



PARKS AND RECREATION ONTARIO

Regulatory Impact Analysis:

New Heat Stress Regulation

Under the Occupational Health and Safety Act

Proposal Number: 23-MLITSD003

Parks and Recreation Ontario Submission

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PARKS AND RECREATION ONTARIO

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 are writing to express our support of the implementation of proactive measures to ensure the protection of Ontario workers from heat stress and heat-related illnesses, as outlined in the proposed Heat Stress Regulation under the Occupational Health and Safety Act. We recognize the importance of safeguarding the well-being of workers, particularly during extreme heat events, and appreciate the effort being taken to address this critical health and safety issue.

As an organization that represents the interests of thousands of workers who work in environments prone to significant heat fluctuations, we acknowledge that heat stress poses a significant occupational health risk, with consequences ranging from reduced performance and discomfort to serious health conditions. From recreation program leaders to parks operations and trails maintenance staff, lifeguards, and swimming instructors – our sector has a significant stake in legislation that impacts work-related environmental health practices. We have outlined below our concerns regarding the financial impacts of implementation and the resources needed to ensure compliance, as well as the critical role green space plays in mitigating heat-stress and heat-related illnesses.

Current Methods of Workplace Heat Stress Mitigation

Through consultation with our Members, we determined that many mitigation practices are already in place during extreme heat events. Some of these best practices include:

- Limiting work during the hours of 11 a.m. and 4 p.m., where possible;
- Offering workers more frequent breaks and reprieve from the heat;
- Limiting certain outdoor activities (such as grass cutting);
- Moving certain programs (such as camp activities) indoors to climate-controlled areas;
- Monitoring physical symptoms of employees via regular communication and observational check-in's; and
- Providing personal protective equipment (PPE) to workers, such as hats and sunscreen.

While these practices are not standardized across our sector, we are proud to share that our members are acutely aware that providing healthy working environments for employees in their organizations is a top priority.

Recommendations for Implementation

Financial Support: The diverse range of workplaces within the parks and recreation sector that would be covered by the regulation present varying levels of financial impact in terms of compliance. We recommend thorough consideration be given to the potential financial impacts, particularly for small and medium-sized organizations, that might face greater difficulty in meeting the prescribed requirements. Financial assistance provided by the provincial government will help organizations acquire essential engineering controls, such as shade structures and water filling stations, as well as necessary PPE like sunscreen and hats. This support will be essential in enabling organizations to align with the new regulation standards.

Resources and Support Materials: Comprehensive guidance and support materials should be made available to assist employers in understanding and implementing the proposed measures effectively. This would include a clear policy outlining steps to be taken during extreme heat events and what constitutes an extreme heat event (including clear definitions) as well as practical recommendations, best practices, and case studies that showcase successful strategies for reducing heat stress risks. Providing employers with worker education tools to help employees recognize signs of heat stress and prevention methods would also help mitigate heat-related illness and ensure a safer work environment during extreme heat.

Phased Approach: A phased implementation of the new heat stress regulation should occur. Flexibility in the timeline for compliance will help ensure organizations have time to adjust their operations and budgets accordingly.

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. Protecting, improving, and increasing green spaces can help address both major issues.

There are many types of green spaces, all of which can provide health and climate change mitigation and adaptation benefits. Green space describes what may be referred to as green infrastructure, natural spaces, open space, or engineered green spaces. There are diverse sizes, types and functions of green spaces, including:

- Public spaces such as parks, conservation areas, greenways, trails, urban and rural forests, street trees, community gardens, school grounds, shorelines and ravines; and
- Private and institutional spaces and infrastructure such as gardens, green roofs, green walls, cemeteries, golf courses, and other outdoor spaces.

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. It is imperative that all levels of government and businesses work together to maximize the co-benefits provided by green space.

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

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 heat stress and related illnesses. As the proposed heat stress regulation takes shape, we recommend 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 and shaded outdoor areas, promoting a healthier and more sustainable work environment.

Conclusion

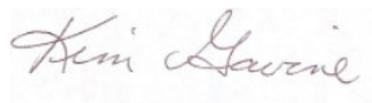
PRO supports the goal of protecting workers from heat stress and heat-related illnesses, in line with the proposed regulation, and we commend the MLITSD for taking proactive steps to address this critical issue. As the proposal moves forward, we would encourage the provision of both financial resources, as well as comprehensive support materials such as best practices documents and worker education tools, to ensure the smooth implementation of the new regulations by parks and recreation providers. We also advocate for the recognition and integration of parks and green spaces as essential components of extreme heat strategies.

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

Sincerely,



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