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Constituent Societies

ANDSOOHA – Public
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Management in Ontario

Association of Ontario
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Association of Public
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Association of Public
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Canadian Institute of
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(Ontario Branch)

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Initiatives Group (RNAO)

Health Promotion Ontario

Ontario Association of
Public
Health Dentistry

*Charitable Registration
Number 11924 8771
RR0001*

October 30, 2015

Municipal Legislation Review
Ontario Ministry of Municipal Affairs and Housing
Local Government Policy Branch
777 Bay St., 13th Floor, Toronto,
ON M5G 2E5

Re: Ontario's Municipal Legislation Review

Dear Sir/Madame:

The Ontario Public Health Association (OPHA) is pleased to see that the Province of Ontario is making it a priority in its five-year review of the Municipal Act to strengthen this legislation so that municipalities have the authority and available tools to respond to climate change. As an organization that includes representation from public health professionals across the province that work with, and through, municipalities, OPHA recognizes that municipal action is vital to protecting local communities and more specifically, vulnerable populations, from the health impacts of climate change. As was highlighted in your Municipal Legislation Review Public Consultation Discussion Guide, climate change is one of the most significant challenges of our time. Public Health Units across Ontario also recognize this challenge and have been involving their communities in developing and implementing mitigation and adaptation plans.

While municipalities are in the best position to implement local plans to prepare for the economic, environmental and health impacts of climate change, they can also play a strong role in influencing and controlling greenhouse gas (GHG) emissions through policies and bylaws relating to land use planning, transportation, construction and energy use. Many studies have demonstrated that investments in low carbon communities could generate wider economic, social and environmental benefits in the form of improved levels of equality, health, education, employment, innovation, productivity, mobility and environmental quality. There is a role for all levels of government, and an important role for public health agencies, in moving towards low-carbon healthy sustainable communities. Having an enabling policy framework is a necessity so that municipalities are empowered to invest and innovate in order to move towards lower-carbon communities.

The OPHA is pleased to provide the following responses, outlined below, to the questions posed as part of the Municipal Legislation Review.

Question # 1: Has your local council integrated climate change considerations in its policies, programs and decision making processes?

OPHA members, through their public health agencies, have been working collaboratively on the development and implementation of clean air and climate change actions in some municipalities. Some health units have completed climate change health vulnerability assessments. Others are promoting programs such as the *Ecoschools 20/20 The Way to Clean Air* campaigns to encourage reductions in GHGs both at home and on the road. Recognizing the linkages between the built environment and health, public health agencies are working with municipal planning and transportation departments to update official plans and develop policies to reduce air pollution and greenhouse gas emissions and their associated health risks.

Question # 2: What tools do municipalities need to address climate change mitigation and adaptation?

- **Vulnerability Assessments:** Many municipalities are embarking on vulnerability assessments to help prioritize action to prepare for the impacts of climate change. Public health units are participating in this work, in varying capacities, to identify health vulnerabilities and impacts. The work of municipalities and health units could be enhanced by providing templates, climate models and data to assist in these assessments.
- **Land Use and Growth Management Policies and Plans:** Efforts to better manage urban growth such as those within the Growth Plan for the Greater Golden Horseshoe; the Niagara Escarpment Plan; the Oak Ridges Moraine Conservation Plan; the Greenbelt Plan and the Provincial Policy Statement are instrumental in encouraging dense, transit-oriented, walkable and livable communities. These plans and policies are also crucial in protecting agricultural lands, ecosystems and water source protection areas. Improvements can be made to these policy frameworks to better enable local action on growth management, community livability and financial, social and environmental sustainability.
- **Knowledge Sharing and Network Building:** Facilitating knowledge sharing within and among municipalities and encouraging municipalities to engage their local public health agencies are fundamental components of informing climate change action. OPHA believes that this sharing of information across jurisdictions and agencies must extend to the provincial level to include all ministries, in particular the Ministry of Health and Long Term Care.
- **Incorporating GHG targets into Official Plans:** Requirements for municipalities to incorporate climate change action plans and targets into their Official Plans would greatly facilitate the uptake of climate change action at the local level and provide a strong incentive for developers, industry and local communities to invest in low carbon initiatives.
- **Integrating Climate Change into Business as Usual:** It is important for local governments (as well as all levels of government and the private sector) *to identify and implement a mechanism for integrating a “climate change mitigation and adaptation lens” to policy development, funding, infrastructure processes and decision making.* Some tools that would advance this effort include: public education and communication resources; evidence and data across all areas relevant to climate change (health, environment, energy, economy, etc.); model by-laws for building construction, energy and water efficiency, compact development, active transportation, anti-idling, electric vehicle recharge stations, etc.; emergency management and risk mitigation tools.

Question # 3: Are you aware of any challenges and/or barriers that your council is facing in implementing initiatives related to climate change?

- **Advancing the mandate for local governments to act on climate change:** Municipal and local public health agency action on climate change would be strengthened if the General Principles section of the Acts would expand on the current purpose by adding *“improve the health and environmental well-being of residents through actions to mitigate and adapt to climate change”*.
- **Prioritizing climate change action to protect the most vulnerable populations:** Recognizing that marginalized populations are those that are most vulnerable to the health impacts of climate change, it is important to identify, prioritize and address the needs of these vulnerable populations. Municipalities and public health agencies would greatly benefit from data, evidence and tools to help in this endeavour.

- **Clarifying municipal authority to adopt mandatory green development standards:** Greater clarity within the Acts *to acknowledge the authority of municipal governments to adopt and implement mandatory green development standards* would enable increased adoption of actions aimed at increasing building energy efficiency, community sustainability actions and other environmental priorities within new developments.
- **Enabling increased authority on the part of municipalities to enact by-laws, policies, and/or programs respecting climate change mitigation and adaptation in order to more effectively enable actions,** such as, but not limited to, reducing greenhouse gas emissions through increased waste diversion, improving energy and water efficiency and ensuring greater resiliency of infrastructure and buildings.
- **That the Section 108 in the City of Toronto Act** regarding green or alternative roof surfaces be **included in the Municipal Act** and enable municipalities to pass green/cool roof bylaws to achieve such purposes of energy and water conservation, habitat creation, and urban heat island mitigation.
- **Increased recognition within the Municipal Act of urban forests and natural areas as a community service and asset that provides significant human health and ecological services and value and be factored into municipal asset management.** A number of municipalities have undertaken iTree Studies that have identified the significant ecological services provided by urban forests.
- **Increased recognition of the ecological value and human health benefits provided by green infrastructure** such as natural areas to protect watershed management, improve storm water management, and provide communities with increased resilience and protection from extreme weather impacts within the Municipal Act would better enable municipalities to enact programs and policies.
- **Increasing climate change as a municipal mandate through increased recognition within the Municipal Act that municipalities are required to advance the development and implementation of climate change action plans/targets/reporting.** This step would strengthen and better enable progress and engagement with all municipal departments if identified within the Municipal Act. It is important to ensure that this requirement is attached to a provincial program that provides capacity and support for municipalities to advance this requirement (for example, the provision of community greenhouse gas inventories).
- **Developing clear expectations and reporting mechanisms for municipalities.** The provision of clear expectations for municipalities would assist Councils as they prioritize many strategic and operational demands.
- **Data collection, analyzing and communication tools.** The provision of climate projection models, ‘open’ data and interpretation frameworks will support the development of vulnerability assessments, climate change adaptation actions and mitigation strategies.

As an organization committed to promoting health and wellbeing, we are encouraged by the Ontario’s government commitment to using a climate change lens in this municipal legislative review. The changes we are recommending would give municipalities the authority and tools they need so they can take leadership in addressing climate change and ultimately improve the health, wellbeing and sustainability of their communities.

We would be pleased to answer any questions and/or discuss these ideas further with you and can be reached at pwalsh@opha.on.ca or 416 367-3313.

Thank you for your consideration

Yours sincerely,



Pegeen Walsh
Executive Director

About the Ontario Public Health Association

Created in 1949, OPHA is a member-based non-profit organization that 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. This mission is achieved through a variety of means including advocating for healthy public policy, providing training, career and leadership development, capacity building, research and knowledge exchange, timely information, analysis and consultation on issues affecting community and public health and access to multi-disciplinary networks. OPHA's membership is open to all those committed to improving the health and wellbeing of Ontarians. Its members represent the different disciplines within public health and come from various sectors (e.g. public health, health care academic, voluntary and private sector) who work with community partners to reduce health inequities among those who may be marginalized or vulnerable due to various social, economic and cultural factors.