

Goldie Ghamari, MPP Carleton, Chair Standing Committee on General Government  
Jocelyn McCauley, Clerk  
Room 1405, Whitney Block  
Queen's Park, Toronto, ON M7A 1A2  
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Dear Ms. Ghamari and members of the Standing Committee

CFUW Ontario Council would like to express a few comments concerning Bill 132 *Better for People, Smarter for Business Act, 2019*

We are the Ontario Council of the Canadian Federation of University Women (CFUW), a voluntary, self-funded, non-profit organization with 49 clubs across the province, which is affiliated with CFUW, a national non-partisan organization with clubs in all provinces of Canada.

Being a grassroots volunteer non-profit organization, it is difficult to express well-researched opinions given the short notice for the consultation. We will therefore confine our comments to Schedule 9, Ministry of the Environment, Conservation and Parks.

Over the years we have been very involved in this area, even presenting to the Standing Committee on Social Policy concerning Bill 64, Cosmetic Pesticides Ban Act, 2008.

#### **Schedule 9 – Ministry of the Environment, Conservation and Parks**

Environmental Protection Act:

16. Section 182.1 of the Act is repealed with substitutions which concern us:

Administrative penalties:

- 182.1 (7) We join other environmental non-profit groups, including the Canadian Environmental Law Association (CELA), who are concerned that the environmental penalty, now called “administrative penalty”, “shall not exceed \$200,00 for each contravention.” Currently the penalty ‘shall not exceed \$100,000 for each day or part of day. Environmental Protection Act 1990 182.1 (5)

**Our question and concern:** Will a one-time \$200,000.00 fine act as any deterrent, especially to larger corporations?

- 182.1 (8) This allows for an increase in penalties dependent “by an amount equal to the amount of the monetary benefit acquired by or that accrued to the person as a result of the contravention.”

**Our question and concern:** Will this increase ever include and factor in the considerable monetary cost to health, land, environment, and people’s lives. Major environmental incidents can lead to degradation for many years.

## **Pesticides Act, 1990**

43 (1)

1(1) The removal of the word 'pesticide', replacing it with the words 'active ingredient':  
"active ingredient" means, subject to subsection (1.1), a pesticide,  
(a) that is **a component of a product that is a pesticide**, and  
(b) to which the intended effects of the product are attributed; ("principe actif")

This also affects 44 – Subsections of the Pesticides Act 7.1 (1)-(4)

**Our question and concern:** Given that pesticides include both active ingredients and inert ingredients, and, according to the US Environmental Protection Agency, "the name 'inert' does not mean non-toxic"<sup>1</sup>, how can we be assured that our health and environmental safety is being protected? Why has the word pesticides been removed, limiting the control to just the active ingredients?

At the same time as this consultation, the Ministry is doing a consultation concerning the Pesticide Regulation (63/09 General). They are proposing to end the Ontario system for the classification of pesticides and depend upon the federal government, with the exception of "its cosmetic pesticide ban and restrictions on the sale and use of neonicotinoid (NNI)-treated corn and soybean seeds."<sup>2</sup> Again, this then asks why remove the word "pesticides"?

43 (3)

1(1) The repeal and dissolution of the Pesticides Advisory Committee

**Our question and concern:** While the preponderance of their work concerned the classification system, they did also review pesticides in use in Ontario. Who will now advise on the new classification if the Ontario system is disbanded? Who is now reviewing the health and safety effects of pesticides? Who is giving advice the Ministry?

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<sup>1</sup> Basic Information about Pesticides Ingredients <https://www.epa.gov/ingredients-used-pesticide-products/basic-information-about-pesticide-ingredients>

<sup>2</sup> Amendments to the Pesticide Regulation (63/09 General) <https://ero.ontario.ca/notice/019-0601>

Written and researched by Teri Shaw, Chair, Advocacy