



Green Party of Ontario
PO Box 1132 Station F Toronto, ON M4Y 2T8

Linda Heron
Chair, Ontario Rivers Alliance
OntarioRiversAlliance.ca

5 June 2014

Dear Linda,

Thank you so much for giving the Green Party of Ontario (GPO) the opportunity to discuss our policies on the issues that are important to the Ontario Rivers Alliance. I am pleased to be able to respond on the GPO's behalf. Please contact me should you have any further queries.

1. Will you make protection and conservation of Ontario rivers, lakes and wetlands a high priority?

Protection and conservation of Ontario's rivers, lakes, and wetlands has been and will continue to be a high priority for the Green Party of Ontario. Water protection is one of the nine commitments outlined in the Green Party of Ontario's 2014 Platform. We share your concerns about the lack of focus on environmental sustainability and consultations with the public and First Nations in Ontario's water policies. To amend that, the GPO is advocating for provincial legislation to protect source water in Ontario.

The GPO has also taken part in citizen advocacy such as the protests against the Melancthon mega-quarry and efforts to protect Guelph's drinking water from the negative effects of the Dolime quarry operations.

In addition, the party endorses the grassroots movement "Food & Water First" that aims to protect Ontario's source water from non-farming activities, and GPO leader Mike Schreiner is the only provincial party leader to have taken the Pledge to put food and water first in Ontario. Finally, the GPO has encouraged cross-party partnerships by joining forces with other parties to protect water in Guelph from the negative effects of mining. It is clear from these and other examples that the GPO is deeply committed to water protection and conservation. The party will continue its activities to protect, conserve, and restore river ecosystems in Ontario.

2. What would you do to protect, conserve and restore healthy river ecosystems in Ontario?

The GPO will introduce legislation to protect source water regions from mining and development projects that put those regions at risk. It will also make sure that businesses in Ontario use water responsibly and efficiently. This includes paying a fair price for water resources. This will be achieved by increasing royalties and levies for industrial water-taking.

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The party will continue to engage in public advocacy for water protection alongside citizens' groups and grassroots organizations.

3. Environmental legislation, policies and processes have been streamlined and gutted to open the way for development and reduce government costs. This has threatened lake and river water quality, water quantity, habitat, fisheries, endangered species, navigability, public health and safety, and places many Ontario rivers at risk.

a. Would your government ensure environmental protection laws and rights are enforced, strengthened, and placed before corporate interests?

Yes, of course. We have demonstrated our commitment to upholding environmental protection laws in speaking against the misuse or overlooking of these laws.

For example, we have continuously spoken out about the Ontario Liberals' gutting of the Endangered Species Act. Endangered Species are not luxuries. By the Ministry of the Environment's own estimations, Ontario's ecosystems provide \$84 billion a year worth of services. Endangered species live in habitats that help clean the air and water, provide us with food and fuel, and offer us great opportunities for recreation. We can't afford to lose them. At the same time, the Liberal government has made it a lot easier to destroy priceless habitats, and to kill, harm and harass endangered species. Behind closed doors, Kathleen Wynne's cabinet added a raft of exemptions to the Endangered Species Act (ESA). The Liberals have put the profits of developers, gravel pit owners, and mining companies ahead of the places we love and the lives of the creatures with whom we share Ontario.

The Green Party of Ontario is the only provincial party to object to the changes to the ESA. We're also alone in standing up against the aggregate industry and demanding a stronger Aggregate Resources Act. And we are the only party to have signed the Food and Water First Pledge. We will commit ourselves to renewing the Endangered Species Act and to reversing the exemptions that have recently been made by the Liberal government.

b. What would you do to restore confidence in government to protect freshwater ecosystems?

The Green Party of Ontario will increase the transparency of decision-making on water use through a) enforcing health, safety, and environmental regulations as a necessary prerequisite for development, b) increasing the role of consultations with the public and grassroots organizations, and c) broadening the agenda of these consultations to ensure issues such as corporate interests are adequately addressed.

c. What would you do to ensure regulators are equipped to properly assess, monitor and ensure compliance of developments that impact on Ontario rivers?

The GPO would ensure that regulators are equipped to properly carry out their jobs by funding

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also through legislation to ensure that they have enough authority to carry out their jobs independently and with integrity.

4. There have been numerous scandals and hidden agendas within government.

a. How would you restore public confidence and trust in the provincial government?

The GPO believes that public confidence and trust in government can be restored through increasing the transparency of government decisions.

For example, the GPO will fight to increase the transparency of land use planning in Ontario by working to overhaul or abolish the Ontario Municipal Board (OMB) whose unelected political insiders overturn the decisions of local councils and the efforts of citizens' groups. This will have direct positive impact on decisions affecting water safety in Ontario. Another way to restore public trust in government is to strengthen public participation in decision-making and policy development.

b. What would you do to ensure an open, transparent, inclusive and accountable government?

See above.

5. Contracts for tailor-made studies that are designed to produce selective outcomes have been used to build public support for a political course of action. A common answer to the criticism is that "it was not within the scope of the study". If governments do not use integrity in all communications, then how can they expect corporations to?

a. What will you do to ensure integrity and honesty is your government's highest priority?

Bringing honesty, integrity, and good public policy back to Ontario's government is the highest priority for the Green Party of Ontario. This is the guiding principle in our current platform and will always remain our goal. We will ensure that each of our decisions come from a place of integrity and honesty by being an open and transparent government. We will encourage public participation in decision-making, engage in dialogue with all stakeholders in any project that we undertake, and we will open our decisions to public scrutiny. We will also consult a wide range of peer-reviewed studies before making decisions and we will consult experts.

b. What will you do to ensure all the facts, both positive and negative, are considered and communicated in studies contracted by and relied upon by your government?

The GPO believes in consulting all the research done on a particular topic, not just the research commissioned by the ruling party. We take pride in the fact that our policy decisions are based on a broad range of well-researched and peer-reviewed studies.

6. TransCanada's proposed Energy East Pipeline would carry highly toxic and corrosive tar sands bitumen across the Province for offshore export. This DilBit will offer little long-term benefit to



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the Province, would

contribute to climate change, and when a spill occurs would place source drinking water and sensitive riverine ecosystems at risk.

a. Would you support or oppose the Energy East Pipeline crossing our Province when it will place 41 rivers, numerous wetlands and source drinking water at risk?

The GPO will prioritize the protection of Ontario's food and water sources. We oppose the Energy East and Line 9 pipelines due to the health and environmental risks posed by possible dilbit spills.

A Cornell University study found that between 2007 and 2010, U.S. pipelines carrying dilbit had a spill-rate three times higher than pipelines carrying conventional crude. Some have compared pumping dilbit to moving hot sand paper through a pipeline because it is more abrasive and acidic, with acid concentrations up to 20 times higher than conventional oil. In addition, dilbit is 40 to 70 times more viscous than conventional crude oil, which requires operating at a higher pressure than conventional pipelines. These factors may explain the increased risk of spills in pipelines pumping dilbit.

Although the science on the corrosive nature of dilbit is not settled, we do know a lot more about dilbit than we used to. We gained most of that knowledge in 2010 when Enbridge's Line 6B spilled more than 3 million litres of dilbit into Michigan's Kalamazoo River. We learned that dilbit both floats and sinks and that it is harder and far more expensive to clean up than conventional crude.

Three years later, the cleanup of Enbridge's Line 6B spill is still not complete. Enbridge expects it to cost at least \$725 million with some estimates exceeding \$800 million.

We do not want to expose our communities, our water and our environment to these risks and for this reason, we oppose these proposed pipelines.

7. Ontario has a surplus of power, and is predicted to have a surplus of power until at least 2030. We all want to see a transition to truly green energy, but not at the expense of the environment, our democracy, or our public health and safety.

a. What would you do to ensure a green energy transition is smart, democratic, environmentally balanced, and economically and environmentally sustainable and responsible?

The GPO advocates for locally owned community power generation projects. We believe that empowering communities to make their own decisions is the only way to keep financial benefits flowing to local community.

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We will institute a Feed-in Tariff (FIT) program. Governments around the world are adopting FIT programs as a sensible way to support the transition to sustainable energy systems. The GPO advocates for a 20% minimum local equity component in order to ensure that local communities have a say in projects that are taking place around them. Alternatively, commercial projects could meet local ownership requirements by providing 20% of gross project revenues to the host municipality or a registered charity in the host community. FITs are a way to ensure that community projects are given a chance in the market. We will also ensure that community and locally owned green energy projects should have priority access to Ontario's grid. Projects that have widely engaged local citizens in ownership should have the right of first refusal for available grid access, especially on crown land. Preferred access to the grid should be allocated on a sliding scale based on the extent of local participation. That is projects with 100% local ownership access the grid first and those with 20% local ownership go last.

b. How would you reduce rising electricity prices?

The GPO also believes that the cheapest and greenest solution to Ontario's rising energy prices is to promote a "Conservation First" policy.

We can cut home energy costs even as energy prices rise. It's not magic: it's conservation. Political games like hydro rebate gimmicks won't work and they waste money. Investments in conservation do work. They will put money back in the pockets of Ontarians and will increase the value homes. They will create jobs and reduce pollution.

These jobs are not only in construction and trades, but also in cleantech innovation and manufacturing, which is presently worth \$3 trillion and is expected to double in the next decade. Best of all, the cost of owning or renting will go down. Cutting energy bills by 50% would save the average household about \$1000 a year.

The GPO will call for legislation providing grants up to \$4,000 for million homeowners to invest in energy conservation. We will also propose legislation requiring local utilities to provide affordable loans for you to retrofit homes.

8. Hydroelectric generation is promoted by our government as "clean" and "renewable" energy, when in fact this statement could not be further from the truth. Its highly cumulative negative effects on aquatic ecosystem are well documented. Riverine ecosystems and the citizens of Ontario will have to live with these effects for many decades.

a. What will you do to ensure the "Green Energy" label is used with integrity and fully reflects environmentally sound science and oversight?

In general, the GPO understands that no energy sources are completely free from negative environmental effects. However, the GPO believes that hydropower is a better alternative to nuclear energy, and so supports further development of hydropower, especially micro-hydro, in Ontario. At the same time, hydropower can be environmentally sound only if sites are chosen after a full environmental assessment and consultations with local communities. This is the best way to ensure the “Green Energy” label is used with integrity.

b. Will you ensure sustainability and the precautionary approach are core considerations made when assessing the cumulative effects of waterpower proposals?

A drive for sustainability is at the core of the GPO’s approach to policymaking. The GPO believes that hydro development must be in balance with Ontario’s biodiversity, and that ecologically sensitive land areas should be protected. Additionally, the GPO believes that Ontario should focus particularly on run-off river hydro projects as those are more sustainable than regular hydro projects. Finally, to ensure sustainability proper environmental assessments and consultations with local communities are essential to new hydro developments.

c. Would you allow hydroelectric proposals that would have numerous environmental impacts to proceed through to approval?

Before approving any projects, we will subject the proposals to rigorous third-party environmental assessment. Should the studies indicate that environmental impacts are onerous, we would not proceed to approve the project. The well-being of the environment and the communities affected by any type of development is always the GPO’s primary concern.

d. Will you ensure that only environmentally friendly and responsible green and clean energy proposals are approved?

Yes, of course. That includes third-party environmental assessments and consultations with communities that can potentially be affected by the implementation of those proposals.

e. Will you ensure the negative effects of existing waterpower facilities are effectively mitigated?

Yes. Impact of hydro developments on ecosystems should be carefully and accurately measured, and ecologically sensitive areas should be protected from negative impact.

9. Currently there are 48 proposed hydroelectric facilities moving through the approvals process in Ontario, and these proposals have FIT Contracts that guarantee 50% bonuses to produce power during peak demand hours. They cannot be told to stop generating, and get paid whether the power is needed or not.

a. Would you cancel the FIT contracts on those hydroelectric proposals that have not yet been approved?

The GPO believes that further studies must be undertaken on the matter of hydroelectric FIT contracts as to their environmental and economic impacts. We will commit to undertaking a review on this matter.

b. Would you cancel the FIT contracts on hydroelectric projects that have already been approved?

Please see answer above.

10. Privatization of Ontario rivers and lakes is happening through the transfer of Crown Land to private corporations for the purposes of hydroelectric development. These projects impact on water quality, water quantity, place public health and safety at serious risk, and take control of many kilometers of river and lake ecosystems.

a. Do you support this policy?

No, the GPO does not support the privatization of hydro projects on Crown Land. However, the GPO supports sustainable development of hydro facilities, especially micro-hydro, in partnership with local communities.

b. How would you protect the public's right to safe access and navigability of river systems?

As noted above, the Green Party of Ontario believes that hydroelectricity is best developed in partnership with citizens. Therefore, the GPO will ensure that citizens and communities participate in all the decisions that impact their lives and the sustainability of water systems in Ontario.

c. What would you do to protect fresh water and aquatic ecosystems?

Third-party environmental assessments will help reveal potential risks to Ontario's water associated with hydro development. Protecting water resources is best done in partnership with local communities; therefore, the GPO will work to empower local communities to help protect Ontario's environment against possible negative impacts of existing and planned hydro projects.

d. What would you do to protect public health and safety?

See above.

e. Would you give municipalities the power to say no to green energy proposals that would impact on them?

The GPO always puts the environment and Ontario's communities ahead of development priorities. Therefore, if citizens/communities oppose energy projects and their concerns are confirmed by independent environmental assessments, the GPO will support the citizens.

f. Would you ensure our public utility, Ontario Power Generation, has first option on any new potential hydroelectric allotment and site?

Please see answer to 7a

Ontario has an opportunity to move from an inflexible, bigger is better, centralized electricity system to one that is flexible, democratic and resilient. Moving to a decentralized system creates economic opportunities that enable anyone to generate power and local jobs.

Today, most communities in Ontario import power and export dollars to the few places where power is generated. This leads to a less efficient, secure and resilient system.

The 2013 LTEP should be open to allow communities to be more active participants in energy planning and benefits. The government should consider requiring Community Energy Plans as part of a municipality's official plan. The government must remove barriers, such as those the City of Guelph has experienced, to the implementation of community energy initiatives.

The 2013 LTEP must also leave the door open for individuals, farmers, municipalities, First Nations, businesses, and community groups to generate clean power that also produces local jobs. In short, the government should not let yesterday's bigger is better, mega-project thinking prevent transitioning to a decentralized 21st century power system.

11. In order to make "small hydro" economically feasible on small rivers with lower flows, developers use harmful cycling and peaking operating strategies to maximize power generation. Many kilometres of river are at risk for a very small amount of power.

a. Would you continue to allow new hydro facilities to be built when we have a surplus of power?

The Green Party of Ontario supports the development of hydroelectric projects, especially micro-hydro, in Ontario. However, hydro should not be seen in isolation from other strategies to reduce energy demand and lower the cost of energy, including energy efficiency and conservation, as well as purchase of surplus energy from other provinces such as Quebec. The GPO supports accurate estimations of demand to avoid unnecessary energy surplus in Ontario.

b. Would you allow small hydro developments under 10 MW?

In general, the GPO supports small hydro. But as noted above, there are many circumstances that need to be taken into account, including the actual energy demand in Ontario, the status of areas for proposed hydro development, the results of environmental assessments, and the opinion of local communities.

12. We currently have a proponent-led EA process that puts the "fox in charge of the

henhouse”, and is clearly is not working to protect the environment. It has undermined stakeholder trust and confidence in the entire EA process.

a. What will you do to rectify this?

The GPO will ensure that EA processes are led by unbiased experts who consult with the community about development projects.

b. Will you eliminate the proponent led process?

Yes, of course.

c. Will you ensure that MNR and MOE lead and direct the approvals and permitting process instead of the developer?

Yes.

13. The Environmental Commissioner of Ontario (ECO) has pointed out many deficiencies and problems with the environmental assessment process, and the effectiveness and integrity of government policies and processes. The ECO has reported that "Ontario's EA process is broken", and "a no decision is not a possible outcome". Little has been done to address these issues.

a. What will you do to ensure the EA process is strengthened and effective?

See 12 a. above

b. Would you provide the ECO with the power to make positive change to environmental legislation, policy and process?

Yes.

14. Over the last 15 years in Ontario there have been over 50 Part II Order requests to elevate a Class Environmental Assessment (EA) to a more rigorous Individual EA, but none have ever been granted by the Minister of Environment.

a. What will you do to ensure integrity is restored to this crucial process?

See 12 a. above. In addition, we will be transparent about how decisions are made and the criteria on which they are based. We intend to subject all decisions made by our government to public consultation and scrutiny.

15. The United Nation’s Millennium Ecosystem Approach assesses the consequences of ecosystem change for human well-being, and the scientific basis for action needed to enhance the conservation and sustainable use of those systems and their contribution to human well-

being. It places a value on ecosystem services and the benefits they provide to human well-being.

a. Will you enshrine the United Nations Millennium Ecosystem Approach into the province's Environmental Assessment and approvals process?

The United Nations' Millennium Ecosystem Approach is a sound and sensible method by which to assess the impact of certain development projects. We would certainly use it, or a similar approach when assessing the environmental sustainability of all development projects.

16. Currently fish passage is not required at hydroelectric dams operating in Ontario.

a. Will you ensure safe and effective upstream and downstream fish passage is mandatory at every new or upgraded dam site in Ontario?

Yes.

17. The ecological benefits of dam removal are widely recognized to improve water quality and restore fisheries.

a. Would you undertake a review of the ecological harm inflicted by impoundments, dams, and weirs throughout Ontario?

Yes.

b. Would you encourage removal of dams which no longer serve any useful purpose and that place public safety at risk?

Yes, of course. Once we complete a review of the dam and determine that it no longer serves any purpose, or that it is a safety hazard, we would encourage removal of the dam.

18. Dam Decommissioning provisions are currently not required for developers to secure funds up-front for future decommissioning and removal of hydroelectric dams. Instead, the cost is left to the taxpayers to pay for MNR to maintain, and for unsafe dams to be removed.

a. Would you ensure developers/operators are required to secure funds up-front for future dam decommissioning and removal – as is the case in the mining industry?

Yes.



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Sincerely,

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