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**Comment**

The City of Peterborough formally submits their comments through the Environmental Bill of Right on Bill 172 - Climate Change Mitigation and Low-Carbon Economy Act, 2016 (the Bill) and on Cap and Trade Regulatory Proposal and Revised Guideline for Greenhouse Gas Emissions Reporting (the Draft Regulations).

After reviewing the Bill and the Draft Regulations, the City of Peterborough provides the following comments:

1. Need for a Low-Income Climate Action Tax Credit

Low-income household cannot bear the addition expenses associated with Cap and Trade Program on their monthly utility bills. Funding must be available to offset this additional expense.

The Premier noted that the Cap and Trade program will cost an addition 4.3 cents per litre for gasoline and \$5 more per month to heat the average home with natural gas. This equates to an annual increase of \$156 annually for the average household, effective 2017. This increase will put an unrealistic additional pressure on low-income households who have not cushion to cover this expense. Associated funding from the Cap and Trade Program will be required to cover this additional expense, which may parallel the approach used in the B.C. Carbon Tax.

The B.C. Carbon Tax has a "Low Income Climate Action Tax Credit" that helps offset the impact of the carbon taxes paid by low-income individuals or families. The low-income climate action tax credit is combined with the federal goods and services tax/harmonized sales tax credit into one quarterly payment. These non-taxable payments are paid by the Canada Revenue Agency. A similar credit needs to be included in the Ontario Cap and Trade program.

2. Funding through the Greenhouse Gas Reduction Account

Spending from the Greenhouse Gas Reduction Account must be transparent and accountable, focusing on projects and services that reduce greenhouse gas emissions. To help meet reduction targets and to reduce emissions in our communities and improve resilience in local economies, municipalities need:

- an adequate, stable and long-term funding resource to invest in GHG reduction initiatives in our communities such as public transit and active transportation, building energy efficiency, water conservation, green infrastructure, planning development and other programs;
- to have their projects that reduce GHG recognized for offset credits in Cap and Trade programs, without being overburdened with documentation and

verification that inhibit their participation;

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- dedicated funding for climate change adaptation to help municipalities provide resilient infrastructure to keep our local economies and communities viable, productive, and resilient; and
- tools to help facilitate and transfer knowledge regarding GHG reduction and climate adaptation projects.

### 3. Funding through the Greenhouse Gas Reduction Account

All revenue generated from the Cap and Trade program will flow into a “Greenhouse Gas Reduction Account”. This account, estimated to be \$1.9 billion annually will be used to reimburse the government’s costs of administering the program and to fund initiatives that will reduce GHGs. The City of Peterborough supports the types of initiatives that may become eligible for funding, including:

- renewable, low-carbon or carbon free energy,
- land use and building changes,
- transportation innovation,
- industrial improvements,
- agricultural and forestry practices,
- waste disposal, and
- financial models and services.

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