

Dear Councillors,

The Environment and Energy Division's TransformTO Net Zero Strategy shows that the division wants to take a whole of city approach. This approach allows climate to be worked into every budget, every division, every line item, the city manager's office, financial office, and all policies that go forward. It would embolden conversations about the climate crisis in every part of the city and the community. This is a crucial step forward and Toronto350 encourages you to take it! Yet, the city needs to go further and apply an even broader and bolder approach, one that sees line items change from somewhat aspirational considerations to actionable items more quickly, that fully addresses equity and that includes community wide as well as city-wide emissions. This will require re-thinking current structures and systems, a full contingent of staff, inclusive input and substantial funding. Given the long-term savings of acting now and the co-benefits, like job creation and citizen health, there is no question that directing significant resources toward reaching net-zero as soon as possible is worth every effort.

On the topic of climate justice, we'd like to point out that the report stated "Locally, the impacts of climate change will be felt by everyone, but some of us will feel its impacts more than others. We also know that the outcomes of the delivery of climate action can provide significant opportunities to improve equity, economic prosperity, resilience and health." The city as a whole needs to work closely with BIPOC to address what they are feeling around the climate crisis. To go further, there are communities and neighbourhoods all across the city that are feeling unheard and they need to be the first to be heard as they're on the frontlines of the climate crisis. Some of those on the frontlines are facing the climate impacts already e.g. living next to a 46 year old oil pipeline called Line 9; and the same goes for people who have their homes flooded or can't access water in buildings when the pipes don't work from the extreme weather.

A direct way the City of Toronto, Environment and Energy Division and TransformTO team can show action is by learning and applying the lessons from the Indigenous Knowledge Workshop done in 2018 with local Indigenous Peoples in Tkaronto. The workshop and its Indigenous Climate Action Summary Report should be the basis of moving forward and the knowledge should be embedded throughout the TransformTO report with direct links back to the workshop and report.

On the topic of direct emissions reductions, the approach for getting to Net Zero by 2040 must be clear, swift and strong. It is good that the report emphasizes getting as close to zero as possible using direct emissions reductions and natural carbon sinks before considering technical methods of carbon capture and offsets. However, since the Climate Emergency Declaration was made in October 2019, there has been criticism of the framing of Net Zero emissions. In Attachment A, it says "Achieving net zero is not simply a technology solution" and then later on says "...the use of offsets or technological sequestration activities can be explored." Net Zero allows the city to potentially continue to approve policy that is polluting, allowing for carbon capture and offsets to get the city to the full target. Offsets pose the risk of allowing targets to be met in theory but not in reality as there is no reduction in the remaining emissions.

Another related concern is that a large share of the emissions reductions the city has made can be related to the Ontario coal phase out. To achieve the further reductions required, actions that speed the elimination of fossil fuels, including wide-scale electrification, decarbonization of the energy grid and divestment, must take place. We encourage you to take cues from the Net-Zero report and maximize the potential of renewable energy generation within the city. This may mean reinventing Toronto Hydro and breaking away from Enbridge's influence in order to achieve and maintain affordable, clean energy. In fact, all revenue tools and other mechanisms that are within the city's jurisdiction need to be implemented, in order to fully address the climate emergency. At the same time, we encourage advocating to the province to enable Toronto's climate-related actions and keep the electricity grid clean. These moves are critical to the success of any municipal climate plans.

One key policy piece that Toronto350 has been pushing for many years is to say clearly that the City of Toronto isn't going to ever invest in fossil fuels. In late 2020, the council made a bold and urgent move by signing the Fossil Fuel Non-Proliferation Treaty. Now, plain and simple language on this is needed to allow the community to have confidence in their local municipal government. Recently, many large universities around the world including the University of Toronto said they are going to fully divest from fossil fuels. On top of that recently a new mayor was elected in Boston and one of her first acts was to commit that the city will divest of fossil fuels. Toronto's report doesn't talk about divestment in clear language and this needs to be rectified.

To provide credible leadership on climate action, Toronto also needs to acknowledge the city's role as the financial capital of Canada. City Hall may not have direct influence on decisions taken further down Bay Street, but it can demand accountability on behalf of the community. Toronto350 proposes an annual public report, conducted by city staff, of fossil fuel financing undertaken by businesses with headquarters in Toronto, including analysis of compliance with the Fossil Fuel Non-Proliferation Treaty.

There are some major successes in the report, including having a carbon budget that is updated yearly, having a community-wide 2025 emissions reduction target, using a climate lens, and having a climate advisory group. The implementation of the carbon budget needs to be in place by Q2 of next year and Toronto350 suggests annual reporting starting now. Edmonton has already put out a [2019 report](#) that states what their carbon budget is. Toronto needs to do the same. Going beyond the numbers and reports, the climate advisory group needs to have a focus on equity where a diverse group of stakeholders are gathered together.

Toronto350 supports the detailed and compelling work that TransformTO staff has done. We agree that all actions need to be implemented at greater scale and with greater speed. Toronto350 also believes that the TransformTO report doesn't fundamentally change the narrative of where the City of Toronto needs to go. Implementation of many of the items in the report are left to years in the future, which will not get Toronto to its 2030 target. Toronto has always beat targets they have set with provincial help, but it needs to lead on its own to reduce

even more emissions while tracking all greenhouse gas emissions within the City of Toronto and broader communities.<sup>[1]</sup> COVID taught us that people can change rapidly and that programs can be designed and delivered at high speed. It taught us about agility, about partnerships, and about the leadership role of this City in the Provincial and national landscape. We must leverage every learning from this experience to ensure that we deliver the outcomes that are key to our survival as a city, a province, and a nation.

Sincerely,

“Amelia Rose” Khan (they/them)

On behalf of the Toronto350

[1] The Government of Canada states the sources of greenhouse gas emissions are “The GHG inventory includes emissions of carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), sulphur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>)...” on this [page](#).