



October 19, 2017

Standing Committee on Justice Policy
Legislative Assembly of Ontario
Room 1405, Whitney Block
Queen's Park, Toronto, ON M7A

Attention: Clerk of the Committee Christopher Tyrell

Re: Bill 154, Cutting Unnecessary Red Tape Act, 2017

Dear Committee Members:

Environmental Defence would like to express support for the Canadian Environmental Law Association (CELA)'s letter to the Standing Committee, and echo CELA's recommendation that Sections 2, 4, 7 and 8 be deleted from Bill 154, the *Cutting Unnecessary Red Tape Act, 2017*.

Of particular concern is the proposed "One-for-One Rule" in Section 2, Schedule 4, which dictates that if government adopts a new regulation, it would need to eliminate an existing regulatory requirement.

Since 1984, Environmental Defence has been working to protect Canadians' environment and human health. A critical part of this work is researching and advocating for important regulations to keep Ontarians safe and healthy. These regulations are driven by a need to improve the lives of Ontarians and the natural environment they depend on.

As we learn more about the impacts of toxic chemicals and pollutants, we need our government to be ready to act quickly. This proposed rule will result in a slower and more onerous process for introducing new regulations to protect Ontarians. Additionally, this rule will necessitate the hasty and arbitrary removal of existing regulations which may be critically important to the public good, human health, and the protection of the environment.

We would also like to echo CELA's concerns around the proposals for Crown Immunity, Small Business Requirements, and Recognition of Excellent Compliance.

While we understand the intent to reduce unnecessary administrative burdens, the proposed rules provide insufficient guidance to achieve this



goal without creating serious and potentially devastating impacts to the environment and human health, and causing arbitrary removal of requirements designed to protect the public good.

Environmental Defence strongly recommends that Sections 2, 4, 7 and 8 be deleted from Bill 154.

Sincerely,

A handwritten signature in blue ink, appearing to read 'KB' followed by a horizontal line.

Keith Brooks

Programs Director,

Environmental Defence