

October 11, 2018

Dear Minister Phillips,

Climate change is irrefutably real. The effects of a changing global climate continue to become more frequent and severe. Climate change threatens everything around us: our homes, our infrastructure, even our health and well-being. Mitigating the risks of climate change is the responsibility of everyone: the general public, businesses and industries, and most importantly, all levels of government, which must provide the leadership to guide our collective efforts. Extended summers and mild winters may seem appealing, but higher than average temperatures are constant reminders of the reality of climate change, driven by greenhouse gas (GHG) emissions from human activities. Coupled with extreme weather events; including floods, fires and drought, the effects of climate change are figuratively and literally at our doorsteps.

In 2014, Burlington experienced a catastrophic rainfall when nearly 200 mm of rain fell in eight hours. A 100-year storm would only generate 99.8 mm of rain in ten hours¹. The storm was almost the equivalent of two 100-year storms. What is troublesome is that it is hard to consider this storm an anomaly. Storms like this are happening at an alarming rate and continue with increased severity.

Catastrophic events often bring to mind the financial costs associated with physical property; such as flooded basements or damaged roofs. These costs are astonishing, but there are also significant human and economic costs. These costs add stress to the healthcare system, as well as lost productivity for businesses when employees are forced to take time off to deal with the outcome of the events, recovering from both the physical damage as well as the mental anguish.

The shift to a low carbon economy will not only mitigate and reverse the effects of climate change, it will also save Ontarians money by lowering their energy costs. A well-designed carbon price is an indispensable part of a strategy for efficiently reducing greenhouse gas emissions while also fostering growth². For some, there is a belief that pricing carbon will make life unaffordable for Canadians, but the economic facts don't support that belief. According to a new report, headed by a Stephen Cameron, a former policy director for Stephen Harper, the majority of households will actually benefit financially from the federal carbon tax option. In an example cited by Cameron, by 2020, the average household in

¹ Climate Ontario, The Burlington Flood - <http://www.climateontario.ca/doc/workshop/BMRCO/GOLDRING.pdf>

² John Roome, Senior Director for Climate Change at the World Bank - <https://www.worldbank.org/en/news/press-release/2017/11/01/more-countries-are-putting-a-price-on-carbon-but-stronger-action-is-needed-to-meet-paris-targets-new-world-bank-report>

Ontario would get \$517 back in carbon dividends, while only paying about \$300 in carbon pricing³.

According to a report, released on October 5, 2018 from the Intergovernmental Panel on Climate Change⁴, we only have twelve years to avoid a global tipping point. Thus, it is paramount that we do not discontinue cost-neutral GHG reduction programs unless there is an effective replacement policy ready for immediate implementation. Any replacement policy must undergo sufficient consultation by the general public and a broad group of specialists that have a thorough understanding of climate risks.

As the Government works to establish a new climate change plan, we strongly recommend that it include the following policies:

Buildings

- Homeowners should be provided incentives to retrofit their homes to improve household energy efficiency. This will not only be a benefit to the environment, in terms of lower GHG emissions, but it will also be a benefit to the citizens of Ontario, by allowing them to save on utility costs in the long term. Rebates directed to upgrading to energy efficient solutions in home heating (heat pumps) are a priority, as are rebates to advance Low Impact Development (LID) stormwater management features such as permeable surfaces for driveways and patios.
- Ontario Building Code - Update to ramp up energy efficiency standards, and require new builds to incorporate low-carbon technologies (i.e. Solar, geothermal, EVs).
- Maintain programs to support net metering, rooftop solar, and other cost-effective options to build energy resilience – this provides opportunities for adaptation to and mitigation of climate change as well as cost savings for customers who can produce their own energy.
- Move to modernized clean fuel standard to lower GHG emissions from building and transportation fuels - this allows markets to innovate and choose lowest cost ways to implement low-carbon fuels rather than dictating which fuels to use in which quantity. Introduce an incentive-based “Smart Development” checklist and monitoring process as part of the development permit process to encourage developers to shift to lower impact developments.

Transportation

- Implement a mandate to the auto industry similar to what Quebec has in place to spur the supply of zero-emission vehicles and low-emission vehicles⁵. Electric vehicles have been in very short supply in Ontario which made it challenging for consumers to purchase them.
- Further investment in electric vehicle charging infrastructure across the province at public /

³ CBC, Why Stephen Harper’s former policy director is defending Trudeau’s carbon tax, <https://www.cbc.ca/radio/asithappens/as-it-happens-thursday-edition-1.4831404/why-stephen-harper-s-former-policy-director-is-defending-trudeau-s-carbon-tax-1.4832116>

⁴ IPCC, Summary for Policy Makers, http://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf

⁵ Quebec ZEV Standard - <http://www.mddelcc.gouv.qc.ca/changementsclimatiques/vze/index-en.htm>

commercial locations and work places.

- Implement policies to reduce GHG emissions from freight vehicles, i.e. encouraging switch to biodiesel blends with tax incentives, scrappage programs to replace old inefficient trucks, and support regional freight planning.
- Provide funding to electrify public transit.

Industry

- Support clean technology via an innovation fund to help business/industry shift to cleaner, more efficient, cost-effective technologies.

Forests and Green Space

- Strengthen tree protection by providing funding for municipalities to protect and grow urban tree canopies—in Burlington, the 17% urban tree canopy⁶ is alarmingly below the 30-50% minimum requirement to support a sustainable environment, as per Environment Canada⁷, and 13% of our trees are at threat due to Emerald Ash Borer.
- Strengthen Green Belt Protection and ensure no development is allowed within its boundaries.
- Develop a forest carbon strategy to protect Ontario's forests, and to maximize Ontario forest's carbon storage capabilities.

Finally, we appeal to the Government of Ontario to set aside partisan politics and consider the future of this province: resisting a carbon pricing program will prove costly in the long term, both in economic and human impact terms, and will also cost us critical time that we don't have to arrest the escalating process of climate change. The recently-announced Nobel prize in economics, awarded to two American researchers whose work on the economic impacts of climate change and the innovation that can be driven by responding to it positively, rather than attempting to put short-term perceived savings ahead of what is best for all of us in the long term, demonstrates where the future lies. William Nordhaus of Yale University endorses a universal tax on carbon, while Paul Romer of New York University suggests that the necessity of reducing GHG emissions will drive industries to innovate, saying "I hope the prize today could help everyone see that humans are capable of amazing accomplishments when we set about trying to do something."⁸

We appreciate the opportunity to participate in this consultation process, and hope that the Government of Ontario will think carefully about the legacy it will leave the citizens of Ontario, and consider that true leadership begins with the courage to take the long view. The cost of doing anything less is too great a price to pay.

⁶ COB Urban Forestry - <https://www.burlington.ca/en/services-for-you/About-our-Urban-Forest.asp>

⁷ Environment and Climate Change Canada - https://www.ec.gc.ca/nature/default.asp?lang=En&n=E33B007C-1#_02_3_1

⁸ Hamilton Spectator, Two Americans win economics Nobel for work on climate and growth, <https://www.thespec.com/news-story/8951663-two-americans-win-economics-nobel-for-work-on-climate-and-growth/>

We look forward to further opportunities for dialogue and to hearing about consultation on the new Ontario Government's climate change plan. Meanwhile, please let us know if you have any questions.

Sincerely,

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