



Registered Nurses' Association of Ontario
L'Association des infirmières et infirmiers
autorisés de l'Ontario

Goldie Ghamari, Chair
Standing Committee on General Government
99 Wellesley Street West
Room 1405, Whitney Block
Queen's Park
Toronto, ON
M7A 1A2

November 28, 2019

Re: Bill 132 hearings

Dear MPP Ghamari and members of the Standing Committee on General Government,

On behalf of the Registered Nurses' Association of Ontario (RNAO), I wish to thank you for the opportunity we had to present the views of Ontario's registered nurses, nurse practitioners and nursing students on Bill 132 on November 25, 2019.

We would like to reiterate our position on Bill 132. The bill is a very large omnibus bill, containing 17 schedules and affecting 83 legislative acts, including over a dozen environmental pieces of legislation. It was introduced on October 28, with the shortest possible period to comment – 30 days on the Environmental Registry and 32 days to the Standing Committee. That is not sufficient time to analyze and understand the health implications of any complex bill, particularly given that the explanatory note accompanying the bill provides no assistance in that regard.

We have substantial concerns about major pieces of the bill, including Schedules 9 and 16, which respectively weaken protections against pesticides and against the health effects of gravel pit operations on rural communities. Government members of the committee asked whether we supported other elements in the bill, and our response is: the short time allowed for comment does not allow us to critically assess those other sections. We did find elements that were steps forward, such as the addition of monetary benefits to administrative penalties, but the presence of such elements does not change our position that at least the environmental sections of the bill should be withdrawn and then put to full and thorough public consultation.

RNAO was closely involved over the last two decades in all the extensive consultations that led to the development of legislation on cosmetic pesticides, neonicotinoids, clean energy and toxics. The consultation involved key stakeholders, including industry, community, health and environment representatives. All parties had ample opportunity to understand the options and to argue their cases. The resulting legislation took time and reflects the shared concern to protect human and environmental health while supporting other objectives. The past protections we jointly developed are not red tape, and any proposals to revise them must be carefully discussed in public to ensure that resulting changes do not weaken health and environmental protections.

Thank you for your time and consideration.

Warm regards,

A handwritten signature in black ink, appearing to read "Doris Grinspun". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Doris Grinspun, RN, MSN, PhD, LLD(hon), Dr(hc), FAAN, O.ONT
Chief Executive Officer, RNAO

C.C. Premier Doug Ford

Hon. Prabmeet Sarkaria, Associate Minister of Small Business and Red Tape Reduction

Hon. Jeff Yurek, Minister of the Environment, Conservation and Parks

Hon. Christine Elliott, Minister of Health

Andrea Horwath, Leader of the Official Opposition

Ian Arthur, ONDP Environment Critic

France G linas, ONDP Health Critic

John Fraser, Interim Leader Ontario Liberal Party

Mike Schreiner, Leader, Green Party of Ontario.

Jerry DeMarco, Commissioner of the Environment