Clean Air Partnership

RE: Input on Bill 229, Protect, Support and Recover from COVID-19 Act (Budget Measures), 2020

Clean Air Partnership recommends that the Province of Ontario withdraws Schedule 6 (proposed changes to the Conservation Authorities Act and consequential amendments) in its entirety from Bill 229.

There are significant implications with this proposed regulatory change that will have significant cost and societal implications for Ontario communities (see below for costs of climate change in Ontario). This is not how regulation changes should occur in the Province of Ontario, especially not changes that will have a significant impact on the resilience of Ontario's communities.

We are very concerned regarding the lack of opportunity for meaningful public consultation on changes to the Conservation Authorities Act. We ask the Government to withdraw Schedule 6 because the proposed changes to the CAAct are not administrative budget-related amendments but rather are significant amendments impacting public policy and for which adequate and specific public consultation has not yet occurred and should occur. These proposed amendments are deserving of the proper and due process for regulatory changes through specific consultations and then debate in the Legislature.

While the purpose of the Conservation Authorities Act is to "provide for the organization and delivery of programs and services that further the conservation, restoration, development and management of natural resources in watersheds in Ontario", the proposed amendments will limit the scope and powers of conservation authorities to the point that no meaningful integrated watershed management will be possible. The "watershed approach" and the "conservation authority model" praised by the Special Advisor on Flooding, will be severely hampered. Building climate resilient communities for the future will be impeded, if not impossible.

This is back tracking on all the lessons we learned from Hurricane Hazel and sets us up for increased flossing impacts and costs into the future. The opposite of what we should be doing in Ontario to protect our communities from future flooding risks. As costly as our flood costs are at present, just imagine what the flooding costs would be if we had not set policies in place following hurricane Hazel.

Embedding significant regulatory changes into Omnibus budget bills undermines transparency and accountability and important regulatory changes such as Schedule 6 of Bill 229 deserve the accountability Ontarians expect from their elected governments. We sincerely recommend that the Province of Ontario withdraws Schedule 6 (proposed changes to the Conservation Authorities Act and consequential amendments) in its entirety from Bill 229.

That regulations need to be updated is understandable but embedding the updates in Omnibus Bills and not undertaking a formal public consultation process is not what Ontarians expect from their democratic governments. We look forward to supporting the Province of Ontario to undertake that public consultation and offer up our support to streamline municipal input to the consultation via the Clean Air Council network. Please do reach out to us to discuss how Clean Air Partnership can support the Province's public consultation process for update to the Conservation Authorities Act.

Sincerely,

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Costs and Impacts of Climate Change

The US Council of Economic Advisors found that if delayed action causes the mean global temperature increase to stabilize at 3°C above preindustrial levels, instead of 2°C, that delay will induce annual additional damages of 0.9% of global output. To put this percentage in perspective, 0.9% of Ontario's 2017 GDP is $7.5bn. An additional degree increase, from 3°C to 4°C, would incur greater additional annual costs of 1.2% of global output or almost $10 billion dollars from Ontario's GDP. These costs are not one-off costs: they would be incurred year after year because of the permanent damage caused by additional climate change resulting from the delay.

It is also worthwhile to note, in light of the costs from extreme weather that Ontario and other jurisdictions have incurred, these estimates are likely to be significant underestimations. Climate change impacts are already costing everyday Ontarians significant financial and social costs through extreme weather; cleaning up flooded basements, fighting forest fires, and evacuating homes threatened by those fires, as well as suffering health impacts from polluted air and extreme heat and mental health impacts as a result of evacuations and damage to property. In recent years, Ontario has seen a rise in climate-related extreme weather events, which have brought to the forefront both climate and infrastructure vulnerabilities, through extreme rain, wind, freezing rain and ice, and flooding. As per the Insurance Bureau of Canada (IBC), "the costliest insured severe weather event of all time for Ontario remains the 2013 Toronto floods, which alone caused almost $1bn in damage." The year 2018 on its own has seen numerous extreme weather storms, resulting in the following insured losses (not including costs to governments):

- January 2018: Winter storm damage in Toronto, London & southwestern Ontario of nearly $10m
- February 2018: Water and winter storm damage in southern Ontario of over $40m
- Early April 2018: Wind and rain storm damage in southern Ontario topping $79m
- Mid-April 2018: Winter storm and ice storm in Toronto and southwestern Ontario of over $187m
- May 2018: Wind and rain storm in Hamilton & the GTA of over $500m
- August 2018: Extensive flooding due to rain storm in Toronto of over $80m

These impacts are on top of a number of recent extreme weather events that have already caused significant costs for municipalities, insurance companies and Ontarians.

- In 2016 Windsor's flooding caused $108m in insured losses and Windsor's 2017 flooding caused $124m in insured losses. A survey of flooding victims found that an estimated 45% of the residents had insurance cover these losses. The rest used personal savings, cashed in RRSPs, remortgaged their property, and/or borrowed from family and friends. This survey also highlighted the emotional toll it has taken on those who have flooded (i.e. increased anxiety, fear).
- Estimated insurance cost of the 2014 flood in Burlington was close to $90m.
- The 2013 Ice Storm resulted in $65m in direct costs to the City of Toronto and $940m in insured losses.
- The 2013 Flood in Toronto resulted in $103m in direct costs to the City of Toronto and almost $1bn in insured losses.
- The 2005 Flooding resulted in $50m in direct costs to the City of Toronto and $500m in insured losses.