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Ministry of the Environment, Conservation and Parks
Environmental Policy Branch
40 St. Clair Ave W. 10th Floor
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Mr. Aguda:

RE: York Region Response – ERO 013-4208– Made in Ontario Environment Plan Proposal

York Region staff thank the Ministry of the Environment, Conservation and Parks (the Ministry) for the opportunity to comment on the proposed Made in Ontario Environment Plan (the Plan). York Region has significant interest in building resiliency to climate change given our role in delivering critical services to 1.2 million in our communities. York Region Council has committed to complete of a Climate Change Action Plan and is well positioned to deliver local solutions to meet the Provincial direction.

Building on our October 11, 2018 comments on *Bill 4 - Cancellation of Cap and Trade Act, 2018* (ERO-013-3738), staff request the Ministry consider the recommendations included in this letter and in the attachment when moving forward with the proposed Plan. As the proposed Plan is very broad in scope, it is expected that further consultation on implementation will be undertaken to enable meaningful dialogue on how best we can work together to protect our air, water and land, reduce litter and waste in Ontario.

Municipal Advisory Group can drive a coordinated Ontario-wide approach to managing the broad scope of this Plan

York Region is pleased to see the Province's commitment to empower local leadership as municipalities provide direct services to the public and build resilient communities. A Municipal Advisory Group would provide significant insight and leverage expansive collaborative networks as municipalities have practical expertise, knowledge of best practices and partnerships to operationalize provincial policy. For example, Association of Municipalities of Ontario or the Clean Air Partnership, assist municipalities by sharing approaches to addressing common environmental challenges, including climate change. These existing collaborative networks would enable the Province to quickly find solutions across multiple jurisdictions and enable rapid scale-up of innovative solutions. This proposed Municipal Advisory Group could also begin consultation with the

municipal transportation sector for regional transit system integration and other modes of transportation to lower greenhouse gas emissions and provide better customer service.

York Region staff support the Province's commitment to the Paris Agreement and encourages continuation of long term emission targets

As municipalities take action to address long term challenges of climate change through implementing of the Growth Plan and other provincial direction, the need for sustained long term targets to maintain momentum at the municipal level is imperative. York Region staff support the Province's commitment to reduce emissions by 30% from 2005 levels by 2030. Staff also encourages the Province to establish 2050 emission targets to keep the momentum on innovation and investment. Long term targets help municipalities drive effective actions and decisions regarding infrastructure assets that last longer than 50 years. Consideration of targets out to 2050 help drive transformational change in our community design and be future ready.

Proactive measures need to be taken now to drive resilience and reduce costs into the future

The Plan highlights many strategic actions that encourage on-going investment in protecting our drinking water through programs like Source Water Protection, *Lake Simcoe Protection Act* and *Great Lakes Protection Act*. With so many diverse priorities, it would be beneficial for the Province to develop an implementation plan for priority actions that includes timelines, key activities, and lead Ministries. This implementation plan will to drive efficient implementation at the local municipal level.

Given the breadth of this 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. These priority actions should:

- Streamline regulatory processes for municipal infrastructure projects addressing climate change risks;
- Phase in provincial low impact development standards for effective sustainable stormwater solutions;
- Modernize the Building Code to mandate backwater valves and other resiliency measures in newly constructed and renovated homes;
- 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;
- Focus on Province-wide public education and strategies to effectively reduce food and organic waste; and

- Target investment in nutrient loading through water quality trading programs as a mechanism to cost effectively reduce watershed nutrients and nuisance algae in lakes and rivers.

Sustainable funding mechanisms are essential to advance local solutions

York Region acknowledges that the proposed \$400 million Ontario Carbon Trust fund will help expedite private sector action on low carbon solutions. A greater understanding on funding priorities and target sectors will help enable collaboration between private sector and end-user municipalities. We think it is helpful that the Plan acknowledges the need for cross-government action as partnerships and collaboration are vital for success across all sectors and government levels.

Municipalities remain concerned about the liability associated with emergency events from the changing climate and strive to be proactive in protecting the public and our infrastructure. To achieve this objective, sustainable, long-term financial resources are needed by all levels of government to support needed investments in waste management, water, wastewater, stormwater, transit, roads, forestry, bridges and other infrastructure. Along with adaptation measures, York Region requests that the Province maintain increases in the Ontario Gas Tax program to ensure that low carbon municipal transportation options are adequately supported.

Implementing extended producer responsibility and expanding mandatory diversion targets for non-residential sector are priority actions

York Region staff support consideration of litter and waste in the proposed Plan, including driving action on extended producer responsibility and expanding waste diversion goals to non-residential sectors. It is critical that the Province make extended producer responsibility a priority and drive forward actions identified under the *Waste Free Ontario Act* and the *Resource Recovery and Circular Economy Act*. Enabling extended producer responsibility is the best tool available to the Province to tap into the creative talents and energies of the private sector and drive innovative packaging design. This will achieve the desired circular economy in Ontario while shifting the burden from taxpayers to those producers who are in the best position to drive that change.

York Region together with our local municipal partners has achieved number one ranking in the Province for diversion at well over 60 percent far exceeding the provincial average of 26 percent. Province-wide diversion performance could be enhanced by improving the non-residential sector 17% diversion rate (based on most recent data from Statistics Canada). Given the high diversion performance by the Municipal sector, we encourage the Province to leverage municipal expertise in transitioning the blue box program to ensure better environmental outcomes and continued service delivery to our communities. We recommend that the Province leverage the advanced expertise available through the Municipal Resource Recovery and Research Collaborative formed

by the Association of Municipalities of Ontario, Municipal Waste Association, Regional Public Works Commissioners of Ontario and the City of Toronto to achieve the Plan's objectives.

Inclusion of resource recovery in the Plan demonstrates global leadership in considering waste as a resource

We are quite encouraged that the Province will explore options to recover the value of resources in waste. This direction aligns with the position taken by York Region supporting the 4R's (reduction, reuse, recycle, recover) including resource recovery through thermal treatment. Thermal treatment combined with high diversion performance reduces the reliance on landfilling for waste management.

Use a watershed approach to target investment in reducing key non-point nutrient sources to reduce nuisance algae in lakes and rivers

Nutrients need to be managed across the entire watershed and the most cost effective solutions should be prioritized to respect taxpayers and ratepayers. Extensive scientific research continues to consistently demonstrate that reducing non-point sources, and not just discharges from wastewater treatment plants, holds the greatest opportunity to reduce phosphorus entering our Great Lakes. Actions to address non-point sources like agricultural and stormwater runoff offer significantly higher phosphorus reductions per dollar spent. Water quality trading is a viable mechanism that the Province should implement to significantly increase the environmental and economic benefits by allowing the flexibility to fund lower cost solutions by another party. Trading programs enable action for those areas in the watershed that would yield a higher return in the reduction of nutrients and effectively reduce nuisance algae in lakes and rivers.

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

The Province is well positioned to provide strong leadership to accelerate adaptive action and improve community resiliency. York Region is pleased the Province will undertake an impact and vulnerability assessment across key sectors. The Province might also consider using adaptive capacity assessment tools to help prioritize actions at the regional scale. Staff supports the development of a one-window source for climate projection data and adaptation measures to expedite action. Implementation of a green button data standard would also advance work by making data more readily available to municipalities to monitor and report on their progress.

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Made in Ontario – Environment Plan Proposal

York Region staff thank the Province for considering our comments. If you have any questions regarding this response or would like to further discuss these recommendations, please contact Teresa Cline, Senior Planner at Teresa.Cline@york.ca and Wendy Kemp, Climate Change Resilience Advisor at Wendy.Kemp@york.ca.

Yours truly,



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Commissioner, Environmental Services

Attachment: #9092231 Detailed YR Comments on Made in Ontario Environment Plan
#9092314