

TO: Honourable Minister Rod Phillips, Ministry of Environment Conservation and Parks
DATE: Friday, November 16, 2018
FROM: Ontario Climate Consortium
RE: Comments in response to Ontario Climate Change Plan Consultation

About the Ontario Climate Consortium

The Ontario Climate Consortium (OCC) is a regional collaborative that has been working since 2011 across the Greater Golden Horseshoe with a network of municipal governments, public agencies, and academic institutions to build capacity for climate change mitigation and adaptation planning at the local and regional level. Founded in 2011 through a partnership between York University and the Toronto and Region Conservation Authority (TRCA), OCC membership has grown to include McMaster University, Western University, Ryerson University and the University of Guelph. Core municipal membership includes the Region of Peel, York Region, Durham Region, and the City of Toronto, but also extends to lower-tier municipal governments, civil society groups, private sector, and other public agencies on specific projects.

Working in partnership with other municipal networks, such as the Clean Air Partnership, the OCC has been playing a number of key roles to support our collaborative members in advancing climate planning efforts on both mitigation and adaptation:

1. **Facilitating climate research and analysis** – working as a partnership broker between academics and end-users the OCC has delivered downscaled climate projections to regional municipal governments, and assisted municipal partners in translating climate data into actionable information for infrastructure and natural heritage planning.
2. **Policy and Planning guidance** – OCC develops recommendations for coordinating climate policies and plans, with voluntary implementation by local governments or others with decision-making authority.
3. **Convening and Engaging stakeholders** – Through targeted thematic engagement sessions, the OCC provides space for collaborative members to share lessons learned and best practices, discuss challenges and strategies for addressing them, and build partnerships to tackle common issues.

Context: the Climate Imperative

The IPCC's Special Report on 1.5-degrees represents an unprecedented message of urgency from the global scientific community. It is up to all of us, individuals, businesses, and governments to change gears in response to the credible threat posed by climate change. Reaching and sustaining net zero carbon emissions at the global scale by mid-century is required to halt anthropogenic warming. Infrastructure investment informed by future climate projections will be needed to prepare our communities for the impacts associated with the inevitable climate change caused by emissions we continue to emit. Addressing climate change is arguably the most significant challenge that Ontario has ever faced. While Canada, and by extension Ontario, is a relatively small contributor to overall emissions, we do make an outsized contribution on a per capita basis and therefore have a responsibility to build on our leadership role and deliver deep GHG emissions reductions, while also building resilience to the inevitable changes to come. An “all of the above” strategy is needed that encompasses:

- **Energy** - cutting demand, and substituting for low carbon sources in all sectors (esp. buildings and transportation)
- **Land use planning** - curbing urban sprawl, maintaining and enhancing remaining natural carbon sinks

(e.g. forests and wetlands)

- **Municipal infrastructure** - water, wastewater, transportation, etc.
- **Industrial transitions** – supporting the development of new low carbon industries, while incentivizing the greening of existing industries through market-based mechanisms like carbon pricing

Key role for local and regional government

Local and regional municipal governments are on the front lines of climate impacts, have direct and indirect control over more than half of Ontario's GHG emissions, and are therefore critical actors for preparing for climate change, working in partnership with academic institutions, utilities and other government agencies (e.g. Conservation Authorities, School Boards, Public Health Transit, etc.).

Planning and preparing for climate change is challenging for all municipalities, particularly due to funding and staffing constraints and a lack technical capacity to access and interpret future climate data. Furthermore, the impacts of climate change as well as GHG emissions sources cross municipal jurisdictional boundaries, creating challenges for local/regional municipalities because decisions about climate action can affect neighbouring areas.

Key recommendations to support municipal government action

1. Support the development of formal regional collaboration initiatives across the province

Regional collaboration is needed to help address the challenges that municipalities face when planning for climate change, and realize important synergies including:

- Leveraging scarce financial resources and staff time
- Collectively assessing climate change risks
- Developing regional strategies for responding to the threats of climate change

Piecemeal climate adaptation and mitigation approaches that vary from one community to the next can prove counterproductive. In contrast, well-coordinated climate action at the regional scale can more effectively foster low carbon climate resilience across an entire region such as the Greater Golden Horseshoe.

Underpinning such regional collaborations is the need for an effective science-policy interface to help translate complex climate information into formats that support decision-making by local governments and agencies, and enable the development of business cases for investment in climate-friendly programs and infrastructure. The OCC has been playing such a role informally over the past several years, but without sustained program funding support required to scale-up its activities beyond one-off project delivery to local and regional governments.

As we evolve our service delivery to meet the needs of our partners, the OCC sees a strategic opportunity to play a role in connecting climate science to municipal finance and asset management stakeholders in order to stimulate the development of innovative financial solutions for infrastructure and asset renewal. The OCC is keen to work with academic and municipal partners to develop and pilot cost-benefit analysis tools that incorporate future climate scenarios, and project ROI for climate friendly investments such as green infrastructure, and sustainable building retrofits. We want to empower municipal climate action by enabling them to pilot innovative financial solutions.

2. Develop climate data decision-support tools

Accessing and transforming data into formats that are useful for climate planning is a major challenge for municipalities. This holds true for both climate mitigation and adaptation efforts.

On the mitigation side, the province could play a key role in improving access to energy use data for municipalities to help them more easily undertake energy and emissions inventories and identify energy saving opportunities. Municipalities are very keen to work with the Province and utilities to streamline data access in order to reduce costs to all stakeholders associated with energy data access and analysis.

On the adaptation side, the province could empower multi-stakeholder regional entities like the OCC to work as a broker between University experts and local/regional policy practitioners to support the translation of climate data and establish consistent methodologies for incorporating data into vulnerability and risk assessment for the design/implementation of infrastructure.

3. Enable and support the use of innovative financial tools by municipalities

The OCC is pleased to see that the Government has recognized the importance of unlocking the power of the private sector capital to finance innovative climate solutions. In order to achieve another of the stated objectives, that of helping to make life more affordable for families and small business, we need to ensure that climate finance solutions are available to residential and commercial building sectors that enable investment in water, energy and stormwater retrofits that reduce emissions and enhance resilience.

In 2012, changes to the Municipal Act and City of Toronto Act enabled municipalities to use the local improvement charge (LIC) mechanism to fund retrofits on private property. This approach of funding building retrofits through the property tax system is a fairly standard practice in the US, where such programs, known as Property-assessed Clean Energy (PACE), operate in 20 states. Unfortunately, uptake of the enabling legislation by Ontario municipalities has been limited only to the City of Toronto, as other municipalities express concern about the financial risks. The Government of Ontario could help to overcome these concerns by establishing a loan loss reserve for municipal-level building retrofit loan programs, or by raising funds through provincial green bond issuances to capitalize such programs.

We look forward to sharing more about the important role that the OCC has been playing at the regional-scale, and to working with the Government of Ontario on developing and implementing your new Made-in-Ontario climate change plan.

Sincerely,



Peter Love BA, MBA, ICDD
Chair, Governing Council
Ontario Climate Consortium