

Dave Smith, MPP (Peterborough-Kawartha) Chair
Christopher Tyrell, Clerk pro tem
Standing Committee on General Government
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Chair Dave Smith and members of the Standing Committee on General Government:

Re: Bill 66, Restoring Ontario's Competitiveness Act, 2019

The **Ontario Council of the Canadian Federation of University Women (CFUW Ontario Council)** is an organization with 50 clubs throughout the province from Windsor to Thunder Bay to Ottawa to Welland.

Any advocacy done by CFUW and its clubs is based on policy derived from our annual grassroots resolution process, with those resolutions voted on and adopted at the Annual General Meetings.

SCHEDULE 3

Ministry of Education
Child Care and Early Years Act, 2014

CFUW has been advocating for child care since 1968 in a Brief to the Royal Commission on the Status of Women that stressed the need for increased child care services in order to assist women entering the workforce.

This was more formalized over many years with policies adopted both at the national level and here in Ontario asking governments to establish “ a quality, universally accessible and comprehensive early learning and child care program which emphasizes the development of the whole child”

Members of CFUW Ontario Council have just returned from the 63rd United Nations Commission on the Status of Women. In the many discussions related to improving the world's economy, increasing women's employment was considered fundamental. While there were many methods discussed to encourage women, the baseline was always child care.

While we recognize this essential need (as well as the need to have flexible systems for those working extended or non-traditional hours), we do have some concerns about the changes being considered as part of Bill 66, Schedule 3: with the increase in numbers for licensed and unlicensed non-regulated child care. [Child Care and Early Years Act, 2014, 2 (1), (2), (3), (5), (6)]

In surveying the standards of most of the other Canadian provinces, the standard ratio is one carer to two infants under the age of 2.

This standard also includes parts of the United Kingdom, such as England and Wales.

The original changes to Child Care and Early Years Act, 2014 were done due to deaths in unlicensed child care centres, followed by a report of the Ontario Ombudsman, *Careless about Child Care*.

Considering that the standard ratio is one carer to two infants under the age of 2 for both licensed and unlicensed home child care, **how can we be assured of the safety of children, especially during a fire or other emergency?**

While this does not relate to Bill 66, it was interesting to note that England and Wales do not have non-regulated child care. All types of centres are licensed, trained and supervised. As the current ratios for children and child care worker were set due to deaths in unlicensed child care services, should we not consider, like the United Kingdom, licensing and supervising them all.

CFUW Ontario Council recommends:

- That the ratio remains 1 carer for every 2 children under the age of 2.

SCHEDULE 5

Ministry of the Environment, Conservation and Parks
Toxics Reduction Act, 2009

CFUW Ontario Council has worked with, and followed the recommendations of, the Canadian Environmental Law Association (CELA) for many years.

Their advice concerning Bill 66, Schedule 5, is not to repeal the Toxics Reduction Act, 2009 (TRA).

While it is the intention to only remove the Toxics Reduction Act in 2021 once the federal law on toxic substances has come into effect, CELA indicates some variations between the two:

- “Ontario has also previously identified many toxic substances in Ontario not covered by federal requirements that if they are still present in the province could benefit from application of the TRA.”ⁱ
- The TRA does not duplicate the federal legislation but complements and supplements it. The Ontario legislation was based on the Massachusetts Toxics Use Reduction Act which has been successful in curbing toxins.

- The federal program focuses on gathering information, the stricter TRA is intended for toxic reduction, to pick up where the federal plan finishes “by getting companies to use less of, or not create in the first place, potentially problematic substances the federal government allows to remain in commerce.”ⁱⁱ

CFUW Ontario Council recommends:

- That the Toxic Reductions Act, 2009 not be repealed;
- That, given that Ontario’s emission of toxic substances are some of the highest in North America, and that the total amounts of the total amounts of toxic substances released to air, land, and water for all facilities were greater in 2016 than in 2012ⁱⁱⁱ, that the TRA needs to be improved, and that its sections not in force need to be proclaimed;
- That Ontario still has a ‘made in Ontario’ problem, and Ontario needs to continue to be part of the solution.

CFUW ONTARIO COUNCIL

Ontario Council of the Canadian Federation of University Women (CFUW) is a voluntary, self-funded, non-profit organization with 50 clubs across the province, which is affiliated with the national Canadian Federation of University Women.

Our mandate is to promote education and life-long learning, to encourage the participation of members in their communities and to enhance the status of women and girls.

Our main concerns include high quality public education, universal health care, a clean safe environment, the economic security of women as well as the prevention of violence against women.



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ⁱ <http://www.cela.ca/SubmissionsOnBill66-Schedule5>

ⁱⁱ Ibid

ⁱⁱⁱ Ontario Ministry of the Environment and Climate Change, Minister’s Report on Toxics Reduction 2017 (Toronto: Queen’s Printer, 2018) (Minister’s 2017 Report”).