



Ontario Public Health Association
 l'Association pour la santé publique de l'Ontario
 Established/Établi 1949

The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

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Constituent Societies

- Alliance for Healthier Communities
- Association of Public Health Epidemiologists in Ontario (APHEO)
- Association of Supervisors of Public Health Inspectors of Ontario (ASPHIO)
- Canadian Institute of Public Health Inspectors (Ontario Branch) (CIPHIO)
- Community Health Nurses' Initiatives Group (RNAO)
- Health Promotion Ontario (HPO)
- Ontario Association of Public Health Dentistry (OAPHD)
- Ontario Association of Public Health Nursing Leaders, (OAPHNL)
- Ontario Dietitians in Public Health (ODPH)
- Ontario Society of Physical Activity Promoters in Public Health (OSPAPPH)

*Charitable Registration
 Number 11924 8771 RR0001*

January 28, 2019

Nathaniel Aguda
 Environmental Policy Branch
 40 St. Clair Avenue West
 10th floor
 Toronto ON M4V 1M2
 Canada

Dear Mr. Aguda,

Re: EBR# 013-4208 – Ontario's Environment Plan

The Ontario Public Health Association (OPHA) is a member-based, non-profit, non-partisan organization which has been providing an independent voice for public health for nearly 70 years. We bring together a broad spectrum of individuals and groups from various backgrounds and sectors, such as public health, health care, academia, voluntary and private sector, which are all committed to promoting health and wellbeing through health promotion, protection and prevention.

OPHA appreciates the opportunity to provide comments on Ontario's Environment Plan. As articulated in the subtitle – "Preserving and Protecting our Environment for Future Generations" – there is the potential for the Environment Plan to achieve its vision and to protect Ontarians from the health impacts of climate change and other environmental impacts with effective policies and timely implementation of actions. The Plan's guiding principles: Clear Rules and Strong Enforcement; Trust and Transparency; and Resilient Communities and Local Solutions, can ensure that actions result in positive health, environmental and economic outcomes.

OPHA believes that strong policy, effective programs and a financial commitment is needed to protect the health of all Ontarians from the impacts of climate change, both today and in the future. Recent events such as the extreme temperatures that Ontario has experienced in the past year, the increasing number and extent of forest fires, tornadoes and other wind events, toxic Blue Green algae in surface water, and damage from heavy rainfall and

flood events illustrate the widespread impact climate change can have on our health, our environment and our economy.

The 2018 United Nations' Intergovernmental Panel on Climate Change Special Report on Global Warming of 1.5°C, stressed the critical need to reduce carbon emissions, noting that “rapid and far-reaching transitions in energy, land, urban and infrastructure (including transport and buildings), and industrial systems” is required to avoid the substantial risks anticipated for global temperatures rising above 1.5°C. Furthermore, the Special Report also noted that increases in temperature above 1.5°C to 2°C would increase the risk to human health from vector borne diseases and extreme heat.

Scientific evidence is increasingly drawing links between climate change and health impacts, such as cardiovascular disease, respiratory disease and negative mental health outcomes, to name a few. Climate change has contributed to increased heat-related mortality and expanded the range of vector-borne diseases. Forest fires have significant impact on air quality and human health. Costs to the health care system from these and other climate related health impacts will continue to increase unless action is taken to mitigate and adapt to climate change.

OPHA strongly urges the Ontario Government to consider our comments and recommendations, outlined in **Appendix A**, developed in response to the actions proposed in your ministry's Environment Plan. Our detailed comments and recommendations correspond with and follow the relevant proposed actions and sections of the Environment Plan. Below we have highlighted the key points from our submission:

- Climate change is one of the greatest public health challenges of our time and it is imperative to act now. Taking action to mitigate and adapt to climate change can result in multiple co-benefits to our health, improve our air quality, protect our environment and strengthen our economy. Strong climate change policy, putting in place strong emission reduction targets, investing in research on impacts and climate change solutions, and supporting vulnerable populations will ensure that Ontarians are prepared for climate change today and in the future.
- Improving air quality continues to be an important public health issue. With an estimated 560 cancer cases attributed to exposure to fine particulate matter in outdoor air every year in Ontario, it is important to maintain and strengthen legislation and incentives to reduce emissions of air pollutants, and to expand research on sources of exposure such as high traffic corridors and industrial emissions. The Toxics Reduction Act is one tool that, with full implementation can result in real emission reductions and spur innovation to clean technology.
- Access to safe and adequate water supplies is under threat from climate change, from increasing development, from industrial operations and from excessive unregulated water-taking. Strong plans and policies are needed to protect source water, to monitor toxins and other harmful in our lakes and waterways, and to promote water conservation as we experience more extreme rainfall events and droughts due to climate change.
- Promoting and supporting efforts by municipalities and the private sector to reduce waste and to evaluate their purchasing and waste disposal decisions can help address some of the

environmental health challenges we face including impacts to air quality, water quality, soil contamination and greenhouse gas emissions.

- Strong environmental assessment legislation is needed to ensure that any development proposal, whether an industrial facility, a municipal operation, a transportation project or waste disposal facilities does not negatively impact human health and the environment.
- Priority must be given to ecosystem protection and consideration of environmental impacts so that development, climate change and other forces do not cause irreparable harm to natural systems that are vital to human health. The integrity and health of these ecosystems is under threat from climate change and extreme weather events.

OPHA is pleased to see that the Ontario Government is committed to measuring and reporting on the progress made to environmental health protection through the Environment Plan. As noted in the Plan's guiding principles, the government is committed to trust and transparency. It is vitally important that all Ontarians are aware of and understand what actions are being taken to address climate change and ensure healthy environments, where we are doing well and where we need to improve. OPHA looks forward to seeing the details on action areas and key indicators that will be developed to ensure transparency in reporting on progress. OPHA welcomes the opportunity to work with your ministry on actions that will further environmental protection, healthy environments and healthy people today and for future generations.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Walsh', written in a cursive style.

Pegeen Walsh
Executive Director

Appendix A: OPHA’s Comments and Recommendations regarding EBR# 013-4208 – Ontario’s Environment Plan.

Outlined below are OPHA’s comments and recommendations for each section of Ontario’s Environment Plan.

Protecting our Air, Lakes and Rivers

Ontario’s Environment Plan Proposed Actions: Clean Air

Improve air quality in communities by creating unique solutions to their individual challenges

- Focus on parts of the province that continue to experience air quality challenges due to pollution from transportation, industry and other sources.
- Work in partnership with municipalities, industry, public health units, other community stakeholders and Indigenous communities to address local air quality concerns and achieve clean air objectives.

Reduce emissions from heavy-duty vehicles

- Redesign the emissions testing program for heavy-duty vehicles (e.g. commercial transport trucks) and strengthen on-road enforcement of emissions standards.

Improve understanding of different sources of air pollution and their impact

- Monitor pollutants to evaluate long-term trends so we can gather the information we need to take action on air pollution.
- Increase road-side monitoring of traffic pollution and expand road-side monitoring of pollutants beyond the Greater Toronto Area to other heavily urbanized communities such as Sarnia, Sudbury and Hamilton.

OPHA Response:

OPHA supports the Ontario’s Government’s actions to improve air quality, increase road-side monitoring of traffic pollution, improve our understanding of sources of air pollutants and their impacts, and work with partners including public health units to address local air quality concerns.

Poor air quality continues to have significant health impacts on Ontarians. According to a 2016 report “an estimated 560 cancer cases (specifically, lung cancer cases) per year are attributable to environmental exposure to PM_{2.5} (fine particulate matter) via inhaling outdoor air in Ontario”.¹ While overall air quality has improved across Ontario, those living in close proximity to high traffic

¹ Cancer Care Ontario, Ontario Agency for Health Protection and Promotion (Public Health Ontario). Environmental Burden of Cancer in Ontario, Toronto: Queen’s Printer for Ontario: 2016

corridors or industrial facilities experience higher exposure to air pollutants. As recognized by many researchers and noted in the Environmental Burden of Cancer report, “actions to reduce exposure to PM_{2.5} include reduction in burning of carbon-based fuels, tighter emission standards, and increasing the separation distance between areas of elevated combustion emissions (e.g., around major roads or some industrial sites) and residences.”

OPHA urges the Ontario Government to increase funding for research into the health impacts of air pollution, climate change and other environmental contaminants as this work is vital to helping Ontarians and policy makers prioritize action to improve the health of all Ontarians.

The Ministry of Health and Long Term Care, Public Health Ontario, local public health units and academic institutions can collectively contribute to, and benefit from this research.

As acknowledged in Ontario’s Environment Plan parts of the province are impacted by air pollution from a number of sources, including industry. One solution to tackle this is the Toxics Reduction Act which requires industry to not only report on the use, creation and release of toxics substances but also to develop toxic reduction plans and to make this information publicly available. With proper oversight and enforcement, this Act has the potential to reduce emissions of air pollutants and to encourage innovative, sustainable and cost-effective practices for industry. **OPHA urges the Ontario Government to reconsider repealing the Toxics Reduction Act (Schedule 5 of Bill 66) and to include additional actions on toxics reduction within the Environment Plan.**

OPHA appreciates that the Environment Plan includes an action to reduce emissions from heavy duty vehicles. When the Ontario Government cancelled the Drive Clean program in September it announced that it would be redesigning the program to focus on emissions from heavy duty vehicles noting that “heavy duty vehicles remain a significant source of nitrogen oxides, a smog forming pollutant, and fine particulate matter, a carcinogen that causes heart and lung disease.” It is important that the Government remains focused on reducing emissions from heavy duty vehicles through some form of emission testing program and enforcement.

Ontario’s Environment Plan Proposed Actions: Clean Water

Continue work to restore and protect our Great Lakes

- Build on previous successes and continue efforts to protect water quality and ecosystems of the Great Lakes. This includes keeping coastlines and beaches clean, protecting native species and safeguarding against invasive species such as Asian carp or Phragmites, and reducing harmful algae by continuing partnerships and negotiations with the federal government under agreements and plans such as the Canada-Ontario Great Lakes Agreement (COA) and the Canada- Ontario Lake Erie Action Plan.
- Review and update Ontario’s Great Lakes Strategy to continue to protect fish, parks, beaches, coastal wetlands and water by reducing plastic litter, excess algae and contaminants along our shorelines, and reducing salt entering waterways to protect our aquatic ecosystems.

Continue to protect and identify vulnerable waterways and inland waters

- Build on previous successes and continue to implement the Lake Simcoe Protection Plan to protect and restore important natural areas and features of the lake. Ontario has invested annually in the implementation of the Lake Simcoe Protection Plan.
- Protect the quality of the Lake of the Woods by continuing to work with partners on reducing phosphorus that, in excessive quantities, can cause toxic blue-green algae.
- Build on the ministry's monitoring and drinking water source protection activities to ensure that environmental impacts from road salt use are minimized. Work with municipalities, conservation authorities, the private sector and other partners to promote best management practices, certification and road salt alternatives.

Ensure sustainable water use and water security for future generations

- Thoroughly review the province's water taking policies, programs and science tools to ensure that vital water resources are adequately protected and sustainably used.
- Enhance how we manage water takings to ensure we have sustainable water resources in the face of a changing climate and continued population growth. We will do this by examining approaches to assessing and managing multiple water takings, establishing priorities for different water uses, and preparing and responding to drought conditions.
- Ensure the knowledge gained through the drinking water source protection program helps inform our water management programs.

Help people conserve water and save money

- Promote the use of technologies and practices to ensure water is used more efficiently. This includes water conservation planning; water use tracking and reporting; improving standards for household fixtures and appliances, such as dishwashers or washing machines; and profiling provincial and broader public sector leadership in this area.

OPHA Response:

OPHA agrees with strong action to protect our water supplies and judiciously manage permits to take water to ensure we do not deplete or contaminate our valuable water resource that helps to maintain health and life for Ontarians. OPHA also supports water conservation and low-impact development that saves both money and the environment. OPHA recommends that the Ontario Government continue to support municipalities in these efforts.

With climate change we can expect a greater potential for negative impacts to our water resources. Whether it is from droughts or extreme rainfall events, reductions in water quality or water quantity, we face severe threats to our water security. We can also face threats from development or land use

practices, especially in areas of vulnerable and sensitive aquifers. Provisions in the Clean Water Act and associated regulations require a rapid response to “imminent drinking water health hazards” but it is more cost effective and health protective to prevent contamination of water supplies through strong source water protection plans rather than having to respond to discharges of contaminants. OPHA is encouraged that the Ontario Government has announced that it will not move forward with Schedule 10 of Bill 66 and will thereby maintain provisions in the Clean Water Act and the Planning Act that protect water supplies .

OPHA supports the Ontario’s Government’s actions to protect water quality and ecosystems of the Great Lakes, inland waters and waterways across the province. The impact of climate change, the growth of toxic Blue-Green algae, urban and agricultural run-off, and new chemicals all present growing challenges to our precious water resources in Ontario. **OPHA actively supports action to reduce toxics and other harmful pollutants in our Great Lakes and waterways, and is represented on the Great Lakes St Lawrence Collaborative, an independent, stakeholder-driven process to propose new and innovative ways to tackle some of the most challenging and imminent threats to the Great Lakes and St. Lawrence region.** Public health units across Ontario monitor and report on beach water quality and promote actions to reduce contamination of both surface water and groundwater.

OPHA believes that monitoring of water quality, protecting source water through enforcement of source water protection plans and promoting action to keep our water clean, are all important components of ensuring Ontarians have access to safe water for drinking and recreational uses. OPHA is pleased to see that the Ontario Government plans to build on its source water protection activities but feels that it should go beyond the impacts of road salt to address all contaminants of concern to our water supplies. OPHA is pleased that the Ontario Government has reconsidered changes to the Planning Act (Schedule 10 of Bill 66) such that protection of source water is maintained under the Clean Water Act and Source Water Protection Plans.

Addressing Climate Change

OPHA Response (General):

Ontario’s Environment Plan acknowledges that people across the province are feeling the impacts of climate change and paying for the costs associated with these impacts. While the Plan provides some examples of specific impacts and costs, **OPHA recommends that your ministry put greater emphasis on drawing attention to the human health impacts and health costs of climate change.** As noted in the 2016 Ontario Climate Change and Health Modelling Study, humans are at increased risk of climate-related adverse health outcomes such as heat-related illness, respiratory and cardiovascular disorders due to increasing temperatures and reduced air quality, Lyme disease and West Nile virus, aggravation of allergy symptoms, food and waterborne illnesses, and injury, illness or loss of life from extreme weather events. Climate change may also increase health inequities among our most vulnerable populations.

http://www.health.gov.on.ca/en/common/ministry/publications/reports/climate_change_toolkit/climate_change_health_modelling_study.pdf

Research has shown that framing climate change as a public health issue rather than an environmental issue has the potential to better engage the public to protect themselves and their family and to take action on climate change. OPHA is pleased to be leading collaboration with other health and environmental organizations to highlight the important links between human health and climate change. Key preliminary findings as we begin to develop this health-focused climate communication strategy can be found here: <http://taf.ca/publications/health-focused-communication-strategy-climate/>

The Ontario Environment Plan indicates that this chapter – Addressing Climate Change - acts as Ontario’s climate change plan, and that the plan is the Ontario Government’s alternative to a carbon tax. OPHA would like to reiterate our comments from our 2018 submission on the Government’s plan to cancel the Cap and Trade Act. There is broad global consensus that some form of carbon pricing is the most effective way to reduce greenhouse gas emissions and at the same time, drive a clean productive economy. This conclusion was reinforced by the awarding last year of the Nobel Prize for Economics to William Nordhaus for his decades long work on climate change and the value of using price to reduce carbon emissions. **OPHA urges the Ontario Government to consider some mechanism for carbon pricing to address climate change.**

Ontario’s Environment Plan Proposed Actions: Building Resilience – Helping Families and Communities Prepare

Improve our understanding of how climate change will impact Ontario

- Undertake a provincial impact assessment to identify where and how climate change is likely to impact Ontario’s communities, critical infrastructure, economies and natural environment. The assessment would provide risk-based evidence to government, municipalities, businesses, Indigenous communities and Ontarians and guide future decision making.
- Undertake impact and vulnerability assessments for key sectors, such as transportation, water, agriculture and energy distribution.

Help Ontarians understand the impacts of climate change

- Develop a user-friendly online tool that makes practical climate change impact information available for the public and private sectors. This tool will help developers, planners, educators, homeowners and others understand the potential impacts of climate change in their communities.
- Work closely with climate science modelling experts, researchers, Indigenous communities, and existing climate service providers to identify and create adaptation solutions.
- Support communities by demonstrating how climate science can be applied in decision making to improve resilience.

Update government policies and build partnerships to improve local climate resilience

- Modernize the Building Code to better equip homes and buildings to be better able to withstand extreme weather events.
- Consult on tax policy options to support homeowners in adopting measures to protect their homes against extreme weather events, such as ice and wind storms and home flooding.
- Review land use planning policies and laws to update policy direction on climate resilience.
- Build resilience in the province's critical infrastructure, through better technology as well as back-up generation and energy storage options, so that our vital services and infrastructure, such as hospitals, can better withstand and remain operational during extreme weather events.
- Continue to support programs and partnerships intended to make the agriculture and food sectors more resilient to current and future climate impacts.

OPHA Response (On Actions in the Environment Plan):

OPHA applauds the proposal by the Ontario Government to undertake a provincial climate change impact assessment. It is important that the provincial assessment includes an assessment of population health impacts. With the support of the Ministry of Health and Long Term Care and research by Public Health Ontario and Health Canada, this assessment can go a long way to identifying and prioritizing action to protect human health, and specifically our most vulnerable populations. While some health units are currently undertaking local climate change health impacts assessment, many find it challenging due to the lack of adequate resources.

In addition to transportation, water, agriculture and energy distribution, other key sectors for which vulnerability assessments are needed include the healthcare sector and the social services sector. These sectors are on the front lines when extreme weather events such as tornadoes, wind and ice storms, power outages, and both extreme heat and extreme cold events.

OPHA is encouraged to see the Ontario Government's commitment to provide resources and on-line tools that will enable individuals and interested stakeholders to identify their vulnerabilities and prepare for the impacts of climate change using scientific evidence. Public health units across Ontario assessing local health impacts of climate change have benefited from health and climate data and climate modelling provided by various levels of government, academia and the private sector. Having an on-line system for use by various sectors will allow for better coordination and collaboration that can ultimately result in solutions for climate adaptation based on the best climate science.

OPHA supports policies to improve climate resiliency. Stronger building code standards for climate-resilient homes and buildings (shade for protection from extreme heat and solar radiation, stronger materials to withstand extreme weather events such as wind and ice storms, and low impact development to enhance flood protection) can protect Ontarians from the health impacts of climate change and lessen the cost of maintenance and repairs resulting from extreme weather events.

Considering tax policy options or rebates for improving climate resiliency and energy efficiency of homes, especially for persons on low income is a welcome measure.

Damage to public infrastructure, homes, buildings, properties and natural resources has caused huge economic losses to individuals, businesses and government. The severe rainstorm in July 2013 has been described as the most expensive natural disaster in Ontario's history with an estimated flood and property damage of \$940 million in Toronto alone. A large percentage of municipal sewage treatment plants are not designed to handle heavy rainfall events resulting in untreated water being discharged into our lakes and rivers impacting drinking water and recreational beaches.

Corporations, small businesses, and municipalities are increasingly recognizing potential liabilities and the costs of inaction. The National Round Table on the Environment and the Economy estimated that the economic costs of climate change in Canada will rise from about \$5 billion annually in 2020 to between \$21 and \$43 billion by 2050.

OPHA supports a review of land use planning policies to strengthen climate resiliency measures and targets. The Provincial Policy Statement², the Planning Act and municipal official plans across Ontario already contain climate resiliency measures but it is important that these are reviewed and strengthened as we continue to experience climate change impacts and, at the same time, identify best practices to increase resiliency. The Ministry of Municipal Affairs and Housing's Info Sheet on Planning for Climate Change³ outlines some of the land use planning tools that municipalities can use to strengthen climate resiliency.

One example is the tools developed by municipalities, conservation authorities and government agencies to support low impact development.⁴ Low impact development incorporates measures such as permeable pavements, green infrastructure and rain gardens to reduce surface run-off after extreme rainfall events.

OPHA also supports programs and partnerships to enhance resiliency of our food and agricultural sector. Local food production is an adaptation and mitigation measure. It can address food security and ensure that Ontarians can rely on local, affordable and sustainable food supplies, it relies less on imported foods that will increase in cost as a result of global climatic changes, and it reduces greenhouse gases associated with the long range transportation of imported foods.

Ontario's Environment Plan Proposed Actions: Continuing to do our share: Achieving the Paris Agreement Target

Ontario will reduce its emissions by 30% below 2005 levels by 2030.

² <http://www.mah.gov.on.ca/AssetFactory.aspx?did=10463> Provincial Policy Statement, 2014 (Ontario)

³ <http://www.mah.gov.on.ca/AssetFactory.aspx?did=7035> Info Sheet on Planning for Climate Change, Ministry of Municipal Affairs and Housing, 2009 (Ontario)

⁴ <https://cvc.ca/low-impact-development/low-impact-development-support/stormwater-management-lid-guidance-documents/low-impact-development-stormwater-management-planning-and-design-guide/> Low Impact Development Guidance Documents, Credit Valley Conservation Authority

According to the Plan: “This target aligns Ontario with Canada’s 2030 target under the Paris Agreement.”

This is Ontario’s proposed target for the reduction of greenhouse gas emissions, which fulfills our commitment under the Cap and Trade Cancellation Act, 2018.”

Planned Emission Reductions in 2030 by Sector [percentage of total planned reductions]:

- The Low Carbon Vehicles uptake portion refers primarily to electric vehicle adoption in Ontario and in small part to the expansion of compressed natural gas in trucking. [16%]
- Industry Performance Standards refer to our proposed approach to regulate large emitters of greenhouse gas emissions, as described later in this plan. The final impact of this approach will depend on consultation with industry partners. [15%]
- Clean Fuels refer to increasing the ethanol content of gasoline to 15% as early as 2025 and encouraging uptake of renewable natural gas and the use of lower carbon fuels. [19%]
- The Federal Clean Fuel Standard is an estimate of the additional impact of the proposed federal standards, which could expand the use of a broad range of low-carbon fuels, energy sources and technologies, such as ethanol, renewable natural gas, greener diesel, electricity, and renewable hydrogen. [7%]
- The Natural Gas Conservation action reflects programs that are well established in Ontario to conserve energy and save people money. This case assumes a gradual expansion of programs delivered by utilities, which would be subject to discussions with the Ontario Energy Board. [18%]
- The Ontario Carbon Trust is an emission reduction fund that will use public funds to leverage private investment in clean technologies that are commercially viable. For this action we estimate a fund of \$350 million will be used to leverage private capital at a 4:1 ratio. Estimates will depend on the final design and mandate of the trust. The estimates also include the potential emission reductions associated with a \$50 million Ontario Reverse Auction designed to attract lowest-cost greenhouse gas emission reduction projects. [4%]
- Other policies include the emission reductions associated with investments in public transit, and our commitment to improve diversion of food and organic waste from landfills, as described later in this plan. [6%]
- Innovation includes potential advancements in energy storage and cost-effective fuel switching from high intensive fuels in buildings to electricity and lower carbon fuels. [15%]

As part of our commitment to transparency, the government is committed to updating and reporting on these estimates once program details are finalized to ensure we are making progress to the 2030 targets.

As stated in the Plan: In coming months we will consult on the development of an economy wide carbon intensity target as a complementary metric to our absolute emissions target.

OPHA Response:

OPHA urges the government to set stronger targets than those outlined in the Plan, to help limit global warming. As noted in the Plan, Ontario's GHG emissions have dropped by 22% since 2005, in large part because of the closure of coal fired power plants. Through other initiatives, those mentioned above and others including support for renewable energy generation and an across the board carbon pricing mechanism, Ontario can achieve much more than just another 8% reductions. And for the sake of our citizens and our planet, we have no choice. This can also be a positive step towards a healthy, clean economy supporting innovative and a healthy, productive workforce.

Canada's commitment under the Paris Agreement was to keep warming well under 2 degrees. Scientists are telling us that Canada's emission reduction targets will not meet this commitment. As noted in the recent IPCC report, we need to take unprecedented action to limit warming to 1.5 degrees in order to prevent devastating impacts to human health and the planet. Ontario has made significant reductions in GHG emissions, and at the same time reduced health impacts associated with poor air quality, through the closure of coal fired power plants across the province. To realize substantial co-benefits in terms of improved health, a growing economy and a healthier environment, **OPHA recommends that your ministry set a target that limits emissions to 112.9MT by 2030 rather than the 143 MT outlined in the Plan.**

The Ontario Environment Plan provides some information on specific sectors where emissions reductions are expected because of actions in this plan and where the Government sees the potential to enhance these actions – low carbon vehicles; industry performance standards; clean fuels; Federal clean fuel standard; natural gas conservation; Ontario Carbon Trust; other policies and innovation. OPHA understands that emission reductions in these areas are estimates and that they will be finalized based on feedback from businesses and communities. OPHA urges the Government to act quickly to finalize and report on these actions so that Ontarians can feel confident that targets will be met, and that we can individually and collectively plan for the changes needed on climate mitigation and climate adaptation. The Ontario Government has also committed to consulting on an economy wide carbon intensity target. While this may complement the absolute target, it is important to recognize that emissions may increase in many sectors if we rely on intensity targets. For example, in the transportation sector, fuel standards may improve but more vehicles on the road could counteract these savings. **OPHA urges the government to focus on absolute emission reduction targets to achieve real reductions.**

Ontario's Environment Plan Proposed Actions: Make Polluters Accountable

Implement emission performance standards for large emitters

- We will create and establish emission performance standards to achieve greenhouse gas emissions reductions from large emitters. Each large industrial emitter will be required to demonstrate compliance on a regular basis. The program may include compliance flexibility mechanisms such as offset credits and/or payment of an amount to achieve compliance. An emissions performance standard establishes emission levels that industrial facilities are required to meet and is tied to their level of output or production.

OPHA Response:

The Environment Plan proposes emission standards that are tied to industrial facilities “level of output or production.” The Plan would also allow exceptions for industries of particular concern like the auto sector. OPHA is concerned that ‘emission performance standards’ approach could see emissions actually increase depending on level of production at a facility. OPHA understands the desire for economic growth but believes that growth in the green economy is where the Government should provide incentives. OPHA is also concerned that certain sectors such as the auto industry may be exempt ‘across the board’.

Ontario’s Environment Plan Proposed Actions: Activate the Private Sector

Launch an emission reduction fund –The Ontario Carbon Trust – and a reverse auction to encourage private investment in clean technology solutions

- Ontario will commit to ensuring funding of \$400 million over four years. These funds will complement penalties paid into The Ontario Carbon Trust by polluters. This will ensure that over the next four years, The Ontario Carbon Trust should be able to leverage over \$400 million to unlock over \$1 billion of private capital.
- It will use public funds to leverage private investment in clean technologies that are commercially viable and will have a widespread presence.
- It will also seek to reduce energy costs for ratepayers, stimulate private sector investment and economic activity, and accelerate the transition to a low-carbon economy.
- The Ontario Carbon Trust could consider investing in cost-effective projects from various sectors, such as transportation, industry, residential, business and municipal.

Encourage private investments in clean technologies and green infrastructure

- Ontario will parallel federal changes to the Accelerated Capital Cost Allowance, which will make technology investments in clean energy generation and energy conservation equipment more attractive.
- Consider tax policy options to encourage the creation of clean technology manufacturing jobs in Ontario.

OPHA Response:

OPHA would like to see more details on how the Ontario Carbon Trust would operate. OPHA supports using the funds to help reduce energy costs for homeowners, to invest in clean technology and to accelerate Ontario’s transition to a low-carbon economy. The funds can also be used in other ways to support families, persons on low-income and other vulnerable populations that are disproportionately impacted by climate change – energy efficiency upgrades, tax rebates. OPHA recommends that a firmer commitment be made by the Ontario Government to invest these funds in

climate change mitigation and adaptation efforts, and to report on emission reductions achieved through these investments.

OPHA supports investment in clean technologies and green infrastructure. **OPHA urges the government to make investments in renewable energy generation projects such as wind and solar.** Investing in renewable energy such as co-generation projects can support emissions reduction and energy security.

Ontario Environment Plan Proposed Actions: Use Energy and Resources Wisely

Conserve energy in homes and buildings to cut costs and reduce emissions

- Increase the availability and accessibility of information on energy and water consumption so that households, businesses and governments understand their energy use (e.g. collection of data related to electric vehicles, household-level energy and water consumption data).
- Work with the Ontario Real Estate Association to encourage the voluntary display of home energy efficiency information on real estate listings to better inform buyers and encourage energy-efficiency measures.
- Review the Building Code and support the adoption of cost effective energy efficiency measures that can lower the cost of electricity and natural gas needed to operate buildings. Ontario is currently a leading jurisdiction in Canada when it comes to energy efficiency standards in its Building Code. Today, Ontario's Building Code ensures new homes built after 2017 use 50% less energy to heat and cool than houses built before 2005, resulting in a much lower carbon footprint than older homes.
- Work with the Ontario Energy Board and natural gas utilities to increase the cost-effective conservation of natural gas to simultaneously reduce emissions and lower energy bills.
- Ensure Ontario's energy-efficiency standards for appliances and equipment continue to be among the highest in North America.

Increase access to clean and affordable energy for families

- Continue to support connecting Indigenous communities in Northern Ontario to Ontario's clean electricity grid, to replace local diesel and other types of electricity generation.
- Increase the renewable content requirement (e.g. ethanol) in gasoline to 15% as early as 2025 through the Greener Gasoline regulation, and reduce emissions without increasing the price at the pump, based on current ethanol and gasoline prices.
- Encourage the use of heat pumps for space and water heating where it makes sense, as well as innovative community-based systems like district energy.
- Require natural gas utilities to implement a voluntary renewable natural gas option for customers. We will also consult on the appropriateness of clean content requirements in this space.
- Consult on tax policy options to make it easier for homeowners to increase energy efficiency and save money.

- Streamline and prioritize environmental approvals for businesses that use low-carbon technology, while maintaining high standards for environmental protection.
- Support the integration of emerging smart grid technologies and distributed resources – including energy storage – to harness and make best use of Ontario’s clean electricity.
- Improve rules and remove regulatory barriers that block private investors from deploying low-carbon refueling infrastructure that will help increase the uptake of electric, hydrogen, propane, autonomous and other low-carbon vehicles without government subsidies.
- Collaborate with the private sector to remove barriers to expanding 24/7 compressed natural gas refueling stations for trucks along the 400-series highways, and maintain the existing tax exemption (gasoline and fuel tax) on natural gas as a transportation fuel. This will provide heavy-duty vehicles (such as transport trucks) with a cost-effective path to lower on-road transportation emissions.

OPHA Response:

OPHA supports actions that improve energy efficiency of homes and buildings, reduce energy costs and reduce emissions. All Ontarians should have access to clean energy. **OPHA urges the Ontario Government to invest in renewable energy generation like wind and solar and co-generation or district energy at the community level.** OPHA supports stronger requirements in the Ontario Building Code to make buildings for energy efficient and more resilient to the impacts of climate change. OPHA appreciates that the Ontario Government is considering tax policy options to help homeowners increase energy efficiency. **OPHA urges the Ontario Government to introduce tax policy options and other mechanisms such as rebates not only for home energy efficiency but also for fuel efficient, hybrid and electric vehicles.**

Ontario’s Environment Plan Proposed Actions: Doing Our Part: Government Leadership

Make climate change a cross-government priority

- Improve our ability to consider climate change when we make decisions about government policies and operations; establish clear responsibilities and requirements for ministries to track and report on climate change measures
- Consider climate change when we purchase goods and services across government where it is cost effective.
- Develop tools to help decision makers understand the climate impacts of government activities.

Empower effective local leadership on climate change

- Work with municipalities to develop climate and energy plans and initiatives to support building climate resilience and transformation to the low-carbon future.
- Support the efforts of Indigenous communities to integrate climate action into local plans and initiatives for community power, economic development, health and sustainability.

- Encourage local leadership by forming stronger partnerships and sharing best practices with community groups and business associations.

Improve public transportation to expand commuter choices and support communities

- Establish a public education and awareness program to make people more aware of the environmental, financial and health impacts of their transportation choices.

Support green infrastructure projects

- Work with federal and municipal governments through the green stream of the Investing in Canada Infrastructure Program to invest up to \$7 billion in federal, provincial and municipal funding over the next 10 years. Funding could be for projects that lower greenhouse gas emissions, reduce pollution, and help make community infrastructure more resilient. Example investments could include improvements to transit and transportation infrastructure and improved local water, wastewater and stormwater systems.

OPHA Response:

OPHA is pleased to see that climate change will be a cross-government priority, ministries will report on climate change measures, tools will be developed to help government decision makers understand the climate impact of their activities, and climate change will be considered in government purchases and services. While cost understandably needs to be a priority, **OPHA recommends that additional criteria be considered when making purchasing decisions.** Many municipalities and organizations have developed Green Procurement Policies that are good for human health and the environment, and that make good business sense. A variety of green procurement resources are available on The Clean Air Partnership website at: <https://cleanairpartnership.org/cac/declarations/>

OPHA is supportive of education and communication initiatives that increase public awareness, engagement and behaviour change on important environmental public health issues. The link between transportation options, climate change and human health is one issue where public health agencies across the province have developed programs and campaigns to increase public awareness. The multiple health benefits of active and sustainable transportation – reduced emissions of greenhouse gases, reduced exposure to traffic-related air pollutants, increased physical activity and reduced stress support health promotion and awareness in this area. OPHA’s Health-Focused Climate Communication Campaign will include these topics and we would be pleased to work with the Ontario government and other agencies on a provincial communication campaign on climate change solutions that would include sustainable and active transportation.

OPHA is encouraged to see that support for green infrastructure projects and climate resilience measures at the community level are included in the Environment Plan. OPHA would like to see more details on how the Ontario government will support these programs.

Reducing Litter and Waste in Our Communities & Keeping our Land and Soil Clean

Ontario's Environment Plan Proposed Actions: Reduce Litter and Waste

Reduce and divert food and organic waste from households and businesses

- Expand green bin or similar collection systems in large cities and to relevant businesses.
- Develop a proposal to ban food waste from landfill and consult with key partners such as municipalities, businesses and the waste industry.
- Educate the public and business about reducing and diverting food and organic waste.
- Develop best practices for safe food donation.

Reduce plastic waste

- Work with other provinces, territories and the federal government to develop a plastics strategy to reduce plastic waste and limit micro-plastics that can end up in our lakes and rivers.
- Seek federal commitment to implement national standards that address recyclability and labelling for plastic products and packaging to reduce the cost of recycling in Ontario.
- Work to ensure the Great Lakes and other inland waters are included in national and international agreements, charters and strategies that deal with plastic waste in the environment.

Reduce litter in our neighbourhoods and parks

- Work with municipal partners to take strong action against those who illegally dump waste or litter in our neighbourhoods, parks and coastal areas.
- Develop future conservation leaders through supporting programs that will actively clean up litter in Ontario's green spaces, including provincial parks, conservation areas and municipalities.
- Connect students with recognized organizations that encourage environmental stewardship so they could earn volunteer hours by cleaning up parks, planting trees and participating in other conservation initiatives.

Increase opportunities for Ontarians to participate in waste reduction efforts

- Work with municipalities and producers to provide more consistency across the province regarding what can and cannot be accepted in the Blue Box program.
- Explore additional opportunities to reduce and recycle waste in our businesses and institutions.

Make producers responsible for the waste generated from their products and packaging

- Move Ontario's existing waste diversion programs to the producer responsibility model. This will provide relief for taxpayers and make producers of packaging and products more efficient by better connecting them with the markets that recycle what they produce.

Explore opportunities to recover the value of resources in waste

- Investigate options to recover resources from waste, such as chemical recycling or thermal treatment, which have an important role – along with reduction, reuse and recycling – in ensuring that the valuable resources in waste do not end up in landfills.
- Encourage increased recycling and new projects or technologies that recover the value of waste (such as hard to recycle materials).

Provide clear rules for compostable products and packaging

- Ensure new compostable packaging materials in Ontario are accepted by existing and emerging green bin programs across the province, by working with municipalities and private composting facilities to build a consensus around requirements for emerging compostable materials.
- Consider making producers responsible for the end of life management of their products and packaging.
- We will work to support businesses that are trying to do the right thing and with leading municipalities that are working to reduce waste going to landfills. This will include working with industry and municipal partners to help ensure contamination of the Blue Box and green bin programs is minimized and that the public is provided with accurate information on how to properly manage compostable products and packaging

Support competitive and sustainable end-markets for Ontario's waste

- Cut regulatory red tape and modernize environmental approvals to support sustainable end markets for waste and new waste processing infrastructure.
- Provide municipalities and the communities they represent with a say in landfill siting approvals. While we work to reduce the amount of waste we produce, it is recognized that there will be a need for landfills in the future. The province will look for opportunities to enhance municipal say while continuing to ensure that proposals for new and expanded landfills are subject to rigorous assessment processes and strict requirements for design, operation, closure, post-closure care and financial assurance.

OPHA Response:

OPHA agrees that we need to reduce the amount of waste that is produced in Ontario and drastically reduce the amount that goes to landfill and incineration. As with other key areas in the Environment Plan, waste reduction is an area that requires broad public awareness efforts. It starts with increasing awareness about how our purchasing practices impact the environment, climate change and ultimately, human health. While production of 'goods' is tied to economic growth, the delivery of 'services' also stimulates economic growth. When services are relating to repairing, reusing, redesigning or recycling items, or re-thinking what we do with them, we get more value from the item, reduce our carbon footprint, save money and save the planet. **OPHA urges the Ontario Government to promote and support efforts by municipalities, community groups, NGOs and the private sector to reduce waste by rethinking their purchasing choices ("new is not always**

better!”) and their disposal decisions (“maybe someone else can use this!”). Some municipalities such as York Region promote waste reduction through campaigns such as Curbside Giveaway Days, Repair Cafés or the Good Food Campaign.

When it comes to packaging, OPHA urges the Ontario Government and private sector to make greater efforts to move towards 100% recyclable packaging. Better education is needed about what is recyclable and efforts are needed to ensure consistency across jurisdictions. Ontarians find it confusing to know what is recyclable and what is not as rules are different from one municipality to the next. When it comes to hazardous waste such as batteries and light bulbs, it should be easier for residents to dispose of these at the curb.

To ensure transparency, the Ontario government should compel municipalities to report on how waste in all streams is disposed. If residents use the blue bins, but the material ends up in land fill or incinerated because the municipality doesn’t have the capacity to process these materials or have a buyer for the material, they should be required to disclose this to the public. In some cases, the public is misled in believing that everything they recycle, whether at their home or at a municipal building or private facility, actually gets recycled, when in fact it is disposed as waste.

OPHA urges the government to ensure full accounting of the cost and environmental health impacts of various waste options. For example, while thermal treatment or incineration may allow for recovery of some materials, there are significant emissions of air pollutants from this type of waste treatment that should be compared to recycling costs or costs of campaigns to reduce waste production.

OPHA also urges the government not to weaken environmental assessments and approvals to allow for waste processing or waste disposal facilities where they should not be sited.

Environmental assessments are based on scientific evidence. We must maintain the highest level of health and environmental protection in protecting our land, water and air from contaminants contained in waste materials.

Ontario’s Environment Plan Proposed Actions: Clean Soil

Increase the redevelopment and clean-up of contaminated lands in Ontario to put land back into good use

- Revise the brownfields regulation and the record of site condition guide to reduce barriers to redevelop and revitalize historically contaminated lands, putting vacant prime land back to good use.

Make it easier and safer to reuse excess soil

- Recognize that excess soil is often a resource that can be reused. Set clear rules to allow industry to reduce construction costs, limit soil being sent to landfill and lower greenhouse gas emissions from trucking by supporting beneficial reuses of safe soils.

- Work with municipalities, conservation authorities, other law enforcement agencies and stakeholders to increase enforcement on illegal dumping of excess soil.

Improve management of hauled sewage

- Consider approaches for the management and spreading of hauled sewage to better protect human health and the environment (including land and waterways) from the impacts of nutrients and pathogens.

OPHA Response:

Similar to our comments in the previous section, **OPHA urges the Ontario Government not to weaken environmental assessments and approvals to allow for redevelopment on contaminated sites that have not been remediated to safe levels.** Discovering contamination after a brownfield site has been redeveloped can result in costly remediation for businesses, municipalities, and residents. Strong regulations on brownfields and environmental assessments can support the profitability of future businesses.

The Ontario Government must also strengthen enforcement of the Environmental Protection Act and brownfields regulation to ensure that proponents that make false claims on records of site condition are prosecuted. Soil quality standards set out in the Act and regulations are based on scientific research on the human health and environmental impacts of contaminants in soil, water and air. These standards need to be regularly reviewed by the ministry to ensure they reflect the most recent research on the health and environmental impacts. As noted in the Environment Plan, redevelopment of brownfields “*provides an opportunity to clean up historical contamination and put vacant prime land back into good use.*” OPHA supports redevelopment of brownfields, as they can reduce urban sprawl and help in addressing climate change. However, it cannot be at the cost of human health and environmental impacts.

For the same reasons as cited in the paragraph above, OPHA supports the safe reuse of excess soil. The health and environmental cost of living with contaminated sites is long term – impacts to our water, land and air. The cost of remediating sites where there has been illegal disposal of contaminated soil far outweighs the cost of proper oversight to prevent this practice. Standards and guidelines must be enforced, with stiffer penalties, to deter the disposal of contaminated soil and materials. OPHA agrees that where soil can be safely used locally it can reduce the GHG emissions associated with trucking soil to another location. However, rules governing this use must be based on the soil standards set to minimize health and environmental impacts.

Conserving Land and Greenspace

Ontario’s Environment Proposed Plan Actions:

Improve the resilience of natural ecosystems

- Collaborate with partners to conserve and restore natural ecosystems such as wetlands and ensure that climate change impacts are considered when developing plans for their protection.
- Protect against wildland fire incidents through the ongoing development of Community Wildfire Protection Plans and update technical guidance to protect people and property from flooding and water-related hazards
- Work with leaders in land and water conservation, like Ducks Unlimited Canada and the Nature Conservancy of Canada, to preserve areas of significant environmental and ecological importance.

Support resilience of natural ecosystems

- Work in collaboration with municipalities and stakeholders to ensure that conservation authorities focus and deliver on their core mandate of protecting people and property from flooding and other natural hazards and conserving natural resources.
- Look to modernize Ontario's environmental assessment process, which dates back to the 1970s, to address duplication, streamline processes, improve service standards to reduce delays, and better recognize other planning processes.
- Protect vulnerable or sensitive natural areas such as wetlands and other important habitats through good policy, strong science, stewardship and partnerships.
- Improve coordination of land use planning and environmental approval processes by updating ministry guidelines to help municipalities avoid the impacts of conflicting land uses.

Promote parks and increase recreational opportunities

- Support the creation of new trails across the province
- Provide Ontario families with more opportunities to enjoy provincial parks and increase the number of Ontarians taking advantage of parks by 10% or approximately one million more visitors while protecting the natural environment
- Look for opportunities to expand access to parks throughout the province but ensure Ontario Parks has the tools it needs to conduct its business and create a world-class parks experience
- Promote the link between nature and human health by supporting the worldwide movement for Healthy Parks Healthy People through Ontario Parks' events, education and the development of a discussion paper to engage the public.
- Share the responsibility of conserving Ontario's protected lands by continuing to partner with municipalities, conservation authorities, Indigenous communities, conservation organizations and other community groups such as trail groups.

Sustainable Forest Management

- Work with Indigenous organizations, the forestry industry and communities involved in managing Ontario's forests under sustainable forest management plans. Ontario will support forest managers to further reduce emissions and increase carbon storage in forests and harvested wood products. Ontario's sustainable forest management provides for the long-term health of Ontario's forests by providing potential opportunities to reduce and store greenhouse gases as trees capture and store carbon dioxide.

- Promote the use of renewable forest biomass, for example, in the steel industry and as heating fuel for northern, rural and Indigenous communities.
- Improve data and information, informed by Indigenous Traditional Knowledge where offered, on greenhouse gas emissions and carbon storage from forests, the changing landscape and permafrost.
- Increase the use of Ontario timber in building, construction and renovation to reduce emissions and increase long-term carbon storage.

Protect species at risk and respond to invasive species

- Reaffirm our commitment to protect species at risk and their habitats, as we mark the 10th anniversary of Ontario’s Endangered Species Act. We are committed to ensuring that the legislation provides stringent protections for species at risk, while continuing to work with stakeholders to improve the effectiveness of the program.
- Protect our natural environment from invasive species by working with partners and other governments and using tools to prevent, detect and respond to invasions.

OPHA Response:

OPHA supports efforts to improve and support the resilience of natural ecosystems, promote parks and increase recreational opportunities, sustainable forest management, protection of species at risk and response to invasive species. As an active member of EcoHealth Ontario, OPHA understands the vital role that ecosystems provide for Ontarians.

OPHA is pleased to see the Ontario Government’s commitment to promote the importance of healthy natural spaces for future generations. As noted in the Environment Plan, natural spaces purify our air and water, protect biodiversity, provide recreational opportunities and support Indigenous traditional practices. Healthy natural spaces also play a vital role in mitigating and adapting to climate change and support physical and mental health.

The integrity and health of the ecosystems on which all species rely is under threat from climate change and extreme weather events. A 2017 report prepared by EcoHealth Ontario for the Ontario Biodiversity Council describes conserving biodiversity as a public health imperative and the impacts of biological diversity, climate change and social change on human health and well-being. Climate change and biodiversity are inextricably linked – climate change threatens Ontario’s biodiversity while biodiversity improves Ontario’s resilience and adaptability to climate change.

As identified in the Environment Plan’s actions under Supporting Resilience of Natural Ecosystems, it is important to conserve natural resources and protect people and property from flooding and natural hazards. **For this reason, OPHA urges the Ontario Government not to weaken environmental assessment requirements.** OPHA agrees with efforts to coordinate land use planning

and EA approval processes, and to help municipalities avoid the impacts of conflicting land use. Healthy people rely on healthy ecosystems, so the priority must be on ecosystem protection and consideration of environmental impacts so that development does not cause irreparable harm to natural systems.

OPHA is pleased to see the Environment Plan's action to promote the link between nature and human health by supporting the Healthy Parks - Healthy People movement and developing a discussion paper to engage the public. OPHA requests that these health promotion initiatives also include the environmental health linkages that support health – how parks and greenspace clean air and water, and help address climate change (e.g. mitigation through carbon sequestration and adaptation through shade to protect from extreme heat and ultraviolet radiation). As a partner with the EcoHealth Ontario Collaborative, OPHA is also developing communications materials to increase awareness of human health and ecosystem linkages. We would welcome the opportunity to work with the Ontario Government on these efforts.

OPHA supports the Ontario Government's efforts to partner with municipalities, CAs, Indigenous communities and other groups to conserve Ontario's protected lands. OPHA recommends that the Ontario Government also involve academia and the Centre for Applied Science in Ontario's Protected Areas. Several academic institutions across Ontario and internationally are conducting research in this area and would be a great resource to identify the best scientific evidence to ensure conservation of protected areas across Ontario.

OPHA supports efforts to ensure the long-term health of Ontario's forests. Forests are an important ally in our efforts to not only mitigate climate change (e.g. through carbon sequestration) but also to adapt to climate change by providing shade and regulating surface temperatures to protect Ontarians during extreme heat events.

OPHA also wants to acknowledge the potential impact of forest fires on human health. As noted in the Environment Plan, there was a dramatic increase in forest fires in Ontario in 2018. This is another important consideration and rationale for the need for aggressive and urgent action to mitigate climate change. As the Plan states: "*... it is difficult to connect any given forest fire to the effects of climate change, most research suggests that Ontario will experience more fires and longer fire seasons in the years ahead.*" These fires posed not only a threat to public safety and infrastructure, they also posed a serious public health threat through deterioration of air quality from forest fire smoke.

Next Steps

Ontario's Environment Plan Proposed Actions:

As part of our work on this plan, we are also undertaking several important steps to finalize our environment actions for Ontario. Over the coming months, we will:

Continue to consult with the public and engage with Indigenous communities

- Throughout the environment plan we have identified areas of action and key initiatives. These are areas where we are engaging with stakeholders and Indigenous communities to develop new approaches that support our common goals for environmental and climate leadership.

Establish an advisory panel on climate change

- An advisory panel on climate change will be established to provide advice to the Minister on implementation and further development of actions and activities in our plan specific to climate change.

Begin implementing priority initiatives

- In the plan we have identified a number of priority initiatives. Some of these initiatives are already underway and we will begin implementation of the remaining initiatives following consultation.

Measure and report on progress

- We want Ontarians to see how our plan is helping them save money and improve the quality of their lives and communities.
- We are committed to reporting regularly on the progress we make on our plan and to developing key indicators of progress because we believe that transparency is important to the success of this plan.
- We are also committed to reviewing the environment plan every four years.

OPHA Response:

OPHA is pleased to see that the Ontario Government is committed to continuing to consult with the public and engage with Indigenous communities. There are a number of actions in this plan that can result in very positive human health outcomes but there are also some areas where there could be serious negative health outcomes if the proper regulations and oversights are not maintained to ensure healthy environments for today and future generations. OPHA is encouraged to see that the Ontario Government will be creating an advisory panel on climate change. **OPHA requests that representatives from our organization be considered for membership in this climate change advisory panel.** Through the expertise of our members and their participation in various provincial environmental initiatives, we could provide valuable insight to ensure Ontario can be a leader in addressing climate change.

OPHA is pleased to see that the Ontario Government is committed to measuring and reporting on the progress made to environmental health protection through the Environment Plan. As noted in the Plan's guiding principles, the government is committed to trust and transparency. It is vitally important that all Ontarians are aware of and understand what actions are being taken to address climate change and ensure healthy environments, where we are doing well and where we need to improve. OPHA looks forward to seeing the details on action areas and key indicators that will be developed to ensure transparency in reporting on progress. We are very willing to work with the

Ontario Government to ensure environmental protection, healthy environments and healthy people, today and for future generations.

More about the Ontario Public Health Association

OPHA is a member-based charity that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including promoting public dialogue and education on healthy public policy, capacity building, and research and knowledge exchange. Our membership brings together many different disciplines and sectors working together to achieve our shared vision of optimal health for all.