

January 28, 2019

Mr. Nathaniel Aguda
Environmental Policy Branch
Ontario Ministry of the Environment, Conservation and Parks
40 St. Clair Avenue West, 10th floor
Toronto ON, M4V 1M2 Canada

Re: Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan (ERO No. 013-4208)

Dear Mr. Aguda,

Thank you for the opportunity to provide comments to the Ontario Ministry of the Environment, Conservation and Parks (MECP) on *Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan*. We are submitting this feedback in our capacities as Wildlife Conservation Society (WCS) Canada scientists conducting research on species and ecosystems to inform conservation decisions. WCS Canada is a national non-government organization that has been engaged in Ontario since 2004, with research and conservation priorities in Ontario largely focused on the far north. We are some of the few scientists with continuous presence in the region. Here, we provide high-level comments and recommendations for MECP based on a selection of issues where we have particular experience related to the *Made-in-Ontario Environment Plan*.

Overall, this plan represents a minimalist, and in many ways regressive, approach to addressing myriad threats to Ontario's environment that are only growing in intensity and complexity. We are struck by the numerous "success stories" that are referenced, describing initiatives led by others (including the previous provincial government) as a means to justify a lack of need for further action. Instead of action, the emphasis seems to be most focused on "streamlining" and finding "efficiencies" for economic development. However, experience and evidence have demonstrated that such a focus can rapidly lead to deterioration of environmental values, which will only become increasingly challenging to manage.

Without several fundamental additions and shifts in direction, this plan will fail to accomplish its intention to "preserve and protect our environment". These necessary changes include, but are not limited to:

- 1) Developing a clear, credible, and comprehensive plan for addressing the escalating threat of climate change, which builds on rather than reverses progress reached by the previous government, including emissions targets;**

- 2) Identifying biodiversity conservation as a key environmental objective in the Environment Plan, and outlining approaches to address this challenge, including targets for species and land protection;
- 3) Ensuring that all government initiatives to review and update environmental policies and legislation (e.g., endangered species and environmental assessment acts) are consistent with the overarching goal of preserving and protecting our environment for future generations;
- 4) Publicly committing to meet Ontario's international obligations as they relate to protected area targets, supporting the establishment of new protected areas, and working equitably with First Nations in the processes of meeting these targets; and
- 5) Explicitly considering the unique ecological and economic values in northern half of the province, and the role that First Nations must play in decision-making and land-use planning for the region.

Below we share some brief analyses on three issues in the *Made-in-Ontario Environment Plan* that led to our recommendations: climate change, biodiversity and the far north.

Issue 1: The *Made-in-Ontario Environment Plan* is a step backwards for addressing climate change

The *Made-in-Ontario Environment Plan* signifies a significant step backwards for addressing climate change. At a time when countless scientific studies emphasize the increasing economic, social, and ecological threats from climate change, the *Made-in-Ontario Environment Plan* backslides from previous emission reduction targets, presenting only a vague approach to meet even these weakened targets, with a narrow range of strategies that lack clear, credible actions.

The plan fails to acknowledge that Canada produces the highest per-capita greenhouse gas (GHG) emissions among the G20 economies – nearly three times the G20 average. This means that while our contribution to total global emissions may be small, Ontario has considerable responsibility as the most populous province in Canada to continue its leadership role in slowing down carbon emissions. Yet, the plan takes the opposite stance.

The main new strategy in the *Made-in-Ontario Environment Plan* is a proposed approach to regulate large industrial emitters, accounting for 15% of the estimated emission reduction plan. However, without any details about which industries are included and what this industrial regulation approach will entail, it is impossible to evaluate its effectiveness or the likelihood of its success.

Several strategies presented by the *Made-in-Ontario Environment Plan* to reduce emissions also conflict with other government actions and policies. To provide just a couple of examples, the *Made-in-Ontario Environment Plan* states that 16% of the emission reduction target will be met through the uptake of electric vehicles, and yet, the current government cancelled subsidies for the people of Ontario to purchase electric vehicles. Similarly, the *Made-in-Ontario Environment Plan* also states that 15% of the emission reduction target will be met through technological advances, but there is no accompanying commitment to invest in research and innovation.

Issue 2: The *Made-in-Ontario Environment Plan* fails to identify and address biodiversity as an environmental challenge

We are alarmed that the decline of biodiversity (including species loss) is not among the “pressing” environmental challenges identified in the plan. Similar to climate change, the scientific evidence for the continually deteriorating state of biodiversity, including the province's own State of Biodiversity reports,

is clear. While conserving land and greenspace and ensuring clean water can help address some aspects of this challenge, these alone are insufficient.

The *Made-in-Ontario Environment Plan* lacks a clear plan to protect land area, with no targets for protected areas, or clear commitment to expand protected areas, particularly to better ensure the conservation of areas important for biodiversity.

Further, while we agree that Ontario's environmental assessment processes should be modernized, the *Made-in-Ontario Environment Plan* focuses on the need to streamline processes (on page 48), raising our concerns that efforts to find shortcuts may result lead to considerable environmental degradation. For example, there is no mention in the document that the purpose of environmental assessment is to adequately consider the direct and cumulative impacts of development (and climate change) on the environment, and effectively meeting this primary purpose needs to be at the forefront of any modernization effort.

Issue 3: The *Made-in-Ontario Environment Plan* overlooks the north

The *Made-in-Ontario Environment* plan is focused on southern Ontario issues and approaches. In fact, we have observed that any communications mentioning northern Ontario issued by this government so far (e.g., *2018 Ontario Economic Outlook and Fiscal Review*) have focused exclusively on economic development. The far north in Ontario makes up nearly half of the province, and is comprised of globally-important boreal forests and wetlands, including peatlands that contain deep carbon stores vulnerable to release of alarming quantities of GHGs if converted (e.g., for Ring of Fire development). Land use decisions will play a critical role in any provincial climate change strategy, in meeting international agreements, and in protecting Species-At-Risk that experienced population or range loss in southern Ontario, including but not limited to boreal caribou, wolverine, and lake sturgeon. Any environmental plan for Ontario needs to consider the unique challenges and opportunities in the far north, and also to acknowledge the rights and responsibilities of the Anishinaabeg and Cree Nations for whom the far north is a homeland, and who have important roles to play in planning and decision-making in the region.

We hope our comments are useful, and we would be pleased to engage in any discussions regarding our recommendations. To do so, you may contact Justina Ray at 416-850-9038 or jray@wcs.org. Thank you again for this opportunity to provide feedback.

Sincerely,



Justina Ray, PhD
President & Senior Scientist



Cheryl Chetkiewicz, PhD
Conservation Scientist



Constance O'Connor, PhD
Associate Conservation Scientist