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**RE: EBR Registry # 013-2083 on Guideline on Community Emissions Reduction Planning**

The Clean Air Council (CAC) is a network of 28 municipalities and health units from across the Greater Toronto, Hamilton and Southwestern Ontario Area[[1]](#footnote-1) who work collaboratively on the development and implementation of clean air and climate change mitigation and adaptation actions. The CAC is proud to have the Province of Ontario as a member.

Clean Air Partnership serves as the secretariat for the CAC. Clean Air Partnership is a charitable environmental organization whose mission is to work with municipalities and their partners to create sustainable, resilient and vibrant communities by undertaking efforts to improve air quality, reduce greenhouse gas emissions, increase resilience to extreme weather and climate change impacts and enabling participation in the low carbon economy.

The CAC commends Ontario’s Draft Community Emissions Reduction Planning Guide for Municipalities in recognizing the significant role municipalities play in advancing Ontario’s greenhouse gas (GHG) reduction efforts. The CAC is also very pleased that the province is advancing the policy direction (p. 11) needed to ensure that Ontario is an active participant in the emerging low carbon economy. It was appreciated that the Guideline referenced the work of the CAC in advancing innovation in community energy and emissions planning (p.42).

The policy direction of the Province outlined in the Growth Plan and Climate Change Action Plan will help advance municipal action through capacity building and implementation of GHG reduction actions. While the Guideline helps bring structure to climate action planning in Ontario, to achieve the our GHG reduction goals, ongoing and sustained collaboration and partnership between the province and municipalities is essential.

The CAC thanks MOECC for its work on this Guideline and commits to working with the Province to advance those existing Plans (e.g. CCAP & Growth Plan) and policies (e.g. Ontario Building Code, Home Energy Labelling, Home Energy Retrofit Programs and Financing, etc.) that help municipalities to advance GHG reduction opportunities within their communities.

Below are some priority recommendations related to the Draft Guidelines, but also next step actions that will be necessary to enable the implementation of climate actions.

**Recommendation # 1: Ensure consistency and alignment between MOECC’s Municipal Action Plan Program (MAPP) with the MOE’s Municipal Energy Plan program (MEP).**

This will reduce duplication and confusion, increasing the likelihood that actions will meet the requirements of different programs. It would also be beneficial to align MEP and MAPP with the FCM Partners for Climate Protection (PCP) program (with almost 80 Ontario members). It is clear that the Guidelines have tried to align the various programs. The three identified streams balance consistency and flexibility between the different planning and implementation programs that municipalities access. It would also be of value to ensure that consistent communication occurs between MOECC, MOE and FCM to ensure each is aware of program changes that affect consistency/alignment between their various programs.

**Recommendation # 2: MOECC should work with other Ministries (e.g. Ministry of Energy, IESO, and Ministry of Transportation) to improve access to data to streamline the energy and emissions inventory process.**

Municipalities spend significant human and financial resources on data acquisition. This could be significantly reduced if there was improved access to data from provincial ministries and electric and gas utilities. For example, the Ministry of Energy could require utilities to report annual energy use at a municipal scale as opposed to the current utility-level, streamlining access to utility energy use data for all Ontario municipalities and relieving utilities of many individual municipal data requests.

Another opportunity to streamline data access would be for the Ministry of Transportation to share data on vehicle ownership, type of vehicle and mileage reporting. At present only municipalities with sufficient resources purchase this data from third party providers. In addition, access to mileage information is not available for purchase and as such, mileage figures are based on inaccurate estimates and assumptions, thus reducing their ability to inform possible interventions.

In addition, data collected by MOE via the Large Building Energy and Water Reporting and Benchmarking requirement would inform municipal energy use and emissions reduction opportunities within the large building commercial sector if it were made available.

Another option to increase the efficiency of the inventory process would be to emulate British Columbia’s example of the [Community Energy and Emissions Inventory](https://www2.gov.bc.ca/gov/content/environment/climate-change/data/ceei) where that province provided municipalities with an indicative inventory of energy use, greenhouse gas emissions and supporting indicators at the community level.

It would also be of value to have increased alignment and data sharing with the IESO to be able to better understand where there is significant potential and need for local electricity generation.

**Recommendation # 3: Target setting can be improved by helping municipalities understand hot federal and provincial policies affect future energy and emissions scenarios (undertaking the scenario calculations at the provincial scale and then sharing those scenarios with municipalities).**

If municipalities better understood and could calculate how policies such as the Clean Fuel Standards or Vehicle Fuel Standards affect their BAU scenarios within their communities, they could set more ambitious, well-supported targets.

Undertaking this analysis provincially would enable municipalities to visualize the trajectories of emissions reductions from policies that will be implemented at other levels of government, allowing for the adoption of more ambitious municipal GHG reduction targets. This will also increase understanding of the importance of those higher level policies and actions. The capacity to undertake that analysis at the municipal scale is inefficient, and beyond the capability of most municipalities due to resource constraints.

Increasing alignment between the Climate Change Action Plan target timelines and the Growth Plan population growth timelines would help municipalities align their population growth estimates with ghg targets. For example the Growth Plan has population growth projected to 2041, while the Climate Change Action Plan has estimations for 2050 and 2080 related to target dates.

**Recommendation # 4: Capacity building and support on Task 4.2 Scenario Development; 4.3 Modelling and Task 4.4 Analysis of Co-Benefits would help all Ontario municipalities, but especially smaller municipalities.**

Undertaking the above identified tasks is a challenging and expensive step in the Climate Action Planning process. Working with municipalities to share experiences and results of that work would be of significant value, enabling more resources to be allocated to the implementation of GHG reduction actions. While no two communities are the same, there are many similarities in the climate actions outlined in climate action plans. As such, it would be of significant value to allocate resources to these tasks so municipalities can understand what these actions mean to their local economic, social and environmental priorities. Advancing this effort in a more collaborative manner would also better enable municipalities to understand how their local circumstances and ghg reduction opportunities can inform their target setting. For example, guidance for scenario suggestions and calculations for municipal archetypes would be of significant value (i.e population growth municipalities versus stable population municipalities; rural, suburban, urban; and other municipal archetypes that may be able to inform ghg reduction opportunities and calculations to inform target setting). It would of course be important to share methodology and assumptions to ensure transparency and to enable municipalities to understand how the assumptions used speak to their local circumstances.

**Recommendation # 5: Implementation support such as the Municipal Challenge Fund is imperative to ensure Climate Action Plan development translates into Climate Action Plan Implementation.**

This draft Guideline provides guidance for municipalities to develop Climate Action Plans, however any Climate Action Plan must result in the implementation of climate actions. Securing funding support for community climate actions is extremely challenging using existing property tax bases, and unless supports such as the Municipal Challenge Fund (and similar such funds available from other governments or agencies) are available to Ontario municipalities, their ability to turn planning into action is significantly undermined. The Province should consult with municipalities on how to ensure the reinvestment of Ontario’s cap and trade funds results in cost effective GHG reduction actions, while also ensuring it moves towards those long-term transformative actions that will move Ontario towards our 80% by 2050 GHG reduction goal. Without the reinvestment of cap and trade funds, resources for implementation of community climate actions will be significantly compromised.

In addition, promoting and sharing implementation case studies would help to raise the profile of the implementation value proposition. The CAC would welcome the opportunity to work with MOECC and other Ministries to develop examine which mechanisms would provide the greatest likelihood of advancement from climate action planning towards implementation.

**Recommendation # 6: Highlight the important role stakeholder engagement plays in ensuring Climate Action Plan implementation.**

While Stakeholder engagement is referenced within the Guideline and there is a section dedicated to stakeholder engagement at the end of the document; the significant role and importance stakeholder engagement plays in ensuring the greatest likelihood of implementation success leads to the recommendation to increase the profile of stakeholder engagement within Part A and Part B of the Guideline. This would help to ensure that stakeholder engagement opportunities are advanced throughout the Climate Action Plan process from the onset, which is key to implementation success later.

**Recommendation # 7: A similar Guideline is needed to inform Municipal Adaptation Planning and speak to opportunities for integrating climate change mitigation and adaptation planning.**

This Draft Guideline is extremely helpful in providing municipalities with a process for climate change mitigation planning and the flexibility to ensure that local needs and capacity are met. A similar guideline for climate change adaptation planning, and opportunities to address mitigation and adaptation simultaneously would be extremely helpful for Ontario municipalities.

1. CAC Municipal and Public Health Unit members include:Ajax, Aurora, Brampton, Burlington, Caledon, Clarington, Durham Region, Guelph, Halton Region, Halton Hills, Hamilton, King, London, Markham, Mississauga, Newmarket, Oakville, Oshawa, Peel Region, Pickering, Richmond Hill, Simcoe-Muskoka District Health Unit, Toronto, Vaughan, Region of Waterloo, Whitby, Windsor, York Region. [↑](#footnote-ref-1)