



Oct. 27, 2016

EBR 912-5806 – Guide: Consideration of Climate Change in Environmental Assessment in Ontario

Comments:

OSPE has been a strong proponent and advocate for effective and impactful policies by the Ontario Government to mitigate the effects of climate change. OSPE continues these efforts by providing the Ministry of Environment and Climate Change (MOECC) with input and comments about the policy guide *Consideration of Climate Change in Environmental Assessment in Ontario* (the Guide).

Overall the document presents a broad based and easy-to-understand description of elements of environmental assessment (EA) as it relates to climate change. Specific comments about individual sections of the Guide are as follows.

Introduction –

The description of what environmental assessments entail and their Codes of Practice are stated in layperson language and clearly understood. OSPE is especially pleased that resilience to future environmental effects are recognized. This is most importantly conveyed in the Provincial Policy Statement 3.1.3 that requires consideration of increased risks associated with natural hazards.

In the Introduction and elsewhere in the Guide, statements are made on procedures and steps involved in preparing and undertaking EAs by proponents. Yet, proponents are not clearly defined in terms of whom or what type of person is typically a proponent. It may warrant specifying the qualifications required to undertake EA work – however this can be multi-disciplinary based on the nature of the development project.

Climate Change and Climate Effects –

The two bullet points on Page 8 are extremely important for experts and the general public to understand. OSPE highly supports the conveyance of the two elements essential in addressing climate change – mitigation and resilience. In fact, these two themes are prominent in a course being developed by OSPE with funding from the Ministry of Citizenship and Immigration on workplace culture and communications for newcomers in environmental industries.

Considering the Project's Effect on Climate –

OSPE agrees with MOECC that it is prudent to consider both qualitative and quantitative effect on climate by major or substantive projects. There is much to be gained by a (expert) proponent to first assess the project by summarizing climate mitigation

measures from a holistic, descriptive perspective to gain an overall understanding of all variables and characteristics of project development. As an example, the clearing of vegetation for a major project encompasses more than just clearing of the land. Lack of vegetation increases erosion and potential of flooding as well as, depending on soil characteristics, increased albedo which could lead to higher temperatures on a micro-scale.

For quantitative considerations, it indeed is essential for a proponent to generate metrics to effectively mitigate CO₂ emissions. In conducting analysis on an excess soil project, OSPE found that determining actual CO₂ emitted from vehicles, for example, is a complicated and inexact undertaking. A great many variables are at play such as type of vehicle, distance travelled, etc. It would be helpful if MOECC could take an inventory of emission calculations and estimation factors and develop a generic template or online tool so a proponent can more easily and accurately determine the actual amount of emissions being addressed.

Considering the Effects of Climate on a Project –

OSPE strongly agrees with the tone of statements in this section in terms of the importance of considering all aspects of the environment in EAs including the interrelationships between various components of the environment (i.e. a holistic systems approach). Having said this, the five approaches addressing broad considerations of effects of climate on a project entail a very high number of variables that need to be investigated. While fully realizing that greater protection necessitates greater controls, MOECC should use caution so that they do not lead to additional red tape or overburdening the process of developing and issuing an EA.

Relating to a specific example in one consideration in determining if the proposed project contributes to or diminishes resilience of ecosystems is a sample question that asks if the project's alteration of local drainage patterns exacerbates impacts to water resources projected to occur with climate change. This pertinent and appropriate example would require a QP such as an individual with a P.Eng.. Again, it would be advisable to add more descriptions of the types of proponents that would typically be required (or allowed) to perform EAs to stress that not all proponents are qualified to perform them.

Table 3 is a useful visual to convey a conceptual approach to climate change considerations. Use of this type of table should be encouraged when conveying other considerations, if applicable.

Potential Outcomes of Climate Effects Consideration –

This section is straight-forward and easily understood although implies that proponents all have equal qualifications to conduct EAs.

Documenting Climate Effects in Environmental Assessment –

This section solidifies and reinforces the fact that EAs are complex and a wide range of considerations and their variables are required to develop a proper, valid and acceptable EA. Proponents must be highly qualified to document climate considerations as outlined in the Guide. OSPE reiterates that even if many EAs may not require a QP (as this term

is now defined under O.Reg. 153/04), a proponent nonetheless must have proper educational and experiential qualifications.

As well, the Guide implicitly infers that all proponents know how to prepare an EA. OSPE recommends the Guide clearly indicates that proponents must ensure that they are knowledgeable to properly prepare an EA in addition to being qualified to conduct one. If possible, MOECC should hold info sessions on how to prepare an EA. Even more effective would be to provide funding for OSPE to develop a course or learning tool to prepare proponents on how to conduct and prepare an EA. OSPE would be pleased to discuss this initiative with MOECC.