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Re: Comments on the proposed Climate Mitigation and Low Carbon Economy Act, 2016 – Bill 172

The Green Infrastructure Ontario (GIO) Coalition strongly supports the Province's leadership in pricing carbon, and applauds the Government's efforts to develop a legislative framework to support the implementation of the Ontario Climate Change Strategy. We are pleased to provide comments on proposed Bill 172 - Climate Mitigation and Low Carbon Economy Act, 2016.

Coalition supports the proposed approach of legislating carbon reduction targets for 2020, 2030 and 2050, and creating a "carbon budget" to take the province towards the 2020 target. We also strongly support the provision of authority to make these targets more stringent and/or to provide for interim targets between 2020 to 2030 and 2030 to 2050. Finally, we support the transparency and accountability measures in the proposed act, namely the requirement for the Minister of Environment and Climate Change to prepare a Climate Change Action Plan every five years, as a key factor for its long term success.

In addition to the high level comments provided above, we offer three specific suggestions below which we hope the Ministry will consider as it finalizes Bill 172.

1. Cap and Trade revenue should be earmarked for resilience projects beyond the strict GHG reductions focus.

The Greenhouse Gas Reduction Account is proposed to fund GHG reduction initiatives, such as renewable and alternative energy sources, land use changes, building retrofits and improvements, transportation infrastructure and low-emission technologies. Jurisdictions such as Quebec and California, with whom we hope to work closely, fund a broader scope of projects through their Cap and Trade revenue streams.

The majority of Ontario's carbon emissions originate in cities, with intensification and growth further challenging communities to address their transition to a low carbon economy while preparing for the effects of a changing climate. Protection and enhancement of living green infrastructure, particularly in and near urban areas, is

critical for building resilience to increasingly severe weather events, while also providing mitigation benefits by sequestering carbon and lowering energy use. The GIO Coalition suggests that living green infrastructure assets such as urban forests, green roofs, walls, wetlands, parks, and bioswales, as defined in the Ontario Provincial Policy Statement (PPS 2014), be added to the list of eligible initiatives for funding from the Greenhouse Gas Reduction Account (schedule 1). While the potential offset market is one avenue to support resilience building, other jurisdictions have illustrated that the challenge (and cost) of implementing offset projects in an urban, or near urban, context is complex, and would benefit investment from the Greenhouse Gas Reduction Account.

How key partners invest their Cap and Trade Revenue

In California: Cap and trade revenue is to be spent for environmental purposes, with an emphasis on improving air qualityⁱ

In Quebec: The revenue is allocated to reinvest in their economy and foster the reduction of their hydrocarbon consumption, spur the development and use of green technologies, and export Québec know-how. It also funds projects that improve the quality of individual and community life through actions that target sustainable mobility, energy efficiency and adaptation to the impacts of climate change.ⁱⁱ

2. The Climate Change Action Plan should take a comprehensive resilience approach that integrates mitigation and adaptation.

The GIO Coalition suggests that the forthcoming climate action plan present a holistic and comprehensive resilience approach to climate change which addresses adaptation alongside mitigation. Communities in Ontario require provincial support to prepare for the effects of past and present GHG emissions. Emissions reductions are critical, but preparing for a changing climate is also imperative. Both require paradigm shifts in how we build and manage our infrastructure and economy, and both will be more effective if they are undertaken together. There are also clear synergies between mitigation and adaptation and key practices, such as living green infrastructure approaches, address both. These important opportunities may be missed if they are not emphasized in a resilience focused framework.

3. The Province should enable and empower municipalities to act on climate change.

Carbon pricing alone is unlikely to achieve the ambitious targets committed to via this Act. It is important that the Province enable and empower municipalities to act on climate change. GIO is glad to see that the Ministry is proposing to publish a second regulation that will provide more information on the requirements needed to create, verify and register offset credits. The GIO Coalition looks forward to commenting on the offset protocol. When drafting this regulation, the Coalition encourages the Province to consider that important greenhouse gas reduction opportunities exist within Ontario communities. These opportunities provide local offsets that also result in environmental, social and economic co-benefits and further ensure Ontario's economic resilience and competitiveness. We would strongly encourage the inclusion of offset credits for services delivered by municipal governments.

Green Infrastructure Ontario Coalition Background

Over the last seven years the GIO Coalition has been successfully promoting the implementation of living green infrastructure across Ontario. With over 140,000 people working full time in the industry, from nurseries to designers to contractors, GIO provides a united voice for the sector. The living green infrastructure we promote includes both natural vegetative systems and green vegetative technologies located in urban, suburban and rural areas. These include: urban trees, forests and woodlots; bioswales, wetlands, waterways and riparian zones; meadows and agricultural lands; green roofs and green walls; and parks, gardens and landscaped areas. These features of our buildings, yards and neighbourhoods play a fundamental role in the network of infrastructure that supports our quality of life in Ontario. However, just as for any other infrastructure, this living green infrastructure requires support in the form of funding and active maintenance.

ⁱ <http://www.c2es.org/us-states-regions/key-legislation/california-cap-trade#Revenue>

ⁱⁱ <http://www.mddelcc.gouv.qc.ca/ministere/fonds-vert/secteurs/Changements-climatiques-en.htm>