



Hamilton

Healthy and Safe Communities Department  
Healthy Environments Division - Public Health Services  
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March 29, 2019

Climate Change Programs Branch  
c/o Vicky La  
Financial Instruments Branch- Policy Unit  
77 Wellesley Street West  
Toronto ON M7A2T5

**Re: Making polluters accountable: Industrial Emission Performance Standards**

Dear Sir/Madame:

Thank you for the opportunity to comment on the proposed *Making polluters accountable: Industrial Emission Performance Standards*.

**About The Healthy Environments Division**

The Healthy Environments Division of the Healthy and Safe Communities Department within the City of Hamilton is mandated by the Province of Ontario's Ministry of Health and Long Term Care (MOHTLC). One goal of *Ontario Public Health Standards: Requirements for Programs, Services, and Accountabilities, (2018)* is:

*"To reduce exposure to health hazards and promote the development of healthy built and natural environments that support health and mitigate existing and emerging risks, including the impacts of a changing climate."*

The City of Hamilton's Healthy Environments division maintains *Ontario Public Health Standards: Requirements for Programs, Services, and Accountabilities, (2018)* mandated by the Province of Ontario as well as *Healthy Environments and Climate Change Guideline, 2018*.

The *Healthy Environments and Climate Change Guideline, 2018* states: *"The Healthy Environments and Climate Change Guideline is intended to assist boards of health to develop approaches for promoting healthy built and natural environments to enhance population health and mitigate environmental health risks."* The City of Hamilton is working toward reducing emissions and adapting to Climate Change to protect citizen's health and well being.

The elimination of coal from Ontario's electricity grid was a significant achievement in slowing climate change and it is important to continue with this momentum. Lowering GHG's not only slows climate change, it also protects human health.

We would like to submit the following feedback on the proposed *Making polluters accountable: Industrial Emission Performance Standards* regulation:

Comments:

1. *Program Scope*

Including additional GHG emitters to the program has the potential to reduce GHG emissions Province wide and therefore may deem the program more effective. It may be beneficial to offer the revenue collected from the units to fund GHG reduction initiatives for all the participating industries, instead of only supporting the industrial sector.

2. *Emissions threshold and opt-in provision*

The proposed lower threshold on a megawatt hour basis for the electricity sector is a logical approach if Ontario's grid remains predominately emissions-free. The elimination of a stringency factor does not encourage renewable energy to be used in the grid. To move toward a net-zero grid, it will be essential to eliminate fossil fuels completely.

3. *Competitiveness/carbon leakage risk assessment and determination of stringency factor*

It may be necessary to work with the federal government to align all provinces and territories on standards to avoid carbon leakage within Canada. Stringency factors should take long-term reduction targets into consideration. It is recommended that these goals be determined by science. Currently, the Intergovernmental Panel on Climate Change (IPCC) recommend net zero emissions globally by 2050<sup>1</sup> to limit warming to 1.5°C. It is recommended that Ontario align its targets with the IPCC.

4. *Compliance obligations/flexibility mechanisms*

Although it is very important to keep industry in Ontario and provide employment, it is important to keep in mind that the purpose of this program is to reduce GHG emissions within the Province. The effects on human health and citizens' quality of living should be critical factors in the decision-making process.

The Healthy Environments Division supports initiatives that lower GHG emissions and the promotion of human health. If you require further information or discussion, please contact the Senior Project Manager – Air Quality and Climate Change within the City of Hamilton's Healthy Environments Division. Thank you very much for your time.

Sincerely,

Kevin McDonald, Director  
Healthy Environments Division

1. [https://www.ipcc.ch/site/assets/uploads/sites/2/2019/02/SR15\\_Chapter2\\_Low\\_Res.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2019/02/SR15_Chapter2_Low_Res.pdf)