



**POWER
WORKERS'
UNION**

May 10, 2021

Cheryl Davis
Ministry of Transportation - Environmental Policy Office
777 Bay St.
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Toronto, ON
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Canada

Via online submission to ero.ontario.ca

Re: 019-3422, Update to the Ministry of Transportation's Statement of Environmental Values

The PWU represents the majority of the highly skilled workers in Ontario's electricity generation, and delivery sector. Attached please find a list of PWU employers.

The PWU appreciates the opportunity to submit comments and make recommendations to the Ministry of Transportation in support of the proposed update to its Statement of Environmental Values (SEV).

We hope you will find the PWU's comments useful.

Yours very truly,

Jeff Parnell
President

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List of PWU Employers

Alectra Utilities (formerly PowerStream)
Algoma Power
AMEC Nuclear Safety Solutions
Aptum (formerly Cogeco Peer 1)
Atlantic Power Corporation - Calstock Power Plant
Atlantic Power Corporation - Kapuskasing Power Plant
Atlantic Power Corporation - Nipigon Power Plant
Bracebridge Generation
Brighton Beach Power Limited
Brookfield Power Wind Operations
Brookfield Renewable Power - Mississagi Power Trust
Bruce Power Inc.
Canadian Nuclear Laboratories (AECL Chalk River)
Collus Powerstream
Compass Group
Corporation of the County of Brant
Covanta Durham York Renewable Energy Ltd.
Elexicon (formerly Whitby Hydro)
Enwave Windsor
Erth Power Corporation (formerly Erie Thames Powerlines)
Erth Corporation
Ethos Energy Inc.
Great Lakes Power (Generation)
Greenfield South Power Corporation
Grimsby Power Incorporated
Halton Hills Hydro Inc.
Hydro One Inc.
Hydro One CSO (formerly Vertex)
Hydro One Sault Ste. Marie (formerly Great Lakes Power Transmission)
Independent Electricity System Operator
Inergi LP
InnPower (Innisfil Hydro Distribution Systems Limited)
J-MAR Line Maintenance Inc.
Kenora Hydro Electric Corporation Ltd.
Kinectrics Inc.
Kitchener-Wilmot Hydro Inc.
Lakeland Power Distribution
London Hydro Corporation
Milton Hydro Distribution Inc.
New Horizon System Solutions
Newmarket Tey/Midland Hydro Ltd.
Nuclear Waste Management Organization
Ontario Power Generation Inc.
Orangeville Hydro Limited
Portlands Energy Centre
PUC Services
Quality Tree Service
Rogers Communications (Kincardine Cable TV Ltd.)
Sioux Lookout Hydro Inc.
SouthWestern Energy
Tillsonburg Hydro Inc.
The Electrical Safety Authority
Toronto Hydro
TransAlta Generation Partnership O.H.S.C.
Westario Power

Power Workers' Union Submission to the Update to the Ministry of Transportation's Statement of Environmental Values

The Power Workers' Union (PWU) is pleased to submit comments and recommendations to the Ministry of Transportation (MTO) regarding updates to the Ministry's Statement of Environmental Values (SEV). The PWU is a strong supporter and advocate for the prudent and rational reform of Ontario's electricity sector and recognizes the importance of planning for low-cost, low-carbon energy solutions to enhance the competitiveness of Ontario's economy. Electrification of the transport sector is a core component of this reform and is important for Canada's clean energy transition.

The SEV provides guidance to the Minister and staff for making policy, legislation, regulations and instruments that may affect the environment. Ontario's *Environmental Bill of Rights, 1993* requires each ministry to have an SEV. The MTO is updating its existing SEV to: better reflect its current vision, mandate and management approach; acknowledge climate change as a priority; and, ensure up-to-date references.¹

The PWU believes in a sustainable, environmentally-responsible transportation sector that includes addressing climate change as a priority. We are encouraged by the Ministry's shared vision and support the Ministry's initiative to update their SEV.

Recommendation: Complete the MTO's Statement of Environmental Values Update

The MTO describes their mandate as being "a world leader in moving people and goods safely, efficiently and sustainably to support a globally competitive economy and a high quality of life."² Actions taken by the MTO to integrate the principle of sustainability into its activities are outlined in its annual report.³ The PWU notes that the MTO operates programs promoting sustainability in the transportation system, including:

- **Green vehicle licence plates** that allow electric vehicles (EVs), plug-in hybrid vehicles, and hydrogen fuel cell vehicles to access HOV lanes that are otherwise reserved for vehicles carrying two or more people.⁴
- **Implementation of EV-related legislation and emissions standards** set out in the Highway Act, 1990.⁵

The PWU considers mitigating climate change to be a matter of critical importance for achieving a sustainable transportation sector consistent with the MTO's goals and objectives. The PWU believes that the continued electrification of the provincial economy – fuelled by Ontario's low-carbon-hydro, biomass, and nuclear generation – is a fundamental prerequisite to a sustainable transportation system. The electrification of Ontario's transportation sector reduces greenhouse gas emissions that lead to climate change, as well as pollutants that impact human health and the environment.

¹ Environmental Registry of Ontario, Update to the Ministry of Transportation's Statement of Environmental Values, 2021

² Ontario Ministry of Transportation, About the Ministry of Transportation, Website.

³ Ontario, Published plans and annual reports 2020-2021: Ministry of Transportation, 2020

⁴ Ontario Ministry of Transportation, Ontario's Green Licence Plate Program, Website.

⁵ Highway Traffic Act, R.S.O. 1990, c. H.8

The Ministry's accountabilities for roads and public transit extend to every corner of the province and influence the impacts that Ontario's transportation sector has on the economy, the environment, and civil society. For example, the province's transportation sector contributes about a third of Ontario's annual greenhouse gas emissions. This breadth requires MTO to work collaboratively with other provincial ministries, the federal government, and municipalities to improve efficiencies and coordinate policy and planning. MTO's continued focus on sustainability is important and appropriate, particularly as it relates to its role in combatting climate change.

The PWU supports three additions to the MTO's proposed SEV that will further support this commitment to the sustainability of Ontario's transportation sector:

1. **"Integrating sustainability into the ministry's decision making, programs, policies and operations"**

The Organisation for Economic Co-operation and Development (OECD) has developed guidance for "improving policy integration to better incorporate sustainable development into policy and finance, and in that respect capitalise on synergies and benefits across economic, social and environmental policy areas as well as between domestic and internationally-recognized sustainable goals."⁶

The PWU supports integrating sustainability into the fabric of the Ministry's decision-making. Integrated policy making addresses both horizontal sectoral integration—between different ministries, and vertical integration – between different tiers of government, or a combination of both.

2. **Climate Change:** "ensure climate change mitigation and resilience are reflected in relevant operations, policies and programs"

The PWU applauds the MTO for including climate change mitigation and resilience as important factors in its operations, policies, and programs. The MTO's policies can advance the electrification of Ontario's transportation sector through supporting the adoption of electric and hydrogen vehicles for light, transit and heavy vehicle applications. These innovations can take advantage of Ontario's sustainable low-carbon baseload electricity made right here in Ontario.

3. **Climate Change:** "work with other ministries to support integration of climate change considerations"

The PWU supports the MTO's intention to work with other ministries to take an integrated approach to climate change policy making and planning. Here in Canada, research has clearly demonstrated that solutions to climate change must be integrated across many different technologies and economic sectors.⁷ Hydrogen vehicles, for example, will require integrated policies and planning between the natural gas, electricity, and transportation sectors. Clean biofuels integrate the agriculture, forestry, and transportation sectors. As the OECD suggests, these synergies can generate significant benefits. Co-operation among all ministerial portfolios will be required to mount an effective response to climate change.⁸

⁶ OECD, Policy Integration, Website

⁷ Strategic Policy Economics, Analysis supporting the 2020 Green Ribbon Panel Report, 2020

⁸ PWU submission to the MENDM on refocusing Ontario's long-term energy planning framework, April 2021

The PWU looks forward to continuing this dialogue with the MTO in future consultations to achieve a sustainable transportation system for Ontario.

Closing

The PWU has a successful track record of working with others in collaborative partnerships. We remain committed to continuing to work with the Ministry of Transportation and other energy stakeholders to strengthen and modernize Ontario's electricity system. The PWU is committed to the following principles: Create opportunities for sustainable, high-pay, high-skill jobs; ensure reliable, affordable, environmentally responsible electricity; build economic growth for Ontario's communities; and promote intelligent reform of Ontario's energy policy.

We believe this recommendation is consistent with, and supportive of Ontario's objectives to supply low-cost, low-carbon, and reliable electricity for all Ontarians. The PWU looks forward to discussing these comments in greater detail with the Ministry of Transportation and participating in the ongoing stakeholder engagements.