

Comment on Bill 66

There is no business investment emergency in Ontario.

"Capital investment into Ontario increases 53%, surpassing California and New York for the first time since 2014: Ontario is again a leading North American destination for foreign direct investment (FDI), according to [fDi Intelligence's 2018 report on global greenfield investment](#). The annual report, published by a division of the *Financial Times*, is the most authoritative source of intelligence on real investment in the global economy, tracking greenfield investment projects globally across industries."

<https://www.investinontario.com/spotlights/ontario-top-3-destination-foreign-direct-investment>

There is no employment emergency in Ontario, with the unemployment rate steady at a 30 year low.

"Ontario's unemployment rate remained at 5.6% in November compared to October and has remained below 6.0% since August 2017."

<https://www.ontario.ca/page/labour-market-report-november-2018>

There is no construction industry emergency in Ontario.

"Full Capacity: As far as labour constraints go, there's unlikely to be any short-term relief, in part because the industry is firing on nearly all its available cylinders. In the second quarter of this year, the most recent quarter for which data is available, Statistics Canada pegged the construction industry's capacity utilization rate at 93 per cent. The metric, which weighs actual output against theoretical potential, has not been so high for the sector since 1990."

<https://www.on-sitemag.com/features/canadian-construction-outlook-positive-for-2019-but-last-years-setbacks-could-cast-a-long-shadow/>

If anything is holding back the construction industry, it's a labour shortage.

https://www.constructionforecasts.ca/sites/forecast/files/highlights/2018/2018_ON_Constr_Maint_Look_Foward.pdf

There is no employment land emergency in Ontario municipalities.

In the last review of its official plan, Ottawa in fact converted some employment lands to residential use.

<https://ottawa.ca/en/city-hall/planning-and-development/official-plan-and-master-plans/official-plan-amendment-180>

There is no regulatory requirements emergency in Ontario.

Despite current planning and environmental requirements, the world's largest retailer decided in 2018 to locate a huge distribution centre in Ottawa.

<https://ottawa.ctvnews.ca/amazon-to-open-massive-distribution-centre-in-ottawa-1.3944121>

We are however facing a climate emergency in Ontario

So the main thrust of Bill 66 to suspend the application of a multitude of environmental protection measures in the name of removing obstacles to investment and job creation is completely out of step with what is needed. Its passage into law can only make matters worse, not only for the environment and public health, but for the overheated development industry itself.

In light of how wildly disconnected from reality this legislation actually is, it can only be seen as another artifact of the culture war mentality of this government. It invokes extraordinary, draconian measures to address an issue that does not even exist, but ignores the most significant problem that is staring us in the face, climate change.

<https://www.afr.com/business/insurance/world-economics-forum-world-sleepwalking-into-catastrophe-over-climate-risk-20190116-h1a4ko>

We strongly object to the provisions in Schedule 10 as they would undermine environmental protection measures such as found in the Provincial Policy Statement and the City's Official Plan and also violate good planning practices such as advance notice, public consultations and the ability to appeal.

Bill 66 should be withdrawn and replaced with something that addresses the real emergency that we are facing, climate change.

Paul Johanis
Chair Greenspace Alliance of Canada's Capital

January 20, 2019