

Canadian Union of Public Employees (CUPE) Submission

Bill 17, *Protect Ontario by Building Faster and Smarter Act, 2025*

June 11, 2025



CUPE Ontario represents over 290,000 members in the province, in sectors including health care, education, universities, social services, and municipal services. Our membership also includes thousands of residents and constituents in communities across Ontario that are represented by, and rely on services in single, upper, and lower tier municipalities.

CUPE Ontario's largest sector is the municipal sector where CUPE represents over 100,000 members who maintain roads, operate water and sewage plants, perform clerical and technical duties, install and repair traffic lights, deliver social services, maintain our parks, collect garbage and recycling, keep the streets clean and do many, many more things that make our towns and cities work. Our members are the front-line workers providing public services, and have deep knowledge of their communities, and understanding of how municipalities run, enabling them to coordinate services more effectively, reduce duplication, and leverage complementary municipal supports—such as public health, libraries, recreation, transportation, economic development, poverty reduction, and newcomer settlement services. This unique perspective allows CUPE to respond to government changes through multiple lenses.

CUPE Ontario has a vested interest in the proposed changes under Bill 17 and is pleased to provide the following submission for consideration by the Committee.

Background:

On May 12, 2025, the Province through the Ministry of Infrastructure introduced Bill 17 – *Protect Ontario by Building Faster and Smarter Act, 2025 - Accelerating Delivery of Transit-Oriented Communities* (Bill 17). The proposed legislation status is in Second Reading (May 15, 2025). Bill 17 seeks to make amendments to eight pieces of legislation. The primary objective of the proposed legislation is to advance the government's housing agenda. The government's preamble to the Bill is:

Protecting Ontario and responding to economic uncertainty with measures designed to speed up the construction of infrastructure and homes with the goal of supporting economic and community growth and keeping workers on the job.

Accelerating provincial transit and other critical provincial infrastructure projects.

Working in close partnership with municipalities to simplify and standardize municipal development approval processes and charges to help increase housing supply in Ontario.

Construction of Infrastructure and Transit

Bill 17 aims to accelerate the development of transit and provincial infrastructure by expanding the scope of the *Building Transit Faster Act, 2020* to include all provincial projects. CUPE has long supported the expansion and proper funding of public transit systems. Increasing ridership and encouraging Ontarians to choose transit over private vehicles are critical goals—especially as gridlock worsens in municipalities across the province. Incentives such as reduced travel time and lower costs are essential to achieving this shift.

While CUPE supports the prioritization of transit expansion and infrastructure development, we firmly believe that public transit must remain public. This means transit projects should be publicly funded, publicly built, and publicly operated. Unfortunately, Ontario continues to pursue and invest in public-private partnerships (P3s), despite consistent evidence that these

arrangements do not mitigate risk, are not cost-effective nor are these deals beneficial to the public.

The Eglinton LRT system serve as a cautionary tale. These P3 projects, managed through Metrolinx and promoted as a solution to congestion have faced serious and multiple setbacks, including litigation. The Eglinton line, initially scheduled to open in 2020, remains unfinished in 2025, with no definitive opening date provided by Metrolinx¹². In spring 2024, Metrolinx reported software defects requiring fixes from Crosslinx Transit Solutions—the private consortium responsible for construction—and Alstom, the train manufacturer³. To date, we still await the opening of the LRT.

The Eglinton LRT, originally budgeted at \$10.9 billion, the 15-kilometre line is now projected to cost \$27.2 billion⁴—including construction, maintenance, and operations. Its expected service date has been pushed to 2031—four years later than promised and at more than double the original cost.

The Eglinton LRT is representative of the broader issues with P3s in transit. When transit is driven by profit motives rather than public interest, the process becomes opaque, less responsive to community needs, and ultimately more costly to taxpayers. The Ottawa LRT project has been another P3 transit nightmare that has experienced delays and overbudgeting often highlighted in the media. CUPE has documented multiple examples of failed or mismanaged transit P3s, and has published a detailed [background document](#) outlining these concerns.

Changes to Development Charges

CUPE, alongside the Association of Municipalities of Ontario (AMO), has consistently raised concerns with the provincial government regarding recent and proposed changes to development charges (DCs), emphasizing the critical need for meaningful consultation with stakeholders before making such changes.

Development charges are a key tool that allows municipalities to recoup the costs associated with population and infrastructure growth⁵. These charges are most commonly used in high-growth areas and fund essential services such as water, wastewater, stormwater, transit, waste management, housing, emergency services, and recreation facilities. DCs are highly regulated and play a crucial role in ensuring municipalities can maintain and expand public infrastructure in line with growth. Any revision to modernize DC frameworks—especially those that impact how municipalities raise revenue—must be developed in consultation with municipal governments and affected stakeholders (including labour).

¹ King, A. (2022, December 8). There's no 'credible plan' to complete the Eglinton Crosstown LRT, confidential documents say. CBC News. <https://www.cbc.ca/news/canada/toronto/confidential-documents-eglinton-crosstownlrt-1.6675131>

² Metrolinx is an Ontario-owned crown corporation that manages road and public transportation in the Greater Toronto and Hamilton Area.

³ Westoll, N., (2024, March 25). Still no Eglinton Crosstown opening date as officials provide small west extension update. CityNews. <https://toronto.citynews.ca/2024/03/25/eglinton-crosstown-west-construction-update/>

⁴ <https://globalnews.ca/news/10585617/ontario-line-original-price-metrolinx/>

⁵ <https://www.amo.on.ca/policy/development-charges-reform-and-community-benefit-charge>

While the government claims that the proposed DC exemption for new long-term care homes is designed to incentivize additional capacity within the sector, CUPE is particularly concerned that this exemption could disproportionately benefit for-profit long-term care providers and corporate developers, raising broader questions about equity and public benefit. We urge the province to consider how such incentives might skew the market in favor of private operators over non-profit and public-sector alternatives.

Additionally, both CUPE and AMO have expressed concern about the broader implications of DC changes on public utilities and essential services. Most recently, CUPE raised concerns through Bill 185 in relation to water and wastewater systems. These services are critical public assets, and their funding mechanisms must remain stable, transparent, and publicly accountable. The recent passage of Bill 185 has left the door open to further exploration of public utility or municipal corporation models, which CUPE strongly opposes.

While these models are often promoted as “publicly owned”, they operate under the Municipal Act⁶ as corporate entities—run more like businesses than public services. Municipal corporations are structured with shareholding and board governance models that mirror private corporations, often lacking democratic oversight and transparency. Directors are not required to be elected officials, and decisions are typically driven by a shareholder mandate focused on profit rather than the equitable provision of services to residents, which is a core principle of municipal services.

Such governance structures can lead to the erosion of public accountability and diminish the ability of residents to influence decisions that directly affect them. Unlike traditional municipal services, municipal corporations operate with limited transparency, fewer public reporting requirements, and less community input—undermining the principles of public service delivery.

While AMO’s recent statements affirm that water and wastewater systems should remain publicly owned assets, CUPE remains deeply concerned about the potential for these services to shift toward public utility models or municipal corporations. The ongoing downloading of regional services under Bill 185 continues to facilitate this shift, raising alarms about the long-term integrity of public service delivery in Ontario.

CUPE strongly advocates for publicly funded, owned, operated, and built infrastructure and services. We urge the Ontario government to reaffirm its commitment to democratic, accountable, and accessible public service delivery—and to engage in meaningful dialogue with municipalities and frontline workers before making structural changes that impact public infrastructure and community well-being.

Erosion of Green Standards

There is concern that Bill 17 could erode municipal authority over environmental building standards, particularly the Toronto green standard—a leading framework for sustainable development in the province. On May 12, the Toronto Environmental Alliance (TEA) issued a public [statement](#) warning that the legislation may strip municipalities of their ability to enforce local building regulations tailored to environmental and climate resilience goals. TEA raised

⁶ <https://www.barristonlaw.com/municipal-law/the-basics-of-municipal-service-corporations/>

alarms about a broader pattern, suggesting that developers are systematically working to dismantle municipal standards that address the intersection of infrastructure and climate change.

CUPE shares TEA's concerns around Bill 17 limiting the ability of municipalities like Toronto to uphold and enforce green building requirements. The erosion of local environmental regulations undermines efforts to address climate change at the community level and weakens the role of municipalities in planning for sustainable, resilient infrastructure. CUPE believes that environmental leadership must be protected—not overridden—especially as municipalities bear the front-line impacts of extreme weather and climate-related infrastructure challenges.

Conclusion

CUPE emphasizes that in evaluating public services, “better” should be evaluated by using several metrics such as quality, community benefit, and economic. Quality child care and long term care is a public good that deserves stable investment—not exposure to market pressures. We strongly support the expansion of child care and long term care across Ontario, but we urge the province to prioritize the development of publicly delivered, municipally operated child care and long term care spaces. Caring for our youngest and most vulnerable citizens should not be left to the lowest bidder.

CUPE remains concerned about ensuring proper funding for municipalities and potential privatization of water and wastewater systems. These services are foundational public assets and must be owned, operated, and managed directly by municipalities, with full transparency and accountability to residents.

One of the most troubling characteristics of this government remains to be governance through regulation. In many cases the legislation passed only offers a hint at the government's policy directions and frameworks. This lack of transparency does not allow for appropriate scrutiny by the Opposition parties or key community constituencies. We further recommend that the government be clear in their intent when crafting legislation and do not leave material issues to be dealt with through a process solely controlled by the government's ministers. Ontarians have already dealt with the Greenbelt debacle – a process solely controlled by a Minister.

CUPE will continue to advocate for:

- Publicly funded, accessible, and equitable public services.
- Strong public oversight of critical infrastructure.
- Fair wages, benefits, and working conditions for the frontline workers who deliver these essential services every day.

Ontarians rely on public services that are rooted in community, governed democratically, and delivered with the public good—not profit—as the guiding principle. CUPE urges the province to ensure that infrastructure planning, funding, and delivery under Bill 17 upholds these core values.