



Promoting safe and sustainable infrastructure

December 15, 2015

MEMBER ASSOCIATIONS



Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Air Policy Instruments and Programs Design Branch
77 Wellesley Street West
Floor 10
Ferguson Block
Toronto, Ontario M7A 2T5



Attn: Melissa Ollevier, Senior Policy Advisor

**RE: CAP AND TRADE PROGRAM DESIGN OPTIONS
EBR REGISTRY NUMBER: 012-5666**



As one of the leading voices of public infrastructure in Canada, the Ontario Coalition for Sustainable Infrastructure (OCSI) is committed to the sustainability of our transportation, water and sewer systems and other public infrastructure.

OCSI brings together the combined resources of six well-established organizations to work toward one voice for infrastructure in Ontario. The Coalition comprises:



- Municipal Engineers Association (MEA)
- Municipal Finance Officers' Association (MFOA)
- Ontario Good Roads Association (OGRA)
- Ontario Public Works Association (OPWA)
- Ontario Water Works Association (OWWA)
- Water Environment Association of Ontario (WEAO).



The mission of the Coalition is the promotion of "Safe and Sustainable Infrastructure".

The Ontario Coalition for Sustainable Infrastructure represents the municipal public works sector. In reviewing the EBR post on Cap and Trade Program Design Options, OCSI has the following important points which we feel the provincial government should consider during development of this important and far-reaching policy.

www.on-csi.ca

Ontario Coalition for Sustainable Infrastructure
c/o: 108 Georgian Drive, Oakville, Ontario L6H 6V1 CANADA



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1. The Ministry of the Environment and Climate Change must coordinate policy development with other relevant ministries, such as the Ministry of Energy (MOE), Ministry of Economic Development, Employment and Infrastructure (MEDEI) and Ministry of Municipal Affairs and Housing (MMAH), to ensure that the policy fulfils the intended objectives without duplicating other programs that those ministries may already have put in place.
2. We recognize that municipalities have an important part to play in addressing climate change; however, the policy must ensure municipalities are not unduly negatively impacted by the cap and trade policy.
3. The policy must acknowledge the initiatives and significant efforts that municipalities have already implemented to reduce GHG emissions in the province.
4. To continue that momentum, future programs should provide incentives for municipalities to continue to reduce their GHG emissions.
5. We recommend that the cap and trade policy be considered as only one, but important, part of the province's overall response to climate change, which should also include initiatives and projects that help municipalities to become more resilient to the effects of climate change.

OCSI looks forward to continuing to be involved in the consultation associated with this policy.

Thank you for the opportunity to participate in this important consultation process. If you have any questions, please contact our Executive Director, Darla Campbell, P.Eng. at 416 562 9082 or by e-mail at ExecutiveDirector@on-csi.ca. Thank you.

Sincerely,

Carl Bodimeade, P.Eng.
Chair, Ontario Coalition for Sustainable Infrastructure