



ONTARIO CLEAN ECONOMY ALLIANCE

Clean Economy Alliance Comments on Ontario's Environment Plan

The following submission provides the Clean Economy Alliance's response to the proposed Made-in-Ontario Environment Plan, [ERO 013-4208](#).

[The Clean Economy Alliance](#) is a group of over 100 organizations representing a broad cross-section of Ontarians working together to support the advancement of effective climate action in Ontario.

Our previous [submissions](#), [letters](#), and other materials submitted to this government have outlined top priorities and suggestions for Ontario's climate plan. These priorities include:

- **Science-based emission reduction targets in line with Canada's international commitments to limit warming to 1.5 degrees**
- **Consultation with Ontario businesses, scientists, economists, and others who understand the sources of, and solutions to, carbon pollution**
- **Targeted action to tackle the primary sources of carbon pollution in Ontario including transportation, industry, and buildings**
- **Opportunities for all Ontarians to participate and give feedback into this plan**
- **Adequate funding for implementation, and transparency mechanisms to make sure Ontarians know how this funding will be spent**

Now that Ontario's Environment Plan has now been released with measures to address climate change, we've evaluated how this plan fits these priorities.

1. Science-based emission reduction targets in line with Canada's international commitments to limit warming to 1.5 degrees.

The IPCC, the United Nations' body for assessing the science related to climate change, recently called on all governments to step up ambition by cutting greenhouse gas (GHG) emissions in half by 2030 and down to net-zero by 2050. Ontario's Environment Plan introduces new, weaker emissions reduction targets, which are about one third as ambitious as Ontario's previous targets in the Climate Change Mitigation and Low-carbon Economy Act. These new targets do not match science-based goals.

Ontario's new targets were designed to match Canada's federal emissions reduction goals. But mounting scientific evidence now shows that these targets do not meet Canada's international commitment to limit warming to 1.5 degrees, or even "well below 2 degrees." The federal government recently committed to [increase Canada's ambition on climate change](#) and explore stronger targets.

We urge Ontario's government to undertake a similar process, and re-evaluate the proposed targets against what scientists tell us is necessary to limit warming to 1.5 degrees. Stronger targets are achievable coupled with strong action to reduce emissions, and are necessary to protect the health and well-being of Ontarians.

Many municipalities have also adopted stronger targets to reduce emissions, or are in the process of doing so. Weakening provincial targets undermines these efforts, especially now that funding for urban climate solutions has been dramatically reduced. Cities play a vital role in climate action, and must be encouraged and given the resources to act.

2. Consultation with Ontario businesses, scientists, economists, and others who understand the sources of, and solutions to, carbon pollution.

The Environment Plan commits to establishing an advisory panel “to provide advice to the Minister on implementation and further development of actions and activities in our plan specific to climate change.” While an expert panel is a welcome step, ideally it would have been in place to help lay the foundations of the plan before its release.

Although online consultations were held through a web portal in the fall of 2018, there was no formal consultation with scientists, economists, academics, clean technology leaders, and other experts on the front lines of addressing climate change before the plan was released.

It is essential that expert feedback be officially gathered as soon as possible to refine the proposed policies and programs. We look forward to hearing more details on the timing, structure, and responsibilities of this advisory panel.

3. Targeted action to tackle the primary sources of carbon pollution in Ontario including transportation, industry, and buildings.

The Environment Plan includes some workable options for Ontario to explore further, which could reduce greenhouse gas emissions in all of these sectors. But there are few details to assess whether the proposed actions will have any impact on Ontario’s GHG emissions, and many actions fall far short of what is feasible with the tools and technologies we have on hand.

For example, there is a commitment to address rising transportation emissions by encouraging a switch to cleaner fuels – a welcome step. But to achieve deep decarbonisation, Ontario needs to take additional action now to support a broader shift in how we move people and goods, aiming for a long-term goal of eliminating emissions from transportation entirely.

To accelerate this shift, Ontario should prioritize solutions to get Ontarians out of vehicles that rely on fossil fuels and into alternatives that work for them. This could mean investing in more effective, more frequent transit, encouraging active transportation methods like cycling and walking, and helping more Ontarians shift to zero-emission vehicles like electric cars. These alternatives will achieve much greater long-term emissions reductions and help Ontario keep pace with a worldwide shift to clean transportation – and many of these options will help decrease traffic congestion and improve the health of Ontarians at the same time.

Other initiatives to reduce emissions from buildings and industry have promise, such as ramping up natural gas conservation and using public funds to spark private investment in clean technologies. But ambition is lacking on long-term solutions. For example, updating Ontario’s Building Code with tighter energy efficiency standards can usher in transformative change over time, giving industry time to adapt. But Ontario will fall behind other jurisdictions without a clear timeline for key steps like net-zero building requirements, and without a plan in place to provide a consistent transition to low carbon building solutions.

We recommend filling in the gaps in these policy areas as soon as possible in consultation with stakeholders who understand the possibilities and next steps, and releasing a more detailed plan to reduce emissions from the primary sources of carbon pollution in Ontario.

4. Opportunities for all Ontarians to participate and give feedback into this plan.

Ontarians have been given opportunities to give feedback into this plan through online consultations, including the current consultation through the Environmental Registry of Ontario (ERO). The most publicly promoted consultation was carried out through an anonymous web portal, and not the ERO. This feedback is not currently available to the public. We recommend making this available to the public for further review.

It is unclear how or whether that feedback will be incorporated into the Environment Plan's climate change section. We recommend releasing a clear outline of next steps, including expected dates for a finalized plan and implementation of key emissions reduction initiatives.

5. Adequate funding for implementation, and transparency mechanisms to make sure Ontarians know how this funding will be spent.

The plan commits to \$500 million in spending over the next four years, with \$350 million of this devoted specifically to an "Ontario Carbon Trust" to leverage public funds to spark private investment in clean technologies. This is a welcome start, but with increased funding the government could take broader action, and restore a selection of the most effective programs previously funded by cap-and-trade. This funding could help Ontarians transition to clean, energy-efficient homes, switch to vehicles that don't pollute, help municipalities and school boards retrofit aging buildings, and many more effective solutions to reduce carbon pollution.

MECP has not released updated figures on the funds remaining from cap-and-trade revenues, which had previously been set aside exclusively for climate action. It's estimated that \$1 billion remained when the new government took office, leaving up to \$500 million in extra funding for additional climate action. These revenues were collected from participants in the cap-and-trade program in good faith, who understood that, by law, the money was bound for action to fight climate change. In the interest of transparency, we recommend releasing updated information on remaining cap-and-trade revenues, and devoting the entirety of these remaining funds to climate action initiatives.

Contact Information

Thank you for this opportunity to submit feedback on Ontario's Environment Plan. The Clean Economy Alliance looks forward to continuing to work with the Province on programs to address climate change, and to further collaboration in the future.

If you have any questions, please contact:

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