

EX20.3

From: [REDACTED]

To: Executive Committee

Via email: exc@toronto.ca

Jan 27, 2021

Subject: My comments for EX20.3 City of Toronto Environmental, Social, and Governance (ESG) Annual Performance Report, Executive Committee consideration on January 27, 2021

RE: EX20.3 City of Toronto Environmental, Social, and Governance (ESG) Annual Performance Report

Dear Mayor and Executive Committee Members,

Thank you for this opportunity to comment.

The City of Toronto's decision to *"take the lead and be the first government in Canada to issue an ESG annual report to reflect its commitment and performance in each of three areas: Environment, Social, and Governance ("ESG")"* is very timely and necessary.

Report's section Environment/Priorities evolve around various aspects of Climate Action:

"5.C Advocacy and Achievements in Climate Action"

"The City of Toronto is a leader in addressing climate change both domestically and internationally. The City is a member of C40 Cities¹⁶ which connects 96 world cities to take bold climate action, leading the way towards a healthier and more sustainable future. Toronto is a signatory of the Global Covenant of Mayors for Climate and Energy¹⁷ and reports through the Carbon Disclosure Project (CDP)¹⁸. Toronto is also a member of the Carbon Neutral Cities Alliance (CNCA)¹⁹."

Conspicuous by absence in section on Environment is any content on Biodiversity, apart from affirmation that *"The City is implementing strategies that align with the UN Sustainable Development Goals"*:

5.H Alignment with Sustainable Development Goals (SDGs)

Goal 15

*"Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and **halt biodiversity loss**"*

This is the only occasion when the word biodiversity is mentioned in the City of Toronto Environmental, Social, and Governance (ESG) Annual Performance Report

Considerations in respect to the City of Toronto Environmental, Social, and Governance (ESG) Annual Performance Report

1. Biodiversity loss and climate change are no longer seen by decision-makers as two separate crises

The last week's [One Planet Summit](#), marking the first time the annual gathering of world leaders was dedicated to biodiversity, speaks volumes about urgency to include biodiversity lens into the City of Toronto ESG annual report.

While previous conferences focused on the climate crisis, this year's summit made it clear that decision-makers no longer see biodiversity loss and climate change as two separate crises: leader after leader spoke about integrating the policy responses to biodiversity loss, the climate emergency and the pandemic. This urgency is well articulated in article on **"One Planet Summit: Biodiversity's rise up the global agenda"**:

"We need to step up our efforts to protect biodiversity, and not just at 'some point in time', but now," said Angela Merkel, Chancellor of Germany. The Summit also emphasized that: "Expanding protected areas and managing them effectively is critical, but new research launched at the Summit stressed that nature-related investments need to go far further in order to tackle biodiversity loss."

2. Toronto biodiversity is a part of Ontario biodiversity and vice versa

What we have learnt recently from several reports on the state of provincial governance re protected areas, biodiversity, conservation of species and their habitats, compliance with environmental laws, the long term plans for conservation, etc. is very concerning.

- **Conserving the Natural Environment with Protected Areas
2020 Value-for-Money Audit**

Target of 17% of protected areas in Canada, as we learn from AG report, was missed by a large margin in Ontario:

*"Ontario has no plan or a province-wide target to expand its network of protected areas. **As of October 2020, protected areas covered 10.7% of the province**, with only 3,007 hectares or 0.003% of the land area being added over the last five years. **Biodiversity is most at risk in southern Ontario, where only 0.6% of lands are protected.** The lack of dedicated staff tasked with expanding the protected areas network and the decrease in 2012 in the Ministry's land acquisition budget from \$500,000 to only \$1,000 per year have contributed to Ontario's slow progress."*

"Ontario lacks an overall plan or long-term target and the staff it takes to protect the province's parks and other protected areas, concluded Auditor General Bonnie Lysyk in her 2020 Annual Report of Environmental Value-for-Money Audits and the Operation of the Environmental Bill of Rights."

"As we have seen during the COVID-19 pandemic, there is a need for people to be outside and enjoy green space for both physical and mental health reasons," stated the Auditor General. "Unfortunately, the part of the province with the highest population density—southern Ontario—only has 0.6% coverage of protected areas. This is unfortunate for both people and nature."

- **Canadian Parks and Wilderness Society Report 2020** comes also with extremely disturbing findings.
<https://cpaws.org/2020parksreport/>

"Ontario is liquidating rather than conserving nature"

RECOMMENDATIONS:

The Government of Ontario should:

Put protecting and restoring nature — our life support system — at the heart of COVID-19 recovery plans

Reverse plans to open up important green spaces in southern Ontario to development and to double logging, focusing instead on protecting and restoring connected networks of natural spaces throughout the province, including critical habitat for caribou and other species at risk.

Recognize and support Indigenous protected areas, including those proposed by Moose Cree First Nation and Kitchenuhmaykoosib Inninuwug Nation in northern Ontario.

Increase investment in provincial park management to ensure the parks' ecological integrity is maintained and restored, as visitation increases."

- According to **ParkPeople Report 2020**, parkland per population in Toronto, is now at the very low end of the cities studied - 2.7 Ha per 1000 population.

This report also includes notion that protected areas in the cities may form part of Ontario 17% of protected land target for 2020. *"Total city parkland in Canada that is under special protection as ecologically sensitive is 8,300ha in total or equivalent to nearly 21 Stanley Parks—a number that could help contribute to Canada's target of 17% protected land in the country."*

63%

of cities listed protecting and enhancing biodiversity and natural environments as a top challenge

70%

of cities reported increasing demand for park naturalization projects

2020 Canadian City Parks Report

3. These findings point to very unsettling trends in respect to protection of natural heritage and biodiversity across of our province, especially southern Ontario, while Toronto is not immune to none of the problems indicated

From **"2021 Staff Recommended Capital and Operating Budget Notes - Parks, Forestry and Recreation"**

<http://www.toronto.ca/legdocs/mmis/2021/bu/bgrd/backgroundfile-159678.pdf>

Urban Forestry

Parks, forestry and recreation services are key drivers of social, environmental, and economic capital, contributing to Toronto's sustained livability and overall health during **a period of unprecedented growth**.

How Well We Are Doing – Behind the Numbers

- Although 84% of Toronto's population live within walking distance (500 metres) of a park, only 66% of Toronto's population live within an area above the parkland provision threshold (12 m²/person) based on the Parkland Strategy adopted by City Council. **With Toronto's population growth the City will not be able to keep up with parkland acquisition.**

- **Within the COVID-19 context, Toronto's public uses parks at much higher intensity and rates. Furthermore, 84% of survey respondents say parks have become more important to their mental health, while 74% of respondents expressed an increased appreciation of parks and green spaces.**

Priority Actions

Grow and retain the ecological integrity of parkland, forests and ravines in the face of increasing pressure to advance and expedite development and heavy impacts to parks, beaches and natural spaces as a result of increased use during the pandemic”.

End of excerpts from “2021 Staff Recommended Capital and Operating Budget Notes - Parks, Forestry and Recreation”

4. City of Toronto has accomplished a major step towards protection of the most valuable natural areas in the city and enhancing biodiversity by adopting [OPA 262](#)

"Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto."

City of Toronto By-law No.2015, OPA 262 the Environmental Policies and Designation of Environmentally Significant Areas, which was approved by the Province in May 2016. The OPA is in full force and effect.

However, since OPA 262 was enacted in May 2016, there were numerous factors undermining biodiversity potential of newly designated ESAs and also impacting ravines and entire city natural heritage system related to the pressures from growing city, land use change, insufficient funding, lacking management plans, limited restorative efforts, ever increasing user demands, high emphasis on access and use as opposed conservation and other limiting factors such as number of city staff available, etc.

Also, without a robust implementation of protection policies at all levels of the relevant planning decisions and the city departments, protection of ESAs and building of resilience into biodiversity hot spots gets affected.

5. Recommendation

City of Toronto Environmental, Social, and Governance (ESG) Annual Performance Report has a potential to develop analytical method based on criteria similar to those used by the provincial Auditor General in Conserving the Natural Environment with Protected Areas 2020 Value-for-Money Audit to bring biodiversity lens into same level of urgency as climate change to activate task forces within the city agencies.

Rapid development and implementing of biodiversity lens and criteria into ESG Annual Performance Report would be a step towards integrating the policy responses to biodiversity loss, the climate emergency and the pandemic.

As the City of Toronto is a leader in addressing climate change, integrating biodiversity loss would be another much needed step along the last week's [One Planet Summit](#).

Thank you for your attention to these considerations.

Sincerely,

Lenka Holubec, member of [ProtectNatureTO](#)

Background:

[One Planet Summit: Biodiversity's rise up the global agenda](#) 21 January 2021

“Increased policy action on biodiversity strengthens the imperative for financial institutions to understand their own impacts and dependencies on biodiversity, as stronger government action will alter the expectations and requirements placed on corporates and financial institutions.”