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Constituent Societies

ANDSOOHA – Public Health
Nursing Management in Ontario

Association of Ontario
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Association of Supervisors of
Public Health Inspectors of
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Health Promotion Ontario

Ontario Association of Public
Health Dentistry

Ontario Society of Nutrition
Professionals in Public Health

*Charitable Registration
Number 11924 8771 RR0001*

December 15, 2015

Melissa Ollevier
Senior Policy Advisor
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Air Policy Instruments and Programs Design Branch
77 Wellesley St. W., 10th Floor
Toronto Ontario, M7A 2T5

Dear Ms. Ollevier:

**RE: OPHA Comments – Cap and Trade Program Design Options – EBR
Number 012-5666**

The Ontario Public Health Association (OPHA) would like to thank the Ministry of the Environment and Climate Change (MOECC) for an opportunity to comment on design options for the upcoming cap and trade program. OPHA strongly supports concrete actions to reduce greenhouse gases and help Ontario achieve its emission reduction targets. While everyone has to do their part to meet these targets, OPHA wants to stress the need to consider the impact to our most vulnerable populations especially those on low income.

Vulnerable populations should not be unduly burdened by a cap and trade program

Research has identified that vulnerable populations (children, seniors, chronically ill, low income, homeless, disabled people) are most affected by the impacts of climate change. These groups often also struggle financially. It is important that any criteria tied to a cap and trade program consider the social determinants of health and not present an additional burden to the most vulnerable populations already under duress. It is recommended that the Province consider providing rebates and/or incentives for low income populations, seniors and others who are most affected by the cap and trade program to mitigate the financial burden for these groups.

Health co-benefits of reducing carbon should feature prominently in promotion and education plans

Health co-benefits of these actions are numerous and include: improved air quality, reduced urban heat islands, increased community resiliency, protection from climate-related events such as flooding and power disruptions, protection of housing and community infrastructure, reduced incidence of vector-borne diseases, increased physical activity, general wellbeing and lower health care costs. As a part of this cap and trade program, the Province should consider launching a communication campaign demonstrating the health, environmental and economic benefits of the program as well as the consequences of inaction. Health benefits on reducing carbon emissions should be identified in communication and education plans.

Proceeds from cap and trade should be allocated to a dedicated fund to address climate change

It is recommended that all revenue generated through the cap and trade program be reinvested into ensuring Ontario transitions to a low carbon economy. Investment should focus on actions that further reduce carbon emissions such as public transit, transit-supportive communities, incentives for energy efficient homes and vehicles, LED and solar powered street lighting/signaling, electric vehicle charging station infrastructure, active transportation supportive infrastructure, renewable energy, and green technology.

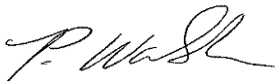
Adaptation will be costly and challenging for communities. It is recommended that a portion of the funds collected from the Province's cap and trade program be directed to assist communities in implementing climate change adaptation and mitigation measures. Examples include health vulnerability assessment tools, climate modeling, flood mapping, and model building code standards.

Urban forestry and afforestation activities should be considered an offset under the cap and trade program

Green spaces and other natural systems help to improve air quality and mitigate climate change impacts. Forested areas and green spaces contribute to carbon sequestration and storage, provide shade from heat and help buffer against the damaging effects of flooding during storm surges. Municipalities, conservation authorities, and non-governmental organizations are involved in afforestation, sustainable forest management, urban forest management and management of natural. These programs all contribute to capturing carbon and should be considered under an offset program.

In closing, OPHA commends the Ministry of Environment and Climate Change for taking action to reduce greenhouse gas emissions through the proposed cap and trade program and climate change strategy. Strong and immediate action is needed by all levels of government to transition to low carbon communities and to implement adaptation measures to reduce the health impacts of climate change.

Sincerely,



Pegeen Walsh, Executive Director
OPHA