [The OINP program allows for nominations for Masters level graduates who meet certain conditions. There is no such program for undergraduate international students. Undergraduate students must obtain viable employment and have sufficient work experience to meet residency requirements before applying for permanent residence.](#)

¹⁴⁹ – [International Graduate Entrepreneur \(novascotiaimmigration.com\)](#)

¹⁵⁰ [Ontario Immigrant Nominee Program \(OINP\).](#)

L. More systems needed in place to encourage women to pursue a career in skilled trades

Submitted by: Cambridge Chamber of Commerce. Co-sponsored by: Guelph Chamber of Commerce & Greater Kitchener Waterloo Chamber of Commerce

Issue

A severe and chronic shortage of skilled trade workers continues to dog the Ontario landscape, despite more than 30 years of ongoing discussion among business, education, and government leaders on how to solve the problem.

While a strong focus remains on streamlining immigration policies to introduce some of the world's mostly highly skilled individuals into our labour force more seamlessly, the fact that an existing pool of potential talent already exists among Canada's female population remains virtually untapped unless the necessary encouragement and programming are provided.

Background

Ontario, and Canada in general, are dealing with a severe shortage of skilled trade workers. In fact, a report released in January of 2022 by Employment and Social Development Canada projects that 700,000 skilled trades workers are expected to retire by 2028¹⁵¹.

Left hidden among these staggering number is the fact only 5% of all tradespeople in Canada are women, according to Statistics Canada, noting this includes 84% of workers in hairstyling and aesthetics are women¹⁵².

As outlined in a CBC report in June 2019, Statistics Canada Labour Force Survey indicated as of 2018 approximately 34,800 women were working in industrial, electrical and construction trades nationwide. This represents an increase of 200 women, just under 3.9%, compared to a decade earlier. However, during this same 10-year span there were 38,600 fewer people of the overall 934,000 that were working in trades in 2008¹⁵³.

Furthermore, it's been noted in the first quarter of 2019 that there were 60,170 job vacancies in Red Seal trades, an increase of 14 % from a year earlier, according to Statistics Canada's job vacancy and wage survey¹⁵⁴.

As for those currently rising through the training ranks, according to the Canada Labour Force Survey, only 1 in 10 apprentices in Canada are women and that most populate female-dominated programs including early childhood education (which isn't considered a skilled trade in all provinces)¹⁵⁵.

A 2019 report from the Organization for Economic Co-operation and Development (OECD) praised Canada's economic immigration system and recommended streamlining and standardizing the ranking system for skilled workers entering this country and abolishing the Federal Skilled Trades Program. However, it has been noted that while immigration accounted for 80% of our population growth, there are projections indicating there are now only two workers ready to replace every skilled trade retiree in Canada by 2035 compared to seven that were available in 1971¹⁵⁶. This is another indication that filling the skilled trades gap must be accomplished using as many avenues as possible – noting the benefits of enhanced productivity and increased creativity a

¹⁵¹ Canadian skilled trades shortage has a simple solution - women' – Oct. 25, 2022, (The Hamilton Spectator)<https://bit.ly/3icbQcr>

¹⁵² Women are the Solution to Canada's Skilled Trades Shortage' – (Niagara & Halton Skilled Trades Academy)<https://bit.ly/3GBMUEF>

¹⁵³ Here's where Canadians are finding well-paying jobs in the trades' – July 12, 2019 (CBC) <https://bit.ly/2YRXjUB>

¹⁵⁴ 'Canada must adapt quickly to attract skilled workers, immigration minister says' – Aug. 13/2019 (CBC) <https://bit.ly/2MeJs8b>

¹⁵⁵ Here's where Canadians are finding well-paying jobs in the trades' – July 12, 2019 (CBC). <https://bit.ly/2YRXjUB>

¹⁵⁶ 'Majority of women in Canada are living paycheck to paycheck' – Sept. 30/2019 LowestRates.ca. <https://bit.ly/2RYhrEa>

diversified workforce brings – so creating more awareness to encourage more young women about the benefits of pursuing a career in these fields is important.

In 2019, the annual BDO Canada Affordability Index, which measures how affordable life is in Canada, indicated that nearly 60% of women are living paycheck to paycheck. #6 More recently, BDO's 2022 index found more 78% of Canadians said their personal finances have worsened due to inflation, while just over half (54%) indicated they're living paycheck to paycheck – an increase of three percentage points over 2021¹⁵⁷.

Education is key to raising awareness. In effort to promote skilled trades to all secondary school students, in 2019 the Ontario government has announced it was investing approximately \$75 million in three programs: \$12.7 million for the Ontario Youth Apprenticeship Program; \$20.8 million in a pre-apprenticeship program; and \$52 million for the Specialist High Skills major program that has the potential to reach 54,000 students in 700 Ontario high schools through more than 2,100 programs^{158 159}.

As well, in March of 2022, the Ontario government announced a \$28 million investment to expand its pre-apprenticeship training to provide young people with the training they need for careers in skilled trades¹⁶⁰.

Also, continued co-op programs in many secondary schools and having students from grades 7 to 12 participate in province-wide skills competitions organized by Skills Ontario and Skills Canada provide opportunities for them to experience the world of skilled trades over a period of a few days. As well, additional supports are provided by more localized initiatives such as Your Pathways, Your Choice, operated by the Career Education Council, which interactively assist Grade 8 students in Guelph by showcasing potential career paths, and the BEP (Business and Education Partnership) Waterloo Region, which introduces secondary students to various careers through an assortment of programs.

In terms of ongoing education for younger students, in our area, the Waterloo Region District School Board does provide tech rooms in some of its grades 7 and 8 schools centred on woodworking, while its counterpart, the Waterloo Catholic District School Board, provides STEM (science, technology, engineering and mathematics) kits to assist students who show an interest in those areas. Additional skilled trades learning opportunities are provided by neighbouring boards, including the Upper Grand District School Board and Wellington Catholic District School Board.

In hopes of attracting more female students, one-day initiatives such as the annual Build a Dream at Bingemans in Kitchener, helps promote skilled trades to grades 7 to 12 girls and attracts at least 1,200 students. Also, Conestoga College's 'Jill of All Trades' event is held annually and gives approximately 200 grades 9 to 12 students from eight school boards the chance to get 'hands-on' experience under the guidance of female mentors in one day. Conestoga College, which has consolidated its various trade schools after transforming the former 250,000-square-foot Erwin Hymer plant in Cambridge into its Skilled Trades Campus, also provides 'Explore Your Future' days to give Grade 8 students the chance to tour and participate in hands-on activities in specific trades.

¹⁵⁷ 'BDO Affordability Index 2022' – Sept. 29, 2022 (BDO). <https://bit.ly/3CpyZ1X>

¹⁵⁸ 'Ontario increasing investments in skilled trades' – Nov. 8/2019 – (Ontario Newsroom) <https://bit.ly/3GhuNT7>

¹⁵⁹ 'Ontario helping more young people start careers in the skilled trades' – March 16/2022 (Ontario Newsroom). <https://bit.ly/3IGnO9l>

¹⁶⁰ 'Ontario helping more young people start careers in the skilled trades' – March 16/2022 (Ontario Newsroom). <https://bit.ly/3IGnO9l>

Recommendations

The Ontario Chamber of Commerce urges the Ontario Government to:

1. Continue to market a career in skilled trades as a viable employment option, and ensure intentional outreach is extended to girls and women.
2. Allow students graduating from high school with an interest in any skilled trade to apply to the college of their choice, regardless if they have found employment in the industry.
3. Consider working with industry and post-secondary institutions to offer more opportunities at colleges with skilled trades programs to host similar events modelled after Conestoga College's 'Jill of All Trades', in hopes of ensuring more high school students have the opportunity to experience skilled trades training.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

M. The Workforce Ontario Needs

Submitted by: Greater Kingston Chamber of Commerce. Co-sponsored by: The Greater Peterborough Chamber of Commerce, Kawarthas Chamber of Commerce, Quinte West Chamber of Commerce & Belleville Chamber of Commerce

Issue

Our work and its environment have changed rapidly. From technological innovations, demographic shifts and working from home, we adapted. The skills development environment remains under pressure. We must continue to help people facing labour market disruptions and cycles of unemployment or underemployment, and to help businesses and organizations access talent with the skills needed to succeed.

Background

The previous 36 months sent shocks through labour market. What this did was amplify existing trends and transformations affecting the future of work in Ontario. Job polarization is one of several trends — including automation, offshoring and the growing importance of the gig-economy — that were already of general interest prior to March 2020. As Chamber leaders, we must consider how to assist in continuing to build back the economy.

On the positive front, we Ontarians are facing new opportunities and challenges that require new skills. Many sectors are already facing talent gaps, with 64% of Canadian entrepreneurs reporting that labour shortages are limiting their growth.¹⁶¹ Yet, workers in other sectors are facing high levels of unemployment and many individuals are keen to transition to new roles, with 43% of working Canadians reporting that they will likely look for a new job in the coming year.¹⁶²

It's clear that employers are struggling to find the right talent at the same time that people are struggling to find the right opportunities. These conflicting trends are indicative of a broader skills mismatch in Ontario.¹⁶³ The size of this mismatch can have an enormous economic impact – the Conference Board of Canada estimates that the unrealized value of skills vacancies in the Canadian economy hit \$25 billion in 2020.¹⁶⁴

Ontario needs a robust and responsive skills development ecosystem that helps people enter meaningful jobs, advance in their chosen careers, and transition to new occupations when needed.

As it stands, Ontario's skills development ecosystem is not ready. In general, Canada is a leader in providing high-quality K-12 and post-secondary education but has been a laggard in workplace training and lifelong learning.¹⁶⁵

New challenges require a system that is much better able to support Ontarians by providing ongoing, flexible education and training that helps them navigate the changing labour market.

¹⁶¹ Business Development Bank of Canada, 2021, "Labour Shortage is limiting the growth of most Canadian businesses: BDC study," <https://www.bdc.ca/en/about/mediaroom/news-releases/labour-shortage-study>.

¹⁶² Newswire, 2021, "Study reveals that Almost Half of Canadian Employees are Considering Switching Jobs in 2022," <https://www.newswire.ca/news-releases/study-reveals-that-almost-half-of-canadian-employees-are-considering-switching-jobs-in-2022-849994150.html>.

¹⁶³ Sullivan, K., 2017, "Talent in Transition: Addressing the Skills Mismatch in Ontario," <https://occ.ca/wp-content/uploads/Talent-in-Transition.pdf>.

¹⁶⁴ Gabler, N., Gormley, B., 2022, "Lost Opportunities: Measuring the Unrealized Value of Skill Vacancies in Canada," <https://www.conferenceboard.ca/product/lost-opportunities-measuring-the-unrealized-value-of-skill-vacancies-in-canada/>.

¹⁶⁵ Munro, D., 2019, "Skills, Training and Lifelong Learning," <https://ppforum.ca/wp-content/uploads/2019/03/SkillsTrainingAndLifelongLearning-PPF-MARCH2019-EN.pdf>.

Recommendations

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

1. Expand employment opportunities for international students through the OINP by broadening the scope of study permits and introducing fast-tracked visa streams for specialized academic programs targeting fields facing labour shortages.
2. Work with post-secondary institutions to provide technology skills training to adapt an aging workforce to the changing labour market and encourage life-long learning.
3. Enable the seamless transfer of foreign professional credentials held by immigrants to enable their participation in the Canadian labour force.
4. Provide post-secondary institutions with incentive to enhance recruitment towards the skilled trades and high demand programs that are currently experiencing labour shortages.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

N. Improve Early Childhood Educational Outcomes Through Expanded Education Opportunities, Targeted Programming, and Innovation in the Classroom

Submitted by: Sault Ste. Marie Chamber of Commerce

Issue

Ontario's long-term economic success relies on the quality of its workforce.

There is a strong connection between early childhood development, educational outcomes and future success. Ontario's unreasonably high child developmental vulnerability rate will have a negative impact on our future labour supply, including skilled workforce shortages and ultimately a loss of economic potential. This is especially true for areas of Ontario that are faced with low growth rates, low immigration rates, and an aging workforce. It is imperative for the future of our province that every child is given the best opportunity to succeed.

Background

Education is a pathway to a successful and sustainable labour market career. Over the next few years 70% of new and replacement jobs will demand post-secondary credentials, compared to 6% that will be available to individuals with less than high school education¹⁶⁶.

Research shows that children's development at age 5 is a strong predictor of adult health, education and social outcomes. Many later problems like school failure, anti-social behaviour, obesity, high blood pressure, depression, type-2 diabetes, can be traced back to early childhood¹⁶⁷.

The Early Development Instrument (EDI) is a tool that gathers information about children's development in their early years (birth to age 5). The most recent provincial EDI collection (2017/18) shows that the developmental vulnerability rate amongst young children in Ontario is near 30 percent, as measured by one or more of the five developmental scales. This does not include children who have an identified special need. Research states that such levels of vulnerability at school entry are at least five times higher than the rates of biological vulnerability that are detectable in the postnatal period¹⁶⁸. Especially concerning is the fact that the Ontario vulnerability rate is worsening rather than improving, having risen 2 percentage-points in the past ten years.

Drivers of vulnerability include socioeconomic adversity, physical issues like low birthweight, the lack of knowledge of an official language, increases in screen time and sedentary behaviour, limited opportunities to take on developmentally appropriate responsibility or self-care, inadequate sleep, inadequate nutrition, etc¹⁶⁹.

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 scores¹⁷⁰. Their education trajectories are likely to be lower and these children will face more

¹⁶⁶ Lightman, E., Herd, D., Um, S. G., & Mitchell, A. (2009). Post-secondary education and social assistance in Ontario. Canadian Social Work Review/Revue canadienne de service social, 97-113.

¹⁶⁷ Offord Centre for Child Studies. (2019). Retrieved from: <https://edi.offordcentre.com/about/what-is-the-edi/>.

¹⁶⁸ Kendall P.R.W. (2003) A Review of Infant Mortality in British Columbia: Opportunities for Prevention. Victoria, BC: Government of British Columbia, Office of the Provincial Health Officer in Kershaw, P., Warburton, B., Anderson, L., Hertzman, C., Irwin, L., & Forer, B. (2010). The Economic Costs of Early Vulnerability in Canada. Canadian Journal of Public Health. 2010;101(Suppl. 3): S8-S12.

¹⁶⁹ Buote, D. (2015). Increasing Vulnerability in the Early Years: A Closer Look at Five North Shore Neighbourhoods. Retrieved from: <http://nsccr.bc.ca/pdf/Increasing%20Early%20Years%20Vulnerability.pdf>.

¹⁷⁰ Calman, R. C., & Crawford, P.J. (2013). Starting Early: Teaching, Learning and Assessment (pp. 1–37). Education Quality and Accountability Office.

challenges as they grow. Many will remain behind their peers throughout life, be disruptive in school, fail to graduate and unable to fully contribute and participate in society¹⁷¹ and may rely on the social system (such as Ontario Works) for financial support.

Overall, grade 3 EQAO data shows a decline in writing skills over the previous three years (from 73% in 2015/16 to 69% in 2018/19). Assessments in math were similar to writing. In grade 3, 58% met the provincial math standard, a four percentage-point decrease from the average of the previous three years. If these trends continue unchecked, we should expect the number of students not meeting provincial standards in grade 6 to rise. We should also expect the number of children who are unprepared for high-school or post-secondary to rise over time.

There is a significant economic cost to vulnerability. A high vulnerability rate will dramatically deplete our future stock of human capital and will have a negative influence on the quality of our future labour market¹⁷². 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 vulnerability¹⁷³.

Although governments face fiscal constraints, policymakers should prioritize initiatives with high economic and social returns, such as early childhood education¹⁷⁴. There is a 7:1 return on investment for early childhood programming compared to a 1:1 payback for adult education¹⁷⁵.

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 wages¹⁷⁶. With this in mind, the province should focus on expanding licensed early childhood education services in an affordable way which helps everyone equally regardless of their socio-economic situation.

For vulnerable children already in the school system, more targeted programming and an increase in teacher/student interaction time can help close the gap between them and their peers. Research shows that appropriate supports and interventions during the primary school years will allow many children who were not on track in kindergarten to address early challenges and proceed on a positive academic trajectory¹⁷⁷. For children who are significantly behind their peers, a combination of grade retention and targeted programming should be investigated as an option. Researchers/data analysts at the Ministry of Education should conduct a review of the educational outcomes of Ontario children who were retained to determine if grade retention has a positive long-lasting effect on struggling students.

¹⁷¹ Calman, R. C., & Crawford, P.J. (2013). Starting Early: Teaching, Learning and Assessment (pp. 1–37). Education Quality and Accountability Office.

¹⁷² Kendall P.R.W. (2003) A Review of Infant Mortality in British Columbia: Opportunities for Prevention. Victoria, BC: Government of British Columbia, Office of the Provincial Health Officer in Kershaw, P., Warburton, B., Anderson, L., Hertzman, C., Irwin, L., & Forer, B. (2010). The Economic Costs of Early Vulnerability in Canada. Canadian Journal of Public Health. 2010;101(Suppl. 3): S8-S12.

¹⁷³ Kendall P.R.W. (2003) A Review of Infant Mortality in British Columbia: Opportunities for Prevention. Victoria, BC: Government of British Columbia, Office of the Provincial Health Officer in Kershaw, P., Warburton, B., Anderson, L., Hertzman, C., Irwin, L., & Forer, B. (2010). The Economic Costs of Early Vulnerability in Canada. Canadian Journal of Public Health. 2010;101(Suppl. 3): S8-S12.

¹⁷⁴ Alexander, C., Beckman, K., Macdonald, A., Renner, C., & Stewart, M. Ready for Life: A Socio-Economic Analysis of Early Childhood Education and Care. Ottawa: The Conference Board of Canada, 2017.

¹⁷⁵ Pascal C.E. (2009). With Our Best Future in Mind: Implementing Early Learning in Ontario. Toronto, ON: Queen's Printer for Ontario.

¹⁷⁶ Alexander, C., Beckman, K., Macdonald, A., Renner, C., & Stewart, M. Ready for Life: A Socio-Economic Analysis of Early Childhood Education and Care. Ottawa: The Conference Board of Canada, 2017.

¹⁷⁷ Calman, R. C., & Crawford, P.J. (2013). Starting Early: Teaching, Learning and Assessment (pp. 1–37). Education Quality and Accountability Office.

Furthermore, many teachers indicate that only 49% of their time is spent in direct interaction with students, with “time” being the most important barrier to providing personalized learning¹⁷⁸. An innovative approach is to use automation technology to reduce time spent on preparation, administration, evaluation, and feedback, saving approximately 13 hours per week¹⁷⁹. Teachers could redirect that time toward activities that lead to higher student outcomes such as instruction, engagement, and coaching. Further investments in permanent teaching assistants may also help decrease the burden of preparation and administration work that teachers commonly face.

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 to reduce the number of these children in Ontario.
2. Place a focus on catching up vulnerable (and at-risk of being vulnerable) children to their peers through targeted programming and early interventions.
3. Identify communities/regions that have consistently higher child vulnerability rates than the Ontario average and increase their funding for targeted programming.
4. Investigate the effectiveness of grade retention combined with targeted programming for children significantly behind their peers.
5. Utilize automation technology in the classroom to reduce teacher preparation and administration time so they can spend more time directly interacting with students.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

¹⁷⁸ Bryant, J., Heitz, C., Sanghvi, S. & Wagle, D. (2020). How artificial intelligence will impact K-12 teachers. New York: McKinsey & Company. Retrieved from: <https://www.mckinsey.com/industries/social-sector/our-insights/how-artificial-intelligence-will-impact-k-12-teachers>.

¹⁷⁹ Bryant, J., Heitz, C., Sanghvi, S. & Wagle, D. (2020). How artificial intelligence will impact K-12 teachers. New York: McKinsey & Company. Retrieved from: <https://www.mckinsey.com/industries/social-sector/our-insights/how-artificial-intelligence-will-impact-k-12-teachers>.

O. Invest in Workforce Planning Boards

Submitted by: Peterborough and the Kawarthas Chamber of Commerce. Co-sponsored by: Brockville and District Chamber of Commerce, Port Hope and District Chamber of Commerce, Belleville Chamber of Commerce

Issue

Workforce challenges are one of the biggest barriers to economic growth in Ontario. It is essential that businesses, non-profits and charities have access to as many workforce resources and tools as possible. After years of funding cuts and precarious one-year funding agreements, now is the time to re-invest in all 26 Workforce Planning Boards across the Province of Ontario with increased funding and three-year contracts.

Background

Rebuilding our local economy will take years and a series of calculated investments from the private sector. The single biggest hurdle for many is rebuilding their workforce, especially in the skilled trades, health care and service sectors like tourism, retail, food service, and hospitality.

According to the Canadian Chamber of Commerce Canadian Survey on Business Conditions Report, Q3 2022, 39% of respondents identified Recruiting skilled employees as an obstacle to business over the next three months, 37% listed a shortage of labour force, and 31% identified retaining skilled employees.

Access to thorough, accurate and no-cost labour information and expertise will play a critical role in how the business community adapts, plans for the future of work, and influences our economic growth.

Our local Workforce Planning Boards are an indispensable and vital partner in rebuilding our workforce. They bring decades of direct experience in identifying and addressing labour market and workforce development trends, opportunities and priorities within their catchment areas. Local businesses regularly use Workforce Planning Board resources and data tools like the free local online job boards, Census tools and Labour Market Information Help Desks. The annual Local Labour Market Planning Report provides crucial summaries of key data and qualitative feedback gathered through local consultation and collaboration with industry, businesses, training and employment service providers.

In order to provide local labour market information, service coordination and public education, Workforce Planning Boards need more sustainable funding. Operating on one-year contracts on budgets that have decreased over the years has made it difficult to recruit and retain talent to provide these services.

We are aware that part of the request is to receive an increase in operational funding in order for Workforce Planning Board's to continue to recruit and retain talent to provide these services and a shift from one-year agreements to three-year agreements to ensure that activities and local initiatives are adequately resourced and stable. The current labour market and economy requires certainty and a steadfastness and strength of leadership. Operationalizing plans for the future of work is very difficult to achieve within a one-year time frame. Three-year contracts will enable the Chamber of Commerce to work effectively with our local Workforce Planning Board's to complete a number of activities identified in their Local Labour Market Planning Report that includes an Action Plan with a three-year outlook.

Recommendations

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

1. Increase the funding for each Workforce Planning Board to cover the cost of LMI Help Desk Services, the Local Jobs Hub, and website maintenance and updates.
2. Increase the length of funding agreements with Workforce Planning Boards to three years.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

SPECIAL ISSUES

A. The Capacity to Operate

Submitted by: The 1000 Islands Gananoque Chamber of Commerce

Issue

The tourism economy has been heavily hit by the coronavirus (COVID-19) pandemic, and measures introduced to contain its spread. Depending on the duration of the crisis, revised scenarios indicate that the potential shock could range between a 60-80% decline in the international tourism economy. Beyond immediate measures to support the tourism sector, countries are also shifting to develop recovery measures. These include considerations on lifting travel restrictions, restoring traveler confidence and rethinking the tourism sector for the future.

Background

Domestic tourism, which accounts for around 75% of the tourism economy in OECD countries, is expected to recover more quickly. It offers the main chance for driving recovery, particularly in countries, regions and cities where the sector supports many jobs and businesses.

Looking ahead, the measures put in place today will shape tourism of tomorrow. Governments need to already consider the longer term implications of the crisis, while staying ahead of the digital curve and promoting the structural transformation needed to build a stronger, more sustainable and resilient tourism economy. The crisis is an opportunity to rethink tourism for the future.

Tourism is a significant part of many national economies, and the immediate and immense shock to the tourism sector resulting from the coronavirus pandemic is affecting the wider economy. As governments around the world have introduced unprecedented measures to contain the virus, restrictions on travel, business operations and people-to-people interactions have brought the tourism economy to a standstill. Many countries are **now entering a new phase in fighting the virus while at the same time managing the re-opening of the tourism economy**. This is a complex and challenging task, and quantifying the impact on the tourism economy is difficult.

In the near term, the expectation is that **domestic tourism offers the main chance for driving recovery and supporting the tourism sector**. The domestic tourism economy is significant and accounts for around 75% of the total tourism economy in OECD countries. Domestic tourism flows have also been heavily affected by restrictions on the movement of people but are expected to recover more quickly once containment measures are lifted. Nonetheless, it is unlikely that domestic tourism could compensate for the decline of international tourism flows, particularly in destinations heavily dependent on international markets. This will translate into significant macro-economic effects in countries, regions and cities where the sector supports many jobs and businesses.

Recommendations

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

1. Work with the federal government to remove barriers to travel, such as testing requirements.
2. Change the narrative around travel to show Ontario is open for tourism.
3. Extend relief programs critical to the tourism sector, such as the Ontario Business Rebate and the Ontario Tourism Recovery Program, to support cash flow as businesses reopen.
4. Develop a province-wide workforce strategy to address labour shortages in the sector.
5. Ensure vaccine passport requirements are consistent with the latest public health recommendations and neighbouring jurisdictions.

Effective Date: April 30, 2022
Sunset Date: April 30, 2025

B. Supporting international student job seekers to connect to local labour markets

Submitted by: 1000 Islands Gananoque Chamber of Commerce, Belleville Chamber of Commerce, Greater Kingston Chamber of Commerce, Prince Edward County Chamber, Port Hope and District Chamber of Commerce and Toronto Region Board of Trade

Issue

Ontario's labour market shortages are compounded by barriers in communities with international students and recent graduates seeking employment supports and services.

Background

Ontario faces a significant skills shortage in many key sectors. Increased immigration is essential to building a strong workforce. This includes attracting international students who pursue careers in Ontario. "Study, Work and Stay in Canada", this is the brand that makes Canada one of the top destinations of choice for international students and provides an important preview of life in Canada.¹⁸⁰

There were more than 96,000 international students enrolled at Ontario's colleges last year and many will continue to live and work in this province after they graduate.

International students are essential to employers and are highly valued as prospective immigrants for numerous reasons. International students have Canadian educational qualifications, are proficient in at least one official language, and can help address both current and future labour market needs, particularly for highly skilled work and where there are ongoing shortages such as healthcare.¹⁸¹ Prior to the pandemic, almost 40 percent of Canadian small and medium-sized businesses were struggling to hire new employees and as our population continues to age and retire in the post-COVID-19 world, the shortage will keep growing.¹⁸²

Ontario's public post-secondary institutions and public-private college partnerships offer more than just an education to international students seeking to study in Canada. These institutions provide wrap-around services that help link international students into the local community and cultural organizations. This includes career planning, assistance with resumes, interview preparations and access to community job boards.

To maximize the positive experience of international students in Ontario and their engagement with local communities, more can be done to help international students at Ontario's public post-secondary institutions find employment. This is a particular challenge as international students are ineligible for many of the services provided through provincial and federal employment programs.

International students are not eligible for the services provided through employment placement agencies – either federal or provincial. Ontario's public post-secondary institutions remain concerned that there are few services or supports for international students to look for work within local communities.

Enabling international students to access services provided by employment agencies would help them to find jobs. With many communities facing skilled and unskilled labour shortage and with international students seeking employment within the allowed threshold, enabling these students and international graduates to access

¹⁸⁰ Immigration and Refugees Canada. "Stay in Canada after you graduate." <https://www.canada.ca/en/immigration-refugees-citizenship/campaigns/study-work-stay.html>

¹⁸¹ Global Affairs Canada. "Building on Success: International Education Strategy (2019-2024)." 2019. <https://www.international.gc.ca/education/strategy-2019-2024-strategie.aspx>

¹⁸² Business Development Bank of Canada. "Labour Shortage: Here to Stay." Report by Michael Cocolakis-Wormstall. 2018. https://www.bdc.ca/en/documents/analysis_research/labour-shortage.pdf

employment services will help local communities retain workers and support international students and recent graduates succeed in Ontario.

To help Ontario prosper, we need to provide opportunities for our international students to succeed by ensuring that Employment Ontario services and programs, such as assistance with job preparation and outreach (assistance with resumes, interviews, using job boards, etc.), as well as access to more targeted supports like on-the-job training opportunities backed by training subsidies for employers, are available to all graduates, including international students.

Specifically, the provincial government needs to create more opportunities for graduates of international programs and the services provided at Employment Ontario offices should be available to all graduates, including graduates of international programs.

Recommendations

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

1. Create more opportunities for international students and recent graduates of public post-secondary institutions to access employment in local labour markets; including by,
2. Provide Employment Ontario services and programs, such as assistance with job preparation and outreach (assistance with resumes, interviews, using job boards, etc.), as well as access to more targeted supports like on-the-job training opportunities backed by training subsidies for employers, to all graduates, including international students.
3. Remove restrictions to these programs based on age.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

C. Support for the Trucking Industry

Submitted by: Windsor-Essex Regional Chamber of Commerce. Co-sponsored by: Leamington Chamber of Commerce

Issue

The challenges of the Covid-19 pandemic have brought to light the operational difficulties in the trucking industry throughout Canada. The trucking industry is facing two major challenges:

- Driver shortage: Throughout Canada trucking companies are struggling to find drivers. This is more pronounced for smaller fleet companies.
- High cost for training and insurance: Current licensing rules mean that truck drivers who have international driving experience must completely re-train when they arrive in Canada. The additional costs for training drivers hurt smaller business more than the larger fleets. Insurance premiums for smaller trucking companies are significantly higher than the larger fleets. The issues related to retaining truck drivers, the rising costs of insurance premiums, and equipment shortage for smaller owner-operator businesses make it important to review and amend regulations and develop a strategy to implement support, both federally and provincially.

Background

More than 55,000 truck drivers' jobs will need to be filled in Canada by March of 2023 according to the latest report and statistics gathered by Trucking HR Canada. Ontario was the first province to introduce mandatory entry-level training programs, which requires 103.5 hours of core training, and another 8.5 hours of training for an air brake endorsement, before testing for a Class A/Z license.

The turnover rates are lower for larger fleets while the smaller fleets struggle to retain drivers. The challenges of increased insurance costs, shortage of equipment and rising price in makes it challenging for smaller trucking companies to remain competitive.

When international drivers arrive in Canada, their driving experience is not considered, and they must retrain which can cost between \$7,000 and \$12,000 dollars. Smaller businesses are paying over \$15,000 a year in insurance costs and are unable to secure new drivers because of insurance policies that favour the larger trucking companies. Smaller fleets are disadvantaged because they do not have resources and cannot offer wages at par with larger fleets, thereby leading to driver retention challenges.

Recommendations

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

1. Implement and adjust licensing requirements for internationally trained truck drivers so that specific training and safety tests allow new truck drivers to fast-track their careers and consider their previous experience, thereby reducing the time and cost to obtain a license.
2. Increase immigration and bring internationally trained truck drivers that would amplify the pool of workers available.
3. Implement financial support to smaller fleet companies (owner-operator) so that they can offset high insurance cost, offer competitive wages, cover training, and hire more workers.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

D. Increase business R&D with competitive applied research funding

Submitted by: Greater Niagara Chamber of Commerce. Co-sponsored by: Belleville Chamber of Commerce, Port Hope & District Chamber of Commerce, and Peterborough and the Kawarthas Chamber of Commerce

Issue

Ontario's access to federal applied research funding lags behind other jurisdictions and, as a result, small-medium enterprises (SMEs) lack Ontario-based access to research and development hubs that can promote economic growth through local innovation.

Background

Ontario's public post-secondary institutions routinely partner with industry to support research and development programs. Colleges are able to boost economic growth by strengthening innovation, especially by SMEs, in areas such as digital innovation, advanced manufacturing, agri-food and resources, health care technology, and green infrastructure.

Ontario's 24 public colleges are required through legislation to respond to local workforce needs and tend to work closely with local employers, including Ontario's 300,000 SMEs, to support innovation. As most smaller businesses in Canada lack the resources to do this kind of research on their own, a growing number have therefore entered into research partnerships with colleges.

The main barriers to innovation through R&D that Ontario's SMEs tend to cite include lack of in-house expertise, lack of capacity, lack of technology and equipment, and lack of R&D funding/capital. SMEs across Ontario would often prefer to engage with researchers local to their community.

Ontario's colleges have and continue to offer a solution to these SMEs by providing local expertise that is typically community and industry relevant and accessible. Colleges bring with them strong academic and industry connections, as well as the facilities, equipment and administrative expertise that's needed to help a SME solve their problem through innovation and applied research.

Research projects lead to innovations that generate economic growth in the businesses' communities and deliver excellent returns on government investments. Fueling local, community level and college-industry partnered applied research in Ontario is central to the province's economic recovery.

College applied research return on investment (ROI) is very high, predictable, and quickly achieved for Ontario businesses, employees, and communities around the province, as well as Ontario taxpayers, principally because:

- Employers co-invest only in innovative ideas that have an excellent chance of a high ROI; i.e., they are expected to quickly contribute to the bottom line – through higher sales or reduced costs.
- Colleges raise Ontario's ROI further by providing specialized training and credentials to anchor the resulting jobs in Ontario.

Yet, Ontario's applied R&D capabilities fall behind other jurisdictions. The province of Quebec provides \$20 million in base funding annually to ensure that its Collège d'enseignement général et professionnel (CEGEPs) have the capacity through 59 industry and technology specific applied research centres to support innovation and expansion by existing small businesses in their local communities across Quebec.

Through this program, CEGEPs are recognized for helping Quebec businesses compete better and create jobs in industries as diverse as metallurgy and mineral processing, artificial intelligence, robotics and machine vision,

aerospace and innovative vehicles, bioproducts and biotechnologies, geosynthetics and polymers, electrochemistry, pharmaceuticals, geomatics and digital imaging and interactive media.

In addition to its direct impact on local business expansion, Quebec's base annual funding enabled CEGEPs to win \$33 million through 500 federal research awards in 2018-19. In comparison, Ontario colleges won 190 awards, totaling less than \$19 million.

Without the ability to compete on a national state and without funding that is aligned with other jurisdictions, Ontario's innovation agenda and SMEs will fall behind those emerging in provinces like Quebec. In order to maximize Ontario's local economic development through partnerships focused on innovating for industry, Ontario needs to increase funding for applied research so that colleges and the industries they support can complete on a level playing field.

Recommendation

The Ontario Chamber of Commerce urges the Ontario Government to:

1. Increase base funding for applied research to match or exceed annual investment in Québec.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

E. Creating a backstop for the implementation of mandated workplace vaccination policies

Submitted by: the Cambridge Chamber of Commerce

Issue

The financial impact the COVID-19 pandemic continues to have on Ontario businesses and our economy has yet to be fully tallied, or even realized. While mandated vaccination policies have been put in place for some sectors to offset potential interruptions, talk of similar policies being put in place at workplaces in general continues to generate heated political and social debate surrounding personal freedoms and government interference, not to mention threat of legal challenges. However, the need to keep businesses operating and providing a safe and healthy work environment for all employees should be paramount, even when not facing a national health crisis, and provisions should be included in the Employment Standards Act to ensure businesses that choose to mandate a vaccination policy are protected from discriminatory lawsuits.

Background

The Omicron variant of the COVID-19 pandemic has been the latest blow to Ontario's economy, potentially costing billions as businesses deal with even more lost revenue and a rising debt load as they continue to operate between waves of government-imposed health restrictions and persistent staffing shortages instigated by illness.¹⁸³

The use of mRNA vaccines, whose foundation can be traced back to the early 1960s, to lessen the severity of this virus and its impact have become key tools at keeping our economy moving, especially since those who are fully vaccinated in Ontario with symptoms can now isolate for only five days compared to 10 for those who are not fully vaccinated.¹⁸⁴ The development of vaccines in general – smallpox, polio, MMR, Tdap, HPV – have provided protection to society, which in turn has helped businesses and economies continue to operate.¹⁸⁵

However, ensuring this valuable mRNA technology can be utilized to its full potential during the most recent pandemic – one of five the world has experienced since 1900 – has sparked much political and social debate and protests surrounding use of the vaccinations, resulting in a seemingly widening divide in our society as government leaders attempt to find ways to navigate us out of this health crisis.¹⁸⁶

Calls for the implementation of mandated vaccination policies have clearly added fuel to this heated debate, resulting in numerous protests as well potential legal challenges.¹⁸⁷ Three labour arbitration decisions filed in Ontario on behalf of the unionized employees of Ontario Power Generation, Paragon Protection Ltd. And Electrical Safety Authority resulted in only the latter action not being upheld when the judge ruled the Authority could not demonstrate having such a policy was reasonable since many of its employees worked from home.¹⁸⁸

¹⁸³ Toronto Star, Jan. 11, 2022. <https://bit.ly/3H2ZBpY>

¹⁸⁴ John Hopkins Bloomberg School of Public Health, Oct. 6, 2021. <https://bit.ly/32CAJGA>

¹⁸⁵ Insider, Nov. 28, 2020. <https://bit.ly/3u9bdUv>

¹⁸⁶ CBC, Nov. 3, 2021. <https://bit.ly/3H6urhu>

¹⁸⁷ Waterloo Region Record, Jan. 23, 2022. <https://bit.ly/33ZAPsl>

¹⁸⁸ Bennett Jones LLP, Nov. 22, 2021. <https://bit.ly/3r1TVqx>

Meanwhile, even mandated vaccination policies enacted for non-unionized employees in the healthcare, long-term care and education sectors have not come without challenges,¹⁸⁹ including protests outside Ontario hospitals¹⁹⁰ and harassment of healthcare workers.¹⁹¹

The acrimony surrounding the implementation of mandated, and proof of vaccination policies continues to fester – even though the Ontario Human Rights Code has deemed them generally permissible providing they meet an extensive list of criteria – as the current COVID-19 pandemic continues.¹⁹²

It's this acrimony and clear lack of direction when it comes to the implementation of a mandated vaccination policy which has made it difficult for businesses to take any further steps without fear of legal and social repercussions.¹⁹³ Therefore, implementing elements within the articles of the Employment Standards Act to provide businesses with legal protection from discriminatory lawsuits should they choose to introduce such a policy to protect their employees and business down the road from any potential future health concerns or crises should be considered.¹⁹⁴

Recommendation

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

1. Have the Ministry of Labour include elements within the articles of the Occupational Health and Safety Act that can provide protection against discriminatory legal actions against businesses that implement a vaccination policy for the workplace.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

¹⁸⁹ Samfiru Tumarkin LLP. <https://bit.ly/348bufD>

¹⁹⁰ CBC, Sept 13, 2021 <https://bit.ly/3r2qfcW>

¹⁹¹ Canadian Press, Sept. 3, 2021. <https://bit.ly/3KMs0Tn>

¹⁹² WeirFoulds.com LLP, Sept. 23, 2021. <https://bit.ly/32FWuFw>

¹⁹³ Canadian Press, Jan. 2, 2022. <https://bit.ly/3IHIWsj>

¹⁹⁴ World Bank Blogs, Nov. 15, 2021. <https://bit.ly/3r6TZp0>

F. Create and Implement a Provincial Strategy to Address Homelessness, Mental Health and Addictions

Submitted by: The Chamber of Commerce Brantford-Brant and the Greater Sudbury Chamber of Commerce.
Co-sponsored by: The North Bay and District Chamber of Commerce, the Orillia District Chamber of Commerce, the Timmins Chamber of Commerce, the Sault Ste. Marie Chamber of Commerce, and the Barrie Chamber of Commerce.

Issue

Many communities across Ontario are dealing with unprecedented vagrancy and nuisance behaviours as a result of a number of factors including the opioid crisis, shortage in social services supports, and a lack of housing that is affordable to many struggling with addictions. Businesses in many urban areas are struggling to manage loitering and trespassing issues, and police forces and municipalities are frustrated with repeated violations of the *Trespass to Property Act* with minimal tools at keeping people and negative activities from impacting their daily operations.

Background

Communities across Ontario are struggling to manage transient groups of individuals that lack access to permanent housing or are unable to be housed in available units. Encampments can be found across the province. The December 2021 homelessness report by the Ontario Auditor General is based on four key municipalities - City of Toronto, City of Ottawa, City of Greater Sudbury, and the District of Cochrane. These municipalities were selected because they had the most people experiencing homelessness in absolute and relative terms, and/or they had a high number of COVID-19 cases in their shelters.¹⁹⁵ However, other municipalities including the City of Hamilton, City of North Bay, City of Kingston, City of Thunder Bay, City of Sault Ste. Marie and Kitchener Waterloo region are also impacted by homelessness encampments. Following the onset of the COVID-19 pandemic, the cost of a one-bedroom apartment in the City of Toronto rose by \$200 per month from 2018 to 2021.¹⁹⁶

Unsheltered populations have complex and varied needs including mental health challenges, physical disabilities, and addictions that make supporting them within business areas like downtowns a challenge. The prevalence of addictions stemming partially from prescription opioids has increased the numbers of hard-to-house and employ individuals who are unable to work or follow rules needed for traditional community supportive housing units. Since the onset of the COVID-19 pandemic in March 2020, rates of emergency medical services (EMS) for suspected opioid overdose increased by 57% and rates of fatal opioid overdose increased by 60% in Ontario. Rural and northern communities, people experiencing poverty or homelessness, people experiencing incarceration, and Black, Indigenous, People of Colour (BIPOC) communities have seen the largest relative increases.¹⁹⁷ Public Health Sudbury District reported an increase of almost 40% in suspected opioid related incidents from January to the end of November 2021.¹⁹⁸ Social Services funding to and within municipalities has not kept up with the increased demands for mental health and addictions supports due to pressures on the existing revenue tools of municipalities. Further to this, the Auditor General states that “Ontario does not have an overarching and co-ordinated provincial strategy to prevent and reduce

¹⁹⁵ https://www.auditor.on.ca/en/content/annualreports/arreports/en21/AR_Homelessness_en21.pdf

¹⁹⁶ <https://www.toronto.ca/community-people/community-partners/social-housing-providers/affordable-housing-operators/current-city-of-toronto-average-market-rents-and-utility-allowances/>

¹⁹⁷ <https://covid19-sciencetable.ca/sciencebrief/the-impact-of-the-covid-19-pandemic-on-opioid-related-harm-in-ontario/>

¹⁹⁸ https://www.sudbury.com/local-news/opioid-related-incidents-in-sudbury-jump-by-almost-40-in-less-than-a-year-4951051?fbclid=IwAR3y1tjs_Qk3MEJg2Hq3KGZYhIjci7HEKLuWSaCAOMOCKG6Av-waMQ9FMh0

homelessness.”¹⁹⁹ She recommends “that the Ministry of Municipal Affairs and Housing take a lead role, in collaborating with other ministries that fund or directly provide services and supports to people who are homeless or are at risk of homelessness, in developing a provincial strategy with specific actions, targets, and timelines to collectively aim to address the issues that contribute to homelessness”.²⁰⁰ In addition, it would be beneficial to incorporate best practice ideas from the City of Medicine Hat, Alberta a municipality that successfully addressed chronic homelessness over a 10-year period through their *Plan to End Homelessness*.²⁰¹

At the onset of the pandemic, police forces in Toronto, Ottawa, and York Region all reported increased business break-ins as a result of the pandemic.²⁰² The enforcement and implementation of the Trespass to Property Act is not effective. In Ontario, the number of actual incidents of Trespass at Night violations increased from 789 in 2019 to 1030 in 2020.²⁰³

Anecdotally, Ontario-based chambers of commerce and municipalities have received numerous calls from businesses regarding vagrancy, trespassing and loitering among other bylaw infractions. The Trespass to Property Act and their enforcement mechanisms needs to be reviewed and revamped in order to better support municipalities managing transient populations.

Communities are facing increased policing costs due to the policing demands in managing the struggling population, while simultaneously facing new demands on their services.²⁰⁴ Funding allocations should be reviewed and budgeted to reflect the growing funding priorities stemming from the pandemic.

Increasing funding for social services that address mental health, homelessness and addictions is important as this has a direct positive impact on business health. Improving the visible social issues will ultimately allow municipalities to attract and retain vibrant economies across the province.

Recommendations

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

1. Create and fund a provincial strategy to ensure social services outreach teams as partners or as an alternative to police throughout Ontario to support marginalized individuals.
2. Invest in more in-patient beds and support staff for addictions and mental health services throughout Ontario to support marginalized individuals.
3. Ensure that the Ministry of Municipal Affairs and Housing, the Ministry of Children, Community and Social Services, and the Ministry of Health coordinate efforts in developing a provincial strategy to address homelessness, mental health and addictions with a view to incorporate best practices from successful municipalities.
4. Review the *Trespass to Property Act* and their enforcement mechanisms to enable municipalities to better manage transient populations.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

¹⁹⁹ https://www.auditor.on.ca/en/content/annualreports/arreports/en21/AR_Homelessness_en21.pdf

²⁰⁰ <https://mhchs.ca/homelessness-initiatives/plan-to-end-homelessness/>

²⁰¹ <https://mhchs.ca/homelessness-initiatives/plan-to-end-homelessness/>

²⁰² <https://www.cbc.ca/news/canada/crime-data-during-covid-19-shows-spike-in-business-break-ins-stunt-driving-1.5539331>

²⁰³ <https://bit.ly/3nqkLqi>

²⁰⁴ <https://www.ctvnews.ca/canada/a-better-way-this-is-what-alternatives-to-defunded-policing-could-look-like-1.5001517>

G. Biomass Generation Key to Economic, Environmental and Social Benefits

Submitted by: Thunder Bay Chamber of Commerce. Co-sponsored by: Greater Sudbury Chamber of Commerce, North Bay & District Chamber of Commerce, Sault Ste Marie Chamber of Commerce, and Timmins Chamber of Commerce

Issue

Biomass heat and power generation is a key element in the economy of Ontario, diverting waste fibre from unacceptable and detrimental usage such as landfilling. Biomass heat and power generation contributes to the reduction of greenhouse gases, creating investment & employment in communities and First Nations, and assisting in the sustainability of the forest industry in the province. To grow these economic, environmental and social benefits, the Government of Ontario must take action to implement policies and programs that support biomass generation.

Background

The Ontario Forestry Industry is a significant element of the economy of the province. There are 47,800 Ontarians directly employed in forestry, and over \$242.6 million in timber charges were paid to provincial coffers by Ontario's forestry companies in 2020. In 2019, forest manufacturing revenues were over \$17.6 billion. The industry has the potential to grow as currently only 46% of the total allowable cut is being harvested, totalling 130,837 hectares.

One key growth scenario is the utilization of waste fibre in the generation of electricity to support the Ontario electrical grid as well as the distribution of the industrial steam by-product as a means of reducing greenhouse gases produced by heating residential, industrial, and institutional buildings.

According to Ontario's Minister of Energy, the Hon. Todd Smith, in a letter to the IESO dated November 10, 2021:

“The Independent Electricity System Operator (IESO) has forecasted an emerging capacity need following the closure of the Pickering Nuclear Generating Station that grows through the latter part of the decade. Fulfilling this forecasted capacity need will require IESO to procure both existing and new resources. As demand continues to grow in response to electrification, ensuring we have a framework in place to secure capacity is critical.”

The IESO has also identified the need and opportunity for distributed generation facilities to meet the overall needs of the region and the province.

Ontario already supports a number of biomass electricity generating facilities through power purchase agreements (PPA) which are shortly due to expire in the next 2 to 3 years. These facilities will be eligible to participate in negotiations with the IESO to renew their respective PPAs including:

- Atikokan Generating Station (OPG)
- Calstock (Atlantic Power)
- GreenFirst (formerly Tembec) sawmill in Chapleau
- Hornpayne Power Inc.
- Resolute Forest Products Thunder Bay

The integrated aspect of biomass generators ensures the sustainability of their operation, and in many cases, the operation of sawmills and harvest operations associated with them across a geographic area hundreds of kilometers wide.

For example, Thunder Bay's Resolute Forest Product's biomass facilities draw on fibre from sawmills and lumber producers in Ignace, Atikokan, Thunder Bay, Fort Frances and Barwick in addition to the many bush contractors, who rely on grinding or chipping waste material in order to access timber stands that otherwise would be un-harvestable without a market for lower grade fibre. Similar relationships exist for the other biomass generators noted previously.

Ontario's Fall Economic Update indicated the commitment of the government to fund the above-market cost of renewing existing biomass energy generator's Power Purchase Agreements. However, the Minister of Energy letter of November 10, 2021 to the IESO clarified that new contracts would be for terms up to five years only, and that the agreement for the first generator would be set at a significantly reduced capacity.

While all of the generators supply electricity to the Ontario electrical grid, a few also provide electricity for their own operations which improves their viability. However, the generation of electricity is not the only benefit created by their operations. Biomass generators are a part of an integrated energy and environmental system. The primary source of the fibre is waste wood from forestry operations. Historically this waste wood was either incinerated or deposited in a variety of landfill sites which contributed to the release of carbon dioxide into the atmosphere with no value to society. Without existing facilities, Ontario could be landfilling over 1.3 million metric tonnes (equivalent to over 40,000 truckloads of waste annually). Using this biomass to generate renewable electricity and heat diverts significant waste from landfills and will also assist in moving natural gas consumers over to a district heating supply utilizing waste steam from the generator.

The existing and future biomass generators have a broad economic footprint in their area. Employment is enhanced in harvesting, transportation, and generator operations. This is extremely important to First Nation communities as well as the host community of the generator. They also support the operations of the municipalities where they are located.

There is also a growing interest in Ontario's sustainably managed forests as an invaluable source of feedstock to support the emerging low carbon bio-economy (fuels, plastics, chemicals). These new technologies require a robust and integrated primary forest products sector to be successful and this includes a stable and reliable source of heat and power. There is tremendous opportunity to attract significant investment into Ontario over the next couple of years and the presence of biomass cogeneration facilities will play a critical role in attracting this investment as they are a source of heat, power and necessary industrial infrastructure.

Recommendations

The Ontario Chamber of Commerce urges that the Ontario Government invest in the future of a sustainable forest and biomass generation industry by:

1. Renewing the existing Biomass Power Purchase Agreements for a minimum of 10 years to enhance business certainty.
2. Ensuring that the extended PPAs sustain the same volume of fibre as the current contracts to protect the jobs and the economy of neighbouring facilities and communities as well as the diversion of waste fibre from landfill facilities.
3. Expanding the output of existing biomass generators to meet the electrical demands of the regions where they are located.
4. Creating enabling policy to support the development of cogeneration and district energy systems, including a framework for heat contracts, prioritizing government energy procurement and investment incentives for municipalities, generation facilities and building owner, creating conditions for new investment, job creation and revenue streams supporting provincial low carbon objectives.
5. Developing a policy which encourages the development of additional biomass generation facilities as an option to the lengthy process for the creation of additional transmission and distribution facilities

into communities currently served by radial lines. This would meet the concept of distributed generation as identified by the Independent Electrical System Operator (IESO).

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

H. Supporting the Further Professionalization of Ontario Child Care and Early Childhood Education

Submitted by: Hamilton Chamber of Commerce & Guelph Chamber of Commerce

Issue

Throughout 2021 the federal government made significant strides towards the pursuit of universally accessible and affordable childcare for all Canadians through the establishment of the Canada-wide Early Learning and Child Care Plan. At the time of writing, Ontario remains the only province yet to sign on to the national strategy, and as such, Ontarians continue to pay among the highest childcare and early learning costs in the country. Meanwhile, effective January 1, 2022, families in other provinces are already reaping the benefits of the nationally supported Early Learning and Child Care Plan.

The experiences of the pandemic have laid bare the importance of accessible and affordable childcare options for Canadian families, and moreover, highlighted how these services contribute positively to economic opportunity and workforce participation. Ontario ought to act now and sign onto the federal strategy to ensure equality of access to affordable and accessible childcare, and moreover, study how Canada's largest province can maximize potential benefits of the Canada-wide Early Learning and Child Care Plan for Ontarian families.

Background

The onset of the COVID-19 Pandemic was particularly punctuated with a renewed public perception and appreciation for services often taken for granted, including childcare and early learning. When the majority of childcare and early learning centres were closed or limited in terms of service capabilities to focus on supporting our province's essential workers, many families were thrust not only into working remotely in many instances, but also taking on the role of full-time care provider and educator for their children. The result was a near universal acknowledgement and reflection that our community's childcare and early learning educators serve crucial roles not only to the development of children, but also serve a broader facilitative role in terms of maximizing workforce participation and economic opportunity for many.

However, despite the acknowledgement of its facilitative benefits to the broader economy and opportunity for Ontarian families, child care and early learning remains a significant financial burden for many just trying to make ends meet. The federal government has further acknowledged these community-wide benefits derived from high participation rates in child care and early learning settings by establishing the Canada-wide Early Learning and Child Care Plan. The government's goal is ensure that all families have access to high-quality, affordable, and flexible early learning and child care no matter where they live. Specifically, the federal government has established a goal of bringing fees for regulated child care down to \$10 per day on average within the next five years and to pursue a 50 per cent reduction in average fees for regulated early learning and childcare.²⁰⁵

Throughout 2021, the federal government successfully struck deals with provinces and territories to join the Canada-wide Early Learning and Child Care Plan and as of January 1, 2022, families across Canada are already reaping the financial and social benefits of the new subsidized program. In Ontario, however, Canada's most populous province, the provincial government has yet to sign on to this program leaving thousands of Ontarian families on the hook for early learning and child care costs that Canadians in other provinces are no longer paying out of pocket for.

²⁰⁵ Budget 2021: A Canada-wide Early Learning and Child Care Plan <https://www.canada.ca/en/department-finance/news/2021/04/budget-2021-a-canada-wide-early-learning-and-child-care-plan.html>

While the long-term benefits of this program are yet to be borne out, it is not difficult to project that these significant investments in our children's development will result in more engaged, compassionate, and responsive youth equipped with the essential skills to succeed through the rest of their educational journeys. Moreover, the long-term financial benefits for families and the economic opportunities unlocked by ensuring affordable and accessible child care will be transformative in terms of maximizing workforce participation and overall provincial economic output.

While the Ontario provincial government ought to sign on to the federal strategy immediately, this will only be the beginning of a larger conversation about early learning and child care priorities for the province. As the Ontario government continues to claim the \$10.2 billion annual federal funding remittance proposal is not enough for support our provinces existing early learning and child care services,²⁰⁶ this claim remains disputed, and inaction only continues to further set back Ontario families dealing with ever-increasing early learning and child care costs. Ontario needs to sign on to the federal program in order to bring relief to families immediately and to springboard a provincial conversation about where our priorities are and how we can achieve them in concert with the federal strategy.

Where the Ontario government has identified concerns about the program, it ought to engage in robust sector consultation to explore creative solutions to ensuring greater province-wide access to affordable and high-quality early learning and child care services. Our local service providers and agencies have a wealth of front line experience that should be tapped into as the province explores what the future of early learning and child care looks like. There exists a litany of considerations to improve the sector and further support its professionalization that ought to be explored and potentially ushered in alongside the federal plan. These considerations include matters pertaining to career pathways, attracting and retaining staff, wage scaling and compensation, and to supporting equity, diversity and inclusion within the sector.²⁰⁷ In concert with early learning and child care service providers, the province of Ontario has the opportunity to consult and collaborate with the sector to understand challenges and opportunities to ensure the long-term prosperity and accessibility of Ontario's early learning and child care sector.

Recommendations

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

1. Establish an Ontario Childcare and Early Learning Task Force to explore various aspects of further professionalization of the sector and to study the long-term requirements of supporting affordable and universally accessible childcare services.
Items to be studied include, but are not limited to:
 - Employee Attraction and Retention;
 - Compensation;
 - Career Pathways and Additional Credentialling;
 - Recognizing International Accreditations;
 - Funding Formulas and Operational Structure;
 - Assessing Impacts on Regulated vs. Non-Regulated Child care;
 - Assessing Impacts on Not-for-Profit and For-Profit Child care.
 - Exploring licensed home child care as a flexible and viable model and opportunity for scalability.

²⁰⁶ Ontario's \$10/Day Daycare Delay Based on Wrong Numbers; Ottawa. <https://ipolitics.ca/2021/11/10/ontarios-10-day-daycare-delay-based-on-wrong-numbers-ottawa/>.

²⁰⁷ The \$30B Child Care Challenge: Building a New Program from the Ground Up. <https://www.cbc.ca/news/politics/child-care-into-2022-challenges-obstacles-1.6287720>.

- Reviewing existing research on the lifelong impact of early learning and childcare on children's ages 0-3.8.
- 2. Following adoption of the Canada-wide Early Learning and Child Care Plan, conduct community consultation with regional childcare and early learning service providers to understand evolving needs as the anticipated increasing demand for childcare outpaces provincial supply.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

I. Supporting Ontario's achievement of 2030 emissions reduction target, and setting us on a path to net-zero in 2050

Submitted by: London Chamber of Commerce

Issue

Ontario requires a diversified and integrated energy solution to decarbonize the energy sector to meet net zero targets in a cost-effective manner for businesses. Focusing on electrification as the singular approach to decarbonizing Ontario's economy limits flexibility and choice in how we may achieve net zero goals and will leave Ontarians vulnerable to escalating energy costs.

Background

To characterize the decarbonization challenge that lies ahead, we need to examine where our existing energy demands reside to understand how these needs may transition in the future. In 2020, Ontario consumed 2881 PJ of energy,²⁰⁸ the majority of which (44%) was delivered as refined petroleum products to the transportation sector which can be easily stored and transported over the road through a series of vehicles and containers. The natural gas system represents the next largest source of energy delivered to the province (31%) where the demand for this energy is created from heating buildings and industrial activity. The natural gas system in Ontario includes 281 BCF²⁰⁹ of energy storage (about 30% of annual natural gas demand) which allows it to reliably meet Ontario's daily and seasonally fluctuating energy needs.

In contrast, electricity provided only 16% of Ontario's energy demands in 2020 and is equipped with less than 1% of electricity storage capacity. Ontario's electrical grid is also facing an aging fleet of nuclear reactors, whose eminent refurbishments are already presenting a challenge on how the province plans to meet the current levels of electrical demand, let alone any future demand that might be realized from the decarbonization of Ontario's transportation, buildings and industrial sectors. Ontario needs a coordinated and integrated approach to decarbonize our energy systems; one that leverages its existing energy infrastructure to achieve our 2050 net-zero goals while keeping energy reliability and affordability a priority for all generations. To entirely rely on Ontario's electrical grid to decarbonize our energy and economy is impractical, unnecessary and is likely to prevent the most cost-optimal solutions from being deployed. The Independent Electricity System Operator (IESO) has indicated that the elimination of gas fired electrical generating capacity by 2030 would result in system instability and be cost prohibitive. A more practical solution to decarbonizing the remaining emissions in Ontario's electrical grid may be to deploy carbon capture facilities at existing gas-fired power plants to continue to provide this essential peaking service.

A suite of technology and fuel agnostic options should be pursued to cost effectively manage the decarbonization of heating buildings in Ontario. Geothermal and district heating and cooling systems are highly efficient, but in most circumstances cannot be affordably or practically retrofit into existing buildings for which they were not originally designed, and typically have higher capital equipment costs than conventional systems. Most Ontarians (84%)²¹⁰ have chosen to heat their buildings with natural gas.

Policies that mandate a switch from gas heating to electricity would require not only considerable capital investment by building owners, but would demand sizable investments for more electricity supply, transmission, and distribution, capacity that would undoubtedly lead to higher electricity prices for rate payers. Alternatively, programs that encourage customers to install a hybrid heating solution would be

²⁰⁸ Canada's Energy Future 2020, End-Use Demand, Reference Case, Ontario

²⁰⁹ [Natural Gas Storage - Enbridge Inc](#)

²¹⁰ Net Zero 2050. Ontario Energy Association. June 2021.

beneficial. A hybrid heating solution replaces a conventional air-conditioner with a higher efficiency air source heat pump, and pairs it with a gas furnace and smart controls. This solution allows customers to fuel switch between natural gas and electric heating, reducing emissions while also providing affordable heat during the coldest weather as well as limiting the need to provide new electrical generating capacity to service peak heating needs

Historically, gas networks delivered gas produced from coal, which was a mixture of methane, hydrogen, carbon monoxide and other gases. Between the 1960's and 1970's, gas networks began converting their systems and their customer's equipment to accept cleaner burning natural gas. Blending hydrogen into existing natural gas distribution networks, as well as future conversion of the gas distribution system to deliver 100% hydrogen is being considered in many jurisdictions as an economical means of reaching their decarbonization goals.²¹¹ Since hydrogen can be produced from natural gas or electricity, it offers several unique solutions to decarbonizing Ontario's economy. While carbon dioxide is produced when hydrogen is produced from natural gas, it is a high purity source of carbon dioxide that can be easily captured and either utilized or permanently sequestered in geological formations. This is a practical way to begin building a cost effective and low-carbon supply of hydrogen in Ontario. This hydrogen supply is now available to support hydrogen demand for end-uses such as heating or other industrial purposes. The introduction of hydrogen electrolyzers at various points on the electrical grid and at electricity generating facilities is also an opportunity to better manage excess electricity and generate low-carbon supplies of hydrogen that could displace natural gas.

The electrification of light-duty vehicles is an efficient and economical means of decarbonizing this segment of the transportation sector, with a growing number of vehicle options and charging locations introduced to Ontario. Currently, the heavy-duty transportation segment has fewer market ready solutions; however, the delivery of renewable natural gas (RNG) to compressed natural gas (CNG) stations, and vehicles are an immediate pathway to fully decarbonize the heavy-duty transportation sector. CNG vehicles can be fueled 100% with RNG with zero performance concerns. RNG also has a cost advantage over diesel fuel. As of Oct 1, 2021, RNG was being offered to Fortis natural gas customers in British Columbia at a price of \$11.83 per GJ.²¹² Compare that to current cost of diesel in Ontario of \$1.43 per liter of diesel²¹³ (\$39.6 per GJ)²¹⁴ - a distinct economic and environmental advantage can be seen. In the longer term, hydrogen fuel cell electric vehicles are another option for zero-emission vehicles.

Recommendations

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

1. Keep energy affordable for Ontarians by:
 - a. Ensuring the pace of energy transition is balanced to recognize the capacity of Ontario and businesses to pay for the increased costs of decarbonization, particularly coming out of the COVID-19 pandemic.
 - b. Recognizing that decarbonizing the gas system is an affordable, market-ready option that does not require families and businesses to replace their heating systems and avoids the need to build new electricity generation infrastructure to serve the increased load.

²¹¹ [European Hydrogen Backbone - Gas for Climate 2050](#)

²¹² [How much does Renewable Natural Gas cost \(fortisbc.com\)](#)

²¹³ [Motor fuel prices | Ontario.ca](#)

²¹⁴ 1 GJ of natural gas is the equivalent of 27.7 liters of diesel.

2. Help Ontarians conserve energy by leveraging and building on the success of current energy conservation programs to help businesses and residents reduce their energy demands.
3. Adopt an integrated, diversified pathway to decarbonize our energy systems that includes;
 - a. Formalizing inclusion of the gas system perspective in future energy system and distribution system planning, as this ensures the existing infrastructure is leveraged and helps to enable the reliable delivery of least cost low carbon energy solutions to rate payers.
 - b. Policies that enable the blending of RNG and hydrogen into the existing natural gas system.
 - c. Programs that encourage the adoption of natural gas and electrical hybrid heating and cooling systems at the time of equipment replacement, as this provides consumers the opportunity to take immediate action to decrease their GHG footprint, and the ability to fuel switch according to their economic means.

A focus on Carbon Capture, including:

- Revising the Oil, Gas, and Salt Resources act so as not to prohibit the exploration and development of carbon dioxide storage in underground geological formations. For some industrial facilities, electrification of processes may not be practical and retrofitting equipment to capture CO₂ may be the lowest cost means of decarbonizations.
- Policies that support the deployment of carbon capture equipment at existing hydrogen production facilities in Ontario, as this represents an economic means of building a low-carbon supply of hydrogen in Ontario. A study should be undertaken to understand the operational and economic impacts that may arise from deploying carbon capture systems at gas-fired power plants in Ontario.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

J. Support for Mental Health Services

Submitted by: Richmond Hill Board of Trade

Issue

Mental Health represents a major health issue that impacts businesses and residents of Ontario. Without ongoing support, businesses will see increased challenges maintaining staffing levels. This will directly impact the economy and productivity in all geographic and demographic areas of the province.

Background

According to the Ontario Chamber of Commerce, the cost of mental illness of the Canadian economy is estimated at over \$50 billion annually, with \$20 billion of that stemming directly from workplace losses. On average, mental health issues cost businesses almost \$1,500 per employee, per year.²¹⁵

Even though many large organizations have in place an Employee Assistance Program (EAP) and supplementary lifestyle programs, many small and medium-size companies may not be able to afford such services for their employees either self-funded or through third-party insurers. This puts a large portion of the population without access to treatment for mental illness and puts businesses at risk of staffing shortages due to a lack of available urgent treatment. When this unattended sector of the population seeks help, the wait times for treatment are long, and while they wait for treatment, they can sometimes be dealt with unsympathetically.

Over the past two years, the pandemic has highlighted the struggles individuals are experiencing to access adequate mental health care services.

Children's Mental Health Ontario (CMHO) says that a child or youth suffering from mental illness has to wait as long as two and a half years to receive mental health treatment, and due to the pandemic, the waitlists for services have doubled in the past two years.

One of our members, who provides services for the seriously mentally ill, expressed these same sentiments. The member shared the stories of their clients who have spiraled because of the lack of immediately available service.

The issue remains that if we do not fix the health issue of our society, it will continue to affect our economy. Businesses will continue to have massive losses. An unhealthy society equals an unhealthy economy.

According to CMHO statistics:

1. Currently, more than 6.7 million people are living with a mental health condition in Canada.²¹⁶
2. More than 28% of people aged 20-29 experience a mental illness in any given year.²¹⁶
3. Approximately 8% of adults will experience major depression at some time in their lives.²¹⁷
4. About 1% of Canadians will experience bipolar disorder (or "manic depression").²¹⁷
5. Schizophrenia affects 1% of the Canadian population.
6. Anxiety disorders affect 5% of the household population, causing mild to severe impairment.
7. Suicide accounts for 24% of all deaths among 15-24-year-olds and 16% among 25-44-year-olds.
8. The mortality rate due to suicide among men is four times the rate among women.

²¹⁵ <https://occ.ca/mentalhealth>

²¹⁶ [Mental Health Commission of Canada. \(2013\). Making the Case for Investing in Mental Health in Canada. http://www.mentalhealthcommission.ca/English/node/5020](http://www.mentalhealthcommission.ca/English/node/5020)

²¹⁷ [Canadian Mental Health Association. \(2014\). Fast Facts about Mental Illness. http://www.cmha.ca/media/fast-facts-about-mentalillness/#.Uw0Eo3lupg0](http://www.cmha.ca/media/fast-facts-about-mentalillness/#.Uw0Eo3lupg0)

The lack of adequate service and help for our youths and adults who may be the future leaders of our society can lead to devastating effects on our communities.

Even though companies have implemented their own Mental Health programs for employees over the last decade and many organizations are trying to help with this cause, there is still a massive gap for accessibility to adequate service. This gap has led to significant losses for businesses. In 2011 it was \$6 billion in losses. In little over a decade later, it is \$50 billion in losses. Some of the statistics provided by CMHO include:

1. Mental health issues account for more than \$6 billion in lost productivity (from absenteeism, presenteeism and turnover) in 2011.
2. Those with lower incomes generally report poorer physical and mental health than those in the higher income quintiles.
3. According to Statistics Canada, Canadians in the lowest income bracket are 3-4 times more likely than those in the highest income bracket to say that their mental health is fair to poor.
4. Research indicates that only 10-20% of persons with the most serious mental illnesses are even in the workforce.
5. 21.4% of the working population in Canada currently experience mental health conditions, which can affect their productivity.
6. Mental health conditions account for approximately 30% of short- and long-term disability claims and are rated one of the top three drivers of such claims by more than 80% of Canadian employers.
7. If unaddressed, the impact of mental health conditions on lost productivity will cost Canadian businesses \$198 billion over the next 30 years.

The Centre for Addiction and Mental Health (CAMH) data shows clear vulnerabilities relating to employment:

- While mental illness accounts for about 10% of the burden of disease in Ontario, it receives just 7% of health care dollars. Relative to this burden, mental health care in Ontario is underfunded by about \$1.5 billion.²¹⁸²¹⁹
- The economic burden of mental illness in Canada is estimated at \$51 billion per year. This includes health care costs, lost productivity, and reductions in health-related quality of life.²²⁰²²¹
- Individuals with a mental illness are much less likely to be employed.²⁶ Unemployment rates are as high as 70% to 90% for people with the most severe mental illnesses.²²²
- In any given week, at least 500,000 employed Canadians are unable to work due to mental health problems. This includes:
 - approximately 355,000 disability cases due to mental and/or behavioural disorders²²³

²¹⁸ Institute for Health Metrics and Evaluation (2015). *Global Burden of Diseases, Injuries, and Risk Factors Study, 2013*. Data retrieved from <http://www.healthdata.org/data-visualization/gbd-compare>

²¹⁹ Brien et al. (2015). *Taking Stock: A report on the quality of mental health and addictions services in Ontario*. An HQO/ICES Report. Toronto: Health Quality Ontario and the Institute for Clinical Evaluative Sciences.

²²⁰ Smetanin et al. (2011). The life and economic impact of major mental illnesses in Canada: 2011-2041. Prepared for the Mental Health Commission of Canada. Toronto: RiskAnalytica.

²²¹ Lim et al. (2008). A new population-based measure of the burden of mental illness in Canada. *Chronic Diseases in Canada*, 28: 92-8.

²²² Marwaha and Johnson (2004). Schizophrenia and employment: A review. *Social Psychiatry and Psychiatric Epidemiology*, 39: 337-49.

²²³ Dewa, Chau, and Dermer (2010). Examining the comparative incidence and costs of physical and mental health-related disabilities in an employed population. *Journal of Occupational and Environmental Medicine*, 52: 758-62. Number of disability cases calculated using Statistics Canada employment data, retrieved from <http://www40.statcan.ca/101/cst01/labor21a-eng.htm>.

- approximately 175,000 full-time workers absent from work due to mental illness.²²⁴
- The cost of a disability leave for a mental illness is about double the cost of a leave due to a physical illness.²²³

CMHO listed the following Communities with the longest wait times for services - York (919 days), Durham (827 days), Northumberland (792 days), Peel (737 days), Hamilton (710 days) and Toronto (684 days)

Listed above are just some of the communities but there are many more in the rural areas with much longer wait times.

For the newly formed Ministry of Mental Health to achieve the promise of a healthier and resilient future for our communities, and to help mitigate the urgent staffing shortages that result from mental health issues, they must act now.

Recommendations

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

1. Work with the federal government to commit the dedicated resources necessary to improve the services provided to mentally ill individuals, ensuring that more service providers are available to tend to this area of health care; and
2. Require the Ministry of Mental Health to act immediately upon their promises regarding improvement on wait time for services.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

²²⁴ Institute of Health Economics (2007). Mental health economics statistics in your pocket. Edmonton: IHE. Number of absent workers calculated using Statistics Canada work absence rates, retrieved from <http://www.statcan.gc.ca/pub/71-211-x/71-211-x2011000-eng.pdf>.

K. Improving Support for Employers

Submitted by: Ajax Pickering Board of Trade

Issue

Currently, the Office of the Employer Advisor (the “OEA”) provides complimentary expert guidance to employers in regard to the Workplace Safety and Insurance Act and reprisal issues in regard to the Occupational Health and Safety Act. However, in guiding employers as to their obligations, the OEA does not address the employer’s obligations under the Ontario Human Rights Code. As a result, the advice given by the OEA may unintentionally cause the employer to violate the Human Rights Code.

Background

The OEA provides “Ontario employers with expert, free and confidential advice, representation, and education on all workers’ compensation issues under the Workplace Safety and Insurance Act, and on unjust reprisal issues under the Occupational Health and Safety Act”.²²⁵ On average, in a given fiscal year, the OEA has roughly 3,000 instances of providing advice.²²⁶ The advice may be provided over a few minutes or several hours. Of the cases handled, 51% were in regard to entitlement issues (e.g. whether there is a leave entitlement) and 15% were in regard to return to work issues (e.g. what obligations are there for when an employee returns from a leave).

In providing this advice, the OEA does not address the employer’s obligations under the Ontario Human Rights Code. For example, if an employer had a worker who was returning after a leave of absence, the OEA would address the requirements under the Workplace Safety and Insurance Act. However, the OEA would not advise that the employer also has an ongoing obligation under the Human Rights Code to provide needed accommodation, up to the point of undue hardship. As a result, the employer may unintentionally violate the employee’s rights under the Human Rights Code when handling her return to work.

The absence of advice regarding human rights obligations is particularly alarming when you consider the fact that 70% of applications before the Ontario Human Rights Tribunal are in regard to alleged employment related discrimination.²²⁷ Further, the lack of assistance on human rights obligations is compounded by the fact that the Human Rights Legal Support Centre (which is funded by the Government of Ontario) only provides assistance to individual applicants, not employer respondents.²²⁸ Employers should be confident in knowing that the advice the OEA provides is consistent and complete in review of all legal obligations.

Recommendation

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

1. Expand the mandate of the Office of the Employer Advisor to include providing expert, free and confidential advice on worker disability and leave related issues under the Ontario Human Rights Code.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

²²⁵ Ontario Office of the Employer Advisor, <http://www.employeradviser.ca/en/>

²²⁶ Ontario Office of the Employer Advisor, Annual Report 2017 – 2018, <https://www.employeradviser.ca/wp-content/uploads/2019/05/OEA-Annual-Report-2017-18-final-English-1.pdf>, at pg. 7.

²²⁷ Social Justice Tribunals Ontario, 2017 – 2018 Annual Report <https://www.tribunalsontario.ca/documents/sjto/2017-18%20Annual%20Report.html>

²²⁸ Human Rights Legal Support Centre, <http://www.hrlsc.on.ca/en/about-us>

L. Establishing an Ontario Marine Strategy to Support Maritime Economies

Submitted by: Hamilton Chamber of Commerce

Issue

Ontario is home to some of the most significant waterways critical to the sustenance of the Canadian economy, thanks particularly our immediate access to the Great Lakes and the St. Lawrence Seaway. Canadians and Ontarians alike depend upon the efficient flow of goods and services through our provincial waterways, and it is essential that the provincial government establish a Marine Economy Strategy that will level the playing field for Ontario with other jurisdictions with similar strategies in place. With such a strategy in place, Ontario can effectively unlock further opportunities to bolster our provincial and national supply chain resiliency, while simultaneously expanding our competitive infrastructure

Background

Whereas legislative matters pertaining to waterways often fall under federal jurisdiction, there exist opportunities for provincial, regional and territorial governments to establish economic and environmental strategies over the utilization and protection of natural assets. This includes the potential to establish a strategy or framework that focuses on maximizing the productive utilization of a given natural asset while coordinating a long-term plan for its preservation and sustenance. Given Ontario's extensive access to critical waterways essential to the functioning of our national economy, it is recommended that the province of Ontario, in conjunction with relevant federal departments work to establish an Ontario Marine Economy Strategy that seeks to coordinate long-term economic prosperity as well as the preservation of our natural assets.

Whereas provincial governments in Quebec, British Columbia and the Atlantic provinces have achieved significant success in promoting and facilitating their marine sector economies, Ontario has the opportunity to review its current utilization of our waterways to increase our competitiveness and coordinate a long-term marine sector strategy. The marine sector is vital to Ontario's economy, and we ought to pursue further job creation, increased supply chain efficiency and resilience, and the ability to further reduce greenhouse gas emissions and road congestion. While the province has been focused on highways, rail and air, there are opportunities for all levels of government to enhance the opportunity for marine transportation as well.

The Great Lakes regional economy alone was estimated to be worth US\$5.8 trillion in 2015,²²⁹ however, not enough is being done in Ontario to expand our marine sector capacity. Beginning the process towards the establishment of a new Ontario Marine Economy Strategy will allow the province to convene relevant stakeholders to assess challenges and opportunities. Moreover, through the formal establishment of a provincial strategy, Ontario can then leverage this asset to press the federal government on additional improvements to be identified during the consultation process.

Similar to neighbouring Great Lakes jurisdictions, Ontario needs to prepare for improvements to our existing marine sector to help prevent critical economic back ups and supply shortages, and moreover unlock the economic potential and job creation opportunities associated with a dedicated strategy towards our provincial marine economy.

²²⁹ <http://www.tvo.org/article/the-great-lakes-need-a-new-maritime-strategy-and-fast>

Recommendations

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

1. Establish a Marine Economy Task Force to convene relevant stakeholders towards the design of a comprehensive Ontario Marine Economy Strategy.
2. Create a comprehensive Ontario Marine Economy Strategy that will:
 - a. Provide the Great Lakes with modern and competitive infrastructure;
 - b. Ensure efficient and ecosystem-friendly navigation of the Great Lakes;
 - c. Deliver sustainable development opportunities for maritime communities; and
 - d. Prioritize the inclusion of marine transportation investments as critical infrastructure to supporting Ontario's economy.
 - e. Grow Ontario's domestic shipbuilding industry.
 - f. Enhance and grow Ontario's key port industrial zones and multimodal hubs.
 - g. Support Great Lakes short sea shipping initiatives.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

M. Auto Insurance Reform: Making Premiums Affordable

Submitted by: Brampton Board of Trade

Issue

Auto insurance premiums rise as accidents decline.

Background

Auto insurance rates continue to climb while the rate of auto accidents continues to fall. In Ontario, auto insurance is mandatory and is provided by the private sector. The overall goal of insurance companies is to provide a good auto insurance product to the customer – at a competitive price – that allows for adequate indemnification in the event of an accident. Yet the insurance companies need to be profitable.

The cost of claims continues to be the driving factor for increasing rates. The technology now used in most newer vehicles has proven costly to replace and repair. At the same time, the cost of auto insurance fraud in Ontario was estimated to be up to \$1.6 billion annually in 2012, placing great burden on insurers and policy holders.²³⁰ Furthermore, according to a review conducted by David Marshall for the Government of Ontario, a third of insurance premium benefits do not even go to the customers as indemnification or for treatment.²³¹

A crisis has developed and the need to make a change is urgent. Customers can't afford the higher premiums, while insurance companies can't afford the higher pay outs. It's a vicious cycle and reform is desperately needed.

Recommendations

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

1. Simplify the accident benefit and tort systems to ensure that these systems are accessible without legal representation except in the most complicated cases. Claimants should receive the maximum amount of benefits while reducing the cost of administrative fees.
2. Conduct a review of the present auto insurance product and rating criteria and make meaningful changes that will fairly indemnify individuals for their loss and keep the product affordable.
3. Continue initiatives that assist the insurance industry in fighting fraud.
4. Increase the support and funding provided to the tort systems in order to ensure matters are dealt with on an expeditious basis.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

²³⁰ <http://www.ibc.ca/pe/resources/media-centre/media-releases/they-cheat-you-pay-how-to-report-auto-insurance-fraud>

²³¹ <https://www.fin.gov.on.ca/en/autoinsurance/fair-benefits.html>

N. Addressing Employment Standards Act

Submitted by: Ajax Pickering Board of Trade

Issue

Currently, when a claim is filed with the Ministry of Labour, the employer does not receive it. Instead, the employer only receives a letter identifying by bullet points the category of each issue (e.g., “wages”, “vacation pay”, etc.). The current policy of the Ministry of Labour to refuse to disclose the claim runs contrary to the efforts for an early settlement and the fundamental rights enriched by our justice system.

Background

The Ontario Ministry of Labour receives on average approximately 15,000 claims per fiscal year.²³² However, in some years, the number of claims has exceeded 23,000. Of the complaints that are filed, roughly 90% are filed by employees who are no longer employed by the employer in issue.²³³

When the Ministry of Labour receives a claim, it then sends out a letter to the employer notifying them of the claim. The letter solely details the nature of the claim by providing the category of each issue (e.g., “wages” or “vacation pay” or “termination pay”). The actual amounts claimed under each category are not normally provided. Enclosed with the letter is a package recommending settlement discussions and a template form to confirm any settlement reached.

At the same time that the letter is sent out, the claim is then placed in queue to be assigned to an Employment Standards Officer, which can often take several months to occur. The claim will be either assigned to an Employment Standards Officer 1 (who can only mediate a settlement) or will be immediately escalated to an Employment Standards Officer 2 (who can mediate a settlement and can issue orders). During the waiting period, the employer can reach out to the employee (if their current contact information is known), but the employee is not obligated to discuss the matter or to provide the claim. Once the Employment Standards Officer is assigned, if a resolution cannot be reached, then the matter will eventually be investigated and an order or a refusal to issue an order issued.

At no point during this entire process is the employer allowed to be provided with the claim from the Ministry of Labour due to its policy. In fact, the employer can only obtain a copy of the claim from the Ministry of Labour if, after an order is rendered, the employer appeals the decision to the Ontario Labour Relations Board and moves for an order for its production.²³⁴ As a result of the refusal to produce the claim, the employer is often unable to address the issues prior to the Employment Standards Officer being assigned. Further, once the Employment Standards Officer is assigned, the employer may not fully appreciate the issues or the source of any misunderstanding.

While essentially all other claim processes in Ontario (including applications before the Human Rights Tribunal) require the claim to be provided to the respondent, the Ministry of Labour has declined to accept this fundamental principle of justice. As a result of this failure to disclose, settlement discussions are hindered and

²³² Ontario Ministry of Labour <https://www.ontario.ca/page/published-plans-and-annual-reports-2017-2018-ministrylabour?_ga=2.89487003.1632369137.1547212240-492227812.1491401077>, Published: August 16, 2017

²³³ Toronto Star <<https://www.thestar.com/news/queenspark/2018/10/25/ministry-of-labour-puts-hold-onproactive-workplace-inspections-internal-memo-says.html>>, Published: October 25, 2018

²³⁴ Friedrich Schiller Schule Inc. (Friedrich Schiller Schule) v. Adam, 2013 CanLII 2654 (ON LRB)

employers are at a disadvantage in responding to claims. The claims process should be improved by requiring that, upon being filed with the Ministry of Labour, a copy of the claim is to be provided to the employer.

Recommendation

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

1. Revise the policy of the Ministry of Labour to require that a copy of any claim filed under the Employment Standards Act be provided forthwith to the responding employer.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

O. International Students

Submitted by: Brampton Board of Trade

Issue

Ontario, particularly the Greater Toronto Area, has become a destination of choice for international students. While international students are important to our economy and our communities this has put additional pressure on housing markets and on social services.

Background

Over the past decade Ontario has become a destination of choice for international students wishing to obtain an education. According to the Auditor General of Ontario, in 2019 there were approximately 114,000 international students studying in Ontario, with approximately 104,000 studying at Public Colleges and approximately 10,000 studying at Private Career Colleges.²³⁵ Overall public colleges have seen growth of 342% of international students over the last ten years, with a decline of 15% of domestic students. Approximately 62% of the international students are from India.

To obtain a student visa, the student must have a GIC with a Canadian Bank and the student is limited to working 22 hours per week. International students also must have mandatory health insurance as a condition of their visa.

International students overwhelmingly attend public institutions. As a graduate from a public university or college international students automatically qualify for a post graduate work permit when they graduate. This opens a path to obtaining Canadian citizenship. Statistics show international students are important for the growth of the Canadian economy.

Colleges and Universities use immigration consultants and agents to recruit international students to their institutions. Only recently has the Federal Government moved to regulate immigration consultants but there are no such regulations for educational agents operating in other countries.

With the increase in international students in the GTA it has put additional pressure on an already tight housing market. Student housing is very hard to find, and it presents the opportunity for international students to be exploited by unscrupulous landlords. There is also tremendous pressure put on social service agencies serving these communities and they are seeing an increase volume of cases of international students suffering from physical and mental illness while studying.

Recommendations

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

1. Take steps to establish minimum quality standards for recruitment agents who represent international students that are applying to study at the province's Colleges and Universities.
2. Work with Municipalities to enact and enforce housing bylaws and give the Landlord Tenant Board the resources necessary to undertake a public education campaign to ensure international students understand their rights as tenants.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

²³⁵ Office of the Auditor General of Ontario 2021 Annual Report, Value for Money Audit entitled "Private Career Colleges Oversight" and Value for Money Audit entitled "Public Colleges Oversight"

P. Access to Team-Based Primary Care in Underserved Rural Communities

Submitted by: Tillsonburg District Chamber of Commerce. Co-sponsored by: Ingersoll District Chamber of Commerce, Woodstock Chamber of Commerce, and Simcoe & District Chamber of Commerce

Issue

The Ontario landscape for equitable access to primary care and mental health and addictions support continues to present a number of health system gaps and challenges specific to: 1) Shortage of family physicians, and 2) Lack of access to team-based care in Rural Communities, resulting in increased and inappropriate Emergency Department (ED) visits and hospital admissions.

Background

There are several salient challenges faced by the health system that hinder the provision of community services:²³⁶

Lack of family physicians and lack of access to team-based care

For those patients without physicians, walk-in clinics are relied on, but in many rural communities they don't exist. Alternatively, the Emergency Department (ED) is relied on for primary care, or by patients who chose to ignore health issues, resulting in untreated conditions that then lead to hospital admission. This results in a high rate of avoidable visits to EDs for problems that are more appropriately managed in the community.

Continuity of care problems also result from not having a family physician and not being rostered with a Nurse Practitioner (unattached patients). HealthCare Connect is available to connect physicians with unrostered patients but often physicians do not use it due to the concern of complex patient issues.

Additionally, from an employer's perspective, employees who don't have access to a primary care provider to assess injuries and general illness have difficulties getting assessed and receiving care potentially resulting in longer periods of absenteeism.

Additional rural challenges

Rural community populations are rapidly increasing with no additional investment in health care supports, programs and services to support the population.²³⁷ The senior population is often higher in these communities presenting a more prevalent need for chronic disease care, such as hypertension and diabetes mellitus support, for example.

Rural communities also tend to present with higher numbers of high-strength opioid users and alcohol use disorder due to isolation and anxiety.

Access and wait times for mental health and addiction support are also higher due to lack of programs and services available.²³⁸

²³⁶ Some of these issues were identified in the Oxford County and Area Ontario Health Team (OHT) Full Application but are seen across the province. <https://www.oxfordandareaohht.com/wp-content/uploads/2021/02/OHT-Full-Application-Oxford-and-Area-FINAL.pdf>.

²³⁷ "Population Growth in Canada's Rural Areas, 2016-2021," Statistics Canada, <https://www12.statcan.gc.ca/census-recensement/2021/as-sa/98-200-x/2021002/98-200-x2021002-eng.cfm>.

²³⁸ "Everything is Not OK: Sector Leaders Call for Mental Health and Addiction Wait Times Strategy to be in Upcoming Ontario Budget," Addictions & Mental Health Ontario, <https://amho.ca/everything-is-not-ok-sector-leaders-call-for-mental-health-and-addiction-wait-times-strategy-to-be-in-upcoming-ontario-budget/#:~:text=The%20average%20wait%20time%20for,access%20the%20services%20they%20need.>

Recommendations

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

1. Investigate the opportunities available to establish equitable team-based primary care access to all rural and remote communities across the province, specifically in areas that are identified as high need: <https://www.health.gov.on.ca/en/pro/programs/highneed/>
2. Invest to expand team-based Primary Care models such as Family Health Teams (FHTs); Community Health Centres (CHCs), Aboriginal Health Access Centres (AHACs), Nurse Practitioner Led Clinics (NPLCs) and expand the Family Health Organizations (FHOs), to enhance access and increase capacity for unattached patients to team-based primary care in rural and remote communities.
3. Roster patients to Nurse Practitioners to avoid duplicate primary care in rural and remote communities with physician shortages.

Effective Date: April 30, 2022

Sunset Date: April 30, 2025

Q. Create a Provincial Pandemic-Response Strategy and Plan

Submitted by: Greater Sudbury Chamber of Commerce. Co-sponsored by: North Bay and District Chamber of Commerce, Timmins Chamber of Commerce, Sault Ste Marie Chamber of Commerce, and Sarnia Lambton Chamber of Commerce

Issue

The COVID-19 pandemic has exposed Ontario's vulnerabilities in its response strategy to health pandemics. Over the past year, the province has faced challenges related to its critical health-care supply chains, infrastructure, and other crisis-response tools. The Government of Ontario should conduct a thorough review of its response to the COVID-19 pandemic and develop a pandemic-response strategy to help manage any future health-care related crises.

Background

The COVID-19 pandemic was an unprecedented health and economic shock for which the province, along with the rest of the world, was underprepared. The early days of the pandemic saw communities around the province struggle with procuring critical Personal Protective Equipment (PPE) supplies for not just average citizens, but frontline health care and essential service workers as well. There were reported shortages in N95 masks, gloves, gowns, face shields, and other equipment. The province responded to these concerns by launching a Workplace PPE Supplier Directory in May 2020, but the initial shortages had already delayed Ontario's safe reopening by several weeks.²³⁹

During normal times, Ontario has relied on its trading partners to supply many materials necessary to power the economy, but due to a variety of reasons, those relationships were not enough in the early days of the crisis and left the province at a disadvantage. In early April 2020, Canada's N95 mask orders from American manufacturer 3M were disrupted due to the US President's invocation of the US Defense Production Act; a shipment of masks ordered by the Government of Ontario were held at the US border in April 2020, but later released; and in early May 2020, news reports indicated that N95 masks imported from China did not meet Canadian health standards and could not be used against COVID-19. These situations eroded trust in our trading partners, and should be seen as an indication that Ontario, despite being a trade-reliant economy, should not rely on other countries to supply critical materials needed to combat a health pandemic.

The provincial government acted to address some of these issues, with multiple investments to increase domestic PPE manufacturing capacity, including launching the Ontario Together fund in April²⁴⁰ and the Workplace PPE Supplier Directory in May.²⁴¹

Additionally, the differences between Ontario's various measures to mitigate the spread of the virus, including states of emergencies, stay-at-home orders, business regulations, etc., and that of other neighboring provinces like Quebec has also contributed to the entire country's response to COVID-19. The level of coordination between provinces and the federal government in communications and response strategies, including supports for businesses, has led to public confusion, and ultimately some erosion of trust among citizens and businesses.

Various factors led to a delay in the provincial, and national, rollout of the COVID-19 vaccines. The federal government is procuring these vaccines from manufacturers while the provinces are administering it to the

²³⁹ <https://news.ontario.ca/en/release/56954/ontario-announces-additional-workplaces-that-can-reopen>

²⁴⁰ <https://news.ontario.ca/en/release/56537/ontario-joins-forces-with-the-private-sector-to-fight-covid-19>

²⁴¹ <https://news.ontario.ca/en/release/56954/ontario-announces-additional-workplaces-that-can-reopen>

population. Despite the federal government signing contracts for multiple doses of vaccine per citizen, vaccine supply shortages still remain an issue as we enter 2021. Part of the reason is the inability to manufacture the vaccine domestically. The province should consider policies to encourage domestic manufacturing of critical, pandemic-related supplies, including vaccines.

Business are doing their part. Many businesses across the country showed organizational flexibility and modified their operations in response to COVID-19 to produce needed PPE equipment. But these were emergency responses to an unprecedented situation, and may not continue in the long-term after recovery, unless there is clear incentive to do so. These businesses may need support from the provincial government to continue such operations, and the Ontario Together fund has a key role to play in this.

The absence of a comprehensive strategic response to the pandemic has led to a difficult response to the pandemic, particularly in the second wave where confusing directives have made public compliance more difficult. The Government of Ontario should ensure these issues are mitigated in the future through the development of a pandemic-response strategy that can be relied upon in any future health-related crises. Part of this should be to conduct a comprehensive review of Ontario's response to COVID-19, and identify opportunities for improvement, inter-provincial partnerships, and plans for improved coordination with the federal government.

Recommendations

The Ontario Chamber of Commerce urges the Ontario Government to:

1. Conduct a comprehensive review of the Ontario's response to COVID-19, with the aim of identifying opportunities for improvement, inter-provincial partnerships, and improved coordination with the federal government.
2. Engage the business community to create a provincial pandemic-response strategy to effectively respond to future health-related crises, paying particular attention to regulatory changes, infrastructure investments, communication strategies, etc., to ensure that business restrictions remain the last resort.
3. Review the performance of the Ontario Together fund and Supply Ontario and potential for expansion into a permanent investment fund for building capacity for domestic manufacturing of critical pandemic-related materials, including PPE, vaccines, and other related medical materials.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

R. Establishment of the Provincial Termination Severance Fund

Submitted by: Vaughan Chamber of Commerce and Newmarket Chamber of Commerce

Issue

Without Government intervention, multiple businesses are liable to enter insolvency once a final date is set for the *Employment Standards Act, 2000* (“ESA”) temporary layoff date, and then resulting termination date.

Background

Understanding the severity of the COVID-19 pandemic on struggling SMEs, the Provincial Government has delayed the start of temporary layoff periods prescribed under the ESA²⁴², with the current delay due to expire on July 3, 2021²⁴³. Moving this date has ensured that businesses do not have to worry about the length of time that an employee is placed on a temporary layoff, thereby avoiding the necessity of having to pay statutory termination pay and severance pay pursuant to the ESA should the employee not be recalled to work within the prescribed time limits under the legislation.

While prudent Government policy after the pandemic should assist in an economic recovery, there will still be many unable to recover and permanent job losses. This will particularly be true in some of the hardest-hit sectors such as tourism, hospitality and retail. Such companies will be at risk once the Provincial Government decides to finalize the end of the delayed start of temporary layoff period. At this point, businesses which cannot recall employees to the workplace will effectively be on a temporary layoff pursuant to the ESA, and if not recalled within the prescribed time limits, necessitate the payment of statutory termination pay and severance pay, which can be as high as 34 weeks of wages. Should the July 3rd date remain, multiple companies will go under between the second half of 2021 and the first half of 2022 when they are required to pay the statutory amounts pursuant to the ESA.

The Government could continue to delay this date but there may be a challenge to this through the courts. An employee could challenge the temporary lay-off period in the courts, by arguing that the layoff is the equivalent to a constructive dismissal, which would require their employer to provide them with common law notice. Both due to the aforementioned common-law challenge and public opinion, the government will need to prepare for this layoff period once the pandemic has ended.

While the Federal Government has established some loans, there will still be several companies that require long-term relief. The CEBA²⁴⁴ loan provides too small a sum to cover costs, whilst the HASCAP²⁴⁵ requirements are too limited to cover all businesses. The Federal Wage Earner Protection Program²⁴⁶ does provide compensation in cases of business insolvency when wages or outstanding severance payments but the sum provided is minimal.

Accordingly, companies that are unable to claim this support and unable to recall employees from a temporary layoff due to the downturn in the economy will eventually have to provide statutory termination pay and severance pay. This will likely result in insolvency for several of them. Businesses remaining open is central to

²⁴² <https://www.ontario.ca/laws/statute/00e41>

²⁴³ <https://www.ontario.ca/document/your-guide-employment-standards-act-0/termination-employment#section-2>

²⁴⁴ <https://ceba-cuec.ca/>

²⁴⁵ <https://www.bdc.ca/en/special-support/hascap>

²⁴⁶ <https://www.canada.ca/en/employment-social-development/services/wage-earner-protection/employee/eligibility.html>

any provincial economic recovery and is imperative that those unable to afford statutory payouts are provided with a support mechanism to keep their doors open.

Recommendations

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

1. Establish a Provincial Termination Severance fund or to support businesses that may enter insolvency, either by covering the costs of statutory termination pay or severance pay on a retroactive basis to March 15, 2020, until a date to be determined in consultation between employers and government.
2. Work with the Federal Government, CRA, and financial institutions to understand which companies have fallen through the cracks of the HASCAP, specifically those who have seen less than a 50% decline in revenue.
3. Work with the financial institutions of businesses to disperse funding easily in accordance with previous government programs.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

S. Implementing Virtual Healthcare in Ontario

Submitted by: Vaughan Chamber of Commerce and Newmarket Chamber of Commerce

Issue

Virtual healthcare in Ontario lacks sufficient direction and funding to effectively operate despite the current gaps present in the system.

Background

The Government of Ontario has recognized the benefit of this support by announcing a \$14.5 million²⁴⁷ investment in the growth of virtual care throughout the Province. While this initial investment represents an important first step in funding virtual health, there will need to be further investments made by the Government to effectively develop this form of healthcare. The first steps are in place with Ontario's Digital Health First Strategy, announced in November 2019.²⁴⁸ However this strategy needs to be developed beyond its current iteration, which is too broad in scope to be actionable.

This issue has been highlighted by the COVID-19 pandemic, which has exposed gaps in Ontario's healthcare system. A focus on closing these gaps to improve wellness of our communities will be key to enabling better health and a more productive workforce. This means ensuring the right services are in place, with the appropriate mechanisms to enable access and equity across our communities, while empowering people with the information and tools to proactively self-manage their health.

We have seen a recent rise in the use of remote care to connect patients with the supports they need, with a global rise of roughly 130% over a four-year period, even prior to COVID-19²⁴⁹. As we look to the future, this will be a key area for growth to enable self-management, access to care, improved patient experience and better health outcomes. The current limitations in the way care is delivered can contribute to longer wait times and challenges in getting resources needed. Digital health capabilities can break down these barriers by enabling people to take greater control of their care and access many services from their home environment.

For example, instead of providers directing where a patient should go through a referral, patients could be given the choice and resources to make an informed decision on where to seek care, with opportunities to access providers across the system and not just within their local region. Modernized digital referral systems can also allow patients to track progress on referrals, minimize time for processing, and help to centralize specialty procedures to level-load demands and improve timely access to care.

Similarly, with respect to medication management, this can mean providing patients a common platform to find where their medications are available, put in orders, and have prescriptions sent to their home. This platform should be developed to complement other modalities including phone-in access and video interactions to ensure ease of access for patients. Many vulnerable populations currently have difficulties accessing medications, resulting in poor outcomes and preventable escalations in care. Improved mechanisms to get the resources people need at home can enable better adherence to care plans and help shift the current system towards a preventative approach to health. To enable these types of services and ensure equal access for our communities, it will be important to ensure the affordable infrastructure is in place, such as high-speed broadband internet²⁵⁰. While healthcare is mentioned in the *Broadband and Cellular Action plan* it is primarily

²⁴⁷ <https://news.ontario.ca/en/release/59437/ontario-expanding-innovative-home-and-community-care-services>

²⁴⁸ https://www.health.gov.on.ca/en/news/connectedcare/2019/CC_20191115.aspx

²⁴⁹ <https://lumeca.com/is-telemedicine-actually-more-affordable/>

²⁵⁰ <https://occ.ca/wp-content/uploads/COVID19-Policy-Brief-Virtual-Care-final.pdf>

targeted at rural communities²⁵¹. While this scope will support virtual care, it will also need to be adapted in urban municipalities to ensure a Provincial ease of access. This could involve providing free high-speed access in public spaces to ensure local supports for those who cannot otherwise afford these resources.

By adapting the way in which care is delivered and enabling access to health resources across the system, community members can be empowered to manage their care, with information at their fingertips to make informed care decisions and connect to the services they need. This proactive approach to care can make it easier and faster to connect to care supports, contributing to healthier communities.

Recommendations

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

1. Review the current Ontario Digital Health First Strategy to discern how best to implement virtual healthcare. This review should ascertain which areas of health care have the capacity to shift to a virtual setting.
2. The Government must then develop a reasonable funding estimate to support the transition to virtual health for compatible areas. Priority should be given to areas such as a digital referral system and remote medication which would benefit from a move to a virtual platform.
3. The Province must undertake a review to focus on understanding what the broadband requirements are to support virtual healthcare. Sufficient broadband will be essential to delivering virtual healthcare across multiple modalities.
4. Ensure the requirements of the healthcare sector are incorporated into the recently announced broadband funding.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

²⁵¹ <https://www.ontario.ca/page/speed-ontarios-broadband-and-cellular-action-plan#:~:text=Invest%20in%20a%20new%20broadband,and%20promotes%20innovative%20industry%20partnerships.>

T. Improving Long-Term Care Services Across Rural and Northern Ontario

Submitted by: Greater Kitchener Waterloo Chamber of Commerce, Port Hope & District Chamber of Commerce, and 1000 Islands Gananoque Chamber of Commerce

Issue

The costs of providing Long-Term Care (LTC) services create significant pressures on municipal financial resources particularly across many rural communities.

The Rural Ontario Municipal Association, the Eastern Ontario Wardens' Caucus, the Federation of Northern Ontario Municipalities, the Northeastern Ontario Municipal Association, and the Northwestern Ontario Municipal Association have advanced a series of measures to provide these services within a more efficient and cost-effective delivery model.

Background

Municipalities operate almost one in five Long-Term Care institutions across Ontario which are home to one of four residents receiving related services.

The Rural Ontario Municipal Association (ROMA) claims there are not enough LTC beds to meet demand and provincial funding has not been maintained at a consistent level. The ability to access a bed in non-urban areas is essential and should be a major component of the universal planning process for allocation across Ontario.

Municipalities contribute more than \$350 million annually in excess of the provincial funding operating subsidy, not including capital costs. The municipal property tax base is not a sufficient or fair source to support Long-Term Care delivery.

On November 2, 2020, Premier Ford accompanied by former Finance Minister Rod Phillips and Long-Term Care Minister Merrilee Fullerton announced that personal care to each Long-Term Care resident across Ontario will be increased to four hours daily. Direct hands-on delivery is generally provided by nurses or personal support workers for individual clinical and personal care requirements.

A commitment was also delivered by the Ministers to work in collaboration with all partners including labour, education, and training providers to advance significant changes across the Long-Term Care sector including the four hour per day commitment.

In early February of 2021, the Eastern Ontario Wardens' Caucus (EOWC) released a report on LTC facilities and proposed five recommendations to improve the efficiency and effectiveness of service delivery including:

- increased direct care funding to achieve the provincial benchmark of the four-hour care model;
- transitioning to a per-bed funding model for more transparency;
- increased provincial capital funding predictability and providing on-going support for capital maintenance;
- supporting resource sharing between institutions;
- improved processes to increase efficiency and cost effectiveness.

A four-hour model will allow the recruitment of additional staff and financial stability to improve the quality of service and increase daily direct care for each resident. The EOWC shares the provincial objective of expanding the number of LTC beds across Ontario along with reducing red tape.

Recommendations

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

1. Review major issues such as staffing, governance, regulations, inspections, and infection control measures to ensure a cost-effective LTC delivery model for municipally run LTC.
2. Ensure adequate, predictable, and stable multi-year LTC funding.
3. Increase direct care funding to ensure the four-hour care objective.
4. Implement a per-bed funding model.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

U. Managing High Water Levels on Lake Ontario

Submitted by: Quinte West Chamber of Commerce. Co-sponsored by: Belleville Chamber of Commerce, Prince Edward County Chamber of Commerce, 1000 Islands Gananoque Chamber of Commerce and Port Hope & District Chamber of Commerce

Issue

The high-water levels in Lake Ontario have caused extreme flooding in the spring extending through the summer months, affecting businesses, municipalities and property owners along the Lake Ontario shoreline and St. Lawrence Seaway on both sides of the border. This flooding was especially significant in 2017 and 2019 and there is a moderate risk of high water and more flooding in 2021 according to the International Lake Ontario St Lawrence River Board Dec 11, 2020, press release. While the International Joint Commission has made improvements to the implementation of Plan 2014 and is now allowing deviations from the plan; more needs to be done to protect shoreline property and work closer with lakeside communities.

Background

On December 08, 2016 the Commissioners of the International Joint Commission (IJC) signed an updated order of approval for the regulation of water levels and flows in Lake Ontario and the St. Lawrence River. **(Instituted to replace plan 1958D)**

The updated order makes it possible for the IJC to approve Plan 2014, a new regulation plan for determining the flows through the Moses-Saunders Dam located on the St. Lawrence River between Cornwall, Ontario and Massena, New York. The updated order and plan were intended to replace what was believed to be an outdated system of regulating flows developed in the 1950s.

While the intention of Plan 2014 was to protect shoreline property and retain the environmental conditions and coastal protections on the lower St. Lawrence River, the water levels have peaked to 100-year flood levels and caused millions of dollars in damage. While there was a need to maintain water levels through the summer, the new plan did not seem to be prepared to handle unexpected weather patterns.

The plan has failed to improve ecosystem health and diversity on Lake Ontario and the upper St. Lawrence River or provide net economic benefits anticipated. While Plan 2014 is the result of more than 16 years of scientific study, public engagement and governmental review, it has failed to accomplish its intended goals and caused catastrophic damage in its continued implementation. There are calls from both sides of the board for the IJC to develop a comprehensive plan to assess and improve Plan 2014.

The International Joint Commission is not transparent and was slow to respond to requests by municipalities, property owners and government bodies to discuss the impacts of Plan 2014. **(Report from the U.S. Government Accounting Office GAO 20-529)**

In 2020, after public and political pressure was applied, the IJC made big strides in allowing deviations from the plan to lower the water in Lake Ontario; many believe this avoided flooding in 2020. In Dec of 2020, they reduced their board to six members including three from the United States and a representative each for Canada, Quebec, and Ontario. It also announced at the same time they are establishing an advisory group of stakeholders and Indigenous communities to report their perspectives directly to the commission. While this is a step in the right direction, the lack of transparency, communications, and consultation with shoreline communities about their plans continues to be a problem.

“Trenton Cold Storage Inc., a 117-year-old business at the mouth of the Trent Severn Waterway, is experiencing more than \$400,000 in direct costs as a consequence of the high water in 2019. The high water is a government made problem because of the flawed decision-making and processes which adversely impacted

all landowners above the Moses Saunders Dam, for the benefit of landowners below the Moses Saunders Dam, as a consequence of Plan 2014,” stated Eben James Junior, owner of Trenton Cold Storage Inc.

“Crate Marine Belleville estimate our loss at \$50K in labour and materials to deal with all the things associated with high water levels in 2017 & 2019, not including the loss of customers,” said Jim Bell, operations manager at Crate Marine.

Insurance companies cover overland flash flooding but not damage from standing water and the wave damage from standing water. To date some businesses and individuals report having paid out over \$70,000 for repairs and mitigation with lands still needing to be relandscaped completely.

Property Owners want to ensure that Conservation Authorities issue Emergency Permits within 24 hours as they can be delayed due to workload during flooding. The Province should outline the type of work that can be completed during flooding to ensure property owners do not face permit delays and potential fines from their actions.

Hon. John Yakabuski, Minister of Natural Resources and Forestry commissioned a report called An Independent Review of the 2019 Flood Events in Ontario. The report, completed by Douglas McNeil, P.Eng. McNeil Consulting Inc. made three recommendations concerning the IJC.

Recommendation #55 That the International Joint Commission, the Ottawa River Regulation Planning Board, and Ontario Power Generation make their detailed information about their flood operations readily available on their respective websites.

Recommendation #56 That the International Joint Commission consider meeting with interested stakeholder groups and individuals to explain in considerable detail how their structures are operated.

Recommendation #57 That the International Joint Commission consider creating specific “2017 Flood” and “2019 Flood” buttons for their home webpage and populating those pages with detailed information on the floods and their operations, as well as providing direct links to related reports.

Recommendations

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

1. Work with the Federal Government to:
 - a. Ensure the International Joint Commission (IJC) provides more transparency and better communications & consultation with impacted groups in Ontario.
 - b. Develop a comprehensive plan to assess and improve Plan 2014.
 - c. Ask the IJC to fully implement recommendations 55 – 57 of the 2019 Flood Events in Ontario Report.
2. Allow municipalities to access Provincial aid without the need to declare a state of emergency.
3. Direct Conservation Authorities to issue emergency permits immediately upon request to allow property owners greater leeway to protect their shorelines during high water without the delay of a permit process and potential fines.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

V. Province of Ontario Oversize/Overweight Permits

Submitted by: Tillsonburg District Chamber of Commerce

Issue

The Ontario Provincial Oversize/Overweight Permit System is very complex making it difficult for companies to comply when their vehicles travel throughout Ontario's county roads that are not designated as King's highways.

Background

Most companies do not understand the requirements of the permit system. A provincial oversize/overweight permit costs a business \$448.75 annually and is valid ONLY for King's highways. This cost is considered very reasonable.

Alternatively, a business can also purchase a single "trip" permit valid for a limited timeframe with costs varying between \$66.25 to \$714 depending on distance travelled and weight of the load carried.

Since the provincial permit is valid for King's Highways only, in some cases businesses must also purchase county oversize/overweight permits as well as permits from the "lower tier" municipalities in that county.

This current system forces a business to contact each county and municipality that maintains the roads their vehicles will be travelling on to determine the trip permit process and requirements. This is a very inefficient, time consuming and complex process.

It is a burden to small and medium sized companies (SMEs) that require oversize/overweight permits to fulfill their obligations to their clients. Ontario companies affected are: excavating companies, construction companies, farm machinery dealerships, agricultural suppliers, for example.

Complexity Highlights

The regions of the Province of Ontario contain 23 Counties with 211 "lower tier" municipalities embedded within the 23 Counties. And, there are 11 single tier municipalities (i.e. Brantford-Brant, Toronto, Ottawa, Chatham-Kent, Haldimand, etc.); which leaves a total of 245 potential contacts for permits.

Considering these statistics, business owners must know what municipality maintains the particular road their vehicles will be travelling on in order to legally transport equipment. To determine this, a business would need access to an entire database of Ontario roads and who maintains/owns them.

In our research, most businesses did not know their compliance requirements; and only one knew that County permits were required but did not know about the lower tier municipal permits.

In speaking with local businesses who were stopped and charged multiple times in the past 15 years, the fines were at least \$500.00. It is their feeling that it is cheaper to pay the fine than to spend the time to acquire the necessary permits.

In summary, the current oversize/overweight permit system is a barrier and a financial burden for companies in Ontario to do business.

Recommendations

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

1. Investigate the opportunities available to create a one-permit system for wide, high, and heavy loads to navigate throughout Ontario's roads regardless of the regions, counties or municipalities vehicles must travel through.
2. Develop a database with a real-time, interactive map with each municipality's rules, restrictions, and information to provide businesses with a centralized hub for all permit information.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

W. Rapid Testing in Workplaces

Submitted by: Mississauga Board of Trade

Issue

Many workplaces would be pleased to offer rapid testing for COVID on site, but regulations require only very specific health professionals to be allowed to administer the test making rapid testing in the workplace difficult and in some cases costly.

Background

The COVID pandemic has significantly changed how workplaces function particularly those deemed essential for in-person work. Employees and customers required to work in a specific business location are susceptible to getting COVID due to the close proximity to fellow workers and layout of the workplace.

One of the ways identified to control the acquisition and spread of COVID is through effective and regular testing. Workplaces are an ideal location for rapid testing to identify positive cases of COVID, isolate the individual and ensure they do not enter the workplace.

Regulations however only permit certain health care professionals from administering the nasopharyngeal swab required for a rapid antigen COVID test, meaning many businesses simply cannot offer the test due to availability of health care professionals or the cost of employing these professionals in a 24/7 operation.

Manufacturers of the COVID rapid tests can train any person to administer and operate a testing machine and have indicated their willingness to do so. Therefore, businesses could arrange for employees within the business to receive the appropriate training and be certified to administer the rapid COVID test and interpret results.

Positive results of the test for an individual would be reported to the local Public Health Unit for the appropriate follow-up and action. The individual would receive on site counselling and be referred to a facility to receive a PCR (Polymerase Chain Reaction) test which is the gold standard for detecting COVID-19.

Recommendation

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

1. Amend the necessary regulations within the Ministry of Health to allow delegation of authority to non-medical professionals, who are trained to administer a nasopharyngeal swab and interpret rapid antigen COVID test results in the workplace.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

X. Resolving Business Ineligibility for COVID-19 Assistance Programs

Submitted by: Greater Kitchener Waterloo Chamber of Commerce and Cambridge Chamber of Commerce

Issue

Ontario businesses applying for COVID-19 assistance require an expedient solution and process for resolving eligibility and ineligibility issues.

Background

The Canadian Manufacturers & Exporters, in their 2020 report *Manufacturing our Future: Leveraging Manufacturing for Long-Term Canadian Prosperity* noted that governments must continue to refine and expand support programs to business for ensuring economic stability. The organization proposed a rapid arbitration process for companies where there are disagreements in COVID-19 financial assistance relief program qualifications.

Businesses that are designated essential and open for personal services such as dry cleaning have experienced significant revenue drops but generally do not qualify for assistance since they are available for regular customer service. Applicants that have either opened or purchased a business between 2019 and 2021 experience chronic challenges in accessing funding programs originating from the verification of revenue declines.

A February 3, 2021 CTV News report indicated there were potentially 56,000 applicants awaiting decisions on assistance from the Ontario Small Business Support Grant. The provincial response was that some applications require “further review.”

The Ontario Restaurant Hotel & Motel Association (ORHMA) wrote to the Ontario Minister of Finance on January 18, 2021 requesting that accommodation establishments secure eligibility for the small business grant. Restaurants and bars are eligible however hotels are not.

Recommendation

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

1. Establish a rapid arbitration process for Ontario businesses applying for COVID-19 relief where there are disagreements on provincial program qualifications.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

Y. Responsible Business Protocol

Submitted by: Greater Peterborough Chamber of Commerce. Co-sponsored by: Brampton Board of Trade, Barrie Chamber of Commerce, Greater Sudbury Chamber of Commerce, Milton Chamber of Commerce, and 1000 Islands Gananoque Chamber of Commerce

Issue

There is significant evidence that the current system of closing businesses based on the products they sell or services they offer is damaging Ontario's economy and forcing businesses to close permanently. An equitable set of safety standards for all businesses to adhere to in order to remain open will help our economy and save businesses from closure while maintaining public safety.

Background

Compliance with safety standards is an integral part of running a business. It impacts every size and sector, from retail and restaurants to construction and manufacturing. The primary reason Ontario businesses are leaders in workplace safety is to protect their employees and customers. Compliance with regulations that continue to evolve is taken seriously. Businesses are accustomed to having their ability to operate depend on their compliance with current safety standards.

Businesses in Ontario follow the Occupational Health and Safety Act closely or face penalties that can include jail time and fines of \$100,000 for individuals and \$1.5 million for corporations. They work within the Workplace Safety and Insurance Act, Human Rights Code, Canada Labour Code, Ontario Fire Code, Liquor Control Act, Ontario Building Code, Health Protection and Promotion Act of Ontario, and more, each with their own set of financial penalties and potential restrictions to conduct business.

Currently, businesses are being shut down or forced to significantly change their service model not because of their adherence to safety protocols, but because of the products they sell or the services they offer. This shuts down some businesses while allowing others to operate with very few restrictions.

The result is a process that has significantly damaged the economy. People have not stopped shopping, resulting in a system that favours large international department and online retailers over Ontario-based businesses.

To both support the economy and keep Ontarians safe, the system defining which businesses are essential requires reform. Restrictions should hinge on compliance, not solely on perception of essentiality, sector, size, product etc. Businesses that can provide evidence of compliance with COVID-19 health and safety protocols should not be ordered under the same operating restrictions as those that are non-compliant.

The Ontario Chamber of Commerce is confident that businesses and lawmakers can work together to create an equitable framework where businesses can operate in compliance with new safety protocols that will both help Ontario work toward the eradication of COVID-19 and provide sustainability and consistency to the business community.

Recommendations

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

1. Establish a Safe Operating Framework with a uniform and equitable set of safety standards, in line with the Occupational Health and Safety Act, for all businesses regardless of products/services or

establishment size — not based on a perception of essentiality — enabling businesses to continue serving the public during a health crisis, including the current COVID-19 pandemic.

2. Establish a Community Contact Reduction Framework that applies the same capacity limits for all public-facing businesses, based on regional virus spread, identifying a clear framework for reducing individual contacts.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

Z. Restoring Democracy in Ontario's Workplaces

Submitted by: Greater Sudbury Chamber of Commerce. Co-sponsored by: Sault Ste Marie Chamber of Commerce

Issue

The *Labour Relations Act, 1995* creates a legal regime which unduly favours union certification, instead of neutrally regulating the process. The card-based certification process is undemocratic and should be repealed; there should be more options to appeal the decisions of the Ontario Labour Relations Board; and there should be options for employers to seek recompense in failed certification cases.

Background

It is time for the *Labour Relations Act* to be overhauled, with the aim of balancing the rights of employers and employees. The current regime unduly favours union certification and allows for underhanded union organization tactics, with limited opportunities for the will of employers and individual employees to be heard in the process.

Card-Based Certification:

Under Ontario's current labour legislation, a card-based system means that the Ontario Labour Relations Board can order a vote on union certification in construction-industry workplaces if more than 40 percent of employees have signed membership cards to join the union, and furthermore, if more than 55 percent of employees have signed cards, the Board can order certification of a union without a vote at all.

Card-based certification makes employers particularly vulnerable as certification is based on those working on the date of application. This means that automatic certification will apply even where 55 percent of the employees at work on the date of application constitute a minority percentage of the employer's total workforce (i.e., 10 employees working on the date of application to the Board could theoretically unionize an overall workforce of a 100). Union strategies can also include the use of "salts" (individuals sent by the union to seek employment for the sole purpose of bringing a union to the workplace) to certify companies against the will of regular, longer-term employees by bringing forward applications on a day where it is known that only a few employees are working.

Secret ballot voting safeguards employees from intimidation or pressure from union organizers or employers and helps ensure their true opinion is represented – this logic is accepted in election voting around the world in democratic countries. While a secret ballot vote is conducted in a neutral environment by the Labour Relations Board, the collection of signatures on union membership cards is controlled entirely by union leadership. Union organizers can pressure employees to sign union cards without communicating the actual purpose of those signatures, and can submit applications with cards that do not reflect the true wishes of some signees. Under the current legislation, there is no means to address abuse and fraud by union organizers during an organizing drive.

Card-based certification is undemocratic, threatens economic prosperity and significantly shifts the balance in certification votes in favour of organized labour. Since there is no evidence to suggest that secret ballot voting does not allow employees to express their wishes, and significant risk that card-based certification does just that, the provincial government should eliminate card-based certification and repeal Section 11.2.c of the Act,

which permits the Ontario Labour Relations Board to automatically certify a trade union without a secret-ballot vote taking place under certain circumstances.

Adjudication at the Ontario Labour Relations Board:

Under current legislation, the Board is composed of a chair, one or more vice-chairs, and an equal number of members representing labour and management. Section 110.14 authorizes the chair or vice-chairs to hear cases alone rather than in a panel if the chair considers it advisable to do so; in practice, this is often the case. Additionally, there are limited opportunities to appeal a vice-chair's decision, and if a request for reconsideration is brought forward, it is often determined by the same vice-chair that issued the initial decision. The province should amend the Act to remove Section 110.14 to ensure that a panel of Board vice-chairs and members hear each application, similar to other Ministry Boards; the province should also allow for a more responsive appeals process.

Failed Certification Applications:

Under current legislation, in cases where the Board holds a secret ballot vote in a workplace and the union receives 50 percent or less of ballots cast, the certification is deemed to have failed. Section 10.3 of the Act prohibits the Board from considering another application by the same bargaining unit for a period of one year. A certification application is costly, time-consuming and a distraction from the business's operations, and a grace period of one-year is not enough time for a business to recover from the legal proceedings of an attempted union certification. The reapplication ban should be extended from one year to five years.

Additionally, the legislation does not allow for any cost recuperation in failed certification cases, unlike other lawsuits. Such a recourse should be included in the legislation. Without such a provision, there is no disincentive for union organizers to bring forward applications year after year.

Recommendations

The Ontario Chamber of Commerce urges the Ontario Government to:

1. Eliminate the card-based certification system for union certification.
 - a. Notwithstanding recommendation 1, the threshold for automatic certification should be raised from 55 percent of the workforce on the day of application to at least 66 percent of the employer's entire workforce.
 - b. Notwithstanding recommendation 1, allow employees a "cooling off" period of at least three business days to dispute the voluntariness of the signature on their union card or their continued interest in membership notwithstanding its use in any application.
 - c. Notwithstanding recommendation 1, repeal Section 11.2.c. of the *Labour Relations Act*.
2. Repeal Section 110.14 and mandate that cases be adjudicated by a panel of Ontario Labour Relations Board chair members, with balanced representation from management and labour representatives, instead of a single Vice Chair to encourage a fair and equitable adjudication process.
 - a. Introduce an appeal/reconsideration process that includes a specific response date and allows for the appeal to be heard by a different Vice Chair or panel than the one that issued the initial decision.
 - b. Introduce a triage system under the Vice Chairs or panels that determine the preliminary viability of any application, including unfair labour practice applications, similar to application processors in the Human Rights Tribunal.

3. Amend Section 10.3 of the Act to extend the bar for reapplying for certification from one year to five years.
4. Amend Section 77 to read that “*no person shall attempt at the place at which an employee works to persuade the employee during the employee’s working hours to become or refrain from becoming or continuing to be a member of a trade union*”; and introduce a remedy that where a membership card is signed in violation of this section it cannot be relied upon in a certification application.
5. Mandate that union organizers be required to communicate clearly to employees the purpose and impact of their card signature during their organization campaigns, including union dues, restrictions on working for non-unionized employers, and their use in a certification application in the employee’s current workplace; the certification cards should include an acknowledgement via a signature that this information has been communicated to the employee.
6. Introduce a mechanism that allows for legal costs recuperation in failed certification cases.
 - a. Introduce a filing fee for certification applications and unfair labour practice applications.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

AA. Small Town Ontario – How to deal with the problem of Brownfield Sites

Submitted by: Napanee and District Chamber of Commerce

Issue

Brownfield sites are an endemic blemish on small town Ontario. For larger jurisdictions with their higher tax base resources and their higher property values, dealing with these Brownfield sites is an easier task. These municipalities have the tax-based resources to investigate and apply available resources, so an action plan for dealing with Brownfield sites can be created and communicated to those interested in developing these properties. Plus, because property values are significantly higher in these larger jurisdictions, and the financially viable alternative uses to which a remediated Brownfield site can be converted allows for an appealing return on the remediation investment, many Brownfield sites in these larger centres are being converted.

With smaller towns and villages, these conditions do not exist, so the Brownfield sites are left unaddressed. Any development in these towns is moved to the fringes of the town, consuming, as often as not, fertile agricultural land and diverting consumers away from the downtown core. The downtown cores already have the infrastructure (electricity, water, sewer, streets, etc.) that these ‘edge of town’ sites do not, and which have to be created in order for these sites to be used for development. Rather than building on the fertile farmlands around the towns, it makes much more sense to utilize the space within the towns that is already available for development. Instead, we are allowing devolution of these municipalities into decrepit ghost towns, with councils and local citizen groups constantly trying to regenerate their towns despite the open Brownfield sores that make regeneration a losing proposition.

Background

Brownfield sites are those that may be contaminated, often due to a previous use, and which may require remediation before they can be developed and used. The cost for assessing the contamination status of the property and, if necessary, rehabilitation of that property can be extensive. When in a smaller town, the value of the property post-rehabilitation typically does not justify the expense of rehabilitation. These properties are left to further decay and besmirch the downtown cores – the downtown core is the town’s heart in these smaller communities. Consequently, these communities across Ontario are dying. This needs to be fixed.

Small towns in Ontario are in this situation with Brownfield sites through no fault of their own. Main street Ontario was developed before current environmental laws and policies were put in place. The Brownfield issue is a consequence of this historic ‘changing of the rules’ combined with the lower property values that demotivates remediation.

Regeneration brings back the historic façade of a downtown core – this is not possible with these Brownfield blemishes. A side benefit of healing this Brownfield site issue is the impetus that it provides for neighbours to enhance their properties, further adding to the appeal of these downtown cores – all this further adds to the municipalities’ tax bases.

COVID-19 has led to an increase of individuals from larger centres moving to smaller communities, drawn by the desire for a better quality of life, spurred by the increased opportunity to work from home. Clearing up these Brownfield sites increases the options for those migrating from the larger centres and makes the smalltown life a more appealing option.

The submission by the Greater Barrie Chamber of Commerce (Effective Date: May 4, 2019 and Sunset Date: May 4, 2022) outlines a proposal that Brownfields Legislation be overhauled to make it effective for dealing with these Brownfield rehabilitations rather than discouraging people and companies from dealing with

properties that have potential contamination problems. This is critical, and we certainly support that OCC initiative. Our concern is that the smaller jurisdictions will still be left out in the cold for the reasons previously mentioned.

The purpose of this submission is to focus on the many smaller Ontario communities with Brownfield issues by giving them a resource to deal with Brownfields (a resource that provides a roadmap for creating a Brownfields strategy), and outlines what financial support alternatives are available. By providing this information in a format that is easily accessible to small towns, and easy to apply, more smaller jurisdictions will be able to develop plans for rejuvenating their downtown cores and help their towns to thrive.

This, of course, does not remove the need for advocacy and lobbying. It does add the need for addressing the unique situations many of these smaller municipalities are facing with regards to dealing with these Brownfield sites. This must be incorporated into the lobbying strategy. Brownfields Legislation needs to be augmented to be more supportive of initiatives in these smaller jurisdictions.

These smaller towns need:

- A clear prescription for alternative ways that the issue of Brownfield Sites can be and has been addressed,
- An easy to access list of government resources regarding Brownfield sites, and a user-friendly process whereby these can be accessed, and
- An indication of what government planned initiatives are in the works to assist in resolving this Brownfields issue.

Recommendations

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

1. As part of an overhaul of the Brownfields Legislation, as proposed by the Greater Barrie Chamber of Commerce, the unique challenges faced by Ontario's smaller communities be addressed; and
2. Create a clear, easy to access process wherein the smaller jurisdictions can establish protocols to positive address and overcome the Brownfields problems these jurisdictions face.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

BB. Supporting Industry Use of Biochar as a Tool for Climate Change Mitigation and Soil Management

Submitted by: Timmins Chamber of Commerce

Issue

Biochar is the solid remains of any organic material that has been heated to at least 350 degrees Celsius in a zero-oxygen or oxygen-limited environment, which is intended to be mixed with soils. If the solid remains are not suitable for addition to soils or will be burned as a fuel or used as an aggregate in construction, it is defined as char, not biochar. There is a very wide range of potential biochar feedstocks, e.g., wood waste, timber, agricultural residues and wastes (straws, bagasse, manure, husks, shells, fibres, etc.), leaves, food wastes, paper and sewerage sludge, green waste, distiller's grain, and many others.

Background

Biochar is created using a process called pyrolysis. Organic waste such as wood chips, agricultural by-products or switchgrass is burned in the presence of little or no oxygen, yielding oil, synthetic gas (known as syngas), and a solid residue resembling charcoal. It is charcoal, except that the point is not to burn it but to bury it. The pyrolysis process can be tweaked, with "slow pyrolysis" yielding more biochar and less oil and gas, and a faster version — seconds rather than hours or days — lowering the biochar product and upping the bio-energy side of the equation. In some systems, the syngas and oil can be used as a fuel to run the pyrolysis reaction, meaning it requires no external energy source beyond the organic waste itself. Proponents point to two completely distinct benefits to burying biochar.

The first is biochar's ability to store carbon in a stable form, preventing the CO₂ from organic matter from leaking into the atmosphere, where it contributes to climate change. Biochar also enriches the soil, which improves food security in developing countries and crop production almost anywhere. The details on the benefit to soil are still being researched, but in certain soil types, burying biochar can improve crop yields by improving water retention and moderating the soil's pH, or acidity.

Creating biochar reduces CO₂ in the atmosphere because the process takes a theoretically carbon-neutral process of naturally decaying organic matter and turns it carbon-negative: When plants decay, they emit CO₂, which other plants eventually absorb, and the cycle continues. Biochar stabilizes that decaying matter and accompanying CO₂ and puts it in the ground to stay for — potentially — hundreds or even thousands of years. With supposedly enormous potential to help slow global warming, this idea has drawn an impressive array of supporters toward biochar. Among its most vocal proponents is James Lovelock, founder of Gaia theory, who has touted biochar as the way to save the planet.

As the commercial biochar field begins to take off, the idea is also getting attention from policymakers.

Recommendations

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

1. Fully fund research-based projects that seek to understand how biochar offers high potential as a climate change mitigation technology.
2. Carefully design projects, policy frameworks, and agricultural extension advice to optimize results and avoid adverse outcomes from poor implementation practices.
3. Encourage well-designed biochar projects ready to be deployed.

Effective Date: May 5, 2021
Sunset Date: May 5, 2024

CC. Supporting Ontario's diverse business community

Submitted by: Ajax-Pickering Board of Trade. Co-sponsored by: Burlington Chamber of Commerce and Whitby Chamber of Commerce

Issue

Following the first wave of the COVID-19 pandemic, many small business owners across Ontario began to pivot their business models, including adopting new safety measures and shifting to online sales platforms. While this massive shift has challenged Ontario's entire small business community, it has taken an additional toll on the many small business owners in Ontario who have limited English and/or French speaking skills. To support growth and diversity, the government of Ontario must ensure resources and supports are available to the whole business community.

Background

The COVID-19 pandemic has disproportionately impacted immigrants and under-represented groups. While there is no requirement to collect race-based data in Canada related to COVID-19, in Ontario, Census data were used to analyze the distribution of COVID cases across neighbourhoods with higher vs lower concentration of visible minorities. The findings show that the rate of COVID-19 infections were three times higher, hospitalizations rates were four times higher, and deaths were twice as high.²⁵²

Further, according to Statistics Canada, the pandemic has also had a greater impact on immigrants and visible minorities in the workforce:²⁵³

- 34% of front-line/essential service workers identify as visible minorities (compared with 21% in other sectors).
- Visible minorities are also more likely to work in industries worst affected by the pandemic, such as food and accommodation services – compounding health and economic risks.
- Impact of COVID-19 on immigrants' employment could reverse gains made in recent years to close the gap.

The Government of Ontario has offered support in the form of multilingual health sheets²⁵⁴ and workplace safety posters²⁵⁵, however live support services like those provided by the toll free Stop the Spread Information Line are available only in English and French.

Programs developed to help reduce the spread of COVID-19 and move businesses to an online platform, such as Digital Main St., rely on business owners' ability to have English or French verbal and oral communication skills.

The lack of multilingual supports could result in non-English and non-French speaking business owners being put at a digital, economic, and safety disadvantage.

²⁵² Public Health Ontario. COVID-19 in Ontario – A Focus on Diversity. <https://www.publichealthontario.ca/-/media/documents/ncov/epi/2020/06/covid-19-epi-diversity.htm>

²⁵³ Statistics Canada. Impacts on Immigrants and People Designated as Visible Minorities (October 2020). <https://www150.statcan.gc.ca/n1/pub/11-631-x/2020004/s6-eng.htm>

²⁵⁴ Public Health Ontario. Multilingual COVID-19 Factsheets. <https://www.publichealthontario.ca/en/diseases-and-conditions/infectious-diseases/respiratory-diseases/novel-coronavirus/public-resources?tab=6>

²⁵⁵ Government of Ontario. Resources to prevent COVID-19 in the workplace. <https://www.ontario.ca/page/resources-prevent-covid-19-workplace#section-3>

As Ontario looks towards recovery, the Ontario Government should ensure that tools are in place to help the entire business community thrive.

Recommendations

The Ontario Chamber of Commerce urges the Ontario Government to:

1. Encourage immigrants and non-English and non-French speaking business owners to fully participate in the local and provincial economy by offering pandemic grants or build capacity within existing local immigration partnerships and like organizations to improve on language skills, and actively market that offering.
2. Ensure that pandemic resources, including live support workers, are available in a variety of languages, based on provincial demographics and need.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

DD. Workplace Mental Health Strategy

Submitted by: Ajax-Pickering Board of Trade and Burlington Chamber of Commerce

Issue

It is widely recognized that mental health problems in the workplace have a severe impact on Canada's and Ontario's productivity. The COVID-19 pandemic has only magnified an existing challenge. In addition, it's clear that providing help to those struggling with mental issues borne out of the pandemic will be key to our recovery as a province – both economically and socially. Ensuring Ontario's workforce and its citizens have the resources they need to improve their mental health is more than good business; it is the right thing to do. The Ontario government's \$12 million commitment to support and develop mental health programs specifically as a result of COVID-19 is a welcome contribution, but we must continue to look ahead and build on these efforts. There continues to be more that needs to be done in the areas of research and promotion. The provincial government has a key role to play in continuing its efforts at mitigating the costs of workplace mental health issues and ensuring that employers are ready and able to properly and positively address workplace mental health issues.

Background

The Centre for Addiction and Mental Health (CAMH) has reported²⁵⁶ that the pandemic has had the following detrimental impacts on the mental health of Canadians:

- 50% of Canadians reported worsening mental health since the pandemic began with many feeling worried (44%) and anxious (41%)²⁵⁷
- 81% of Canadian workers reported that the pandemic is negatively impacting their mental health²⁵⁸
- Experts have warned that pandemic related unemployment, job insecurity, reduced wages and increased workloads could result in 418 to 2,114 excess deaths due to suicide in Canada in 2020-2021.²⁵⁹

The following research evidence, which was provided prior to the pandemic, demonstrates the significant impact of mental health problems in the workplace:

- 1 in 5 Canadians experience a psychological health problem or illness in any given year.²⁶⁰
- Psychological health problems or illnesses are the number one cause of disability in Canada.²⁶¹
- The economic burden of mental illness in Canada is estimated at \$51 billion per year. This includes health care costs, lost productivity, and reductions in health-related quality of life.²⁶⁰
- In any given week, at least 500,000 employed Canadians are unable to work due to mental health problems. This includes:
 - approximately 355,000 disability cases due to mental and/or behavioural disorders ²⁶²

²⁵⁶ Centre for Addictions and Mental Health (2020) Mental Health in Canada: Covid-19 and Beyond <http://www.camh.ca/-/media/files/pdfs---public-policy-submissions/covid-and-mh-policy-paper-pdf.pdf>

²⁵⁷ Angus Reid Institute, 2020

²⁵⁸ Morneau Shepell, 2020

²⁵⁹ 7 McIntyre & Lee, 2020

²⁶⁰ Smetanin et al. (2011). The life and economic impact of major mental illnesses in Canada: 2011-2041. Prepared for the Mental Health Commission of Canada. Toronto: RiskAnalytica.

²⁶¹ Institute for Health Metrics and Evaluation (2015). *Global Burden of Diseases, Injuries, and Risk Factors Study, 2013*. Data retrieved from <http://www.healthdata.org/data-visualization/gbd-compare>.

²⁶² Institute of Health Economics (2007). *Mental health economics statistics in your pocket*. Edmonton: IHE. Number of absent workers calculated using Statistics Canada work absence rates, retrieved from <http://www.statcan.gc.ca/pub/71-211-x/71-211-x2011000-eng.pdf>.

- approximately 175,000 full-time workers absent from work due to mental illness²⁶³
- 39% of Ontario workers indicate that they would not tell their managers if they were experiencing a mental health problem.²⁶⁴

At one time a similar crisis existed with workplace physical safety. Measurement and tracking of incidence rates, coupled with public awareness and the implementation of occupational health and safety regulations and legislation, played a strategic role in turning the tide. The same can be true for workplace mental health.

When not addressed, psychological health problems in the workplace lead to absenteeism, presenteeism, decreased productivity and quality of work issues, which in turn impact business success. By identifying and reducing workplace risks of psychological injury or illness and adopting accommodations specific to mental health, employers will benefit from workforce stability, increased productivity, reduced insurance costs, reduced risk of legal or regulatory sanctions, and a healthier financial bottom line. Similarly, employees will benefit due to the impact upon their health, morale, work life quality and ability to perform at their highest capacity.

The National Standard of Canada for Psychological Health and Safety in the Workplace (the Standard)²⁶⁵ – the first of its kind in the world, is a set of voluntary guidelines, tools and resources. It is one of the tools available to business and lawmakers moving forward, which will be invaluable in promoting mental health and preventing psychological harm at work.

Recommendations

The Ontario Chamber of Commerce urges the Ontario government to:

1. Ensure mental health resources, including stigma reduction, are integrated into the Ontario government's long-term economic recovery plan.
2. Continue to build on existing commitments and identify mental health in the workplace as a key priority for occupational health and safety research grants and funding innovation projects.
3. Ensure that local community resources, using evidence-based treatment practices, are visible to employers and employees, easily accessible and affordable.
4. Promote the National Standard of Canada for Psychological Health and Safety in the Workplace (CSA Z1003).
5. Provide training and education for business leaders with a focus on positive ways to address and respond to workplace mental health issues.
6. Consult with private sector workplace benefit providers to ensure an appropriate supporting policy framework exists to allow more employers to offer Employee Assistance Programs (EAP) to their employees.

Effective Date: May 5, 2021

Sunset Date: May 5, 2024

²⁶³ De Oliveira et al. (2016). Patients with high mental health costs incur over 30% more costs than other high-cost patients. *Health Affairs*, 35: 36-43.

²⁶⁴ Canadian Medical Association (2008). 8th annual National Report Card on Health Care. Retrieved from https://www.cma.ca/multimedia/CMA/Content/Images/Inside_cma/Annual_Meeting/2008/GC_Bulletin/National_Report_Card_EN.pdf.

²⁶⁵ Mental Health Commission of Canada. National Standard. <https://www.mentalhealthcommission.ca/English/what-we-do/workplace/national-standard>

EE. Accounting for economic outcomes in regional collaboration projects

Submitted by: Peterborough and the Kawartha Chamber of Commerce. Co-sponsored by: Richmond Hill Board of Trade

Issue

Jobs created during collaborative regional economic development projects are only attributed to the municipality in which they are geographically located.

Background

“Ontario’s economy is undergoing a period of rapid change. Twenty-first century globalization, urbanization, and technological transformation are challenging the status quo and redefining what it means to be competitive. Given these and other pressures, Ontario’s overall prosperity will increasingly depend on the strength of its regions.” - This is how the 2019 report from the Ontario Chamber of Commerce titled “The Great Mosaic – Reviving Ontario’s Regional Economies” starts.

It’s fitting to start a discussion around how to then calculate economic impacts. Municipalities impacted by “A Place to Grow: Growth Plan for the Greater Golden Horseshoe” are bound by provincial legislation to have official plans, land needs assessments, and zoning by-laws in place that detail how each municipality is going to achieve the pre-determined milestones of jobs and residents per hectare. Those results are then reported to the province.

While these plans and processes are necessary, they don’t account for the fact that more and more economic development is collaborative, crossing geographic lines. One example can be found in the City of Peterborough. The city has contributed significant dollars to infrastructure at the regional airport that lies just outside its geographical boundary. The combined investment by the city, county and local township has resulted in the number of jobs increasing from 50 to over 300 over the past decade. The question becomes how is the outcome of those investments (jobs, new economic opportunities, etc..) accounted for in growth targets? Right now, the outcome falls to the municipality in which the tangible asset exists – therefore, we are back to geographical boundaries regardless it being a regional collaboration.

This disconnect between investment and reporting rules is a barrier to regional economic development because the value of the investment is diminished when the result is not recognized. To resolve this issue and encourage more regional collaboration that will benefit all of Ontario, we ask that government amend the reporting rules and allow all municipalities to account for the jobs they have helped create through regional projects.

The Growth Plan document identifies a need for complete communities with the following paragraph in section 2.1;

“To support the achievement of complete communities, this plan establishes minimum intensification and density targets that recognize the diversity of communities across the Greater Golden Horseshoe (GGH). Some larger urban centres, such as Toronto, have already met some of the minimum targets established in this plan, while other communities are growing and intensifying at a different pace that reflects their local context.”

This allowance will encourage more collaboration across geographical lines by municipalities and help regions invest in projects that will benefit their area and the province as a whole. It will also more accurately reflect the local context of the urban rural mix in the outer ring municipalities. These outer ring municipalities also address issues such as transit and conservation issues across geographical lines, yet recognition of the impact of regional economic development on multiple municipalities does not happen.

Continuing in 2.1 is the following;

“...consider opportunities to better co-ordinate our collective efforts across municipalities to support their contribution to economic growth and improve access to transit.” If this call is to be realized to its maximum potential then there has to be allowance to recognize the impact of jobs created and economic impact when municipalities work together.

Recommendation

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

1. Develop a mechanism that allows for multiple municipalities who have invested in a regionally significant project to account for jobs created proportional to financial contribution when reporting to government.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

FF. WSIB Policy and Procedural Changes to Employer Counts and Costs

Submitted by: Tillsonburg District Chamber of Commerce. Co-sponsored by: Leamington District Chamber of Commerce, London Chamber of Commerce, Woodstock District Chamber of Commerce

Issue

The WSIB recently posted information on their website announcing that effective July 1, 2022, all costs and counts associated with COVID-19-related claims will now be applied in calculating premium rates to individual Schedule 1 employers.

Background

COVID-19 claims with disease dates before June 30, 2022, are allocated on a Schedule wide basis and do not affect the calculation of each individual employer's premium rate. The experience rating change was made from collective or group employer liability to individual employer liability for COVID-19 claims, and this change was made without consultation with employer organizations. The current arbitrary and mandatory change made by the Ontario government and WSIB, effective July 1, 2022, may have significant cost impacts on Ontario Employers with allowed covid claims.

The new WSIB Rate Framework system implemented in January 2020 has significantly changed the duration of the claim cost life cycle for employers. A newly allowed claim now directly affects employers for six years of active claim costs and potentially up to another five or more years until the employer account has reduced all risk bands to the pre-injury levels. An incorrectly or hastily adjudicated decision could now affect an employer for 11+ years. Claim decisions are typically made within one week. Employers who are required by law to fund this system should be able to rely upon adjudication that is not hasty but based upon fair and objective comprehensive evidence. The adjudication of COVID-19 claims on the cost statements of individual employers raises concerns for adjudication and proof of accident.

Other occupational diseases are not experienced-rated on individual employer accounts. It is questionable, and even doubtful, that COVID-19 should be correctly classified as an occupational disease. It is a highly contagious pandemic virus, spread widely in the community without any public health precautions.

COVID-19-related claims should either be deemed a continued collective employer liability or be removed entirely as a compensable condition. The WSIB Claims Appeals and Tribunal process is complicated, costly, time-consuming, and somewhat biased against the employer (especially at the WSIAT).

This recent WSIB policy change now has the potential for a major impact on Schedule 1 employers relating to:

- Lost time claims (especially for long-term COVID-19 cases), NEL permanent disability assessments, and fatality claims have the potential for significant cost impact.
- Annual employer premium rates on individual employer liability vs collective liability, including prolonged claim, costs up to 11+ years due to the WSIB prospective system banding and scaling methodologies.
- A much higher cost burden will be placed on all employers for COVID-19 claims, including many industrial classes outside the high COVID-19 sectors (e.g. healthcare, residential care).
- Because this change can potentially increase costs, Employers might be incentivized to take more steps to mitigate claims. Community transmission is unquestionably dominant. Hazard controls used to minimize claims (continued mandatory masking and mandated vaccines) may negatively affect the hiring and labour market competitiveness.

- The COVID-19 Questionnaire administered by the WSIB to determine causation is inadequate because it depends on the subject beliefs of the person claiming that COVID-19 was acquired at work. No proof is required by PCR tests, which will verify the variant of COVID-19 received. If two people in the same workplace have two different variants of COVID-19, they are unrelated.
- The 2022 number of COVID-19 claims is higher than the previous three years.
- The percentage of Lost Time Claims has increased significantly in Ontario, from 32% to 46% in 2022.
- The adjudication of COVID-19 claims does not specify how or what data will be used by claims managers to determine if the person's employment created a greater risk of contracting COVID-19 to which the public at large is not exposed.
- The adjudication criteria for COVID-19 claims do not ask: do you have children in school? Do you have a spouse who works in a high-risk setting? Are you masking while in public? Has anyone you know been diagnosed with COVID-19 in the past two weeks? Have you been out for any public activity in the past two weeks (dinner, theatre, sporting event, grocery shopping)? How often and when do you test yourself for COVID-19 at home (people who are actively trying to avoid acquiring the COVID-19 virus can quickly identify their most high-risk encounters).

Recommendation

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

1. Amend the WSIB Policy Manual to provide a clear test for when COVID-19 claims will be allowed to ensure a fair adjudicative process.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

GG. Align the Province of Ontario's Framework on Carbon Capture and Sequestration with Global Jurisdictions

Submitted by: Sarnia-Lambton Chamber of Commerce. Co-sponsored by: Guelph Chamber of Commerce

Issue

Industries striving to meet net-zero targets in Ontario are faced with more hurdles than their counterparts in different jurisdictions due to the Government of Ontario's approach to carbon capture and sequestration (CCS), which lacks a clear and efficient regulatory framework. The federal government provides funding that Ontario-based facilities cannot access due to the province's continued delays.

Background

From an investment attraction standpoint, with provincial, national, and international competition for investment dollars and associated projects, the province must be responsive to the needs of industry to develop timely CCS projects in Ontario. Prospective investors linked to the low-carbon economy have indicated to the Sarnia-Lambton Economic Partnership (SLEP) that they are interested in pursuing large-scale capital investment projects in Ontario similar to what have been announced in Alberta and competing jurisdictions in the United States. However, they have noted that until there is a clear regulatory framework with defined timelines and policies, these investments are not being explored as "top-of-desk" amongst the companies' other projects in their investment portfolio. This would change with timely modifications to the existing Oil, Gas and Salt Resources Act (OGSRA), the Mining Act (e.g., to enable sequestration on crown land), and the permissibility to move forward with projects.

Ontario is losing out on potential investment capital that may not be around in two years to other provinces and territories as well as American states and other global geographies.

Any delay in the removal of barriers and the establishment of a new, supportive, and enabling regulatory framework for CCS has significant negative impacts on economic development linked to the low-carbon and net-zero economies.

From an investment retention and expansion standpoint, the implementation of these recommendations would have a tremendous impact on the short-term and long-term economic competitiveness of large emitters in the province, especially those in Sarnia-Lambton that could capitalize on investments linked to the low-carbon hydrogen industry. Additionally, the ability to utilize CCS technologies to capture carbon dioxide emissions would have a tremendous financial benefit to those businesses currently exposed to the escalating carbon tax, while also assisting the province and Canada in their drive to net-zero.

Recommendations

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

1. State definitive timelines for development of a comprehensive legislative and regulatory framework for Ontario CCS projects, targeting completion by the end of 2023, by leveraging industry partners versed on this topic.
2. Work with key industry partners to ensure that Ontario's approach to pore space allocation is strategic and maximizes the most efficient usage of the finite geological storage space available in the region, so that more communities and industry can benefit, and Ontario's climate targets are most efficiently addressed.
3. Develop a comprehensive regulatory framework for full lifecycle CCS project approval, from demonstration/pilot to commercial-scale development.

4. Ensure appropriate flexibility in the regulations for various types of storage applications, an expedited and timely approval process, rigorous pre-screening process for eligible project proponents and an appropriate transfer of long-term responsibilities for stored CO₂ following for example the Alberta model.²⁶⁶
5. Explore further opportunities to maximize CO₂ capture.
6. Expedite the approval process to ensure the competitiveness of economic development in Ontario, with a goal of all regulations being fully and completely defined prior to the end of 2023.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

²⁶⁶ <https://www.alberta.ca/carbon-capture-utilization-and-storage-overview.aspx#:~:text=Captured%20CO2%20is%20injected%20into,capture%2C%20utilization%20and%20storage%20projects.>

HH. Diversifying healthcare to ease the burden on Emergency Rooms and family doctors

Submitted by: Peterborough and the Kawartha Chamber of Commerce. Co-sponsored by: Greater Kingston Chamber of Commerce, Brockville and District Chamber of Commerce, Belleville Chamber of Commerce, Guelph Chamber of Commerce

Issue

Our hospitals are in crisis, struggling to fulfill all the healthcare needs we are asking of them. At the same time, many people in Ontario are without access to a family doctor. Lack of access to healthcare is leading to greater lost time and limiting workforce mobility. While our hospital and family physician services are in need of investment, there are other healthcare professionals in our communities that are underutilized and can help fill in the gaps when it comes to primary and non-urgent healthcare needs.

Background

Healthcare in Ontario is crisis. Hospitals are regularly at capacity for dealing with emergencies and staffing struggles have led to regular temporary closures to new admittance.

While COVID-19 and a particularly difficult influenza season have created challenges, adding further pressure is the lack of family physicians. According to the Ontario College of Family Physicians, more than 3 million Ontarians could be without a family doctor by 2025.

People without a family doctor are left to piece together their healthcare services with what is available to them, including attending Emergency Rooms for non-urgent healthcare needs.

Increasing the service capacity of hospitals and access to family doctors should be a priority for the government, but there are other healthcare services that can help take some of the pressure off in the near term.

Nurse Practitioners can shoulder some of the demand for family doctors through funding more Nurse Practitioner-led clinics as a primary care option, as well as funding the additional Nurse Practitioner seats at Ontario's universities.

Similarly, pharmacists have the expertise to ease some of the healthcare burden by increasing their ability to prescribe and administer medication. Steps have recently been taken to expand this capacity, but more can be done.

Community Health Centres are able to provide physical and mental healthcare to some of our most vulnerable citizens. There are still many communities around Ontario that do not have this service, which serve individuals who live with complex mental health and/or addictions, extreme poverty, and disability. It is welcoming to newcomers, racialized individuals, Indigenous persons, and individuals who identify as 2SLGBTQ+. The need for Community Health Centres is especially important for businesses located in historic downtowns who are dealing with the consequences and filling in some of the gaps for marginalized individuals.

Enhancing funding for Community Paramedicine Programs will assist communities with an additional safety net that will meet people's healthcare needs without a visit to the hospital.

We need our government to work with local healthcare providers to ensure people have access to walk-in clinics. This is a vital stopgap for people unable to access a family doctor, but in need of non-emergency

healthcare — yet many communities are un- or underserved. Enhancing access to walk-in clinics is a necessary preventative measure that will ensure the treatment of various ailments that may otherwise be escalated and lead to readmittance, putting further pressure on an already strained healthcare infrastructure.

Mobile clinics offer resources to rural communities that are often without significant local healthcare services.

Employers in Ontario are facing significant challenges attracting and retaining their workforce. Providing adequate and efficient healthcare will minimize absenteeism and creating a stronger, healthier workforce.

Workers are reluctant to relocate due to the potential loss of access to a family doctor, limiting workforce mobility in Ontario.

Healthcare challenges increase in rural communities, adding more barriers to attracting skilled workers — particularly for our struggling tourism sector.

A healthy workforce will drive a healthy economy.

Recommendations

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

1. Provide more funding for Nurse Practitioner-led clinics, and fund additional Nurse Practitioner seats at Ontario's universities.
2. Expand funding for community paramedicine programs.
3. Support Community Health Centres as a means of addressing healthcare needs for those with barriers and needs that fall outside the scope of traditional healthcare systems.
4. Ensure communities have access to walk-in clinics.
5. Invest in mobile clinics to meet non-urgent healthcare needs in rural communities.
6. Make medical schools more financially accessible to students interested in entering the medical field.
7. Work with the federal government to Improve the mobility of physicians within Canada by broadening the national licensure program.
8. Continue to improve recognition of equivalent qualifications held by international medical graduates to integrate them into the Ontarian medical field and meet fast-growing demand.
9. Increase admission capacity for different types of health care professionals.
10. Expand programs to offer incentives for health care professionals — including physicians, nurses, specialists, and technicians — to locate in rural and northern regions experiencing higher levels of healthcare workforce shortages.
11. Ensure that communities across Ontario possess the digital infrastructure necessary for enhanced and integrated telehealth programs that bring physician teams and patients closer together.
12. Ensure the reduction of unnecessary administrative demand regarding family practitioners.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

II. Establish a Business Energy Audit Program

Submitted by: Mississauga Board of Trade

Issue

When the Ontario Government ended the Cap & Trade system, it cancelled several energy conservation programs that were funded through this tax. The business Energy Audit program was one of those casualties. However, the program was very successful and encouraged businesses to perform an energy audit and use the findings to implement energy conservation programs.

Background

The Ontario Government has stated that it intends to help Canada meet the Paris 2030 Greenhouse Gas emission (GHG) reduction targets through programs that will help residents and businesses reduce their GHG emissions.

In order to develop a successful plan for GHG emission reduction, a business needs an energy audit performed by a qualified contractor in order to use the findings to implement an energy conservation plan.

In the past, the Government has funded up to 50% of the cost of an energy audit as an incentive to get businesses to retain a consultant and complete the audit.

Recommendations

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

1. Establish an Energy Audit program for businesses and fund up to 50% of the cost of the audit to a business through a grant.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

JJ. Healthcare Crisis: Demands Exceed Supply

Submitted by: Brampton Board of Trade

Issue

Ontario's healthcare system is breaking under the compounded pressures of the COVID-19 pandemic.

Background

Hospital overcrowding has become the new normal in too many of Ontario's cities, including Brampton. This is an historic trend but has been made considerably worse by the many pressures that the COVID-19 pandemic put on emergency departments and surgical waitlists.

The issue is simply one of capacity. The supply of 33,000 hospital beds in Ontario has negligibly increased since 1999²⁶⁷, even though Ontario's population has grown by more than 27%, from 11.5 million to just over 15 million. In addition, the segment of Ontario's population that is 65 years or older has increased by 1 million. As a result, hospitals in high growth cities operate at near or over 100% capacity on a near daily basis. Additionally, a shortage of trained professionals such as nurses is a significant barrier to the healthcare system meeting its full potential.

Another significant factor is that approximately 1 in 6 hospital beds are occupied by patients who require a more 'appropriate level of care' (ALC), which on average is less expensive than hospital beds and come in such forms as long-term care, assisted living, and rehab. Although some progress has been made on ALC via Bill 7, it remains a significant structural issue in our healthcare system. The majority of ALC patients are waiting for a long-term care beds, which in 2019 had a wait list of 161 days. While the current provincial government has invested in more long-term care beds, it takes three years to get those beds in operation. Just 21 new long-term care beds opened in Ontario in 2019, while the waitlist grew by more than 2,000. Under the previous provincial government, only 611 new long-term care beds opened from 2011 to 2018.

Matching patient needs to the appropriate healthcare resources will reduce the strain put on hospitals and will contribute to sustainable and inclusive growth.

Recommendations

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

1. Ensure provincial funding commitment for new hospital beds based on communities' and regions' demographic and infrastructure needs.
2. Speed up the process to get new long-term care beds into operation - and make sure the beds are created where they are needed.
3. Ensure provincial funding commitment for variety of 'alternative level of care' options that meet diversity of needs, including at-home, community, and mental health support.
4. Continue seeking solutions to the healthcare staffing crisis, including by;
 - a. Looking at ways to continue to expedite credential recognition for internationally trained nurses and those accredited in other provinces;
 - b. Supporting programs that streamline nursing degrees at postsecondary institutions and those that help healthcare professionals graduate faster.

²⁶⁷<https://www.oha.com/Bulletins/OHA%20Fact%20Sheet%20on%20Hospital%20Capacity%20and%20Projections%20Jan%2015%202021.pdf>

5. Research healthcare technology in comparable jurisdictions where remote patient monitoring and crisis management is used effectively to curtail hospital stays.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

KK. Making the Ontario Energy Board hearing process more accessible

Submitted by: Thunder Bay Chamber of Commerce. Co-sponsored by: Greater Sudbury Chamber of Commerce, North Bay & District Chamber of Commerce, Sault Ste Marie Chamber of Commerce, Timmins Chamber of Commerce

Issue

The current Ontario Energy Board (OEB) framework relating to cost eligibility and cost awards (the framework) makes stakeholder participation prohibitively expensive. As an example, the OEB does not:

- advise parties who are eligible to receive cost awards at the outset of hearings (e.g. proceedings or consultations/policy initiatives)
- guarantee costs associated with participation will be reimbursed; and
- advise parties of the percentage of costs that will be reimbursed.

These costs and the framework are significant barriers to full participation by stakeholders with limited resources. In addition, the Board has pre-determined that certain groups are not eligible for any costs even if they are accepted as an intervenor (i.e., organizations representing municipalities or groups of municipalities).

Background

The Ontario Energy Board regulates electricity and natural gas in Ontario, in part by decisions made during hearings on a variety of energy issues including pricing of energy, regulation of generation and distribution of electricity, and for various energy projects that affect the interests of the business community across the province.

In response to requests from the Ontario Minister of Energy to review intervenor processes and identify opportunities to improve their efficiency and effectiveness, the OEB has undertaken consultations and developed an Action Plan with a timeline for completion by March 31, 2024. Currently implemented, the framework relating to cost eligibility and cost awards is prohibitively complex which results in uncertainty and increased expense for stakeholders with limited resources. The OEB has set up processes and guidelines which parties, in hearings before the Board (i.e., participants that want to actively contribute to the decision-making process), must prove that they should be granted Intervenor Status (deemed eligible to receive cost awards; and awarded an amount of costs). Although the OEB sets the guidelines as noted above, such guidelines are further scrutinized by the OEB and are reviewed using a significant amount of discretion.

The OEB prescribes an avenue for reimbursing some of the costs to participants through separate application processes that are also subject to almost full discretion of the OEB. Organizations or individual participants with limited resources are *advised* to hire legal professionals such as lawyers, paralegals or analysts at their own expense and then apply for reimbursement of the costs that would be calculated according to the OEB's own guidelines. There is no guarantee of what would be accepted as an eligible cost and at what percentage such expense will be reimbursed (if at all). This process is a significant barrier to full participation, especially by groups in small and rural areas with limited cash resources.

Many of the applications to the OEB are extremely technical in nature. As such, organizations that are not in the 'business' of intervening require external expertise to assist them in preparing the material for submitting to the OEB and in examining the materials submitted by the applicant and other intervenors. The more complex the application, the higher the costs will be assumed. When funding is restricted or approved at a late stage, the participation will be less diligent in order to reduce costs.

An example that illustrates the high cost of participation is the recent OEB hearing about alternative mechanisms for natural gas expansion. A group of stakeholders from Northwestern Ontario registered as intervenors and spent more than \$70,000 to actively participate in the hearing by submitting evidence, arguments and interrogatories (written questions) and by cross-examining witnesses. The decision by the OEB on the issue most was to uphold the status quo. The application for the reimbursement of costs associated with the hearing took nearly a year to receive a decision to reimburse 98% of the costs and for those costs to be paid out. There was no advance notice whether all the costs incurred by the group would be reimbursed by OEB's cost award decision. Some of the solutions to mitigate the barriers to participation in the OEB hearings can be found in the National Energy Board (NEB) intervenor process. The intervenors in the NEB process are advised up front of the costs that will be eligible and how much of the cost will be recovered, based on the funds available for that particular issue. The participants can then decide if they will proceed with the application to be a participant in the hearings, and if so, the depth of their participation. The NEB also provides upfront funding to assist with the costs of the participants whereas the OEB process requires that the participants pay for all costs and then apply for partial reimbursement.

The other issue is the outright prohibition of any funding for municipalities or groups of municipalities. As very few municipalities now own their own electrical utility, there is no longer any conflict of interest with a municipality opposing a rate increase initiated by their own Local Distribution Companies (LDC). They should not be forced to fund their own intervention into an Ontario Power Generation (OPG) or Hydro One rate increase. In addition, when it comes to broad policy issues as opposed to rate proposals, groups of municipalities can and do represent their region before the OEB. Those policy decisions tend to relate to issues outside of the municipal boundaries. It should not be the responsibility of the property taxpayer to fund the community's response to existing or proposed policy or rule changes under consideration by the OEB.

Recommendations

The Ontario Chamber of Commerce urges the Government of Ontario (via the Ontario Energy Board) to:

1. Create a more transparent and predictable process for cost eligibility and cost awards for participation in OEB hearings.
2. Provide sufficient additional funding for participants, ensuring full participation for cost eligible participants in OEB hearings by:
 - a. Providing for an OEB process that takes into consideration the eligible participant's actual capacity to pay for full participation in the OEB hearings and upholds the principle of fairness for all stakeholders; and,
 - b. Providing for OEB to release advanced funding for costs so all eligible participants can benefit from an up-front amount that covers the costs of initializing and participating in the OEB hearings and for experts (if required). A hold-back can be put in place subject to final submission of expenses etc.
3. Amend the cost eligibility and cost awards processes by:
 - a. Advising parties whether they are eligible to receive cost awards at the outset of the hearings and what specific costs they are eligible for;
 - b. Guaranteeing costs associated with participation will be reimbursed;
 - c. Allowing organizations that represent municipalities and groups of municipalities to be eligible for cost awards; and,
 - d. Advising parties in advance of the percentage of costs that will be reimbursed.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

LL. Opening the Job Market for Employers and Employees

Submitted by: Cambridge Chamber of Commerce. Co-sponsored by: Greater Kitchener Waterloo Chamber of Commerce

Issue

Finding a solution to Ontario's job shortages will require a multi-pronged approach consisting of unique ideas that take into consideration the diversity of labour needs among various sectors.

While a strong focus on streamlining immigration policies continues to build Canada's labour force, effort must also be made to reduce barriers for newcomers to find work, especially when it comes to accessing language training. As well, a potential workforce may already exist among many of those currently accessing the Ontario Disability Support Program (ODSP) providing they continue to have the support they require to successfully function full-time 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 training.

Background

Terms like 'The Great Resignation', 'quiet quitting', 'ghosting' and 'grey wave', have become commonplace to describe trends creating upheaval for employers in their quest to attract and retain workers.

While the pandemic is often identified as the catalyst behind Canada's continued labour shortage, many experts believe our labour force growth rate has been trending downward since 2000 and has been exacerbated by the arrival of COVID-19. In fact, according to Statistics Canada, in 2021 one in five Canadian workers were between the age of 55 to 64 – representing an all-time high of baby boomers (those born between 1946 and 1964). This translates into 1.4 million Canadians between 2016 to 2021 who are 55 or older and looking towards retirement.²⁶⁸

Adding to this dilemma of a shrinking workforce, according to StatsCan, recruiting skilled workers was expected to be an obstacle for the first quarter of 2022 for 39.9% (approximately two-fifths) of all businesses.²⁶⁹

The effects may be reflected in the results of an annual labour survey conducted in 2022 by the Canadian Manufacturers and Exporters' (CME) of 563 manufacturers in 17 industries nationwide which outlined the impact labour shortages were having by indicating a nearly \$13 billion loss in Canada's economy over the course of a year.²⁷⁰

While a job surge at the end of 2022 which saw the unemployment rate drop to 5% in December compared to 5.1% the prior month was welcomed news, StatsCan says a hike in illness-rated absences resulted in limited worker output.²⁷¹ As well, while StatsCan says Canada's employment rate increased to 61.8% in December, compared to 61.5% the month before, the projected trend shows a drop to 60.9% in 2024 – with the potential to rebound and hit 62.2% in 2025.²⁷²

The effect these fluctuations will have as employers continue to seek employees to fill the nearly one million job vacancies in Canada has yet to be determined, considering the results of a recent poll conducted by the recruitment firm Robert Half indicating half of Canadian workers are planning to seek new jobs in 2023 –

²⁶⁸ <https://bit.ly/3kru36A>-Canada's aging workforce root of national labour shortage - CTV

²⁶⁹ <https://bit.ly/3wmUhKf>-Labour shortage trends - Statistics Canada

²⁷⁰ <https://bit.ly/3XxT0vY>-Canada's economy lost nearly \$13B due to labour shortage: report – Global News

²⁷¹ <https://bit.ly/3wsN0bU>-Strong December job growth muted by more sick workers – Global News

²⁷² <https://bit.ly/3HsQnWq>-Trading Economics website

nearly double the amount from a year ago. That poll, conducted this past fall from among 1,100 workers from multiple sectors, showed that 50% of respondents would be seeking new employment in the next six months (up from 31% six months ago). The top reasons for this shift not only include higher salaries, better benefits, and perks, but greater flexibility to decide when and where they work.²⁷³

As current and potential employees weigh their options and re-value their priorities and goals when it pertains to employment, Canada continues its concentrated effort to reach its immigration target of 1.4 million in three years – 465,000 newcomers in 2023, 485,000 in 2024 and 500,000 in 2025 – to fill these widening labour gaps.

In an effort to achieve these goals, the federal government announced new ‘selection tools’ this past fall aimed at ensuring skilled immigrants find work in their areas of expertise, noting via an Angus Reid Institute poll that at least one third of 500 newcomers surveyed downgraded their jobs to achieve an easier entry to Canada.²⁷⁴ Canada’s immigration efforts have already seen a record-number 406,000 newcomers welcomed as permanent residents in 2021, with more than 191,000 work and study permit holders transitioned from temporary to permanent resident status.²⁷⁵

While an influx of immigrants is welcomed news in hopes of easing labour shortages, the need to ensure resources are available to serve this growing population is imperative. Besides an adequate supply of housing, language training is just as important to provide them with a basic tool they need to enter the workforce even faster.

Currently, the federally-funded LINC (Language Instruction for Newcomers) program is available through many post-secondary institutions, but all avenues at the provincial level - such as Ontario’s Adult Non-Credit Language Training Program, which received a \$60 million boost from the province in 2020 – must also be explored to ensure there are enough spaces available for these potential learners at the community level, such as with organizations like the Waterloo Region Immigration Partnership.²⁷⁶

In addition, while immigration is key when it comes to the rejuvenation of our labour force, an effort also needs to be made to explore other avenues when it comes to cultivating a potential workforce that may already exist, namely among some of the thousands who currently access the Ontario Disability Support Program (ODSP).

The province announced it was increasing the monthly earnings exemption this past fall for those on ODSP from \$200 to \$1,000 per month, allowing individuals on the program to keep 25 cents on the dollar, in hopes of allowing the 25,000 people currently in the workforce to keep more of their earnings and potentially encouraging an additional 25,000 more to enter the labour market.²⁷⁷ Recent StatsCan figures indicate there were 372,000 job vacancies in Ontario during the third quarter of 2022 and that 60% of these required a high school education only, providing much opportunity for employment, but on average paid less than \$20 an hour.²⁷⁸

While these job vacancies could be a positive step in assisting those ODSP recipients who have the capability to work, the province needs to provide assistance towards covering the costs of their needed supports (i.e. prescribed medications) especially if their employers do not, which could allow more to enter the labour market and in turn disengage from the program as they begin to contribute income tax, knowing they would not lose

²⁷³ <https://bit.ly/3HtCGGT>- Half of Canadian workers will job hunt in 2023: poll - CBC

²⁷⁴ <https://bit.ly/3R692KZ>-Canada to admit 1.4 million immigrants in three years to address labour shortages – Financial Post

²⁷⁵ <https://bit.ly/403eHWr>-2022 Annual Report to Parliament on Immigration

²⁷⁶ <https://bit.ly/3HA0G1z>-Ontario spends \$60M on free language training for all immigrants – Immigration.ca

²⁷⁷ <https://bit.ly/3WAAtm8>-Ontario boosts income cap for ODSP recipients but no new changes for those who can’t work – CTV News

²⁷⁸ <https://bit.ly/3kVEkbD>-Noticing a labour shortage? Here’s what’s really going on in Ontario’s job market - CBC

this ‘safety net’. With the appropriate support, it could be a major step in boosting the labour pool and reduce the number of people accessing ODSP.

According to the Province, there were more than 595,000 (families and single adults) in Ontario’s social assistance programs during 2020-21. Among these, 64% (approximately 378,145) were ODSP recipients, while as of November of 2022, there were just under 369,000 ODSP caseloads.²⁷⁹

Also, many employers continue to face a ‘revolving door’ of new hires, each of whom requires provincially mandated WHMIS training. Providing this training to secondary school students could be a benefit to employers, considering many go directly into the workforce. The 2021 census results indicate at least 40% of workers aged of 25 to 64 are not post-secondary graduates.²⁸⁰ However, until any such change as this could occur employers have been left covering the costs of this training, which can take several hours to complete via a process that must be repeated with each new hire, taking them away from their work duties.

To assist employers cost recovery opportunities surrounding provincially regulated training programs, like WHMIS, should be considered to ease some of this burden.

Recommendations

The Ontario Chamber of Commerce urges the Ontario Government to:

1. Develop all potential partnerships within local municipalities and community organizations to ensure that language training is made available for new immigrants.
2. Allow those on ODSP (Ontario Disability Support Program) who can work full time to do so without risking loss of their provincially funded benefits (i.e., prescribed medications) if their employer does not provide those services.
3. Investigate a form of remuneration (i.e., tax credit) for employers when it comes to providing provincially regulated training, such as WHMIS, and their associated costs.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

²⁷⁹ <https://bit.ly/3kKElyZ>-Province of Ontario website

²⁸⁰ <https://tgam.ca/3Rn1qnn>-Census shows high rate of undergraduate and college education among Canadians, but complex trends lie behind it – Globe & Mail

MM. Regional Approach to Provincial Procurement Reform

Submitted by: Thunder Bay Chamber of Commerce. Co-sponsored by: Belleville Chamber of Commerce, Greater Sudbury Chamber of Commerce, Guelph Chamber of Commerce, North Bay & District Chamber of Commerce, Sault Ste Marie Chamber of Commerce, Timmins Chamber of Commerce

Issue

The Government of Ontario is in the process of setting up Supply Ontario, a centralized procurement model across the Ontario Public Service, and the broader public sector which may adversely impact small and medium-sized businesses and regional economic development across the province.

Background

Supply Ontario was established in November 2020 to address challenges in Ontario's supply chain system, including;

- barriers for small businesses to innovate and gain access to public sector procurements;
- a limited focus on the lowest price rather than on overall value, quality and impact; inconsistent customer service experiences, and;
- inefficiencies and duplication.

The government's goal of creating efficiencies through centralized procurement is well-intentioned. However, if not designed effectively, it risks leaving small and medium-sized businesses in small communities across the province unable to successfully bid on provincial contracts. Large province-wide contracts cannot effectively be fulfilled by regional suppliers, which could result in large contract awards being made only to national or multinational distributors, thereby damaging regional suppliers & economic development.

Rather than focusing on centralization at Queen's Park, regional hubs offer an alternate approach that concentrates on deriving the greatest total value and achieving savings objectives while also supporting regional economic development. Provincial initiatives to centralize procurement would be administered by regional hubs and through regionally awarded contracts with support by provincial/national agreements for commodities which are not tied to a regional supplier base. The procurement hubs would be established and administered within the regions they represent, enabling effective supplier/buyer relationship development to occur.

The government would mandate public buyers to use a blended portfolio of national, provincial, and regional suppliers to select a contract which derives the greatest "total value" for that agency where total value is defined as the balanced consideration of price, regional economic impact, and other important factors including but not limited to sustainability and cultural inclusion.

Positive models of this approach are demonstrated by the Lakehead Purchasing Consortium and other successful regional broader public service cooperatives, and provide proof that regional contract awards are as, or in some cases more effective than, singular large provincial agreements. As an example of the strength of regionalized procurement, the City of Thunder Bay recently closed a procurement for confidential waste paper shredding services where a local company provided a price lower than a provincial agreement. Bigger is not always better.

Investing in regional procurement hubs can also support investments in Indigenous businesses, which have long been neglected in Canada's economy. The Ontario Chamber of Commerce's report on regional economic development, *The Great Mosaic*, recommends that the provincial government prioritize economic reconciliation with Indigenous communities. Part of the solution is to encourage more Indigenous involvement in provincial supply chains, either by incentivizing those with government contracts to include more Indigenous suppliers in their own supply chains, or by including Indigenous suppliers in those contracts directly.²⁸¹

Implementing a regional approach to procurement centralization with a focus on achieving the greatest total value provides opportunities for small and medium-sized businesses, Indigenous suppliers, and regional economic development.

Recommendations

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

1. Implement regional procurement hubs that mandate public buyers to use a blended portfolio of national, provincial, and regional suppliers to derive the greatest total value for purchases.
2. Define total value as the balanced consideration of price, regional economic impact, and other important factors including but not limited to sustainability and cultural inclusion.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

²⁸¹ "The Great Mosaic," Ontario Chamber of Commerce, 2019, pg. 21.

NN. Simplify information sharing to improve specialized mental health care for people experiencing homelessness

Submitted by: The Greater Oshawa Chamber of Commerce. Co-sponsored by: Sault Ste-Marie Chamber of Commerce, Chamber of Commerce Brantford-Brant, Scugog Chamber of Commerce, Whitby Chamber of Commerce, and Guelph Chamber of Commerce

Issue

There is a lack of integration among care professionals when caring for the complex mental health needs of people experiencing homelessness and experiencing acute mental health crises, leading to a disproportionate number of hospital emergency department visits, and an increase in preventable overdoses and deaths. The 'circle of care' model put forward by the Information and Privacy Commissioner does address information sharing for several health information custodians, but it fails to include two of the most common service providers involved in the case management of individuals experiencing homelessness with complex mental health needs: law enforcement and social services.

Background

Healthcare providers and community service providers must be able to collaborate to meet the unique mental health needs of people experiencing homelessness²⁸² in order to ensure stronger socioeconomic opportunities and safeguard health system capacity. The misapplication and restrictive nature of current privacy laws prevents the necessary and timely collaboration of professionals when addressing the ongoing and complex mental health needs of those experiencing homelessness. One intention of the *Personal Health Information Protection Act, 2004* (PHIPA) is to provide practitioners with the right information at the right time. Without access to the full scope of information from all providers involved in an individual's case management, emergency healthcare providers and emergency responders are unable to assess and tend to an individual's needs effectively and appropriately.

This results in inadequate care for people experiencing homelessness and mental health and/or addictions challenges, which can lead to the continuation of those complex challenges. It also directly creates missed opportunities to adequately and more quickly address some of the individuals' acute needs, effectively short-circuiting any chance to stabilize the person in a more timely fashion.

With growing rates of homelessness and mental health and addictions challenges in communities across the province, municipalities and local businesses are unable to manage the associated business, economic, and health system costs and impacts. For example, individuals experiencing homelessness make up a disproportionate share of Canadian emergency department visits in the absence of adequate and affordable housing and/or mental health supports.²⁸³ This puts additional and unnecessary strain on our hospitals, healthcare resources, and the community at large. The lack of specialized mental health care for people experiencing homelessness is evident through the inability of all service providers to integrate specific case knowledge in the care planning process and through a system that fails to provide accessible care environments for all demographics. This lack of specialized care is also evident in the suboptimal discharge planning provided by hospitals and the justice systems (e.g., access to affordable housing, mental health and addictions supports, etc.) and the high rates of readmission among people experiencing homelessness.²⁸⁴ The direct impact to businesses is that these barriers to care are directly correlated to a slowing down of many individuals' pathways

²⁸² <https://www.homelesshub.ca/sites/default/files/attachments/s41572-020-00241-2.pdf>

²⁸³ <https://www.theglobeandmail.com/canada/british-columbia/article-western-canada-the-growing-impact-of-homelessness-on-emergency/>

²⁸⁴ <https://www.homelesshub.ca/sites/default/files/attachments/s41572-020-00241-2.pdf>

to becoming re-housed/re-integrated, posing significant, ongoing pressures on local communities, the health care system, and the economy more broadly.

Recommendations

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

1. Review relevant sections of the Personal Health Information Protection Act that prevent sharing of information among service providers involved in clinical case management of people experiencing homelessness, specifically, non-healthcare related sector service providers such as social service and emergency service providers.
2. Ensure a provincial funding commitment to specialized mental health care for people experiencing homelessness.
3. Create enhanced support mechanisms for people with mental health conditions for aftercare after being released from the hospital, so they can be monitored for a more extended period by the required mental health specialist and social service professional, in partnership with the ACT team.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

OO. Supporting Safer and Healthier communities through Detox Centres in a collaborative approach when dealing with those experiencing Homelessness, Mental Health and Addictions

Submitted by: Belleville Chamber of Commerce. Co-sponsored by: Brockville & District Chamber of Commerce, and Peterborough and the Kawarthas Chamber of Commerce

Issue

Across Canada over the past five years, most communities have seen a significant increase in the number of community members experiencing homelessness, mental health and addictions. While not intrinsically connected, there is a direct correlation between homelessness, mental health and addictions. While there are many social service agencies doing their best to work with these affected community members, a missing element in a small to mid-sized community is the support to operate a Detox Centre in an effort to address the addictions component of a triangle that encompasses homelessness, mental health and addictions.

Background

Currently in Canada it is estimated that as many as 6 million people, or 21% of our population, will meet the criteria for substance use disorder in their lifetime. When we look at some of the larger municipalities across our country, they have the resources available to support a Detox Centre. Ottawa has a Detox Centre program that enlists the support of the Montfort Hospital for the health and safety of their clients. It is imperative to address these socioeconomic challenges through an integrated three-pronged approach, including addressing homelessness via the use of short- and long-term solutions (e.g., shelters, supportive housing, affordable housing, etc.), a transition centre and other dedicated services and supports to address the mental health concerns of the clients, and last but not least, the most important element is a Detox Centre to provide wrap around services for clients who are suffering from alcohol and/or drug addictions.

According to the Advocacy Centre for Tenants Ontario, 35,000 Canadians experience homelessness on any given night. At least 235,000 Canadians experience homelessness in a year and 27% are female while 19% are youth. Additionally, the number of adults 55+ years old experiencing homelessness is rising, a combined 24% of shelter users.

In 1988 Robert Graham developed a document called “Building Community Support for People.” This was a plan for mental health in Ontario that included the closure of mental health facilities across Ontario (i.e.: Mountainview & Burritts Rapids along with others). The Graham report highlighted the importance of reintegrating those with mental health challenges in our communities across Ontario. The reintegration of these members of our community was to be supported through social support mechanisms that did not materialize, thus leaving the municipalities to deal with the social support challenges of the reintegration.

With growing rates of homelessness and mental health and addictions challenges in communities across the province, municipalities and local businesses are unable to manage the associated business, economic, and health system costs. This is not a criminal problem but a health care issue that can no longer be managed within a system already stretched beyond capacity.

It is time for the provincial government to support our most vulnerable populations with the support promised the well-intentioned reintegration that not only costs municipalities, but the businesses serving these communities.

It is also critical to note that the establishment of a detox centre in a select community will exacerbate the problem where these resources are located; the request is to consider the creation of these centres in multiple communities across Ontario.

Recommendations

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

1. Invest in integrated and specialized mental health services that meet the unique needs of communities.
2. Facilitate the creation of Detox Centres and healing lodges in communities across Ontario without existing facilities.
3. Develop a framework to allow for sustained funding agreements with parameters to ensure the viability and success of the Detox Centre.
4. Ensure that Detox Centres are provided with mental health and housing resources and integrated with mental health care providers and homeless shelters.

Effective Date: April 29, 2023

Sunset Date: April 29, 2026

PP. Zoning preservation of Crucial Employment (Manufacturing, Retail and Warehousing) Lands

Submitted by: Niagara Falls Chamber of Commerce. Co-sponsored by: Fort Erie Chamber of Commerce, Port Colborne-Wainfleet Chamber of Commerce, Welland/Pelham Chamber of Commerce, Grimsby Chamber of Commerce, Niagara Board of Trade and Commerce, and Lincoln Chamber of Commerce

Issue

Preservation of Employment Lands.

Background

Maintaining Employment Lands that allow for the sustainable expansion of the jobs-producing, broader industrial sector, is essential in preserving Ontario's economy and job growth.

The Niagara Falls Chamber of Commerce recognizes and supports current provincial priorities to provide more residential areas for the province's rapidly growing population. We, and our partners in this resolution, also insist that lands zoned for residential, and Employment Lands must co-exist.

Commercial and industrial lands, dedicated by municipal zoning, allow for Ontario's residents to access the stable jobs they need, to thrive and prosper where they live.

We recognize the pressure to alternatively develop (these usually-serviced lands) for residential purposes, noting the pre-existing services are also intended for new Employment Lands development.

However, as legislation and pressures mount to reduce residential development charges, industrial lands provide a reliable source for ongoing development charges, jobs and tax revenue for the municipal tax base.

Tax revenue and charges from already-serviced Employment Lands help mitigate increasing budget-pressures that are steadily pushing up property taxes and affecting associated rent increases. Future Employment Lands-generated wealth will allow local governments to maintain the services and essential infrastructure needed for hundreds of thousands of new residents.

In recent decades, there has been wide agreement among Niagara's municipal government and stakeholders like the Niagara Industrial Association about the urgency in securing Employment Lands.

Indeed Niagara Region, and lower-tier municipalities that include Niagara Falls, are aware of the essential nature of Employment Lands and Areas in assuring prosperity for all residents.

The region has a thriving industrial/commercial sector in Niagara Falls and across the Peninsula, which is reflected in its Niagara Gateway Economic Zone and Centre Community Improvement Plan (Gateway CIP). It notes that in 2022, the Niagara had \$534 million in non-residential building construction.

Niagara Region's new Official Plan also identifies and protects the Employment Areas for a range of employment uses, including heavy industrial, light industrial, and knowledge and innovation industries. This Employment Lands future security is essential as developable lands become increasingly scarce in this area, and other parts of Ontario, restricted in development by the Greenbelt and other measures.

The November 2022 notice of approval of the Niagara Region Official Plan also references helping the Region prepare for an anticipated population of 694,000 people and 272,000 jobs, by 2051. "Clearly defining and mapping Niagara's employment areas will help direct investment to those areas, attracting and retaining jobs, and growing Niagara's economy," says a summary.

The Niagara Industrial Association has also steadfastly advocated for the preservation of Employment Lands: Its members alone, provide more than 6,000 typically well-paying and stable jobs, producing a total manufacturing revenue of \$1.3 billion in its most recent calculation.

The stakeholder voices from Niagara and elsewhere in Ontario are clear. We must have protected Employment Lands zoning that exist cooperatively alongside rapid residential development. Employment Lands have to be properly preserved for future investment and growth, with zone changes correspondingly restricted by the Province of Ontario.

Recommendations

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

1. Define the need for critical employment lands in official plans while maintaining and protecting the existing volume of employment lands in the pursuit of residential zoning.
2. Ensure the Ontario Land Tribunal protects employment lands through its appeals process.
3. Recognize these lands must sustainably co-exist alongside other community zoning purposes. Employment Lands serve as a future jobs-creating and municipal-revenue complement to new residential developments coming onstream soon — given explicit government priorities to build needed new homes, and residences.

References

Job-Producing Lands Release, Niagara Industrial Association, <https://niagaraindustry.com/niagaras-job-producing-lands-must-coexist-with-new-housing-nia-official-press-release/>

Niagara Employment Area Strategy, [Report - Niagara Region's Employment Area Strategy: Background Report and Recommendations](#)

Niagara Industrial Association, <https://niagaraindustry.com/>

Niagara Region Gateway CIP, <https://niagaracanada.com/incentives-and-programs/gateway-cip/>

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