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**Re: Comments Regarding Ontario Climate Change Discussion Paper,
Submitted by the Sustainable Peterborough Climate Change Working Group**

In the spring of 2012, the City of Peterborough, the County of Peterborough, the eight member townships, and two First Nation communities adopted the Greater Peterborough Area Community Sustainability Plan, known as ***Sustainable Peterborough*** (<http://sustainablepeterborough.ca>). The Plan committed all 12 community partners to building a healthy environment, a strong and vibrant social and cultural network, and a prospering economy to be celebrated by all, including future generations. Representatives from the partnering communities, municipalities, and First Nations formed the Sustainable Peterborough Coordinating Committee to oversee the Plan and to lead the way towards our sustainable future. The Climate Change Working Group is one of the theme-based Working Groups that have formed to activate the strategic directions and recommendations outlined in the Sustainable Plan. These comments are the collective submission from our Working Group.

The Climate Change Strategy Discussion Paper was released by the province on February 12, 2015 and is accepting comments until March 29, 2015. The province is likely to develop new climate change strategies and policies based on the discussion document and feedback from the public.

The discussion paper lays out a four-part vision for Ontario climate change actions (pg. 8):

- Establish Ontario as a leader in climate change mitigation and science;

- Redesign and build strong carbon-neutral economies, communities, infrastructure and energy;
- Leave a legacy of a healthy world for our children and future generations; and
- Protect ecosystems, including air, land and water.

The long-term goal is the transformation of our economy and communities (pg. 12). The paper states that global greenhouse gas emissions need to stabilize in 5-10 years, be reduced dramatically by 2050 and approach zero by the second half of the century in order to avoid dangerous climate change. The province has set targets that align with these goals: 6% below 1990 by 2014 (achieved), 15% below 1990 by 2020, and 80% below 1990 by 2050.

Four “climate critical” policy areas are described to get to the 2020 target: pricing carbon, focusing on key sectors (e.g., transportation, buildings, electricity, agriculture), supporting research and technology, and promoting climate resilience and risk management (i.e., adaptation planning).

The Climate Change Working Group of Sustainable Peterborough is very supportive of the general direction of the Climate Change Strategy Discussion Paper. We know that detailed policy design is crucial to the success of the strategy in the short and long term. We welcome continued opportunities to be involved in this work, noting that the 45-day window for public comment is too short to allow meaningful involvement from municipal councils. Nonetheless, as a cross-sectoral committee working toward sustainable development in the greater Peterborough area, we would like to provide input regarding three of these policy areas: traditional knowledge (discussion question area #1), climate resilience (discussion question area #3) and carbon pricing (discussion question area #4).

First, the following statement on traditional knowledge was provided by Tom Cowie, from Hiawatha First Nation and a member of the Sustainable Peterborough Coordinating Committee. "Traditional knowledge and values about the environment, and its use and management, are based on direct observation and experience, shared information within the community and over generations. Examples include cultural practices and social activities, land use patterns, archaeological sites, harvesting practices, and harvesting levels, both past and present. Traditional knowledge includes moral and ethical statements about the environment and about the relationships between humans, animals, and the environment. This kind of knowledge can be melded with science as First Nations consider themselves as part of the ecosystem and try to protect it." It is crucial, in the opinion of the Working Group, that traditional knowledge be meaningfully integrated into our climate change strategies and policies.

Second, there is great need for further work in improving the resiliency of our communities to a changing climate. We have begun some of this work through

Sustainable Peterborough and highlight the real and significant roadblocks facing municipalities wishing to move on climate adaptation planning including funding, competing priorities, information and expertise, and governance (Langford, 2013). We feel that the province should work closely with municipal governments, Public Health units, Local Distribution Companies, and Conservation Authorities in designing policies for adaptation planning.

Third, we feel that pricing carbon is the most economically efficient way to reduce greenhouse gases: they provide a broad price signal to the market. In Canada, we have been discussing the why's and how's of carbon pricing for twenty years. The most successful model to date is the British Columbia carbon tax (Sustainable Prosperity, 2013), which started small in 2008 at \$10/tonne CO_{2e} and grew each year to \$30/tonne by 2012. Revenue is returned to the public through cuts to existing taxes or a grant to low-income individuals who would not benefit from a tax reduction (a cash dividend for everyone could also be considered but would add a layer of administration). In contrast, cap-and-trade systems are complex, slow to be implemented, and more easily applied to larger industrial emitters (meaning that they are limited in where the price can be applied within the production and commodity chain). They are also more open to manipulation by policy actors because of the series of negotiations required to determine various elements of the system (e.g., burden, allocations, intensity, etc). In Ontario, industrial greenhouse gas emissions have declined by 21% since 1990 while emissions from transportation, particularly personal vehicles, have grown by 24% (Environmental Commissioner of Ontario, 2014). We agree that targeted action in each sector is useful but note that a carbon tax is well placed to connect pricing with the emissions from private automobiles. We recognize that further work in the design of the carbon tax (e.g., production or consumption, tax cut or dividend) is essential to ensuring it will be both environmentally and economically beneficial.

Finally, for the next round of consultations we request that a town hall meeting be organized in Peterborough. We would welcome the opportunity to assist the province in organizing this consultation.

Sincerely,

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On behalf of the
Climate Change Working Group of Sustainable Peterborough.

Works cited:

Environmental Commissioner of Ontario. (2014). Looking for Leadership: The Cost of Climate Inaction.

Sustainable Prosperity. (2013). BC's Carbon Tax Shift After Five years: And Environmental (and Economic) Success Story. *Sustainable Prosperity*.

Langford, L. (2013). Greater Peterborough Area Climate Change Scoping Document. <http://sustainablepeterborough.ca/wp-content/uploads/2015/01/Climate-Change-Scoping-07-2013.pdf>