



SOCIETY *of*
UNITED PROFESSIONALS
IFPTE 160

SUBMISSION ON BILL 5, THE “PROTECT ONTARIO BY UNLEASHING OUR ECONOMY” ACT

SUBMITTED ON BEHALF OF THE
SOCIETY OF UNITED PROFESSIONALS

May 26, 2025



On behalf of more than 10,000 members across Ontario working in the energy and legal services sectors, the Society of United Professionals welcomes the opportunity to comment on Bill 5: Protect Ontario by Unleashing our Economy Act, 2025.

Members of the Society of United Professionals are employed as engineers, scientists, economists, auditors, accountants, market analysts, lawyers, supervisors, and in a wide variety of other professional occupations. As an organization, we have represented professionals for over 80 years.

Our members work in every aspect of the electricity industry. They are involved in generation, transmission and distribution of electricity, management of the electricity system, regulation and enforcement of standards, and management of the electricity market.

As a union with many members who are intimately involved on a day-to-day basis with the planning and implementation of large electricity infrastructure builds, we are well aware of the difficulty of building new infrastructure projects in a timely way. We do share a basic belief, expressed by the government, that there is room for improvement in terms of achieving a more streamlined and efficient process of regulatory review as it relates to major projects.

The Society also believes strongly that investments in Ontario should maximize the degree to which we can capture employment and economic benefits of major projects within our province, and within Canada. As such, we are encouraged by sections of the Bill which speak to conditions respecting the country, region or territory of origin of goods and services procured by Ontario Power Generation Inc.

That said, we have specific concerns about what sections 5 and 6 of the Act could mean for minimum employment standards, safety, and labour rights. This government's chosen motto, Protecting Ontario, expresses a worthwhile and laudable goal. But as a union whose *raison d'être* is to protect and enhance the rights of our members and all workers, we do not believe that the goal of protecting Ontario can be compatible with legislation which makes protections for Ontario's workers conditional.

If it is not the government's intent to abrogate or degrade hard-won workers' rights, and we have no reason to believe that it is, we would request that the government implement amendments to the legislation which ensure that the government's intent to preserve all existing workers rights is clear and captured within the language of Bill 5. The language of the Bill, particularly in Sections 5 and 6, is problematically broad and vague. Where the Bill refers to "*an Act*", we are keenly aware that the lack of specificity in this language means that the unspecified Act in question could be the *Employment Standards Act*, the *Ontario Labour Relations Act*, the *Human Rights Code*, or any of a variety of employment-related legislation, regulations or other instruments.

For this reason, we would specifically request the following amendments (noted in highlighted italics) be incorporated into the Bill:

Exemption from requirements

5 (1) The Lieutenant Governor in Council may, by regulation, exempt a trusted proponent or a designated project from requirements under provisions of an Act or of a regulation or other instrument under an Act, subject to conditions specified in the regulation, as those requirements would apply in a special economic zone.

Municipal by-laws, etc.

(2) For greater certainty, the reference to “other instrument under an Act” in subsection (1) includes a by-law or other instrument of a municipality or local board.

(3) Subsection 1 does not apply to labour, human rights or other employment-related legislation, regulations or other instruments.

Modification of application of provisions of other Acts, etc.

6 (1) The Lieutenant Governor in Council may, by regulation, modify the application of provisions of an Act or of a regulation or other instrument under an Act, subject to conditions specified in the regulation, as those provisions would apply,

(a) with respect to a trusted proponent in a special economic zone; or

(b) with respect to a designated project in a special economic zone.

(2) Subsection 1 does not apply to labour, human rights or other employment-related legislation, regulations or other instruments.

The Society is also aware of a variety of concerns about Bill 5 that have been expressed by Indigenous rights holders from First Nations and Métis communities around the province. As a committed partner in Reconciliation, we believe that all government legislation must conform with our Constitutional and Treaty obligations, and the consequent duties owed to First Nations, Metis and Indigenous rights holders. On these issues however, we reserve specific comment, in deference to the fact that specific positions have been advanced by rights holders, and discussion of those positions is properly the purview of Indigenous rights holders themselves, through processes of Nation-to-Nation dialogue, consultation, and negotiation.

CONCLUSION

In summary, as the union representing professional staff throughout Ontario’s electricity sector, while agreeing with many of the Bill’s intentions, the Society has serious concerns with the proposed Bill 5.

It is the Society’s belief that Bill 5, if passed as written, could potentially be used strip Ontario workers, including Society members, of a variety of hard-won workers rights and protections. While an increased dynamism in the scope and pace of new infrastructure project construction is an important part of Ontario’s tariff response, energy transition plans, and economic revitalization, the government of Ontario needs to be mindful that an impetus for greater regulatory efficiency cannot come at the cost of workers’ rights. As such, the Society urges this committee to report to implement the amendments to Bill 5 spelled out in this submission.



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