

To:	Warden Hicks and Members of Grey County Council
Committee Date:	January 24 th , 2018
Subject / Report No:	PDR-CW-11-19
Title:	Grey County comments on Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan
Prepared by:	Grey County Planning Staff
Reviewed by:	Kim Wingrove
Lower Tier(s) Affected:	All of Grey County
Status:	Recommendation adopted by Committee of the Whole as presented as per Resolution <i>CW33-19</i> ;

Recommendation

1. That Report PDR-CW-11-19 regarding an overview of proposed policy *Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan* be received, and
2. That Report PDR-CW-11-19 be forwarded onto the Province of Ontario as the County of Grey's comments on the proposed policy posted on the Environmental Registry through posting #013-4208, and
3. That the Report be shared with member municipalities and conservation authorities within Grey County, as well as the Grey Bruce Health Unit.

Executive Summary

On November 29th, 2018, the Ministry of the Environment, Conservation and Parks released a new environmental policy document titled *Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan* that is intended to replace the previous environmental policy, *Ontario's Climate Change Strategy*. The Province is seeking comments from the public by January 28th, 2019. This report provides an overview of the proposed environmental policy and comments on how this policy may impact the environment and climate change in Grey County.

Background and Discussion

On October 31st, 2018, the *Cap and Trade Cancellation Act, 2018* received Royal Assent. This act repealed the *Climate Change Mitigation and Low-Carbon Economy Act, 2016* for the purpose of finding an alternative to the cap and trade program. With this repeal, the Province made a commitment to creating a new climate change policy that would better address fiscally the issues of environmental sustainability, greenhouse gas emissions, and pollution. The *Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan* (hereafter referred to as Made-in-Ontario Environment Plan) was released on November 29th, 2018 with the recognition that climate change is a critical issue that needs immediate action from all stakeholders. This policy is focused on addressing climate change by investing in new technologies that will reduce GHG emissions and focusing on developing and updating plans and policies that are currently addressing issues related to climate change at a local level. The proposed policy is categorized by four key environmental concerns for the Province which are Protecting our Air, Lakes and Rivers, Climate Change, Waste Management, and Conserving Greenspace. The guiding principles used to develop this environmental policy are, clearer policies and rules and placing emphasis on enforcement and accountability, more transparency within policies put forth and those that are already in place, and a focus on local solutions that are based on challenges of those communities. Outlined below are key themes and recommendations from Made-in-Ontario Environment Plan.

Made-in-Ontario Environment Plan Overview

Protecting Our Air, Lakes and Rivers - This section of the policy document focuses on addressing pollution in the air and in our clean water systems.

To help reduce air pollution, the Province is focused on understanding and working in collaboration with the sectors that have the highest effect on air quality. This includes consulting with different stakeholders and indigenous communities to understand their individual challenges, understanding the different sources of air pollution and their impact long-term and short-term, and collaborating with different levels of government to understand how air pollution outside of Ontario is affecting the Province.

Grey County is fortunate to have an abundance of fresh water lakes that are utilized by residents and tourists alike. Seasonal cottagers and tourists to Georgian Bay are critical to the local economy and sustainability of the County as a whole. The Province has indicated several actions items that will help protect the health of our fresh water systems and ensure that there is clean water for future generations. Further, as our local municipalities increase in density and development continues, it is our collective responsibility to ensure adequate stormwater and wastewater management facilities are being implemented and we are reducing the impact of these infrastructures on our clean water systems. The following are some action items identified in the Made-in-Ontario Environment Plan:

- Continue to collaborate and invest into federal-provincial pre-existing programs such as the Canada-Ontario Great lakes Agreement (COA) and the Canada-Ontario Lake Erie Action Plan, and review and update Ontario's Great Lakes Strategy.

- Work to build on the success of the Lake Simcoe Protection Plan and engaging with stakeholders and Indigenous community members to identify which of our fresh water systems are affected and how to rehabilitate these sites.
- Review and enhance how the Province and other stakeholders manage water takings to ensure that there is an established priority for different water uses and responding to drought conditions. Further, ensure that drinking water source protection programs help inform water management programs.
- Promote and provide resources that allow access to technologies and practices that can be utilized in households.
- Provide support to municipalities in increasing transparency around wastewater and stormwater overflows, and provide opportunities for municipalities to improve, invest and support new technologies and practices in wastewater and stormwater management.

Addressing Climate Change – This section of the policy focuses on how our climate is changing and the impacts of those changes on temperature, infrastructure and the natural heritage. The focus is on developing an alternative to the carbon tax system and finding effective and affordable ways to mitigate and adapt to the effects of climate change. The Province has developed six (6) areas of focus in order to address climate change.

1. Building Resilience: Helping Families and Communities Prepare

Financial costs associated with extreme weather events in Ontario have increased dramatically since the 1980s and the costs of insuring properties have significantly risen. More specifically, the rise in residential basement flooding has seen financial and economic hardships on many residents. Other temperature related impacts include road closures due to severe storms, damage to infrastructure and utilities, and extreme hot temperatures affecting the health of children and seniors. Building resilience is about helping to understand the multitude of effects climate change can have on infrastructure, personal property and health. Access to accurate information, tools, and resources will help Ontarians to adapt to changing temperatures and prepare for the financial and social impacts caused by climate change.

The Made-in-Ontario Environment Plan notes that the Province will undertake a provincial impact assessment to provide policy-makers and local governments with risk-based evidence to guide decision making. The government has made it a priority to put in place policies that will improve resilience.

2. Continuing to do Our Share: Achieving the Paris Agreement Target

Through this policy, the Province has made a commitment to reduce emissions by 30% below 2005 levels by 2030. This aligns with Canada's target under the Paris Agreement. This goal would mean reducing our emissions from 161 megatonnes per year to 143 megatonnes per year by 2030. Some initiatives that will help in achieving these targets include ensuring that residents are buying and investing in low carbon vehicles, providing cleaner fuels and ensuring that large emitters of GHGs are being regulated.

3. Make Polluters Accountable

This environment plan intends on developing better regulations and enforcement to ensure there is accountability for industries that pollute. Factors that will influence regulations include trade-exposure, competitiveness and process-emissions, and allow the Province to grant across-the-board exemptions for industries that are of concern. The Province intends to implement emissions performance standards which will require the industrial sector to meet certain emission levels which is tied to their level of output or production. Industries in Grey County will have to adhere to emissions targets set based on the type of industry and facility conditions. The program will allow for our industrial sector to have compliance flexibility mechanisms such as offset credits and/or payments to an amount to achieve compliance.

4. Activate the Private Sector

The Province has also launched an emission reduction fund called the Ontario Carbon Trust which is intended to replace the previous Cap and Trade program. Under the Carbon Trust, the Province will commit to \$400 million dollars over four (4) years to encourage private investment in clean technology solutions. Further, the Trust will also collect penalties by large scale polluters that will cycle back into the Carbon Trust. The long-term goal is to create a self-sustaining emission reduction fund to support and encourage investments across the Province for initiatives and technologies that reduce GHG emissions. The Province will leverage \$400 million to unlock over \$1 billion dollars in private capital. This will place an emphasis on the private sector to develop clean technologies with the support of public investment.

The Ontario Carbon Trust

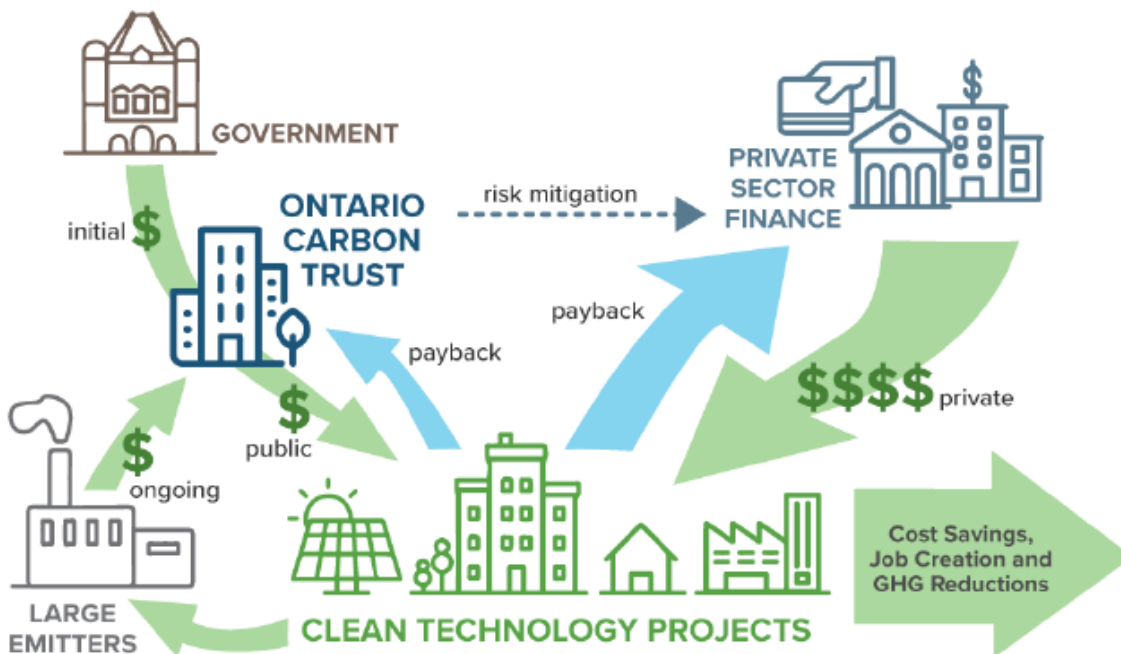


Photo: Adapted from Coalition for Green Capital, Growing Clean Energy Markets with Green Bank Financing: White Paper, page 2.

5. Use Energy and Resources Wisely

Utilizing our energy and natural resources in an efficient manner will help reduce our emissions. The goal is to conserve energy in homes and buildings to cut costs and reduce emissions. Potential effects for Grey County residents include:

- Increase access to information on energy and water consumption and how to conserve;
- Have access to energy efficiency data from real estate agents when purchasing a new home;
- Update the Building Code to ensure that homes are utilizing energy efficient resources and technology;
- Lower energy bills with the introduction of new technologies and tax policy options for homeowners;
- Ensure that Ontario has the highest energy efficient standards for appliances and equipment;
- Support Indigenous communities to have access to clean electricity in order to replace diesel and other types of electricity generation; and
- Increase renewable content such as ethanol in gasoline in order to ensure that our cars are burning cleaner fuel.

6. Doing Our Part: Government Leadership

Provincial leaders have developed Climate Change Governance Framework that puts pressure on ministries to adapt climate change strategies and provide support and guidance to municipalities in making decisions through a climate change perspective. The Province intends on accomplishing this through,

- Investing capital into provincial buildings and infrastructure to make them energy efficient and reduce corporate emissions;
- Empowering local municipalities and Indigenous groups to integrate climate action into local policies;
- Improve public transportation and provide the public with different transportation choices;
- Support green infrastructure projects such as greening the government's fleet.

Reducing Litter and Waste in Our Communities and Keeping our Land and Soil Clean

- This section of the policy focuses on waste diversion and safeguarding our land and soil. Overall, the policy intends to utilize strong enforcement action to ensure that producers are recycling, recovering, and disposing of waste in a manner that does no harm to the land and soil.

The goal is to divert more of our waste from landfills through programs such as blue bin or green bin. Currently, Ontario only diverts 30% of its waste with majority ending up in the landfill. Making producers responsible for managing the waste they produce will be significant to increasing the diversion rate. Action items included in the policy to reduce waste include:

- Ensure that local municipalities are participating in green bin and blue bin collection systems. Along with putting these systems in place, educating the public about reducing and diverting

waste is critical. Lastly, develop a proposal to ban food waste from landfills which are a component in producing methane.

- Work with other levels of government and jurisdictions to develop a plastic strategy that diverts plastic and micro-plastic from our clean water sources. Expand our recyclability by creating better labels for plastic products. In addition, create new policies and rules around composting in order to build a consensus around the requirements for emerging compostable waste.
- Create strong enforcement action against those who dump waste illegally, and develop leaders within local communities that can help to develop programs that can clean up our green spaces.
- Expand programs like the green bin and blue bin program to increase opportunities for Ontarians to participate in waste reduction efforts. It is also crucial to make producers responsible for the waste generated from their products and packaging. This would mean moving towards a producer responsibility model where producers take control of the end product and dispose of it in an appropriate manner.
- Ensure that there is a collection of reusable items and hard to recycle materials are recovered and reused. Lastly, it is also important to update regulatory requirements and modernize environmental approvals for waste and new waste management facilities.

Clean land and soil policies are important for Grey County as it has a strong agricultural sector and therefore we need to protect our land and soil for farming purposes for food production. Policies and incentives that encourage better environmental practices and prevent contamination should be a priority for any environmental legislation. It is important to protect our land and soil in order to ensure that future generations inherit healthy soils and a healthy growth climate. Proper management of soil and how soil is disposed or treated before it is reused will impact the overall health of the environment. The Province intends on revising brownfield development guidelines to ensure that we are cleaning up our contaminated lands sufficiently and that this land is being used efficiently. Further, it is critical to improve and better manage excess soil and hauled sewage so that toxins are not entering our soil and natural environment.

Conserving Land and Greenspace – Natural spaces such as forests, wetlands, and parks play an important role in supporting our air and water, protecting biodiversity and natural heritage, providing recreational opportunities and supporting indigenous traditional practices.

A conscious effort has been identified to work with leaders in land and water conservation who can help provide expert knowledge on how to best preserve areas of significant environmental and ecological importance. Further identified as an action is the need to support conservation and environmental planning which entails working with municipalities to develop mandates that have a conservation focus. The Province is also looking to modernize Ontario's environmental assessment process which will better recognize how other planning policies can integrate greenspace conservation.

Conserving land and greenspace is critical to Grey County as our forests and wetlands play a critical economic and social role. Thousands of people come to Grey County every year to enjoy our extensive trails system, our parks and beaches, and utilize our lakes and forest for hunting and fishing. Further, these natural heritage features also serve an important economic role. Harvesting and logging of our forests, farming, and hunting are critical to economic sustainability of many communities such as the Indigenous community. The Province has introduced a sustainable forest management framework where they would like to work with Indigenous

communities, the forestry industry, and communities involved in forest management to develop long-term plans. The intent of this framework will allow for data and information to be shared between different stakeholders who can help combat issues of greenhouse gas emissions (GHG) emissions, forest conservation, and protecting animal habitats.

Staff Response

In general, the County is appreciative of the efforts put forth in this policy. The key focus on consulting and engaging with communities in order to create local solutions to climate change is valuable. Climate change affects all communities differently, and local knowledge shall influence how to invest in adaptation and mitigation policies that meets the needs of communities affected. The Made-in-Ontario Environment Plan is committed to transparency when developing these policies and to ensure that underrepresented groups such as the Indigenous population have a voice in how their land is protected from environmental threats. Further, the Province places importance on creating climate change solutions without burdening tax-payers. While climate change policies need to be fiscally and economically attainable, the County believes that the health of our environment is critical to the success of our communities and families, and should not be sacrificed.

The policy direction highlights the concerns and effects of climate change overall, but it could better relate the impacts of climate change, and how critical it is for Ontario to be a leader and create innovative solutions. Climate change has had consequential effects on Ontarians to date and has the potential to dramatically impact livelihoods. Much of the policy provides areas for further review and recommendations on further changes needed. The terminology used is often to 'encourage and empower' stakeholders to implement climate change policies. As provincial policy guiding lower-tier governments on climate change, the County would like to see clear and firm policies that express a stronger intention of climate change adaptation and mitigation.

The Province has also indicated throughout the policy that they intend to build on the success of environmental policies currently in place such as the Lake Simcoe Protection Plan and the Muskoka Watershed Conservation and Management Initiative. The work done under these policies and multitude of others highlights years of environmental policy efforts put forth by professionals. Ensuring that these policies are protected, updated and higher funding provided will ensure that we do not erase the hard work that has already been done to protect our environment and continue on its success. The County is of the mindset that it is imperative that the Province not only support previous legislation and policies created under former leaderships, but also develop new comprehensive solutions to climate change, which protect Ontario and set a standard for the Country.

The Great Lakes are a critical resource for the Province of Ontario and restoring and protecting the Great Lakes should be a high priority. The County of Grey is a member of the Great Lakes and St. Lawrence Cities Initiative which is a coalition of mayors and other local officials advocating for the protection and restoration of the Great Lakes and St. Lawrence River. In March 2018, a coalition of businesses, industries, environmental organizations, communities and indigenous communities identified joint priorities for sustaining Great Lakes restoration and economic revitalization. The following are the joint priorities identified by the coalition:

- governments should fully fund the Great Lakes Restoration Initiative
- need to preserve and strengthen agricultural conservation programs

- Invest in aging water infrastructure
- Strengthen the Great Lakes navigation system by maintaining and upgrading ports, locks and other navigation infrastructure
- Protect the Great Lakes from aquatic invasive species

The County recommends that the Made-in-Ontario Environment Plan commit to supporting the priorities identified by the coalition and to also support the priorities and initiatives identified in the Great Lakes and St. Lawrence Cities Initiative Strategic Plan.

The emphasis and focus placed on producers of emissions is critically important in addressing climate change effectively. The policy highlights the Province's intent on making polluters accountable, but does not effectively highlight how policies will be enforced. Further, the policy provides exemptions for large industrial emitters such as the auto sector. This appears to be counter-productive to lowering GHG emissions as industries are the one of the largest GHG polluters in Ontario. The policy intends to regulate some 'large emitters', while providing exemptions to some industries that will not be able to meet regulation standards and could be negatively impacted. It is noteworthy that the document does not define what constitutes a 'large emitter'. Rather than providing a 'pass' for large emitters or individual sectors, it is recommended that regulations be put in place based on the size of the industry/operation or scaled based on the level of emissions from the operator (i.e. so that that a small operator is not impacted with restrictions that are too cumbersome that could cause the operator to go out of business). The Province could also explore having different compliance standards for different scales of industry, which are targeted at the level that the industry can financially sustain in an environmentally sound manner. Ideally the regulations and standards would treat everyone as consistently as possible, but would be scaled appropriately to the size of the industry/operation so that any financial burden is shared equally, and is at a sustainable level for all industries and operations. Strong environmental standards and the promotion of clean industry need not be mutually exclusive with profitability; as long as it is scaled and implemented appropriately.

The Ontario Carbon Trust is a substantive action item in the Made-in-Ontario Environment Plan since this emissions reduction fund is an alternative to previous cap and trade policy that was in place. The premise of this action is to create a trust where public investment is diverted to clean technology projects, with the intent of developing new clean technologies, and investing in climate change projects in various sectors such as transportation, retail, municipal and industry. The Province plans to invest \$400 million over four years to fund this trust. The private sector plays a critical role in climate change, as they are leaders and have the capacity to develop new technologies that can mitigate and adapt to climate change. The County recommends that the Province provide more funding over a longer period of time into the trust, to ensure the long-term sustainability of projects being undertaken. Further, the private sector will be better able to plan and develop technologies if they are certain of long-term guaranteed funding.

Furthermore, the County believes that investment in the private sector through the Carbon Trust should be undertaken in relation to strong policy action by the public sector. Placing much of the emphasis on the private sector to combat climate change, without strong policy action by the public sector, will not be as effective. The Province needs to have strong policies for mitigation, adaptation, and enforcement to collectively have the biggest impact on climate change overall. The Made-in-Ontario Environment Plan currently places emphasis on private sector solutions to address climate change, rather than providing strong policies from a public sector. The Province should be a leader in ensuring the protection of our environment, our communities, and our

natural resources. The Made-in-Ontario Environment Plan is less ambitious than previous climate change strategies and provides less funding, guidance and policy direction on how to help communities and industries reduce their emissions. It is largely the Province's responsibility to create policies that effectively deal with climate change, provide stakeholders and municipalities with guidance on how to implement climate change strategies, and create enforcement strategies that will deter polluters.

There are a number of items in the Made-in-Ontario Environment Plan that could directly impact municipal service delivery or municipal budgets. Some of the key items include, but are not limited to;

- Increased waste diversion efforts,
- Increased emphasis on municipal green bin programs, organics diversion, and composting,
- Continued water and drinking water protection efforts,
- Infrastructure upgrades to make infrastructure more resilient to climate change impacts e.g. stormwater management facilities or roads,
- Increased emphasis on 'cleaner' transportation options, such as electric cars, and natural gas powered heavy trucks,
- Improved public transportation,
- Climate change monitoring and data collection,
- Increased efficiency in government buildings,
- Updates to the Building Code,
- Promoting linkages between nature and human health,
- The protection of natural areas, and species at risk, and
- Preventing the spread of invasive species.

While all of the above are admirable goals, they do have the ability to impact municipalities, both in positive and potentially negative ways, if not implemented properly. A number of the above goals would not only aid in combatting climate change, but could also serve other key municipal interests as well. For example, changes to the Building Code could help spur more energy efficient, and affordable housing opportunities. Similarly increased public transportation could aid our aging population, as well as those with lesser financial resources. However, without key infrastructure upgrades, it will be difficult to enable some of the above goals e.g. more electric car charging stations, or upgraded stormwater management facilities. Furthermore, County staff are cognizant of the balance needed in protecting natural areas, and species at risk; such that the 'protection' does not unduly impact private landowners, or farmers, and that it is a shared responsibility.

Municipalities have a role to play as well (see the 'County Initiatives' section of this report for some of the County's ongoing initiatives); however funding climate change adaptation and mitigation can often be a barrier. The County recommends that on-going and sustainable funding be provided to municipalities to help support local initiatives in adapting to, monitoring, and mitigating the effects of climate change. Many counties and municipalities are hiring Climate Change Initiative Coordinators, or environmental experts to assist in advising on local policy and collecting applicable data that is not otherwise found at the Provincial level. Funding should be provided to municipalities through the proposed Ontario Carbon Trust, or other

funding sources, to help the Province implement the policies outlined in the Made-in-Ontario Environment Plan.

The County appreciates the intent of the Made-in-Ontario Environment Plan and the effort to highlight impacts related to climate change. However, the County believes that further consultation with experts in the field and stronger mitigation policies are needed to truly curb the long-term effects of climate change. Locally, County staff would want to see input into the strategy from First Nations and Metis peoples, as well as agencies and sectors including the Health Unit, Conservation Authorities, the agricultural/industrial/tourism sectors, etc. County staff find that the Made-in-Ontario Environment Plan lacks detail to provide strong policies that will effectively minimize GHG emissions long term, provide suitable emission reduction targets, and guidelines on how targets will be enforced. As noted above, County staff also have concerns about how some of the Made-in-Ontario Environment Plan will be funded at the municipal level.

County Initiatives

The following is a summary of initiatives the County has recently completed or is currently working on in order to help protect the natural environment within Grey County and to help mitigate and adapt to impacts from climate change:

- Recolour Grey – included a number of policies to help protect the natural environment within Grey County including introducing some new climate change policies.
- Healthy Communities Checklist developed in partnership with the Health Unit.
- Natural Heritage Systems Study (Green in Grey) which was incorporated into the new County Official Plan.
- Partnership project with Grey Sauble Conservation Authority and the Town of The Blue Mountains (Natural Disaster Mitigation Program) – this project will develop a well-engineered and systematic understanding of potential flooding scenarios using modelling and enabling proactive flood mitigation and resiliency actions
- Recreational Trails Master Plan (County Forests and the CP Rail Trail)
- Cycling and Trails Master Plan – developing a plan to guide future planning and decision-making that would enhance and support commuter cycling, cycle tourism and recreational trail use throughout the County.
- Sustainably managing our County Forests in accordance with the County's Forest Management Plan.
- County Forest Management By-law.
- Paved Shoulder Policy and Program to include paved shoulders on most/all County roads which will provide further opportunities for commuter cycling/walking and active transportation.

Some other initiatives that the County will be working on and exploring further include:

- Climate Change Action Plan
- Updating the County's Forest Management Plan
- Updating the County's Forest Management By-law to align with the new policies in the County Official Plan. A future report will be brought forward to Committee of the Whole

about the importance of the County Forests, how we currently manage our Forests and to also talk about the overall state of the forested lands throughout Grey County.

- Exploring the use of ecological offsetting
- Recolour Grey Monitoring Program – monitoring the effectiveness of the new policies in the County Official Plan to achieve the targets and objectives established in the policies, including the environmental policies in the Natural Grey section. Working with agencies and other organizations collecting data that would assist with monitoring the effectiveness of the official plan policies. This would act as a 'State of the Environment' report.
- Adopting a policy for the protection and enhancement of tree canopy based on Section 270(1)7 of the Municipal Act as introduced by Bill 68. A future report will be brought forward to Committee of the Whole in February regarding this matter.

Legal and Legislated Requirements

There are no legal or legislative considerations at this time.

Financial and Resource Implications

There are no immediate financial or resource implications of this environmental policy, as the Province has not released the full details of how it will be implemented throughout the Province. However, as noted above it is recommended that the Province provide funding to municipalities to help the Province implement the policies as outlined in the Made-in-Ontario Environment Plan. Staff will continue to monitor and provide future updates to Council if any changes occur.

Relevant Consultation

- Internal – Planning Staff
- External (list)

Appendices and Attachments

[Link to the Made-in-Ontario Environment Plan](#)