



CANADIAN
PUBLIC HEALTH
ASSOCIATION

ASSOCIATION
CANADIENNE DE
SANTÉ PUBLIQUE



The Honourable Jonathan Wilkinson, Federal Minister of Environment and Climate Change

Jonathan.Wilkinson@parl.gc.ca

The Honourable Catherine McKenna, Federal Minister of Infrastructure and Communities

Catherine.McKenna@parl.gc.ca

The Honourable Christia Freeland, Federal Minister of Finance

Chrystia.Freeland@parl.gc.ca

The Honourable Patty Hajdu, Federal Minister of Health

Patty.Hajdu@parl.gc.ca

February 8, 2021

Dear Ministers Wilkinson, McKenna, Freeland and Hadju:

Re: Updated Climate Action Plan – A Healthy Environment and a Healthy Economy

We are writing to you as public health organizations that are deeply concerned about the threat climate change presents to the health of Canadians, global health, and the planet's ability to sustain life.

We commend you for the updated climate action plan - **A Healthy Environment and a Healthy Economy** – that was released in December 2020. Overall, we believe that it includes many of the initiatives needed to address climate change across Canada. We appreciate that the plan demonstrates an understanding of the opportunities presented by climate action to improve health, reduce health inequities, and create new jobs, while preparing our economy and communities for a sustainable future.

We support the overall approach of the plan and the commitments to:

- Implement a Clean Fuel Standard that considers the greenhouse gas (GHG) emissions associated with all stages of fuel production and use;
- Deliver on Canada's G20 commitment to phase-out all inefficient fossil fuel subsidies by 2025;
- Strengthen Canada's approach to reducing methane emissions from the oil and gas sector by establishing new targets for 2030 and 2035 which reflect international targets to reduce methane emissions by 45% by 2025 and 60-75% by 2030;
- Conserve and protect 25% of Canada's land and 25% of Canada's oceans by 2025, working towards 30% of each by 2030;
- Invest in nature-based solutions;
- Cultivate renewed relationships with First Nations, Inuit, and Métis Peoples, that includes free, prior and informed consent, without qualifications, as articulated in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP);

- Support self-determined climate action by Indigenous Peoples;
- Green government operations;
- Make strategic investments to enable the adoption of low-carbon technologies to support economic growth and decarbonization across all sectors in Canada;
- Support the development of climate-smart agriculture; and
- Upskill and reskill workers with a particular goal on increasing workforce participation by underrepresented populations.

With that said, we would like to offer comments on some specific elements of the plan.

1. Bill C-12

We support, in principle, the *Canadian Net-Zero Emissions Accountability Act (Bill C-12)* but encourage the Government of Canada to strengthen it to include strong, science-based, legally-binding targets that holds the federal government accountable in both the short and long term for Canada's fair contribution to fighting climate change.

2. Public Transit

We support the commitment to invest \$1.5 billion to accelerate the electrification of transit and school buses across the country. This is an investment that can create jobs and cultivate new green technologies, while also reducing air pollution, health care costs and GHG emissions.

We also applaud the government's 2016 commitment to spend \$28.5 billion on public transit over 10 years,¹ but strongly support the call from the Federation of Canadian Municipalities to make funding for public transit permanent – in the order of \$3.4 billion per year² – because of the many health, social and climate benefits associated with these services. It is time that Canada recognizes public transit as foundational to the creation of a healthy, sustainable and equitable society, and fund it accordingly.

3. Active Transportation

We appreciate that the new climate action plan recognizes the role that active transportation can play in reducing GHGs, improving health and increasing community resilience, and strongly support the development of a National Active Transportation Strategy to help deliver more active transportation options. We would however like to see a financial investment attached to this commitment.

The Building Back Better³ report estimates that 18,000 jobs could be created in communities across the country if \$2 billion in government funding were directed at active travel infrastructure such as separated bike lanes, sidewalks and traffic lights. This investment would create local construction jobs and provide economic opportunities for tourism in smaller communities, while also saving lives, reducing health care costs, increasing access to jobs and services, and building community resilience. Health equity could be further increased if low-income neighbourhoods were prioritized for these investments.

¹ Infrastructure Canada. 2016. Investing in Canada: Canada's Long-Term Infrastructure Plan

² Federation of Canadian Municipalities. 2019. Building Better Lives Together. November.

³ Torrie R., Bak C., Heaps T. Building Back Better with a Bold Green Recovery, Synthesis Report. IVEY Foundation, June 2020.

4. Zero Emission Vehicles

We support the steps that the Government of Canada has taken, and plans to take, to foster zero emission vehicles (ZEVs) in Canada. However, a larger financial investment and a more comprehensive set of policies are needed to realize our climate goals and achieve greater health benefits.

Canada could create 474,000 jobs and produce about \$11.7 billion in fuel savings for drivers each year if all new cars and SUVs and 75-80% of all new trucks sold in Canada by 2030 were required to be electric.³ This investment would also produce immediate health benefits as demonstrated by a 2020 study that found that the electrification of all cars and SUVs in the Greater Toronto and Hamilton Area alone could prevent 313 premature deaths and provide up to \$2.4 billion in social benefits each year while reducing GHGs by 7.6 Mt per year.⁴ The Canadian government could foster this transition by investing \$12 billion over 5 years which is a much greater investment than that proposed in the new plan.³

This investment must also be supported with policies that include:

- Financial incentives for new and used ZEVs that target lower- and middle-income Canadians;
- Building codes that include provisions for ZEV charging stations;
- ZEV sales targets for medium- and heavy-duty vehicles as well light-duty vehicles;
- Mandatory Vehicle Emission Standards that require improvements in fuel efficiency and reductions in vehicle emissions for each model year;
- Mandatory fuel standards that require suppliers to reduce the carbon intensity of the fuels they sell and provides credits for alternative fuels such as electricity and hydrogen; and
- Funding and tax breaks to encourage ZEV and battery manufacturing plants to locate in Canada and for existing plants to re-tool^{5 6}.

5. Renewable Energy

We strongly support the \$6 billion in investments identified in the climate action plan to modernize Canada's electricity grid.

The Canadian Government could create almost one million cumulative jobs and virtually eliminate 75 Mt of GHG emissions from the electricity sector by investing \$6.7 billion over a 10-year period in the creation of a carbon-free and resilient electricity grid across the country.³ This investment will produce health benefits valued at nearly \$1 billion per year by reducing air pollution.⁷ The development of a green, reliable and resilient electricity grid is an essential building block for a healthier and more sustainable future that will rely more heavily on electricity as we transition away from fossil fuels.

We strongly support the investment of \$300 million over five years for renewable energy projects in rural, remote and Indigenous communities that currently rely on diesel. This investment holds the promise of reducing indoor and outdoor air pollution and adverse health impacts in these communities, reducing health inequities, and decreasing operating and maintenance costs for these communities, while increasing their resilience in the face of a rapidly changing climate.

⁴ Environmental Defence and the Ontario Public Health Association. 2020. Clearing the Air. How Electric Vehicles And Cleaner Trucks Can Reduce Pollution, Improve Health And Save Lives in the Greater Toronto and Hamilton Area

⁵ Clean Energy Canada. 2020. Taking the Wheel. How can Canada cut carbon pollution and revitalize its auto sector.

⁶ Pembina Institute. 2020. Building a zero-emission goods movement system: Opportunities to strengthen Canada's ZEV freight sector.

⁷ Israel B and Flanagan E. 2016. Out with the Coal, in with the New: National benefits of an accelerated phase-out of coal-fired power. Pembina Institute

6. Building Retrofits

We strongly support the Government of Canada’s commitment to invest \$6.1 billion to foster retrofits in residential, commercial and community buildings to increase their energy efficiency, reduce their GHG emissions, and/or increase their resiliency to climate change. We would like to see, however, additional funding directed towards this program to ensure that it achieves the GHG reductions, job opportunities, and health equity benefits it promises.

This investment can produce significant energy savings for consumers, make indoor environments healthier, and improve social equity if lower-income housing and populations are targeted, while also creating jobs and significantly reducing GHG emissions. Though commendable, the proposed investments fall short of the \$20.7 billion recommended for a building retrofit program that could reduce GHG emissions by 58 Mt per year by 2030 while creating 3 million person-years of employment up to 2030.³

We strongly support the Government of Canada’s commitment to invest:

- **\$1.5 billion over three years for green and inclusive community buildings through retrofits, repairs, upgrades and new builds, which would support good jobs and local economic growth, contribute to climate objectives and serve structurally disadvantaged populations; and**
- **\$150 million to projects serving First Nations, Inuit and Métis communities, including Indigenous Peoples in urban centres.**

We would like to see, however, stronger language regarding the training of structurally disadvantaged populations to acquire work in the field of building retrofits.

7. Carbon Pricing

We strongly support carbon pricing and the Government of Canada’s proposal to increase the carbon price by \$15 per year, starting in 2023, rising to \$170 per tonne of carbon pollution in 2030.

We agree that the increasing price of carbon will encourage the behavioural changes and investments needed to transform our economy. We also believe that the transparent long-term trajectory allows people and organizations to make investments that are healthy for people and the planet. We appreciate that the carbon pricing system established in 2019 returns most of the fuel charge proceeds directly to families through Climate Action Incentive payments in recognition of the limited choices available to some families and to mitigate the adverse financial impacts that increasing prices could have on lower- and middle-income families.

8. National Adaptation Strategy

We support the development of Canada’s first-ever National Adaptation Strategy but believe that it should include \$100 million per year in funding for the public health sector to ensure that public health and health equity impacts and risks are properly considered and addressed in the development and implementation of the strategy.

The funding for the public health sector would be used to:

- Support the development and implementation of local and regional climate change health vulnerability assessments and adaptation plans;
- Support pan-Canadian inter-jurisdictional collaborative(s) to:

- foster best practice information-sharing between public health authorities;
- standardize surveillance and reporting of climate-related health risks and impacts;
- better identify and prioritize actions to protect health;
- develop knowledge translation strategies to inform the public;
- generate public health response plans that minimize the health impacts of climate change and realize the health co-benefits of climate action; and
- Increase funding for research on the mental health impacts of climate change and psychosocial adaptation opportunities;
- Participation in the development of the National Adaptation Strategy.

9. Just Transition Program

We support the Canada Coal Transition Initiative developed to support workers and communities affected by the phase-out of coal plants but would like to see a just transition program extended to all communities that rely heavily on fossil fuel industries.

A new study has found that only 18 communities in Canada rely on fossil fuel industries for five per cent or more of total employment.⁸ These communities should be targeted with programs that support diversification, alternative job creation, and job retraining under a just transition program.

In conclusion:

Thank you for the courage and leadership that the Government of Canada has demonstrated in the development of this plan. We encourage you to be bolder so we might secure a healthy, green and just future for our children and their children.

Yours truly,



Ian Culbert
Executive Director, CPHA



Kim Perrotta
Executive Director, CHASE



Pegeen Walsh
Executive Director, OPHA

⁸ Stanford, Jim. 2021. Employment Transitions Report. Centre for Future work. <https://centreforfuturework.ca/wp-content/uploads/2021/01/Employment-Transitions-Report-Final.pdf>