FAILURE TO LAUNCH

A PROGRESS REPORT ON ONTARIO'S CLIMATE CHANGE ACTIONS

environmental defence

ACKNOWLEDGEMENTS

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Climate change is here, and it's getting worse

It's impossible to ignore the escalating impacts of climate change. As we write this report, millions of people around the world are taking to the streets calling on governments and industry to take stronger action. Here at home, people across Ontario are facing wildfires, flooding, disease-causing ticks[1], and a warming north[2]. Scientists warn us that Canada is warming at twice the global average[3]. And the Intergovernmental Panel on Climate Change (IPCC) released their groundbreaking report showing the scale of action needed to keep warming to 1.5 degrees Celsius, and avoid widespread disaster.

The new Ontario government released their Made-in-Ontario Environment Plan immediately after the IPCC's stunning 2018 report. Instead of scaling up ambition, Ontario weakened their 2030 greenhouse gas emissions reduction target in this plan.

This followed Premier Ford's abrupt scrapping of Ontario's cap-and-trade carbon pricing system and the hundreds of climate change action programs it funded. This move was justified with a promise to reduce Ontario's carbon footprint without cap-and-trade, or any other carbon pricing system to replace it.[4]

This report examines whether the Premier's promise holds up. Over a year later, what has Ontario's government done – and not done – to reduce greenhouse gas emissions?

Table of Contents

PART 1

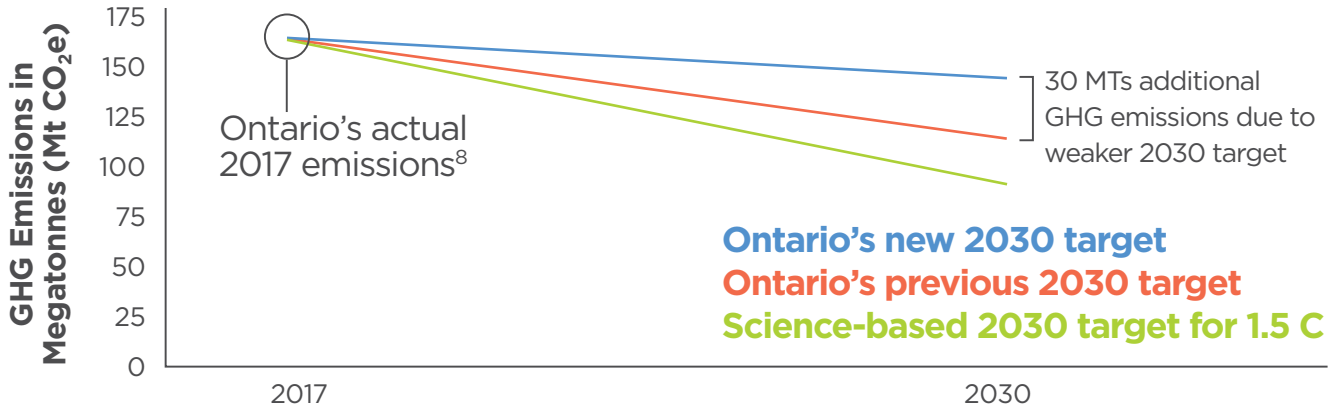
Promises Made

In this section, we review progress on the major climate change actions promised in the Made-In-Ontario Environment Plan. Ontario is relying on these major actions to meet its 2030 emissions reduction target.

There has been widespread media coverage of Premier Doug Ford's vow to fight the federal carbon pricing system, and his claim that Ontario can fight climate change just as effectively without a price on carbon pollution. Less attention has been paid to how to actually do this – or whether Ontario is making good on this promise.

The Premier has been in power for well over a year. This is more than enough time to set a new course for addressing climate change, and take first steps towards implementing programs to fill the void left by cancelling Ontario's previous climate change action plan. It's too early to assess actual greenhouse gas (GHG) emissions impact, since the most recent data available is from 2017. However, we can examine how much progress has been made on the actions they've promised.

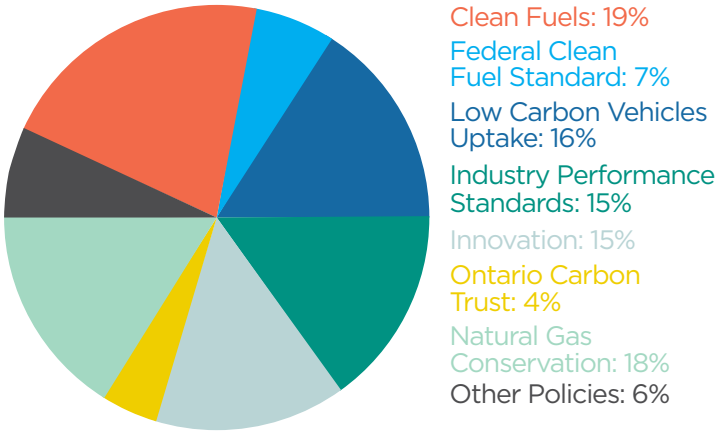
In November 2018, the government laid out its programs and policies in the Made-In-Ontario Environment Plan. To begin, this plan lowers Ontario's overall ambition for climate action. Ontario's Environment Plan sets a target of reducing GHG emissions to 30 per cent below 2005 levels by 2030[5], which adds up to cutting 18 mega tonnes of annual emissions by 2030[6]. The previous government's goal was to reduce GHGs by 37 per cent below 1990 levels by 2030, a reduction of 48 mega tonnes. This means that even if Ontario meets its new target, the province's GHG emissions will be 30 mega tonnes higher in 2030. For context, reducing Ontario's ambition by this amount would undo almost all of the GHG emissions reductions from Ontario's coal phase out,[7] one of the biggest greenhouse gas emission reduction steps ever taken in North America.



Ontario's greenhouse gas emissions targets

ONTARIO EMISSIONS BY SECTOR 2016 (161 Mt CO2e)[9]

ONTARIO EMISSIONS REDUCTIONS IN 2030 FROM ENVIRONMENT PLAN ACTIONS AND EXTENDED POLICIES (18 Mt CO2e)[10]



Overview of Ontario's planned greenhouse gas emissions reductions by 2030

Legend: Progress towards achieving promised GHG emissions reductions in each area

- SIGNIFICANT ACTION
- PROMISING ACTION
- SOME ACTION WITH ROOM FOR IMPROVEMENT
- MINIMAL ACTION, UNLICKLY TO ACHIEVE TARGET
- NO ACTION, OR PROPOSED ACTION WILL LEAD TO INCREASED GHG EMISSIONS

PROMISE 1

Industry Emissions Performance Standards

(i.e. carbon price for industrial polluters)

FROM THE MADE-IN-ONTARIO ENVIRONMENT PLAN:
"An emissions performance standard establishes emission levels that industrial facilities are required to meet and is tied to their level of output or production.[11]"

Targeted GHG Impact: 15 per cent of planned GHG emissions by 2030 (approx. 2.7 MTs)

STATUS: PROPOSED ACTION WILL LEAD TO INCREASED GHG EMISSIONS

Ontario began consultation on their Emissions Performance Standard (EPS) system in early 2019, and finalized it in July. This system makes large industrial polluters pay a price if they pollute above a certain amount. It's important to note that there is already a similar system in effect in Ontario and many other provinces: the Output-Based Pricing System. This was put in place by the federal government in January 2019 as part of their carbon pricing plan.

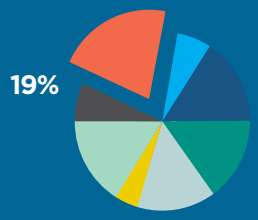
To replace the federal system, Ontario's system would have to be approved by the federal government to make sure it meets minimum standards. The deadline to do this was in 2018, but Ontario did not have its EPS system ready. This missed deadline means that devoting significant time and effort to building Ontario's own system could be a wasted effort.

In addition, Ontario's system is weaker than the federal system already in effect. More GHG emissions are exempted. "Fixed process emissions" from activities for which there are a few clean alternatives (for example, using limestone to produce cement), won't be priced under Ontario's system. But in the federal system, they are priced[12]. Ontario has also proposed greater leniencies for most industrial sectors[13]. Overall, this means that Ontario's system would be less effective at reducing Ontario's GHG emissions than the current federal system.

The province has also provided no modeling or evidence to support their estimate that the EPS system would reduce emissions by 15 per cent by 2030. We must therefore conclude that, if implemented in place of the existing federal policy, this proposal will lead to an increase in carbon pollution rather than a reduction.

If Ontario's system were to replace the current federal system, it would be the third consecutive carbon pricing system that large emitters in Ontario would have to adjust to in less than two years, after a recent switch from cap-and-trade to the federal Output-Based Pricing System. Even if the EPS system is never implemented, the lack of predictability and added administrative burden of preparing for a third potential system will cause even more instability for the large emitters who must participate in these programs. This proposal is not only weaker than necessary, it's also needlessly disruptive to industry.

PROMISE 2



Clean Fuels*

(ethanol gasoline, renewable natural gas)

FROM THE MADE-IN-ONTARIO ENVIRONMENT PLAN:

"Clean Fuels refer to increasing the ethanol content of gasoline to 15 per cent as early as 2025, and encouraging uptake of renewable natural gas and the use of lower carbon fuels.[14]"

Targeted GHG Impact: 19 per cent of 2030 total (approx. 3.5 MTs)

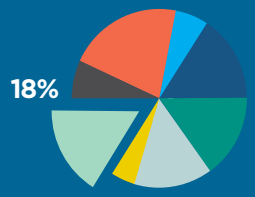
STATUS: MINIMAL ACTION, UNLIKELY TO ACHIEVE TARGET

This was one of the first actions from the Environment Plan to get underway in early 2019. But after consultation with stakeholders, the Ontario government's proposal to increase renewable content in gasoline was weakened and delayed. The final proposed regulation will achieve less than 1 mega tonne of annual emissions reductions.[15] That is less than one quarter of the goal for the "Clean Fuels" category of Ontario's emissions reduction plan.

This is the only publicly proposed action in the "Clean Fuels" category to date, relied on to deliver 19 per cent of Ontario's emissions reductions by 2030, and falls far short of what's been promised. Unless stronger policies are proposed to drive the uptake of low carbon fuels, Ontario's goals will not be met.

*We've excluded the federal Clean Fuel Standard (CFS) from this analysis. Although included in Ontario's Environment Plan, it's a federal policy with no provincial action required. In addition, according to Ontario's consultation documents[16], emissions reductions from renewable gasoline regulations would count as compliance with the CFS, meaning these emissions reductions may in fact be double counted.

PROMISE 3



Natural Gas Conservation

FROM THE MADE-IN-ONTARIO ENVIRONMENT PLAN:
"A gradual expansion of natural gas conservation programs delivered by utilities, which would be subject to discussions with the Ontario Energy Board[17]."

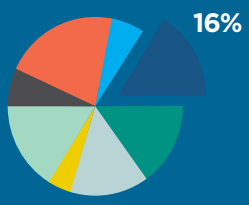
Targeted GHG Impact: 18 per cent of 2030 total (about 3.2 MTs)

STATUS: NO ACTION

Conservation programs help people use less natural gas, which in turn helps reduce gas bills and lower carbon pollution. An expansion of natural gas conservation programs in line with the Environment Plan's target could actually cost less to implement than the savings they create for customers[18] – a true win-win situation. But achieving this goal requires immediate and ambitious expansion of existing natural gas Demand-Side Management (DSM) programs.

A previously scheduled Ontario Energy Board (OEB) review of the post-2020-2025 DSM framework is underway, and is a good opportunity to create the conditions to support increased natural gas conservation. To make this happen, the government will need to intervene and direct the OEB to aim for the target set out in the Environment Plan. So far, this hasn't happened.

PROMISE 4



Low Carbon Vehicles Uptake

FROM THE MADE-IN-ONTARIO ENVIRONMENT PLAN:
"...refers primarily to electric vehicle adoption in Ontario and in small part to the expansion of compressed natural gas in trucking[19]."

Targeted GHG Impact: 16 per cent of 2030 total (about 3.2 MTs)

STATUS: MINIMAL ACTION, UNLIKELY TO ACHIEVE TARGET

Ontario made drastic cuts to programs supporting electric vehicle (EV) adoption before releasing its Environment Plan. The plan promised no new programs or funding to replace them, but also relied on a significant increase in EV adoption.

Instead of increasing, EV sales have dropped 55 per cent in Ontario since the cuts to EV programs[20]. It is extremely unlikely that low carbon vehicle uptake will deliver such a large proportion of Ontario's GHG emissions reductions without programs to support that adoption. Evidence around the world shows that electric vehicle uptake surges where government support exists[21]. But a continued lack of investment will lead to declining or stagnant uptake.

Passenger vehicles are only one side of the coin. Freight vehicles also produce an increasing amount of carbon pollution, and are likely to overtake passenger vehicle GHG emissions by 2030[21]. Ontario's Environment Plan included a promise to reduce emissions from heavy-duty vehicles. A new program to redesign the emissions testing program for heavy-duty vehicles and increase enforcement for emissions system tampering did reach the consultation stage in early 2019, and Ontario did pass legislation to help expand compressed natural gas refueling stations for trucks along 400-series highways[23]. Although neither program has yet resulted in significant emissions reductions, these could have a small impact in future.

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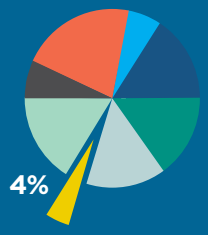
PROMISE 5

Launch an Emission Reduction Fund



FROM THE MADE-IN-ONTARIO ENVIRONMENT PLAN:

"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[24]."

Targeted GHG Impact: 4 per cent of 2030 total (less than 1 MT)

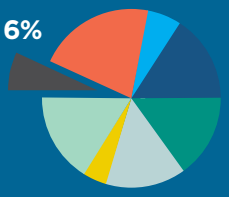
STATUS: MINIMAL ACTION, UNLIKELY TO ACHIEVE TARGET

Ontario promised $400 million to launch the Ontario Carbon Trust, and a reverse auction to encourage private investment in clean technology solutions. This appeared to be included in Ontario's 2019 budget. In fact, this was the only significant financial commitment in the Made-In-Ontario Environment Plan (although a relatively small source of emissions reductions). However there has been no indication of progress towards actual implementation. **That is, there has been no consultation period, nor any progress toward establishing an independent board to form the Ontario Carbon Trust, as promised.**

If implemented properly, this fund could help create new jobs here in Ontario while reducing carbon pollution through cleaner technologies. To maximize impact, any public funds used to attract private investment should support projects with high potential for community benefits and climate change impacts, but that have more difficulty accessing financing on their own. This approach can help clean technology innovators scale up low-carbon tools like clean energy storage systems, energy efficiency improvements, and clean transportation solutions.

We recommend against using a reverse auction model, which Ontario has proposed for $50 million out of the total $400 million fund. This model has proven ineffective in other jurisdictions like Australia, since it funded projects which were very likely to happen with or without public funding[25]. A well-designed fund will not only create distinct and real emissions reductions, but will also achieve broad benefits across Ontario's economy. On the other hand, a poorly designed fund could become one more subsidy for the fossil fuel industry.

PROMISE 6



Other Policies:

Transit, waste, and other commitments

FROM THE MADE-IN-ONTARIO ENVIRONMENT PLAN:

"Emission reductions associated with investments in public transit, and our commitment to improve diversion of food and organic waste from landfills[26]."

Targeted GHG Impact: 6 per cent of 2030 total (approx. 1 MT)

STATUS: SOME ACTION, WITH ROOM FOR IMPROVEMENT

Ontario's most important progress in the "other" category so far has come from action on waste, while the most well-known and highest dollar amount comes from public transit commitments, the impact of which remains to be seen.

When food and organic waste ends up in landfills, it breaks down without oxygen and creates methane, a potent greenhouse gas. In 2015, greenhouse gas emissions from the waste sector accounted for about five per cent of Ontario's total[27]. Government actions can help reduce the amount of organic waste created in the first place, divert it from landfills, and even help turn this waste into compost or renewable fuel sources instead of methane. It's also important to make sure that waste isn't reduced in a way that creates more pollution by, for example, burning it. Ontario has made progress by committing to reducing and diverting organic waste. A 2019 Waste Discussion Paper[28] followed up on several important promises from the Environment Plan, including expanding municipal green bin programs, working to ban food waste from landfills, and improving food donation programs. If implemented, these actions could significantly reduce GHG emissions from organic waste.

Improving public transit is another important action in this category. Ontario needs reliable, affordable public transit to shift people out of their gas-powered cars and into alternatives where it makes sense to do so. While the Environment Plan mentioned additional investments for subways and relief lines, there were few details tying public transit into their plans to reduce carbon pollution.

Since then, Ontario has committed $480 million in provincial funding for rural and northern transportation infrastructure projects[29], with additional funds requested from the federal government. If approved, this investment will help fund new buses, garages, stations, bus fleet electrification, and bike lanes. However the project list also includes road widening and new road construction in forest and wetland areas, meaning some of the proposed projects will actually create more carbon pollution from cars.

Premier Ford's pledge to devote over $11 billion in provincial funds to transit projects in the GTA created controversy by altering previous plans for transit expansion, and relying on other levels of government to fund the majority of these projects[30]. Plans to upload responsibility for Toronto's subways to the province and alter critical infrastructure like the Relief Line (now Ontario Line) will likely mean even longer delays to build what transit riders need right now[31].

This means more drivers out on the roads polluting for longer when they could be taking public transit, and sunk costs to begin design and planning all over again, all to accommodate subway and light rail extensions which are not supported by evidence.

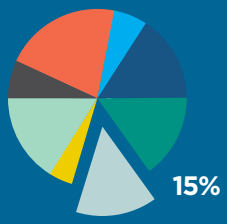
Continuing to prioritize gas-powered car drivers will also keep more polluting cars on the road. Whether it's fighting carbon pricing to avoid higher gas prices, reviving shelved highway proposals like the GTA West Highway[32] (also known as Highway 413), tearing out electric vehicle charging stations[33], or continuing to prioritize car travel in land use planning decisions, Ontario's new government has consistently made it harder to shift drivers out of polluting cars. Without a coherent strategy to guide this shift, any big dollar amounts promised for public transit are unlikely to translate into overall reductions in carbon pollution.

Ontario has made progress on other small action items from the Environment Plan. For example:

- ✓ In January 2019, the Province of Ontario re-opened a Global Green Bond, which allows investors to support energy efficient buildings and clean transportation projects[34]
- ✓ In Budget 2019, Ontario followed the federal government's lead by offering capital cost allowances for businesses to write off the cost of clean energy equipment[35]

PROMISE 7

Innovation



FROM THE MADE-IN-ONTARIO ENVIRONMENT PLAN:
"Innovation includes potential advancements in energy storage and cost-effective fuel switching from high intensive fuels in buildings to electricity and lower carbon fuels. 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[36]."

Targeted GHG Impact: 15 per cent of 2030 total (2.7 MTs)

STATUS: NO ACTION

There is no clear explanation in the Environment Plan of how these significant emissions reductions will be achieved, and which government actions will lead the way. The reference to "program details" shows that program and policy support is necessary to accomplish the stated advancements in energy storage and fuel switching. But without any indication yet of what this support may be, and none of the promised "updating and reporting" in this area of the Environment Plan, we must conclude that there has been no action yet.

PART 2

The Bigger Picture

Ontario's recent cuts to climate change policies and programs have been well documented. It's important to acknowledge that these cuts will have a dramatic impact on Ontario's ability to address climate change. Their impact must be considered alongside Ontario's planned actions as outlined in the Made-in-OntarioEnvironment Plan.

We've mapped out a timeline on the next page which puts Ontario's actions in context with the accompanying cuts, as well as federal actions which will make an impact. For a more exhaustive list of cuts and actions, refer to Appendix A (available online only).

SUMMER 2018

July 2018: Cap-and-Trade cancellation: The Ontario government begins the process to scrap Ontario's first carbon pricing system, which had been in place since January 2017.

July 2018: Cuts to Climate Change Action Programs: The revenues raised from cap-and-trade went directly to hundreds of climate change programs across Ontario, including: energy efficiency retrofits for schools, social housing, and hospitals; the GreenON energy efficiency program for homes and business; electric vehicle incentives; new organic waste facilities and hundreds of municipal cycling programs. The vast majority of these programs ended with cap-and-trade.

FALL 2018

July 2018: Cancellation of 758 Renewable Energy Projects & the Green Energy Act: Many small renewable energy projects in remote and/or Indigenous communities scrapped, along with larger projects meant to further decarbonize Ontario's electricity grid. Future renewable energy projects will now face more stringent municipal planning standards for approval than fossil fuel

September 2018: Ontario misses deadline for provinces to submit carbon pricing plans to federal government.

November 2018: Ontario releases the Made-in-Ontario Environment Plan, outlining commitments to reduce the province's greenhouse gas emissions without a carbon price.

WINTER 2019

January 2019: Federal Output-Based Pricing System (for industrial emitters) implemented in Ontario and other provinces without an approved system of their own.

February 2019: Ontario's Industrial Emission Performance Standards (EPS) system (for industrial emitters) proposed for consultation.

SPRING 2019

April 2019: Federal carbon price on fuels comes into effect in Ontario and other provinces with no approved system of their own.

May 2019: Ontario's budget bill passes, cutting funding to more climate action programs, including cutting the 50 Million Tree Program.

July 2019: Ontario Court of Appeal upholds constitutionality of federal carbon pricing plan. (Appeals to the Supreme Court of Canada now scheduled for 2020.)

What are the impacts of Ontario's cuts to climate action programs?

Let's examine the early impacts of Ontario's cuts to previous climate action programs, as well as the introduction of the federal price on carbon.

Looking at province-wide trends, we see:

1. A significant loss of government revenue. Cap-and-trade brought in approximately $1.9 billion per year designated for projects to reduce GHG emissions. Ontario's Financial Accountability Officer found that "the loss of cap and trade revenues will exceed the savings from cancelling the related spending programs[37]," calculating the Province's budget balance will worsen by a total of $3.0 billion over the next four fiscal years[38].

2. The federal price on carbon has had, thus far, no significant impact on gasoline prices, which are lower now than when there was no price on carbon in Ontario last summer. Both the federal carbon price and the province's previous cap-and-trade system added about 4.5 cents per litre, but the price of gasoline has fluctuated by almost 40 cents per litre in the past year due to changes in the price of crude oil, supply and demand, and other factors[39].

3. A 55 per cent drop in electric vehicle sales following the cancellation of incentives for electric vehicles and charging stations[40].

4. A small loss of electricity capacity due to renewable energy contract cancellations, which will add to the IESO's projected shortfall when the Pickering nuclear facility closes in 2024[41].

5. An overall increase in costs for households. A recent analysis found that the climate change policies in Ontario's Environment Plan would be 59 per cent more costly for businesses and households in 2022 compared with accepting the federal government's carbon pricing approach for the same quantity of GHG reductions[42].

PART 3

How to Fix It: Actions to help reduce GHG emissions in Ontario

Nearly a year has passed since Ontario released its Made-In-Ontario Environment Plan. During that time, there's been next to no progress on implementing its many goals. But some of the lost time can be made up with accelerated action. Here are some short-term recommendations for Ontario to start taking real action:

- ☐ Strengthen Ontario's greenhouse gas reduction target to match what scientists say will keep warming to 1.5 degrees, and achieve net-zero GHG emissions by 2050.
- ☐ Accept the federal carbon pricing plan for both consumers and large industrial emitters.
- ☐ Immediately instruct the Ontario Energy Board to increase utilities' natural gas energy efficiency programs to meet the Environment Plan's targets as a minimum.
- ☐ Restore funding for climate action projects delivered by municipalities (including bike lanes, electrifying transit, social housing retrofits), particularly those cancelled at or after the design stage.
- ☐ Update Ontario Building Code to require stronger energy efficiency measures, aiming for net-zero emissions in new buildings by 2030.
- ☐ Consult with stakeholders on a plan to increase electric vehicle adoption in line with the Environment Plan's targets.
- ☐ Work with rural and remote communities to plan new renewable energy projects to enhance energy independence, energy affordability and continue greening Ontario's electricity grid.
- ☐ Support low-income Ontarians in switching to clean, energy-efficient alternatives to fossil fuels.
- ☐ Review all $700M in fossil fuel subsidies provided by Ontario[43] with the goal of eliminating them and redirecting to cleaner energy alternatives.
- ☐ Stop the GTA West Highway Expansion, and invest instead in good, evidence-based public transit, located where it's most needed, and will reduce the most carbon pollution from cars.
- ☐ Reverse course on policies allowing sprawl developers to build out instead of up. Sprawl significantly increases travel times and carbon pollution from transportation.
- ☐ Support implementation of a federal Clean Fuel Standard, or Ontario's own ambitious low carbon fuel standard, to shift to cleaner fuels.

CONCLUSION

We set out to answer two questions in this report.

Over a year later, does Ontario's promise to reduce carbon emissions without cap-and-trade, or any other carbon pricing system, hold up?

What has Ontario's government done to reduce greenhouse gas emissions?

In answer, Ontario's government is not on track to meaningfully reduce Ontario's carbon footprint. Although this is theoretically possible, Ontario would have to take much stronger action on a larger scale, and act much more quickly.

Unless action is accelerated, Ontario is unlikely to meet even the weaker emissions targets it set in its Made-In-Ontario Environment Plan. The ambition and scale of every proposed action is much smaller than necessary to meet the goals the province has set out, and in some cases much weaker than overlapping federal systems they would replace.

Ontario's failure to act is a broken promise. The government has acknowledged that the climate crisis is real, human-caused, and must be addressed. The Environment Plan contained many promises to "continue to do our fair share to reduce greenhouse gases and help communities and families prepare to address climate change," and to "ensure Ontario achieves emissions reductions in line with Canada's 2030 greenhouse gas reduction targets under the Paris agreement[44]." But these promises are hollow if they aren't backed up by strong actions.

There is still time for the Ontario government to step up and take meaningful action to address climate change. Many ways to reduce greenhouse gas emissions are spelled out in the plan Ontario committed to in 2018. But those actions — and many others — need to be implemented now.

As climate change accelerates and Ontarians face more devastating wildfires, floods, and health impacts, Ontario's government needs to get serious about turning its words and promises into action.

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