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Ontario Ministry of the Environment, Conservation, and Parks  
PDF via EnvironmentPlan@ontario.ca

**RE: 013-4208 -- Preserving and Protecting our Environment for Future Generations:  
A Made-in-Ontario Environment Plan**

Dear Mr Aguda,

The Ontario Headwaters Institute, a charity working to protect the province's headwaters, natural heritage, and watersheds, offers the following notes on Ontario's draft Environment Plan.

1. Not a Plan: As per the submission from the Canadian Environmental Law Association (CELA), the "plan" is not a plan, although there are some aspects of the document regarding climate change that could be considered part of a plan. We will comment on that in a bit more detail below.
2. A Selective Anthropogenic Focus: The current Ontario government, as the last one, continues to take a mostly anthropocentric view of the environment: that the environment provides select ecological goods and services rather than that it encompasses the broad framework in which humanity exists. Without a philosophical commitment to the principle that the environment is an equal partner to the economy and social vitality in the human endeavor, many of the intended aspects of the plan will not protect Ontario and its future generations as you may intend.
3. Water and Natural Heritage: We note limited direction to protect water and natural heritage for other than human outcomes such as pulp and paper, drinking water, or to walk in. While this point is similar to the bullet above, we find very few references to regional ecological health, natural heritage, and watershed management, with the plan taking an inappropriately narrow view of the various environmental pressures rather than a holistic one. For example, rather than even considering a province-wide strategy to protect water, the plan cites numerous regional or regulatory approaches. Even with that, there is no mention of a commitment to integrated or collaborative watershed management; nothing about the biodiversity framework or its innovative monitoring indicators; nothing about establishing standards such those found in How Much Habitat is Enough, the Ontario Natural Heritage Reference Manual, or O. Reg. 97/04; nothing about facilitating a shift toward sustainable agriculture; and nothing about one of the OHI's favourite issues – the Provincial Water Quality Monitoring Objectives. On that, any water body can exceed one or all of the objectives year after year, and there are no triggers for any action. Even in trying to describe existing initiatives, let alone present a coherent plan for their improved delivery in a new "plan", the document is less an inventory than a series of anecdotes about some programs. This is discouraging, and one is left to wonder about what the government plans to do about things it did not mention, such as the privatization of municipal water systems.

4. Development and the Building Code: We consider promises on the Greenbelt of questionable value, given the fact that past promises to protect the Greenbelt are being sacrificed in Schedule 10 of Bill 66 and in various aspects of the review of the Growth Plan. We find the first and third suggestions on the right hand side of page 20 to utterly bizarre. Backwater valves should have been mandated years ago and don't require an Environmental Plan. Brick houses to keep the wolf from blowing down our homes signify that you may not understand the scope of the development problem. As per the Environmental Defence submission on Bill 66 the Housing Supply, we need wholly different types of housing than currently being designed for either an aging baby boomer market or for millennials with no desire nor means to purchase 4,000 square feet. As per the OHI submission in the same consultation:

**Recommendation 2:** A Sustainable Design and Construction Guideline – That, pursuant to sections 1.1 a) and 3 of the Planning Act, cabinet direct provincial staff to develop a Sustainability Design and Construction Guideline, similar to the PPS or the Ontario Natural Heritage Reference Manual. The Guideline could help inform the development of both more sustainable community designs and buildings while facilitating the emergence of both a more sustainable development sector and more sustainable infrastructure such as community-owned local power generation.

5. Air: Congratulations on using the words air zone and airshed. How many do we have? Which have been prioritized, provided appropriate resources, and are demonstrating improved air quality? Why are there informative diagrams on basement flooding and nothing on postal codes with high incidences of respiratory illness and early mortality? What happened to Ontario's commitments to national programs for continuous improvement and keeping clean areas clean? Will you pledge to Keep Clean Areas Clean in the Ring of Fire?
6. Climate Change: An excellent summary of past progress on GHG reductions in Ontario, complemented with some solid general educational material and sectoral analysis, is squandered by four transgressions unacceptable in a provincial document, as follows:
- 6.1 Misleading factoids: The statement that Ontario is responsible for less than 0.4% of global emissions is significantly misleading. As Ontario has about .002 % of the world's population, we are emitted 200 times our "share", notwithstanding exports and the lack of emissions in less-developed nations;
- 6.2 Inadequate scope of the problem: Similar to point 2 above, the plan seems to suggest that climate change is an issue because it will present pressures on people, built infrastructure, and family budgets. In fact, climate change may present existential threats to our species, and others, through global climatic shifts, the acidification of the oceans, the release of methane trapped in northern peat bogs, and alterations in regional flora, fauna, and insects. Outcomes upon the family budget from these issues may be more indirect than direct, but they will have far more long-term impacts than the slight increases in electricity rates the plan refuses to even consider;

- 6.3 Unlocking Capital: We salute any initiative to unlock capital and motivate the business community to reduce emissions, although we have concerns about emerging complications should the provincial government lose its case against the federal plan. We also remind the government that, should legal events or a lack of uptake for this program not generate desired results, most of the leading economists in the world agree that carbon pricing is the most effective way to influence behaviour in this regard; and,
- 6.4 The Carbon Trust: We oppose the carbon trust as proposed. While more detail may be helpful, the trust appears to be a way to transfer public funds to private interests.
7. Inadequate Government Commitment: Finally, we have been perceived by an overall inadequate government commitment to the environment. The government has launched numerous recent environmental efforts not to embrace sustainability, with its significant economic and job creation outcomes needed in today's circumstances, but to trim environmental protection. It has floated inaccurate statistics on the dearth of housing and employment lands that impugn its integrity, contravened promises to protect the Greenbelt, and has repeatedly postured that environmental protection amounts to costly red tape, both broadly and in ill-designed efforts to erode the Greenbelt, the Clean Water Act, public consultation, and the right to appeals.

In conclusion, we find the plan inadequate.

In addition to supporting the first three recommendations from CELA, we suggest that the province embrace environmental sustainability, including a vision to integrate the environment, the economy, and social vitality into provincial decision-making and in daily life.

This should extend from the protection of regional ecological integrity and the pursuit of a provincial conservation culture to sustainable agriculture and forestry; through pollution prevention and life cycle assessment throughout the Industrial / Commercial / Institutional sector; to the encouragement of new job and development opportunities throughout Ontario.

We need a plan with vision to lift peoples' spirits, protect our environment, mobilize the economy, and safeguard social vitality. Sadly, this attempt does not come close.

Sincerely,

*Andrew McCammon*

Executive Director