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BILL 254, *PROTECTING ONTARIO ELECTIONS ACT, 2021* – SUMMARY OF RECOMMENDATIONS

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Standing Committee on the
Legislative Assembly

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INTRODUCTION

This document summarizes the comments and recommendations presented to the Standing Committee on the Legislative Assembly during its public hearings on Bill 254, the *Protecting Ontario Elections Act, 2021*, held on March 29 and 30, 2021. It also summarizes written submissions received by the Committee Clerk by 7 p.m. on March 30, 2021.

The summary is divided into sections with recommendations and comments reflecting the first three schedules of the bill (there were no specific recommendations directed at Schedule 4, *Municipal Elections Act, 1996*), and a final section that contains more general comments and recommendations. Clarifying remarks made by the Attorney General during his presentation to the Committee are included at the beginning of the relevant sections.

Please note that the summary is intended as a working document to aid Members in their deliberations. It is not a complete historical record of all the evidence received by the Committee, or a comprehensive review of the arguments made by witnesses. Comments have been abbreviated and arguments summarized. Submissions expressing substantially the same point have been grouped together. For a full account of the evidence presented to the Committee, reference should be made to *Hansard* and the briefs themselves.

Witnesses are identified by abbreviations or their last names, which are listed in alphabetical order at the end of the summary.

SCHEDULE 1 (*ELECTION ACT*)

[The Attorney General stated that establishing an advisory committee on voting equipment and vote counting equipment, with representation from every registered party and with the addition of experts in election technology, will ensure that Ontario's voting equipment keeps pace with technology.

Regarding COVID-19, the Attorney General said that increasing advance polling days from five to 10 will make it easier and safer for Ontarians to vote.]

Advisory committee, voting equipment and vote counting equipment; Mandate (Schedule 1, s. 1; Act, ss. 4.5.1(1) and (2))

This amendment provides greater transparency through the creation of an advisory committee that would develop voluntary guidelines for voting equipment and vote counting equipment. These standards would help preserve the integrity of and modernize our electoral process.

(EO)

Same [Advance Polls] (Schedule 1, s. 5(2); Act, s. 44(2.1))

Elections Ontario recommended and continues to support providing 10 days of flexible advanced polls as they will give electors more opportunities to vote.

(EO)

General Comments about Schedule 1

Extend the election calendar from 29 days to 36 days. This would provide more time to ship materials across the province, including personal protective equipment, and would allow returning officers to identify safe voting locations and hire staff willing to work during the pandemic. Many poll officials are seniors.

(EO)

Set Election Day to a day when schools are not in session. This would avoid putting at risk the health and safety of students, and their teachers and caregivers.

(EO)

Amend the *Election Act* to clarify who has the authority to suspend voting or to move Election Day after the writs of election are signed.

(EO)

SCHEDULE 2 (*ELECTION FINANCES ACT*)

[The Attorney General stated that the bill introduces safeguards for under-regulated third party advertising. He remarked that there is a place for organizations that are not part of a candidate's campaign; however, he said that the level of spending is disproportionately significant in Ontario compared to other Canadian jurisdictions.

Regarding campaign contributions, the Attorney General commented that by increasing the amount that an individual can contribute to $3,300, Ontario would be "in the middle of the pack," as compared with other provinces.

The Attorney General also remarked that the bill would enhance fairness for independent members by providing access to constituency associations and allowing fundraising outside voting periods.]

Returns not to be re-examined (Schedule 2, s. 2(2); Act, s. 2(1.1))

Eliminate this proposed change that would not allow Elections Ontario to re-examine returns that have been "approved." Subsequent events may provide new details that need to be examined (e.g., Canada Revenue Agency can go back and re-examine previously assessed tax returns for a number of years). This proposed change will not further the public interest.

(Kan)

Constituency associations (Schedule 2, ss. 3(1)-(4), 4(1) and (2); Act, ss. 11(1), (2), (2)(a), 12, 12(1)(b))

Do not create personal constituency associations for independent members removed from party caucuses. These proposed provisions discriminate against "true independent candidates"—those who have not sat as an independent member or been removed from caucus after election as a party candidate. "True" independent candidates are upwards of 90% of the class. However, under Bill 254 they would have to contest an election against another independent candidate who will have had a constituency association raising money on their behalf prior to the campaign period, in addition to the many resources available to a sitting member of the Assembly to promote their own re-election.

(MacDermid)

Maximum contributions (Schedule 2, s. 7(1); Act, s. 18(1)-(1.4))

Delete this section because it doubles all the current donation limits in the Act, giving wealthy donors even more undemocratic and unethical influence over parties and candidates (and even more public funding through related tax credits). Lower the donation limits to an amount that an average voter can afford, which is no more than $100.

(DW)

This increase in contribution limits for individuals will not only disproportionately benefit the governing party, but also increase the influence of wealthy donors on political decisions made by government.

(ETFO; MacDermid)

Do not increase individual contribution limits. Remove these sections that favour parties with wealthy individual donors and promote cash-for-access.

(OECTA; OSSTF)

Do not increase individual contribution limits. In the circumstances of the pandemic, working people have borne the brunt of job losses, and have even less money to consider contributing to political parties and candidates. The increase to individual donation limits only ensures that the interests of the wealthy will be heard and privileged above the voices of working people.

(OFL; Unifor)

Doubling contribution limits makes it easier for politicians to run their campaigns on a smaller number of large contributions. This, combined with the limitations on third parties, makes it much harder for the average Ontarian to have their voice heard through freely associating with likeminded individuals, pooling resources, and collective action.

(SUP)

Reverse the increase in the cap for individual donations and study the pros and cons of increasing the limit yearly at the rate of inflation.

(ONA)

No one in Ontario is asking for these changes.

(CUPE)

How allowance calculated; Adjusted payment schedule for 2022 and 2023 (Schedule 2, ss. 11(1) and (2); Act, s. 32.1(2) and (2.1))

Do not extend the per-vote subsidy. A one-year pandemic does not justify a three-year extension of the per-vote subsidy. Ordinary Ontarians cannot change the law to give themselves more money. Donations to political parties were higher during the pandemic than in 2019. There is no COVID-19 related justification for breaking this campaign promise.

(Giorno)

Delete s. 11(1) of Bill 254 because it increases the per-vote funding subsidy set out in the *Election Finances Act* from 45.2 cents per vote per quarter ($1.81 per-vote annually) to 63.6 cents per quarter ($2.54 annually). Instead, establish an independent commission to study the actual annual costs of running a provincial political party, and provincial and local election campaigns, in this age of email, the Internet and social media.

(DW)

Delete s. 11(2) of Bill 254, which proposes to give the parties the second, third and fourth quarter of 2022, and first quarter of 2023, payments of per-vote funding all together in the second quarter of 2022. It should be deleted because the election results in June 2022 will change the amounts of per-vote funding the parties will each receive for the rest of 2022 and into the future.

(DW)

Remove s. 11(2) from the bill. While Unifor supports the public allowance payments to political parties, we see no reason why political parties ought to receive this advance. Our front-line members who have been working tirelessly throughout this pandemic will not receive a nine-month advance on their wages. Unifor sees no reason to provide political parties with this needless financial advance when everyday Ontarians are struggling.

(Unifor)

The front-loading of political party funding is nothing short of a cash grab. There is no rationale for this loading of the distribution of funds unless the government is contemplating an early election and wants to skew the financing in favour of the governing party. Extending government funding for two more years does not go far enough. CUPE believes in public funding for political parties, combined with a reduced individual contribution limit, because it creates a level playing field for all political parties.

(CUPE)

Recording and disclosure of contributions (Schedule 2, ss. 12 and 13(1); Act, ss. 34(1) and 34.1 (1))

Delete section 12 and subsection 13(1) of Bill 254 because they increase the secret aggregate donation loophole in the *Election Finances Act* from $100 up to $200. This will allow someone to make two donations of $99, a total donation of $198, in secret.

(DW)

Spending limit, non-election period (Schedule 2, ss. 14(1) and (2); Act, ss. 37.10.1(2)(a) and (b))

Restore the non-election period for third party advertising to six months, or raise the cap on spending over the 12-month period.

(ONA)

The current timeline of six months before an election is already indefensibly long.

(USW)

The extension of the non-election period, for which spending limits apply, from six months to 12 months prior to the start of the election campaign will silence government critics for a period of more than one year, shelter a government from legitimate criticism, and limit the ability of organizations, including unions, to participate in important public policy debates through advertisement and other public relations campaigns.

(ETFO; LDLC; OSSTF; Unifor)

Delete subsections 14(1) and (2) from Bill 254. In the alternative, before enacting the restrictions refer the subsections to the Court of Appeal for a ruling on whether they are constitutional.

(DW)

Political advertising is just one way that we advocate on our members' behalf. We communicate the messages our members have asked us to communicate, using our members' dues, as they have asked us. We do not support unrestricted American-style third party advertising, but any restriction must be appropriate and proportionate.

(Unifor)

Extending the non-election period, for which spending limits apply, represents an infringement in members' freedom of expression protected under s. 2(b) of the Charter.

(ETFO; LDLC; USW)

Abandon Bill 254's changes to the regulation of third-party advertising. We are profoundly concerned that Bill 254 will suppress our—and by extension our members'—Charter-protected freedoms of expression and association. If a collective bargaining-related public awareness campaign were to be required during the regulated 12-month non-election period, a union—without intending to be involved in election-related communication—could be accused of not registering as a third party or could exceed the spending limit for third parties.

(SUP)

Maintaining the same spending limit while doubling the period in which it applies is further infringement on the right to free expression. Given Ontario's vast size and the cost of advertising in a world-class media market like Toronto's or a highly competitive market like Ottawa's, the previous spending limit of $637,200 for six months was already highly restrictive.

(SUP)

Political speech is the most valuable and protected type of expression. Bill 254 will suppress freedom of speech and do irreparable harm to our democratic institutions. Under this bill, a government could introduce a budget within the one-year regulated period containing provisions that are detrimental, for example, to the healthcare system. Citizens and organizations that oppose these changes could mount a campaign to inform the public and spend the maximum amount of $600,000 while the government is exempt from any limits to spend over the same period. Then, six months later, the government of the day could introduce new legislation that could affect healthcare and these groups wouldn't have any funds to inform the public. The funding ceiling cap is based on the group or individual and not on the issue.

(Wieder)

The government of the day can introduce any number of controversial pieces of legislation in the last year of its mandate. With its unlimited access to taxpayer funds, it could overwhelm any opposition.

(Wieder)

Third party advertising is political speech, which lies at the very core of the protection of freedom of expression. The current six-month period is already lengthy and gives rise to a very real risk of chilling political speech that is more about debating merits of policy choices than persuading or manipulating voters. Restricting political speech in the six months before an election is an extraordinary measure that is not replicated in any other Canadian jurisdiction. A shorter pre-writ period has twice been ruled unconstitutional by courts in British Columbia and the Ontario scheme is the subject of a constitutional challenge that is currently before the courts.

(CCLA; DW; LDLC; OECTA; OFL; SUP; Unifor)

Remove the amendments relating to third party advertising. The next election will be held on or before June 2, 2022. If Bill 254's amendments are passed, the actions of third parties will be curtailed starting this summer. It may be too early to know which issues are or will be associated with parties or candidates, which gives rise to potential enforcement difficulties for Elections Ontario, but it also stands that pandemic management, long-term care homes, vaccine accessibility and emergency preparedness are all likely to be issues of relevance in the next election. For the government to significantly curtail expression on these topics for a full year before the election is not justifiable.

(CCLA)

Do not restrict issue-based advertising that allows organizations to engage with citizens on matters of public policy. In the context of the COVID-19 pandemic, many issues have been a common focus for unions, such as paid sick leave, class sizes, and health care funding. Our attention to these issues has nothing to do with an election. Our members are not interested in talking about an election, but they are interested in these issues.

(LDLC; OFL; Unifor)

Exempt nonprofit community organizations working for the benefit of the public from third party advertising rules (as long as they remain non-partisan). The courts and the federal government have recognized that it is in the public interest to have public benefit charities and nonprofits at the public policy table.

(OfA)

Eliminate the extension of the non-election period which will smother public discourse on important policy issues for a full year ahead of an election. The prescribed spending limit is well below what would be needed to generate meaningful public awareness and discussion over a 12-month period.

(CUPE; OECTA)

Raise the threshold for registration as a "third-party advertiser" for the proposed extended pre-election period. By lengthening the "pre-election" period to twelve months without raising the $500 registration threshold, Bill 254 imposes new administrative burdens on "small spenders" who engage in issue-based pre-election advocacy.

(EFC; ONN)

Trying to control political messaging in a short pre-campaign period is difficult and trying to regulate it up to a year out from election day is very unlikely to withstand a free speech Charter challenge.

(MacDermid)

No combination to exceed limit (Schedule 2, s. 14(3); Act, s. 37.10.1(3))

The provisions intended to prevent 'collusion' between third party organizations for the purpose of political advertising interfere with the regular operations of trade unions, community coalitions, and other third party organizations, and are a direct attempt to prevent organized opposition to the current government's policies.

(ETFO; LDLC; OSSTF)

These provisions unfairly single out third parties with a common advocacy goal and could be used, for example, to limit coordinated bargaining.

(LDLC)

The Act already prohibits third parties from circumventing or attempting to circumvent spending limits through collusion, and prohibits coordination with parties/candidates. The new provisions impose unnecessary and vague restrictions, which will inevitably cause confusion for third parties and deter them from engaging in expressive activity for fear of being exposed to potentially significant fines and penalties, with a chilling effect on their expression.

(OFL)

Vague and overbroad anti-collusion provisions could mean that only one trade union could advertise on Facebook or Google, or on a particular network.

(Unifor)

New rules to prevent third parties from colluding or circumventing the spirit of the *Election Finances Act* are so vague that a third party working in good faith could easily contravene the rules and not know it. Beyond the unfairness of groups talking about more popular issues having less to spend, there is no coordinating mechanism between groups to determine how much money has been spent at any given time within a common "advocacy, cause or goal." Were groups to try to share information around their total collective expenditures, or coordinate their expenditures to stay within limits, that would, in itself, be further grounds to consider their behaviour collusive.

(SUP)

Clarify the terms to prevent circumvention of the collusion rules in order to improve the ability of third parties to comply, or postpone the application of the 12-month non-election period until the Elections Ontario Handbook has been made public and provide a grace period for third parties to understand the rules and take measures to apply them and comply with them.

(ONA)

Make it clear that third parties who run manifestly independent campaigns, yet who happen to share a common vendor and a common advocacy goal, cannot be found to be colluding.

(ONA)

The changes to the definition of collusion will undermine legitimate coalition advocacy efforts and could cause nonprofits who share a common concern or donor to be guilty of collusion, even if they are unaware of the other activities. These provisions risk imposing a chill on the valuable work nonprofits do in the public policy realm.

(OfA)

Address inconsistencies in the collusion provisions. As currently drafted, only third parties are liable for collusion while political parties are not. These provisions are tough on third parties, but weak on the political parties that collude with them. It is illegal for a third party to collude with a third party, but not illegal for a political party to collude with a third party.

(Giorno)

Clarify the proposed rules around "collusion" so they explicitly do not apply to third-party advertisers whose combined spending remains below the maximum spending limit. This is consistent with the intent of the collusion provisions which is to prevent third parties circumventing spending limits.

(EFC; ONN)

Amend subsection 14(3) of Bill 254 to make it clear that the rules it proposes to add to the *Election Finances Act*, clauses 37.10.1(3)(d) which prohibits third parties using the same vendor if they share the same cause, and (e) which prohibits third parties having the same donors if they share the same cause, only impose these prohibitions if the third parties are attempting to violate the third-party ad spending limits.

(DW)

We are concerned that this bill does not exclude regular communications tools that are part of the permanent communications infrastructure of unions (from emails and texts to websites and social media to communicate directly with our members) from the application of this bill.

(USW)

Auditors (Schedule 2, s. 15; Act, ss. 40(1)-(4), (6) and (7))

Delete section 15 of Bill 254 because it removes the requirement to submit an audited return, even if nomination contestants receive more than $10,000 in contributions or spend more than $10,000 on their campaign. All types of candidates should be required to provide an audited return if they spend more than $10,000.

(DW)

Maintain the requirement for an audit of annual financial statements of all registered riding associations in order to promote compliance with the requirements of the *Elections Finances Act*. It is reasonable to anticipate that removing the requirement for an annual audit by riding associations would cause a deterioration in reporting practices, or an increase in public costs to maintain current standards (e.g., by expanding the role of Elections Ontario), or both.

(Molson)

Modify the eligibility to receive an audit subsidy in respect of annual financial statements to include a threshold of activity below which no subsidy would be paid, in order to rectify opportunities for misuse that currently exist.

(Molson)

Annual filing of financial statement and report, constituency association (Schedule 2, s. 16; Act, s. 41(2))

Follow the federal system fully and require the constituency association campaign period expenses to be included in the candidate campaign period return so that they can be totalled and assessed. Otherwise, having two deadlines that are months apart greatly hinders compliance.

(Kan)

Reporting, appointed candidates (Schedule 2, s. 17; Act, s. 41.1)

Delete section 17 of Bill 254 because it removes the requirement of nomination contestants to submit financial statements to Elections Ontario, even if they receive more than $10,000 in contributions or spend more than $10,000 on their campaign.

(DW)

If it is the intention of Bill 254 to eliminate all financial filing requirements for nomination candidates, then a number of sections of the Act must be amended/struck. Eliminating the requirement to file nomination contest financial returns, however, creates a compliance problem under s. 18(1.1) of the Act. The contribution limit for the constituency association is directly linked to the nomination contestants. How can you ensure compliance with the overall contribution limit if there is no financial reporting of the nomination contest? I do not have a recommendation on this issue since I am unclear as to the intention of the proposed changes.

(Kan)

Administrative Penalties (Schedule 2, s. 21; Act, s. 45.1)

Elections Ontario supports granting the Chief Electoral Officer authority to levy administrative penalties for non-compliance as this gives additional tools for enforcement.

(EO)

Eliminate new provisions establishing administrative penalties. Even if the Chief Electoral Officer takes a narrow interpretation of the law, these provisions open the door to frivolous complaints from Ontarians who oppose the work of advocacy organizations.

(OECTA)

Give the Chief Electoral Officer the power to issue tickets that can be challenged in court. As written, a significant penalty can be imposed with no requirement for reasonable and probable grounds, no investigation and no appeal; the individual bears the burden of disproving the allegation. The provisions, as currently drafted, are problematic in that they “cherry pick” the most restrictive laws from other jurisdictions.

(Giorno)

Making penalties more severe will create a chill on legitimate and constitutionally protected speech and advocacy, instead of a place for robust debate among all citizens.

(CUPE)

Administrative monetary penalties that can be applied by the Chief Electoral Officer without due process are not part of a transparent or accountable process; we do not believe these provisions will stand up to scrutiny if tested in the courts.

(SUP)

Commencement (Schedule 2, s. 23)

Make the commencement date the later of either Royal Assent or June 1, 2021 (or a later date). The annual reporting process in respect of the 2020 year is already well underway. This change would help to maintain equitable treatment of riding associations and to avoid disruption in the annual filing of financial statements due May 31 for approximately 500 riding associations for the 2020 year.

(Molson)

General Comments about Schedule 2

There is a careful balance that needs to be achieved between ensuring robust protection of political expression and safeguarding electoral fairness. The current regime in the *Election Finances Act* does not strike the right balance and the proposed amendments in Bill 254 will take us further off course.

(CCLA)

The amendments to the *Election Finances Act* unreasonably restrict freedom of expression as protected by the *Canadian Charter of Rights and Freedoms* in a way that is not demonstrably justified and are vulnerable to being overturned.

(CCLA)

Voters determine the outcome of elections by voting, and in order to do so they need to be well informed. The third parties that are regulated by the Act may have particular legal structures (unions, corporations, associations) but are made up by Ontario voters.

(CCLA)

Bill 254 has shortcomings that pose an inherent danger to free speech, freedom of association, and democratic participation.

(USW; Wieder)

An independent expenditure organization should not be prevented from making something as fundamental as education part of the public discourse. Political parties are not the sole legitimate actors in the public arena. Advocacy groups to which citizens belong must also be allowed to be part of the process.

(OSSTF)

The services CUPE members provide cannot be separated from the political process. Our unchanging position in support of public services should not be able to be deemed legal or illegal, depending on the position taken by a particular political party.

(CUPE)

Remove the clause in the existing *Election Finances Act* (established in 2016) that prohibits charities from donating to nonpartisan, issue-based campaigns even though they are permitted to run them in-house. This would be in line with a 2018 court ruling that eliminates caps on charities' participation in nonpartisan public policy advocacy.

(EFC; ONN)

Reduce the administrative burden for nonprofits that do have to register as third party advertisers by enabling the Chief Electoral Officer to accept 1) a separate budget line in the nonprofit's accounts for election-related advocacy revenue and election-related expenses, and 2) their annual audited financial statements (with revenue/expenditure lines for election advocacy) in lieu of separate accounting statements that will often cost more than the election expenditure.

(EFC; ONN)

Publicly answer the following two questions pertaining to this legislation, in the interest of improving the conditions for good faith compliance:

> 1. How does the government expect third parties to effectively comply with the new election law, if the Elections Ontario Handbook comes out after Ontario enters the 12-month non-election period?
>
> 2. Will ongoing advertising campaign spending on general "public interest matters," such as the COVID-19 pandemic, impact the new 12-month "non-election" advertising spending cap?

(ONA)

I wish to repeat what I said during my presentation in 2016. My hope is that when this legislation is passed, it will further promote the public interest by ensuring an equal playing field for both the public and the active participants in the political process.

(Kan)

SCHEDULE 3 (*MEMBERS' INTEGRITY ACT, 1994*)

[The Attorney General remarked that the bill would provide the first express recognition that Members use social media and would empower the Legislative Assembly to make the first set of rules regarding how social media should be used by MPPs. He said that it is time to clarify how existing election rules respond to social media platforms.]

Partisan material (Schedule 3, s. 1; Act, s. 9.1(4))

MPPs have always been permitted to post partisan material on their social media accounts. The important distinction is that it was determined, in line with parliamentary convention, that they should keep their partisan world separate from their duties to represent all constituents. This means that partisan material should not be available in a constituency office. By extension, the constituency website should not solicit funds for an election campaign, should not promote a particular party, and should not link to a Facebook page or Twitter account that has partisan content.

(OIC)

General Comments about Schedule 3

Currently, the Act does not directly address what MPPs can and cannot do on social media. Instead, it establishes an ethical framework on how they may conduct their affairs whether in person or online. That framework includes avoiding a conflict of interest, not using their position to influence a decision that improperly furthers another person's private interest, and not using insider information.

(OIC)

It would be difficult for an Integrity Commissioner to determine which rules should govern a Member's use of social media. Some situations, such as linking constituency websites to other social media accounts with partisan content are obvious and have been established as part of parliamentary convention. But others are not. For example, whether "liking" someone else's post could be a breach of parliamentary convention or whether a Member can block a follower on social media for making comments the Member views as offensive.

(OIC)

The Legislative Assembly and the Executive Council should create social media guidelines that would cover more than the ethical obligations and the conflict of interest rules that fall under the Office of the Integrity Commissioner (OIC). The OIC would be pleased to assist the Assembly and the Executive Council as it undertakes this work.

(OIC)

General Comments about Bill 254

The short timeframe for consideration of Bill 254 limits broad, democratic input.

(LDLC)

Bill 254 will stifle political dissent and public debate on important public policy issues and interfere with ETFO and other unions' ability to effectively advocate on behalf of members.

(ETFO)

Bill 254 is unconstitutional. It infringes the freedoms of expression and association guaranteed by the *Canadian Charter of Rights and Freedoms*.

(ETFO; LDLC)

Withdraw Bill 254.

(CUPE; ETFO; OFL; Unifor; USW)

If the government will not withdraw Bill 254, the OFL proposes that the government refer the constitutionality of the proposed Bill to the Ontario Court of Appeal for a constitutional determination, and must not proceed with the Bill until such time as the court has ruled.

(OFL)

The government has not identified any emergency or need to change elections legislation or any threat that requires this new protection of our elections. If a threat has been identified, immediately make it public; otherwise, withdraw this legislation.

(OSSTF)

There is a lot to like about this bill.

(Giorno)

LIST OF WITNESSES

Abbreviation	Organization/Individual	Date of Appearance
CCLA	Canadian Civil Liberties Association	March 29, 2021
CUPE	Canadian Union of Public Employees (Ontario)	March 29, 2021 & Written Submission
DW	Democracy Watch	March 30, 2021 & Written Submission
EFC	Environment Funders Canada	Written Submission
EO	Elections Ontario	March 29, 2021 & Written Submission
ETFO	Elementary Teachers' Federation of Ontario	March 29, 2021 & Written Submission
Giorno	Guy Giorno	March 29, 2021
Kan	Louis Kan	Written Submission
LDLC	London and District Labour Council	March 29, 2021
MacDermid	Robert MacDermid	March 29, 2021 & Written Submission
Molson	William Molson	Written Submission
OECTA	Ontario English Catholic Teachers Association	March 29, 2021 & Written Submission
OfA	Ontario for All	March 29, 2021
OFL	Ontario Federation of Labour	March 29, 2021 & Written Submission
OIC	Office of the Integrity Commissioner	March 29, 2021
ONA	Ontario Nurses' Association	Written Submission
ONN	Ontario Nonprofit Network	March 30, 2021 & Written Submission
OSSTF	Ontario Secondary School Teachers' Federation	March 29, 2021 & Written Submission
SUP	Society of United Professionals	Written Submission
Unifor	Unifor	March 29, 2021 & Written Submission
USW	United Steelworkers Union – District 6	Written Submission
Wieder	Marcel Wieder	March 29, 2021