



PARKS AND RECREATION ONTARIO

Regulatory Impact Analysis

Poor Outdoor Air Quality and Workplace Health and Safety Consultation
Under the Occupational Health and Safety Act
Proposal Number: 23-MLITSD004

Parks and Recreation Ontario Submission
September 11, 2023

Parks and Recreation Ontario
1 Concorde Gate, Suite 302
Toronto, ON M3C 3N6
prontario.org



About Parks and Recreation Ontario

Parks and Recreation Ontario (PRO) is a non-profit association with over 6,500 members that delivers services to more than 85% of Ontario's population. We are devoted to advancing equitable access to quality parks and recreation services for all Ontarians. PRO champions the health, social, and environmental benefits of parks and recreation through evidence-based practices, advocacy, and collaborative cross-sectoral partnerships. Our work includes policy and research, education, training and professional development opportunities, and our flagship quality standards program, HIGH FIVE®. We envision a future for Ontario where every person has equitable access to vibrant communities, sustainable environments, and personal health.

Introduction

We appreciate the opportunity to provide feedback on the issue of poor outdoor air quality and its impact on workplace health and safety. Our organization strongly supports efforts to ensure the well-being of workers in Ontario and welcomes initiatives to address this critical and evolving concern as it becomes more prevalent due to the impacts of climate change.

As an organization that represents thousands of outdoor workers, from camp leaders to parks operation and trail maintenance staff, we acknowledge that poor air quality poses a significant occupational health risk, with consequences ranging from reduced performance and discomfort to serious health conditions. Below, we have outlined the findings from consultation with our Membership, as well as our recommendations to be considered when developing new air quality regulatory requirements.

Current Sector Impacts – Poor Outdoor Air Quality

Through consultation with our Members, we discovered that many organizations in our sector currently implement mitigation practices during Air Quality Health Index (AQHI) advisories to ensure the health of outdoor parks and recreation workers. Examples of some of these practices include:

- Moving programs (such as camps) to indoor, climate-controlled spaces;
- Additional health and safety training for staff on how to monitor their own health and any arising symptoms;
- More frequent or extended indoor breaks; and
- Personal protective equipment (PPE) such as masks.

Recent AQHI advisories during the spring/summer 2023 posed significant barriers to service and program delivery for the parks and recreation sector. Our Members expressed logistical issues as a top concern, as programs that were operated outdoors, such as sport and recreation programming were required to have an alternative indoor location secured in case of an AQHI advisory. Staffing was also a concern, as more frequent breaks and rotation of staff had to be considered and planned for. Older staff and employees with underlying medical conditions were more affected by poor air quality, which had to be navigated when making operational decisions.

Recommendations for Implementation

Financial Support: We propose the allocation of financial resources to support employers in implementing the necessary measures to protect workers during air quality advisories. Funding for adequate PPE such as masks, as well as funding to support alternative program delivery methods (e.g.; program re-locations to indoor settings), will ensure parks and recreation providers can comply with regulatory expectations. This will be especially necessary for small and medium-sized organizations that might face greater financial barriers in meeting requirements.

Resources and Support Materials: The development of a clear and comprehensive policy document that offers a clear roadmap for employers to follow during times of air quality advisories should be a priority. We also recommend the development of a best practices document with practical applications and case studies that showcase successful strategies for mitigating exposure to poor air quality. Finally, we recommend the development of worker education tools to help employees monitor their own exposure and symptoms and implement protective practices during air quality advisories.

Phased Approach: A phased implementation of any new regulatory expectations is necessary to allow organizations ample time to prepare and plan, educate, and appropriately implement. Flexibility in the timeline for compliance will help ensure organizations have time to adjust their operations and budgets accordingly. For example, many of our Members are currently developing operational budgets for 2024 and therefore any changes to legislation that will require additional or new financial resources to achieve compliance should be considerate of these planning timelines.

Green Space Impacts on Health and Environment

The impacts of climate change are being felt across Canada, including increased occurrence of extreme heat, droughts, and floods. Trees and greenery found in greenspaces such as parks, conservation areas, trails, and forests act as air filters, absorbing harmful pollutants like carbon dioxide and capturing fine particulate matter, mitigating respiratory risks. By calming the urban heat islands effect, green spaces combat the formation of pollutants, improve overall air quality, and encourage active transportation, resulting in overall emissions reduction.

Protecting, promoting, increasing, and improving green spaces is one intervention that provides several co-benefits to some of the major issues facing communities and employers today. The presence of green spaces helps mitigate climate change and improve human health by reducing chronic disease risk factors. Green space also provides the co-benefits of improving resiliency and recovery from the impacts of climate change:

Health Impact from Climate Change	Green Space Co-Benefit/Mitigation
Illness and premature death from exposure to extreme heat	<ul style="list-style-type: none"> • Provides shade • Reduces heat island effect
Cardiovascular and respiratory illness due to degraded air quality	<ul style="list-style-type: none"> • Improved air quality • Lowers rate of cardiovascular disease

It is estimated that tens of thousands of Canadians die prematurely each year due to acute air pollution and that high summer temperatures lead to increased illnesses, hospitalizations and deaths, especially among older adults. As the Canadian population ages and extreme heat waves become more common across the country, urban green spaces can provide essential, natural protection.

Recommendation: We encourage the Ministry of Labour, Immigration, Training and Skills Development (MLITSD), and all levels of government, to consider the integral role green spaces play in the overall strategy to combat poor outdoor air quality. Support for the creation and maintenance of green spaces should be included in the strategy to protect workers from poor air quality. If changes are made to the Occupational Health and Safety Act specific to outdoor air quality, PRO recommends that provisions be included to encourage and support the creation and maintenance of parks and green spaces within workplaces and their surrounding areas. This could involve incentives for businesses to incorporate green infrastructure, promoting a healthier and more sustainable work environment.

Conclusion

PRO stands firmly in favor of protecting workers from the adverse effects of poor outdoor air quality. We commend the MLITSD for recognizing this crucial issue and for soliciting feedback to shape appropriate regulations. As the discussion progresses, we would emphasize the provision of both financial resources, as well as support materials such as best practices documents and worker education tools, to ensure compliance with regulatory expectations. We also advocate for the recognition and integration of parks and green spaces as essential components of ensuring and maintaining good air quality. Thank you for considering our input, we look forward to continued collaboration aimed at fostering safer and healthier work environments for all Ontarians.

We are pleased to discuss our comments further with the Ministry, should there be any clarity required. Thank you for the opportunity to provide comments on this important proposal.

Sincerely,



Sarah Ane
Director of Policy and Partnerships
Parks and Recreation Ontario
sane@prontario.org
289-241-4325



Kim Gavine
Chief Executive Officer
Parks and Recreation Ontario
kgavine@prontario.org
905-717-8354