



**RNAO submission re Bill 40 –  
Protect Ontario by Securing  
Affordable Energy for  
Generations Act, 2025**

**Nov. 25, 2025**



The Registered Nurses' Association of Ontario (RNAO) is the professional association representing more than 57,250 registered nurses (RN), nurse practitioners (NP) and nursing students in all roles and sectors across Ontario. Since 1925, RNAO has advocated for healthy public policy, promoted excellence in nursing practice, increased nurses' contribution to shaping the health system, and influenced decisions that affect nurses and the public we serve.

## Introduction

RNAO urges the Government of Ontario to withdraw *Bill 40: Protect Ontario by Securing Affordable Energy for Generations Act, 2025*. The bill represents poor economic policy that runs counter to the government's stated goals of growth, innovation and long-term prosperity. It also accelerates fossil-fuel infrastructure, deepens dependence on natural gas and undermines provincial climate commitments at a time when urgent action is required to safeguard population health.

Before outlining RNAO's concerns, it is important to summarize the bill's central features. Bill 40 amends several statutes to expand ministerial discretion over energy-sector participation, broaden the Ontario Energy Board's authority to approve gas infrastructure, restrict foreign-sourced equipment, remove elector assent for municipal gas franchises, and apply these measures retroactively to existing applications. Together, these provisions pave the way for increased fossil-fuel use while weakening public oversight.

Ontario's own 2025 budget states that "we need to do more than help businesses and workers navigate today's uncertain economy. We need to make the tough choices and strategic investments to unleash our economy and protect Ontario for generations." That guiding principle aligns far more closely with a low-carbon, innovation-driven energy strategy than with expanding fossil-fuel infrastructure.

The global economy is rapidly shifting toward renewables, energy storage, electrified transport and advanced clean-tech manufacturing – sectors already generating major job growth and attracting record levels of investment. Strategic investments that "protect Ontario for generations" therefore mean building a modern, resilient energy system powered by wind, solar, storage, efficiency and smart-grid technologies.

This stands in contrast to large-scale nuclear projects, which are significantly more expensive, take far longer to deliver, and cannot address Ontario's urgent near-term energy needs or its rapidly intensifying climate obligations. By contrast, expanding natural-gas infrastructure locks the province into a higher-cost, higher-risk and rapidly declining sector that will saddle households with rising energy bills and expose Ontario to stranded-asset losses.

In short, the economic strategy articulated in the provincial budget points directly to accelerating the renewable and low-carbon transition – and Bill 40 moves Ontario in the opposite direction.

Nurses see firsthand the growing health impacts of the climate crisis in all care settings – from heat-related illness and respiratory disease to trauma and displacement caused by severe weather. We also understand the future trajectory if Ontario continues expanding fossil-fuel use rather than shifting to a low-cost, renewable system – a trajectory marked by escalating emissions, higher energy costs, worsening climate-driven health impacts and deepening inequities across communities. Ontario has the resources and technological capacity to fully decarbonize its grid; this bill takes the province in the opposite direction.

RNAO instead calls on the province to:

- Implement a science-based climate plan aligned with a 2050 net-zero target.
- Develop programs, regulations and services that meet revised emission-reduction targets.
- Implement the recommendations listed in the conclusion of this submission, which support long-term economic, environmental and population-health resilience.

## Discussion

### **Economic growth does not require fossil-fuel expansion**

Bill 40 embeds “economic growth” as an objective within amended statutes. RNAO is not concerned with this framing; indeed, we have long argued that the transition to a decarbonized electricity system is a major economic opportunity. In our 2025 federal pre-budget submission (1), RNAO highlighted that:

- Canada’s clean-energy GDP is projected to reach \$107 billion within five years, fuelled by \$58 billion in annual investments by 2030 and more than 600,000 jobs.
- Net-zero pathways will reduce total energy-related costs by as much as \$15 billion.
- By 2035, 84 per cent of households are expected to have lower overall energy expenses.
- Average household savings may reach 12 per cent by 2050.
- Climate inaction is already costly: natural disasters in summer 2024 alone caused \$7 billion in damages, while carbon-based assets continue to decline in value.

Economic growth stems from renewable energy, electrification, conservation and innovation – not expanded fossil-fuel burning. The Ontario Provincial Climate Change Impact Assessment (2) warns that continued warming will bring more than 60 extreme-heat days annually to much of southern and eastern Ontario, causing crop failures, supply-chain disruptions and increasing risks to the energy system itself. These impacts require major investments in decarbonized, reliable and climate-resilient infrastructure – not in gas expansion.

### **Bill 40’s provisions: risks to health, equity, affordability and energy security**

- **Expansion of ministerial powers and foreign-actor restrictions**

Bill 40 authorizes the Minister to restrict participation in the energy sector based on foreign ownership or the origin of equipment. Given that China produces 98 per cent of global solar wafers and 80 per cent of the solar supply chain, these provisions would severely limit Ontario’s ability to deploy solar energy – the fastest-growing source of electricity worldwide. Restricting access to key renewable technologies threatens affordability, competitiveness and grid decarbonization (3).

- **Removal of elector assent for municipal gas franchises**

The bill removes long-standing democratic protections requiring elector assent before municipalities can grant new gas distribution franchises. This disenfranchises communities that will bear the risks of expanded fossil-fuel infrastructure while giving corporations increased influence over local energy decisions. It is an inappropriate erosion of local authority (3).

- **Expansion of Ontario Energy Board (OEB) powers**

Bill 40 broadens the OEB’s authority to approve new fossil-fuel infrastructure and allows it to override municipal objections. This shifts decision-making away from communities and accelerates long-term investments that lock in higher emissions and costs, despite clear evidence that gas is the most expensive source of electricity generation in Ontario (3).

- **Retroactive application to ongoing applications**

Allowing the bill to apply retroactively undermines fairness and due process. Retroactivity alters the rules for proponents and communities already engaged in the regulatory process, weakening public trust and skewing outcomes toward gas infrastructure expansion (3).

- **Affordability and reliability impacts**

Ontario is already experiencing major cost escalation tied to natural gas. Electricity supply rates rose 29 per cent on Nov. 1, 2025. The province currently spends \$6–8 billion subsidizing hydro bills and the Independent Electricity System Operator (IESO) projects those costs to climb to \$34.5 billion by 2030 and \$43 billion by 2035 (3).

Bill 40 encourages further investment in gas-fired generation, which will increase emissions, increase system costs and delay the transition to cheaper renewable sources. This is neither fiscally responsible nor aligned with public health protection (3).

- **Lack of compliance with climate-governance requirements**

That course-change must begin with not only the withdrawal of Bill 40 but also immediate compliance with the Cap and Trade Cancellation Act, 2018. Under this Act, the government is required to establish targets for reducing greenhouse gas emissions in Ontario, and the Minister of Environment, Conservation and Parks (MECP) must prepare a climate change plan and report regularly on progress. As noted in the Ontario Auditor General’s October 2025 special report, *Report on Progress to Reduce Greenhouse Gas Emissions*, “despite the legal requirement to prepare a climate change plan and publicly report on progress, no finalized plan exists, and MECP has not released a new progress report since 2021.” (4)

Noncompliance with the act has already weakened Ontario’s climate performance. The Auditor General found that MECP projected in January 2025 that Ontario would miss its 2030 target by 3.5 Mt, and that the combined reductions from provincial and federal initiatives are insufficient to meet that target. Moreover, unlike most other jurisdictions in Canada, Ontario has no emissions-reduction plan beyond 2030 – a serious concern given the cumulative nature of greenhouse gas emissions. Bill 40 compounds these governance failures by expanding fossil-fuel infrastructure without providing any credible pathway to meet Ontario’s climate obligations.

## Health impacts of climate change

The advancing climate disruptions are having an obvious impact on the health of Ontario’s residents, placing growing strain on the health system, health providers and future health-care costs. This includes (5, 6, 7):

- **Heat-related illness** – Extreme heat waves increase heat stroke, dehydration, kidney injury, mental-health distress and mortality, especially among older adults, people with chronic illness, those in inadequate housing and people experiencing homelessness.

- **Air-quality impacts** – Wildfires and climate-driven air pollution contribute to premature death, chronic respiratory disease, asthma and cardiovascular illness. Air pollution caused an estimated 17,400 premature deaths in Canada in 2018, with more than one-third in Ontario.
- **Extreme weather and flooding** – Storms, tornadoes and flooding cause acute trauma, spread water-borne disease and increase mould-related respiratory issues, particularly for people in low-income or substandard housing.
- **Vector-borne disease** – Warmer temperatures have accelerated the spread of Lyme disease. Delayed treatment can lead to long-term neurological, cardiac and endocrine complications.
- **Mental-health impacts** – Climate anxiety is rising, especially among youth and people facing economic hardship or unstable housing. Severe weather events and displacement heighten anxiety, depression and trauma-related symptoms.

## Disproportionate impacts and deepening inequities

Increased environmental instability often intersects with socio-economic determinants such as poverty, food insecurity and barriers to health-care access. This results in disproportionate health impacts and deepening health inequity:

- **Indigenous communities**

Climate change disproportionately harms Indigenous communities, especially in northern Ontario where temperatures are rising far more rapidly. Food sources, cultural practices, traditional medicines and community well-being are closely tied to the land. Disruptions to hunting, fishing and gathering threaten food security and cultural continuity. The United Nations Declaration on the Rights of Indigenous Peoples affirms the right to environmental protection and to full participation in decisions affecting Indigenous lands – rights undermined when fossil-fuel infrastructure is expanded without robust consultation (8).

- **People experiencing homelessness and inadequate housing**

These populations face severe exposure to extreme heat, cold and precipitation, with higher risks of illness, injury and mortality. Social isolation, poverty and lack of access to cooling or safe shelters compound these risks.

- **Black communities**

Higher asthma rates — rooted in social and economic inequities — increase vulnerability to climate-driven air pollution and wildfire smoke.

- **People with disabilities**

Reduced mobility, co-morbidities and barriers to emergency evacuation heighten risks from flooding, wildfire and extreme heat events.

- **Older adults**

Older adults, especially those with low income or living alone, face increased risks from heat waves, respiratory illnesses and climate-driven emergencies.

Ontario's 2023 climate-impact assessment underscores the need for infrastructure and health-system improvements tailored to these inequities. Bill 40 moves the province further from this evidence-based direction.

## **Conclusion**

Ontario faces escalating climate, health and economic risks. The government's own evidence confirms the urgency of a comprehensive and equitable response. Bill 40 exacerbates these risks by entrenching fossil-fuel dependence, weakening local decision-making and undermining affordability. It is wrong both because it represents poor economic policy that contradicts the government's stated goals for growth and innovation, and because it worsens environmental degradation and the health impacts nurses see daily across Ontario, contributing to a future in which these harms intensify further.

RNAO calls on the government to withdraw Bill 40 and implement the following actions with urgency.

### **Climate policy and governance**

- Develop and annually report on a science-based climate plan with revised GHG-reduction targets aligned with net-zero by 2050.
- Ensure all climate actions uphold Indigenous rights and comply with the United Nations Declaration on the Rights of Indigenous Peoples.

### **Energy and emissions**

- Transition to a low-cost, renewable electricity system by phasing out fossil fuels, especially for home heating and cooking.
- Reduce transportation emissions through zero-emission vehicles, walkable communities and sustainable transit systems.
- Accelerate investment and innovation in renewable energy, energy storage, grid modernization and other low-carbon technologies to drive economic growth and align Ontario with global clean-energy markets.
- Shift energy planning away from costly and slow-to-deploy nuclear projects toward lower-cost, faster-to-implement renewable energy solutions that can enhance affordability, resilience and near-term emissions reductions.

### **Just transition and economy**

- Support a just transition by regulating and taxing high-emission industries and investing in green jobs, retraining and worker mobility.

### **Land use and food security**

- Protect farmland, local food systems and ecosystems; reduce urban sprawl to enhance climate resilience.

## Health and emergency preparedness

- Require public health units to update climate-emergency plans addressing the needs of vulnerable populations.
- Collaborate across governments on climate-informed approaches to housing, homelessness and food security.
- Expand the health workforce trained in climate-related health impacts.

## Education and awareness

- Integrate climate science, adaptation and resilience into curricula from primary to post-secondary levels.

RNAO thanks the government for considering this submission and stands ready to collaborate on evidence-informed solutions that advance Ontario's economic prosperity, environmental responsibility and the health and well-being of all residents. We welcome continued dialogue and partnership to build an energy future that supports thriving communities today and for generations to come.

## References

1. Registered Nurses' Association of Ontario (RNAO). (2025). [\*Submission re. 2025 Pre-Budget Consultations: August 1, 2025.\*](#)
2. Climate Risk Institute. (2023). [\*Ontario Provincial Climate Change Impact Assessment: Technical Report.\*](#)
3. Office of the Auditor General of Ontario. (2025). [\*Report on Progress to Reduce Greenhouse Gas Emissions.\*](#)
4. RNAO. (2024). [\*Political Action Bulletin: The climate crisis and health: Impacts on Ontario.\*](#)
5. Government of Canada. (2024). [\*Health impacts of air pollution in Canada in 2018\*](#)
6. Public Health Ontario. (2024). [\*Infectious Disease Trends in Ontario.\*](#)
7. United Nations. (2021). [\*United Nations Declaration on the Rights of Indigenous Peoples.\*](#)