



RNAO

Registered Nurses' Association of Ontario

L'Association des infirmières et infirmiers
autorisés de l'Ontario

Protecting our environment to improve health for all

Do you agree that Ontario must meet or exceed its current greenhouse gas emission targets?

Will you keep and strengthen legislation protecting Ontarians from toxic substances?

Will you dedicate sustainable revenue operate and expand transit and active transportation across Ontario?

Nurses, health, and climate change

The evidence is clear: climate change is real and is caused by human activity that increases the volume of greenhouse gases in the air.¹ Registered nurses (RN), nurse practitioners (NP), and nursing students are unwavering in their commitment to protecting the health of Ontarians. Nurses are concerned about climate change because of its serious environmental and health implications. We already see weather disturbances causing severe population dislocation (e.g., drought in the Horn of Africa, hurricanes in the Caribbean Sea). Temperatures are actually rising faster in Ontario than the global average: the province is 1.5 °C hotter than it was in 1948.² Climate change is already affecting the health of Ontarians in many ways:^{3 4 5}

- Temperature-extremes cause more illness and death from heart attacks, heat stroke, and hypothermia
- Flooding and wildfires also cause illness and fatalities
- Vector-borne diseases like West Nile and Lyme Disease are spreading across Ontario because of milder winters
- More extreme heat promotes smog formation and wildfires, damaging air quality, which, in turn, increases the incidence of respiratory and heart diseases, allergies and asthma. The greater heat also promotes higher pollen counts, which is bad for asthma.

By fighting climate change, we are not merely protecting the environment; we are protecting people's health. We do that by slowing climate change and its health toll.. For example, when we cut automobile emissions, we reduce greenhouse gases and harmful smog.

Climate change mitigation is also a fight for environmental justice, because the most vulnerable are usually those who have contributed the least to climate change.

Ontario's climate change plan

Through the 2000s, Ontario took significant steps to reduce its carbon emissions, producing many benefits. Closing the province's coal-fired power plants, for instance, not only reduced carbon emissions, it improved air quality. The number of smog days in Ontario went from 53 in 2005 to zero in 2014 and 2015.⁶ Another example is the movement towards more walkable and bikeable communities, which reduces emissions from motor vehicles and promotes physical exercise.

As part of these efforts, Ontario also set ambitious but necessary greenhouse gases reduction targets of 15 per cent below 1990 levels by 2020, 37 per cent by 2030 and 80 per cent by 2050.⁷

Since taking power in June, the current government has moved swiftly. It renamed the Ministry of Environment and Climate Change to the Ministry of Environment, Conservation and Parks (MECP), dropping the reference to climate change;⁸ announced that Cabinet's first act would be to cancel Ontario's cap-and-trade program;⁹ revoked the cap-and-trade regulation and banned all trading of emission allowances effective July 3;¹⁰ cancelled all programs funded by cap-and-trade revenues; wound down the Green Ontario fund;¹¹ cancelled and is winding down 758 renewable energy contracts;¹² and announced it will keep the Pickering Nuclear Generating Station open until 2024.¹³

It also introduced and passed legislation that terminated Ontario's carbon pricing system, eliminated Ontario's greenhouse gas emission targets, and repealed legislation that promoted renewable energy (for details, see the appendix). On November 29, the Ontario government released its environment and climate change plan, setting a greenhouse gas target of 30 percent below 2005 levels by 2030.¹⁴ As the Environmental Commissioner pointed out, that represents a two-thirds' reduction in Ontario's previous 2030 target.^{15 16}

Carbon pricing

Economists generally agree that taxing pollution helps to reduce it. For example, pricing carbon emissions can help meet reduction targets. A strong price signal will promote necessary behaviour changes to support the environment. As noted above, the Ontario government has ended Ontario's carbon pricing program, cap and trade. The federal government is imposing a federal backstop carbon tax in 2019 on provinces that do not have an adequate carbon pricing system, including Ontario.¹⁷ Ontario has also signaled it will oppose any such attempt by the federal government,^{18 19} although the likelihood of success is low.²⁰

In the event of a carbon tax, RAO urges that it be set at a rate that helps ensure the province meets its greenhouse gas emission targets, and that it be as inclusive as possible. Whatever the carbon pricing mechanism, the revenue must be used to help fund reduction efforts and protect vulnerable populations. Revenues must be managed transparently with strong public oversight.

Bill 66

Health and environment groups are deeply concerned about Bill 66,²¹ a sweeping deregulation law introduced on December 6. Schedule 10 would allow municipalities to override prescribed provisions of the *Clean Water Act* (passed as a response to the Walkerton tragedy), the *Greenbelt Act*, the *Great Lakes Protection Act*, the *Lake Simcoe Protection Act* and other environmental

protection legislation.²² The environmental law organizations Ecojustice [submission not yet posted] and Canadian Environmental Law Association²³ have both called for the complete withdrawal of Schedule 10, as a threat to the environment and to public health. RNAO shares that concern.

Schedule 5 of Bill 66 would repeal the *Toxics Reduction Act* (TRA), a piece of legislation that health and environment groups including RNAO worked for years to introduce and implement. That legislation was modeled on the successful Massachusetts approach to toxics reduction: mandatory reporting on toxics use, mandatory planning for toxics use reduction, and voluntary implementation of those plans. RNAO worked closely with health and industrial stakeholders to come to a consensus formulation of the rules around act, and is astonished that the government proposes to repeal the act because it “duplicates” federal Chemicals Management Plan under the *Canadian Environmental Protection Act*. A careful analysis by the Canadian Environmental Law Association shows it supplements CEPA; it doesn’t duplicate it.²⁴ Nevertheless, the TRA must be properly implemented in order to bring the health benefits it was designed to deliver; key sections of the act are not yet in force. Moreover, MECP must set targets relating to toxics.²⁵

Transit and active transportation

Automobiles are a major source of pollution, particularly in urban environments. They also cause congestion on our roadways, which costs Ontarians billions of dollars in time, vehicle operating costs, accidents, emissions, and lost economic opportunities.²⁶ Yet many people in urban areas have no choice but to drive, with public transit options inadequate and opportunities for active transportation like biking and walking undeveloped or unsafe.

The Big Move is the regional transportation plan developed in 2008 by Metrolinx,²⁷ which focused on transforming transit in the GTHA. The plan was reviewed in 2013 by the Anne Golden panel,²⁸ which urged the province to develop substantial new dedicated revenue streams to pay for the next wave of transit infrastructure, and to align the Big Move with the Growth Plan for the Greater Golden Horseshoe. The panel also recommended \$300 million funding for a kick-start program to deliver immediate visible improvements in transit service.²⁹

The Big Move was also supported by the medical officers of health for the GTHA in their 2014 report on designing healthier transportation systems and healthier cities.³⁰ The report concluded that better community design and implementing The Big Move could prevent 338 premature deaths every year by increasing physical activity, reducing harmful vehicle emissions and reducing the staggering cost of congestion.³¹ It recommended Ontario provide long-term transit funding, work with Metrolinx and the municipalities to implement and optimize access to transportation options, and change government policies to better support active transportation and public transit.

The provincial (\$31 billion), municipal (\$1.9 billion) and federal (\$6.5 billion) governments have since stepped up with transit capital funding.^{32 33} This is a significant step forward, but another \$28.8 billion³⁴ is required to complete the construction of the rapid transit expansion for the GTHA under The Big Move. There has also been a recent scaling back of Metrolinx rapid transit plans,³⁵ and a recent report put the annual net funding gap for rapid transit construction and operation at over \$2 billion.³⁶

The previous government devoted part of the proceeds from the sale of Hydro One to transit, but this is not a sustainable strategy. As Ontario's financial accountability officer pointed out, it secures some money up-front, but foregoes more in the future, leaving a net loss.³⁷ RNAO cautioned against further privatizing Hydro One because of this revenue loss, and because of the dangers of turning Hydro One over to private interests.³⁸

The current government has maintained commitments to a number of the Metrolinx projects and also proposes adding \$5 billion in new subway funding. One concern is that three of the four proposed projects (Scarborough subway, Sheppard and Eglinton Crosstown) do not have the ridership to justify the cost. Second, the amount of money committed is inadequate to deliver the amount of infrastructure promised.³⁹ Third, the severity of the government's proposed revenue cuts (e.g., \$2 billion per year from cap and trade) raise the question of whether the PC transit commitments can be met.

RNAO's ENVIRONMENT ASKS

- Develop a climate change plan that at a minimum meets Ontario's legislated green house gas emissions reduction targets of 15 percent below 1990 levels by 2020, 37 percent by 2030 and 80 percent by 2050.
- Withdraw the court challenge to federal carbon pricing.
- Withdraw Schedule 10 of Bill 66.
- Do not repeal the Toxics Reduction Act.
 - Through MECP, set targets for toxic substances.
 - Proclaim in force sections 11, 15.1, 20.1, 26.1, 30, 38, and 50(1)(o.1)(o.2) of the Act
- On the issue of transportation, RNAO urges the province to take all necessary steps to:
 - Work with federal and municipal partners to ensure dedicated and sustainable revenue sources to pay for ongoing operation and substantial expansion of transit and active transportation in Ontario
 - Support cost-effective and expeditious delivery of those expansions, implemented by transparent governance and informed expert opinion
 - Avoid resorting to public asset sales like the privatization of Hydro One to fund transit expansions

Appendix

Recent Ontario Environmental Legislation

In July, the current government introduced legislation (Bill 4)^{40 41} to end the cap-and-trade program in Ontario.⁴² Through a cap-and-trade system, a set number ('cap') of permits to emit carbon are auctioned off, in line with emissions targets. Bill 4 repealed the *Climate Change Mitigation and Low-Carbon Economy Act, 2016*,⁴³ and thus eliminated Ontario's legislated emission reduction targets.⁴⁴ In a break with normal practice, the government elected not to hold public consultations on the revocation of cap and trade on the grounds that the election was substantially equivalent to a consultation⁴⁵ – this controversial decision has been challenged by legal experts, as the Environmental Bills of Rights mandates the participation of Ontario residents in the making of environmentally significant decisions by the government.^{46 47 48} On September 11, 2018, Environmental and law groups sued Ontario for failing to consult the public before cancelling the cap-and-trade program.^{49 50} Within three hours, the government posted Bill 4 on the Environmental Registry for public comment.^{51 52}

On September 20, the government introduced Bill 34, legislation to repeal the Green Energy Act, an act that promotes green energy.^{53 54 55} That bill not only repealed the Green Energy Act, it also created an uneven playing field by placing obstacles to renewable energy that were not faced by other forms of energy.⁵⁶

On November 15, the Ontario government introduced Bill 57,⁵⁷ which inter alia terminated the independent office of the Environmental Commissioner.⁵⁸

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- ² Saxe, D. (2018). *Climate Action in Ontario: What's Next? 2018 Greenhouse Gas Progress Report Webinar*. http://docs.assets.eco.on.ca/presentations/2018-10-01_Climate-Action-in-Ontario-Webinar.pdf
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