

Brief on Ontario's Climate Change Discussion Paper  
Ministry of the Environment and Climate Change  
Consultation, Toronto, 24-25 February 2015  
by JustEarth: A Coalition for Environmental Justice

We commend the Government of Ontario for its commitment to establish a vigorous climate change action plan for Ontario, including a price on carbon, on which we wish to focus our remarks at this time.

1. A carbon price must be part of a comprehensive climate change action plan, with targets for emission reductions set on the basis of the best available science (the Intergovernmental Panel on Climate Change is an appropriate source). This means the use of regulations, investment in research, government procurement practices and other measures, such as retrofit programs and education.

2. Action is needed at both the federal and provincial levels; desirably a division of labour between them would have been established years ago. We will return to this in dealing with a price on carbon.

3. We urge that the amount of greenhouse gas (GHG) emission reductions be set overall, with amounts then assigned to the various sectors, such as transportation, electricity, agriculture, forestry, manufacturing and housing.

This will be daunting. George Monbiot's book, *Heat: How to Stop the Planet from Burning*, 2006, is an example of a rigorous rethinking of how to cut GHG emissions for the U.K. by sector, especially interesting on electricity generation, manufacturing, transportation and retail sales. A Canadian plan, of course, will have the added complication of split jurisdiction between two levels of government (counting municipal as under provincial).

4. A Price on carbon: We recommend a revenue-neutral carbon tax, similar to that established in British Columbia. We note the clarity and certainty of a carbon tax, its fairness (assuming well-crafted payback provisions) and speed of implementation. That the amount of reductions is not certain is something of a moot point, given the loopholes in cap-and-trade (C&T) schemes so far.

4 (a) Revenue neutrality is important, notably to ensure that lower income persons are not disadvantaged. Again, the B.C. example is pertinent. The refunds work.

4 (b) We note the good impact on the economy of reducing individual and corporate income taxes, thanks to carbon tax revenues: B.C. now has the lowest rates in Canada and balances its budget. The secretary-general of the OECD called B.C.'s carbon tax "as close to a textbook example as we have."

A refund not linked to tax reduction would lose this great advantage, for the expected psychological/political gain of people receiving a separate cheque.

4 (c) Whether the term "tax" or "fee" should be used is a matter of tactics. We do not see "tax" as a dirty word--they fund our medicare and education systems). B.C. has not suffered from using the three-letter word. "Dividend," however, is misleading, as the payback or refund is not like payments to shareholders from company profits.

4 (d) Some people would prefer to see the revenues from a carbon tax be put into a green energy fund. We, however, believe that the decision of how much and how to invest in renewable and other green energy projects should be made independently by the governments concerned in their budgets.

4 (e) Cap-and-trade: just as we have both income tax and sales taxes in Canada (except Alberta, for the latter), we need not choose between a carbon tax and C&T. The complication now is that one province, B.C., has opted for a carbon tax, which is working well, while another, Quebec, opted for C&T, and it is too early to judge its effectiveness. C&T has the merit of linkage to the Western Climate Initiative, with California, Ontario and Manitoba. Emissions trading in other countries, however, has proven to be problematic: enormous loopholes, especially with offsets.

4 (f) Since Ontario has no significant oil industry, and coal plants have been phased out (congratulations, Government of Ontario!), the main advantages of C&T--to deal with high emitting industries--is not so great.

4 (g) Alberta's carbon pricing program should not be considered, as it is geared only to intensity reductions. The atmosphere counts total emissions.

## 5. The option of both carbon tax and C&T

We recommend that consideration be given to instituting BOTH a carbon tax and C&T: one provincially, one federally. We see decided advantages of the provinces doing the carbon tax, the federal level C&T, however this is a matter to be considered.

## 6. Education: Primary, Secondary, University and College

To address the serious challenge of climate change, notably to take on issues of values, economic and social change, an informed citizenry is needed. Pupils in Ontario's school gain some appreciation of the issues, but more could be done.

6 (a) Ontario's goal should be that all middle and high school students leave school with a basic understanding of the key concepts of climate change, both on the science (e.g., atmospheric warming, 2 degree Celsius increase in average temperature, 350 parts per million CO<sub>2</sub>, renewable/sustainable energy); and on social and economic and political aspects (such as IPCC consensus reports, plans, Kyoto Protocol, national/provincial climate action plans).

6 (b) Ontario universities have faculties, schools or departments on the environment, largely geared to specialist training. We recommend that the Government of Ontario encourage the development of short courses or modules for the broad range of (non-specialist) students: for citizen literacy and numeracy on climate change. Few Canadians are climate change deniers, but not many realize how serious the situation is or what is needed to address it.

7. On implementation strategies, we recommend consideration of the (unanimous) recommendations of the federal Parliamentary Committee on the Environment and Forestry established when the first IPCC report came out:

7 (a) *No Time to Lose: The Challenge of Global Warming*, 1990, ended its 17 recommendations with the proposal that all federal departments and agencies, as part of their budget submissions, be required to report on direct and indirect impacts of their operations on global warming, and set annual targets for reductions in greenhouse gas emissions.

7 (b) In 1991, the same committee published *Out of Balance: The Risks of Irreversible Climate Change*, recommending that the Environment Ministry develop policies, programs and regulations to span the full range of activities of the federal government, analogous to those of the Minister of Finance for financial and economic affairs, and to report annually to Parliament on the environmental impact of all federal activities.

7 (c) Regrettably, neither set of recommendations was acted on and GHG emissions have increased enormously since then. The proposals, we believe, are sound, and could readily be adapted for the province.

## 8. Planning and building codes

Greater density in cities and towns helps to reduce GHG emissions. When people can walk, use bicycles or take public transit for many trips, the result is not only reduced GHG emissions, and reductions in other pollutants, but better health.

8 (a) The proliferation of "bedroom communities" must stop as it increases the number of cars on the road. A particularly bad example can be seen in the (many) new developments between Highway 401 and Guelph. People have to use a car for such a simple thing as buying a litre of milk.

8 (b) The Province of Ontario should establish province-wide planning standards to deal with this.

8 (c) On a similar point, a rigorous province-wide building code which ensures energy efficient buildings: homes, apartments, condos, commercial enterprises and public institutions is urgently needed to stop the waste of energy due to inefficiencies. This should go in tandem with accelerating the Green Energy Act provisions relating to these needs.

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JustEarth was formed in 2006 as an entirely voluntary organization. It has members throughout Canada, but is mainly active in the Toronto area. It is a member of Climate Action Network Canada and Toronto Climate Action Network.

Its focus has been mainly federal. In Ontario the group gave a brief on the Green Energy Act, and members have met with two ministers on climate issues, the Hon. George Smitherman and the Hon Glen Murray. In B.C. it supported the carbon tax.