



Office of the Commissioner  
Environmental Services Department

Office of the Commissioner and Chief Planner  
Corporate Services Department

## MEMORANDUM

To: Members of Committee of the Whole

From: Erin Mahoney, M. Eng.  
Commissioner of Environmental Services

Paul Freeman, MCIP RPP  
Chief Planner

Date: February 22, 2019

Re: Proposed Made-in-Ontario Environment Plan - Staff Comments Submitted to the Province

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This memorandum provides Committee with a summary of staff comments in response to the Province's ERO 013-4208 proposed Made-In-Ontario Environment Plan (the Plan), which reflects the Province's commitment to protect the environment and help industry, businesses, communities and families prepare for climate change. Staff comments were submitted on January 28 to meet the consultation timeline and reflect comments received from across the Corporation. Attachment 1 is the letter to the Province dated January 28, 2019 and Attachment 2 is York Region's Detailed Comments on the Plan. Due to the short timeframe provided, it was not possible to bring the response to Regional Council for endorsement prior to submission, however should Council have any additional comments staff will forward them to the Province. Staff has also included the response prepared by the Association of Municipalities as Attachment 3 as it provides a comprehensive summary on the Plan's impact to Ontario's municipalities.

### **The Plan outlines 121 actions to protect air, land, water as well as reduce litter and waste in Ontario**

On November 29, 2018, the Province released a new plan for environmental action in Ontario. The Plan targets clean water, waste, planning, climate resilience and reducing greenhouse

gases (GHGs) in Ontario. The Plan establishes revised targets for Ontario's greenhouse gas reductions, increases the focus on climate change adaptation, stormwater and wastewater management as well as waste reduction and reuse. The Plan was posted for consultation until January 28, 2019.

The proposed Plan is broad and brings together a diverse number of policy areas and priorities. Given the breadth of the Plan, York Region encourages the Province to give priority to low cost solutions that reduce barriers to innovation and build climate resilience at the local level. Priority actions should:

- Streamline regulatory processes for municipal infrastructure projects addressing climate change risks;
- Phase in provincial low impact development standards for effective and sustainable stormwater and flood mitigation solutions;
- Maintain the '50 million trees' program to support municipal urban forest canopy expansion and forest management as viable mechanisms for sustainable long term mitigation of climate change;
- Implement full producer responsibility for sustainable waste diversion programs that shift the burden of managing end of life products and packaging from the tax base to the Producers where they are best positioned and accountable to achieve a circular economy;
- Identify the benefits of energy recovery achieved through facilities like the Durham-York Energy Centre by formally recognizing energy recovery as waste diversion;
- Focus on Province-wide public education and strategies to effectively reduce food and organic waste; and
- Target investment in nutrient loading reduction through water quality trading programs as a mechanism to cost-effectively reduce watershed nutrients and nuisance algae in lakes and rivers.

Staff requested the Province create a municipal advisory group to enable dialogue before implementation.

## **Province remains committed to a number of existing programs to protect air, land and water**

The Plan's 121 actions are largely consistent with previous Provincial plans and strategies that invest in science-based approaches to protecting air, water and land. These include actions to address heavy duty vehicle emissions testing, water conservation, Source Water Protection, *Lake Simcoe Protection Act* and *Great Lakes Protection Act*. Many of the actions to reduce waste in this new Plan are well aligned with York Region's SM4RT Living Plan. The Plan also commits the Province to move towards 'polluter pays' and full producer responsibility for the waste and pollution they produce.

Despite the many strategic actions, there remain some gaps that could be addressed through this Plan including direction on urban forest management and support for expansion of forest canopy to mitigate climate change. In addition, details on how the Province plans to ban food waste from landfills and expand green bin programs are needed.

Implementation would benefit from a deeper discussion with municipalities and other stakeholders. Staff recommend the Province tap into existing engagement opportunities, such as participating in dialogue with the Municipal 3Rs Collaborative (waste) and Clean Air Partnership (climate and energy) to gain valuable municipal perspectives on implementation. Each of these stakeholder groups also submitted detailed comments on the proposed Plan, representing interests from Regional Public Works Commissioners of Ontario, Association of Municipalities of Ontario and several municipalities.

## **Province maintains alignment with Paris Agreement greenhouse gas emissions target for 2030**

Ontario's new Greenhouse Gas (GHG) emissions target has been adjusted in recognition of the 30 megatonnes of annual GHG emissions already achieved primarily from the closing of coal fired plants in 2015. The Plan proposes a new target of 30% reduction from 2005 levels by 2030 and keeps Ontario on track with the [Paris Agreement](#). The target proposed in the Plan balances the economic vitality of Ontario and the need to tackle climate change, without adding additional costs to Ontarians.

## **York Region encourages continuation of long term emission targets beyond 2030**

As municipalities implement actions to address long term challenges of climate change to communities, the need for sustained long term targets to maintain momentum at the municipal level is imperative. Long term targets help municipalities drive effective actions and decisions regarding infrastructure assets that last longer than 50 years and ultimately help to drive transformational change in our community design. Staff would encourage the Province to continue the dialogue on establishing 2050 emission targets to keep the momentum on innovation and investment in long term goals. The Province should also consider establishing incentives to drive emission reductions from municipalities. For example, there are significant benefits associated with energy recovery from waste materials, which otherwise would have emitted methane in landfills. Non-monetary incentives, such as formally recognizing energy recovery as waste diversion, would help drive municipal investment in leading facilities like the Durham-York Energy Centre.

## **Province plans to create \$400 million Ontario Carbon Trust to provide sustained funding for clean technology and low carbon solutions**

The Province is proposing to use innovative financing techniques in partnership with the private sector to support use of clean technology and transition to a low carbon economy at the lowest cost to taxpayers. The Province has identified that an investment of \$400 million, over four years should leverage over \$1 billion of private capital. A greater understanding on funding priorities and target sectors will help enable collaboration between private sector and end-user municipalities. Social housing should be a targeted area for partnership as there remains a significant need for improvements to reduce greenhouse gas emissions, lower heating costs

and increase opportunities for valuable jobs to support over 6,000 units in our community serving our most vulnerable population. As reported in [November 2018](#) to Council regarding Province's cancellation of Cap and Trade program, there remains a substantial funding gap to support these improvements.

Focused provincial funding on private sector initiatives now requires municipalities to pursue federal funding opportunities laid out in the Pan-Canadian Framework on Clean Growth and Climate Change. For example, the Disaster Mitigation and Adaption Fund, created by Infrastructure Canada, will invest in \$2 billion to support large-scale infrastructure improvements. York Region recently submitted applications totalling \$400M for four infrastructure improvement projects and is awaiting a response on the next stage of these submissions, anticipated in Q2 2019.

### **Municipalities need access to the right information, tools and resources to understand climate change and be future ready**

The Province has a leadership role to play in making climate information and in translating climate science into useable information for decision-makers, industry and residents to improve resilience. Demonstrating this leadership, the Province has committed to undertaking provincial impact and vulnerability assessments for key sectors including transportation, water, agriculture and energy distribution. It is recommended that the Province undertake these assessments expeditiously to help municipalities and residents who are already experiencing the impacts of a changing climate and the need to adapt.

### **Data shows extreme weather events are intensifying across Ontario, highlighting the financial and social impact of climate change**

The Insurance Bureau of Canada has reported a rise in claims as a result of increases in severe weather events related to climate change over the past few years. Extreme weather events have financial impacts on operation and maintenance of infrastructure and can increase the exposure of municipalities' liability. Municipalities need access to information, tools and resources to develop meaningful climate change action plans. The Plan commits the Province to lead the way by making climate change a cross government priority through a governance framework and continue to support emergency management and Municipal Disaster Recovery Assistance program. York Region staff encourages the Province to consider a one-window source for climate projection data and adaptation measures to expedite work at the local level.

York Region Council has committed to addressing climate change and building climate resiliency through our strategic documents including Vision 2051, Regional Official Plan and the Corporate Energy Conservation and Demand Management Plan. The comments and recommendations by York Region attached to this memo build on previous submissions on *Bill 4 – Cancellation of Cap and Trade Act, 2018* as reported to Regional Council in November 2018. Staff look forward to working with the Province in advancing action to preserve and protect our environment. Any comments provided by Regional Council will be provided to the Province in an effort to drive effective policy outcomes.

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Commissioner of Environmental Services

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Attachments (3)  
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