ERO 013-4208: Preserving and Protecting our Environment for Future Generations: A Made in Ontario Environment Plan, 2019

The Ontario Society of Professional Engineers (OSPE) is pleased to present the following submission concerning the *Made in Ontario Environment Plan*, released on November 29, 2018.

OSPE is the voice of the engineering profession in Ontario. As an organization, we advance the professional and economic interests of our members, many of whom work in the environmental, energy and transportation sectors. OSPE is pleased to respond to this notice for public comments to provide feedback to Ontario's Environment Plan.

While OSPE commends some of the actions outlined in the plan, we believe it does not do enough to reduce carbon emissions and provides several opportunities for improvement.

Ontario's professional engineers are experienced at reducing carbon emissions in almost every sector of Ontario's economy, including the achievement of significant gains in Ontario's clean electricity system. Engineers are capable of leveraging their knowledge and experience to inform legislation to achieve and surpass emission reduction targets, even without putting a price on carbon pollution.

OSPE stands ready to work with the government to deliver on its vision of growth, prosperity, and a cleaner environment for the benefit of the people of Ontario.

Key Recommendations

Climate Change

1. **Consult engineers in discussions regarding the development and implementation of a Provincial Impact Assessment.**
    - OSPE supports the government's plan to undertake a provincial impact assessment to identify where and how climate change is likely to impact Ontario's communities, and urges the involvement of engineers, who are capable of leveraging their knowledge and experience to properly assess and analyze the risks, vulnerabilities, and impacts of climate change on key economic sectors.

2. **Ensure the Ontario Carbon Trust and its Reverse Auction system do not focus on identifying projects that will solely reduce emissions and costs, but also emphasize those that are able to deliver high quality, long-term, sustainable results.**
    - Australia's Emission Reduction Fund has been documented as an ineffective tool that has failed to reduce greenhouse gas emissions. This Fund is skewed towards projects from lower-polluting sectors of the economy, while the heavily polluting industries are underrepresented. It is important for Ontario to learn from Australia's experience and focus on policies that target prominent polluters.
    - OSPE agrees with the importance of involving the private sector, as it has the necessary capital, capability and research expertise to transform clean technology markets and help reduce Ontario's green house gas emissions. However, the government of Ontario must ensure that they are incentivizing behaviours that will motivate companies to effectively adopt these new technologies.

3. **Require municipalities to include Stormwater Infrastructure Asset Management Plans as a component of Municipal Asset Management Plans, and develop standardized measurement criteria for municipalities to properly monitor stormwater infrastructure**
    - These recommendations were developed after surveying municipalities across Ontario in OSPE's *Weathering The Storms* report, prepared in partnership with the Residential and Civil Construction Alliance of Ontario and the Ontario Sewer & Watermain Construction Association.

4. **Include at least one professional engineer representing OSPE on the advisory panel on climate change.**
    - Engineers play a critical role in alleviating the negative effects of climate change and their technical expertise must be considered when establishing innovative climate change solutions.

5. **Ensure engineers are involved in modernizing the Building Code to equip homes and buildings to better withstand extreme weather events.**
    - Scientific evidence and engineering insight are imperative when establishing guidelines to improve local climate resilience.

6. **Support research on autonomous vehicles for transit.**
    - OSPE encourages more research and development on autonomous vehicles and other mobility systems. Currently OSPE is working with Ryerson University and the Canadian Urban Transit Research and Innovation Consortium (CUTRIC) on a National Smart Vehicle Demonstration and Integration Trial which aims to integrate fully autonomous, connected, low speed, electrified vehicle shuttles (e-LSA) in Canadian municipalities. Engineering research is critical in the new economy and fosters economic growth.

7. **Reverse the decision to eliminate the Office of the Environment Commissioner of Ontario.**
    - OSPE truly values the importance of an independent office that reports on government progress on climate change, energy and other environmental issues
    - OSPE has had the opportunity to work with both the Environmental Commissioner and the Auditor General, and have the utmost respect for both Offices. However, we believe the environment would be better safeguarded under the watch of an independent office such as the Environment Commissioner of Ontario.

Energy

8. **Implement new regulations where surplus emission-free electricity is priced separately from dependable electricity.**
    - The government of Ontario should engage in consultations with appropriate engineering and electricity rate experts on how best to introduce an interruptible retail electricity market. OSPE's Energy Task Force is currently working on a Retail Electricity Price Reform report and will provide the Ontario government with a number of recommendations regarding a no-cost way to achieve economy-wide emissions reductions in the future.

Excess Soil

9. **Create a model-by-law to promote the use of best management practices for excess soil, as outlined in *Management of Excess Soil- A Guide for Best Management Practices*.**
    - OSPE applauds the government's recognition that excess soil is very often a resource that can be reused, as well as the need to limit soil being sent to landfills.
    - OSPE believes decisions regarding the use of excess soil on construction sites should be placed on a Qualified Person (QP), and regulators need to be involved in ensuring those QPs have the proper qualifications. QPs must also be held accountable for demonstrating an effective Quality Assurance Program.
    - OSPE's *Excess Soil Management: Ontario is Wasting a Precious Resource* report, prepared in partnership with the Residential and Civil Construction Alliance of Ontario and the Greater Toronto Sewer and Watermain Construction Association, highlights the importance of excess soil management in Ontario.

Sincerely,

Jonathan Hack, P.Eng
President and Chair
Ontario Society of Professional Engineers

Sandro Perruzza
Chief Executive Officer
Ontario Society of Professional Engineers