

January 20, 2019

Michael Helfinger,
Intergovernmental Policy Coordination Unit
Ministry of Economic Development, Job Creation and Trade
900 Bay Street Hearst Block, 7th Floor Toronto, ON M6H 4L1

Ken Petersen
Provincial Planning Policy Branch
Ministry of Municipal Affairs and Housing
777 Bay Street, 13th floor Toronto, ON M5G 2E5

Dear Mr. Helfinger and Mr. Petersen:

RE: ENVIRONMENTAL REGISTRY NO. 013-4293 (Restoring Ontario's Competitiveness Act, 2018) ENVIRONMENTAL REGISTRY NO. 013-4125 (Proposed Open-for-Business Planning Tool) ENVIRONMENTAL REGISTRY NO. 013-4239 (New Regulation under the Planning Act for Open-for-Business Planning Tool)

I am providing comments on Schedule 10 of Bill 66 (Restoring Ontario's Competitiveness Act, 2018) in accordance with the above-noted Registry notices.

I have some decades of background in the interconnections between land/water use and water quality issues. In recent times I teach a 4th year water management course at Lakehead University and am the president of Environment North, a non-governmental organization based in Thunder Bay founded in 1972.

Bill 66 was introduced for First Reading in the Ontario Legislature on December 6, 2018. Todd Smith, the Minister of Economic Development, Job Creation and Trade indicated that Bill 66 intended to eliminate "red tape" and "burdensome regulations" in order to promote business growth and create employment.

As a person who teaches about the Walkerton tragedy that caused seven fatalities and affected more than two thousand people, some for long durations, prompts my concerns about the "burdensome regulations" that Bill 66 is targeting. This concern is compounded by past remarks by Lisa Thompson, now the Minister of Education, that the drinking water regulations arising from the Walkerton were "excessive":

https://www.thestar.com/news/queenspark/2014/03/11/walkerton_water_tragedy_resulted_in_to_much_red_tape_says_tory_mpp_lisa_thompson.html

What kind of "cost/benefit" analyses preceded the introduction of Bill 66? I suspect 'eliminate "red tape" and "burdensome regulations" in order to promote business growth and create employment' do not have numbers associated with these "benefits". Please supply them if I am incorrect.

However, one supposes that the potential "costs" are considered. What liabilities could/would be incurred if various acts, the Clean Water Act, 2006, the Toxic Reduction Act, 2009, the Great

Lakes Protection Act, 2015, are modified and reduced. One can be fairly certain that Act 66 to 'eliminate "red tape" and "burdensome regulations" will have cost numbers associated.

What does your research identify as risk and hazard concerns – both to health and safety and to cost liabilities.

Sincerely

Graham Saunders