

Tuesday April 25, 2023

RE: 2023 IE3.3 - TransformTO 2022 Annual Report: Laying the Foundation for Net Zero

To the Infrastructure and Environment Committee:

The Toronto Environmental Alliance commends the city for releasing this TransformTO annual Net Zero progress report. This is the first report on the City's progress in reaching its updated Net Zero goals since City Council approved the more ambitious Net Zero Strategy in 2021. This report is a significant milestone in Toronto's climate action journey and TEA commends City Council, the Infrastructure and Environment Committee, City Staff, and all other stakeholders that have led to this moment.

Moving forward, we believe the structure of the progress report could be improved for next year, and we have included some suggestions below. However, we support the staff recommendations to adopt the report as a strong move towards accountability and increased transparency to the people of Toronto.

We are confronting a complex and significant crisis together. As such, our comments are focused on improving honesty and transparency in the hopes that significant barriers to meeting the City's climate commitments can be named, addressed collectively, and solved through each year and through each iteration of the City's climate action.

With that in mind, TEA has two significant process concerns with this year's Annual Report that we hope will be addressed in the 2023 Annual Report:

1. Granularity

The City's Net Zero Strategy progress reporting would benefit from a tracking system with more specific information about incomplete items.

Currently, all Action Items in the Short-Term Implementation Plan (Attachment 1) and progress under City Council directions on the TransformTO Net Zero Strategy (Attachment 2) are labeled '*Complete*', '*Not Started*', or '*In Progress*'.

This existing labeling system does not offer enough information for decision-making purposes. As currently worded, action items labeled ‘*In Progress*’ could refer to a project that is 99% complete, or a project that is only 1% complete. This can create a misleading assessment when the City claims in its press materials that “100% of short-term items are either complete or in progress.”

For example, #10 of the Short-Term Implementation Plan is a five-part item on Transportation Demand Management. Progress on this item was significantly and understandably impacted by the pandemic and the TDM Strategy was not launched as planned. However, the item is labelled as ‘*In Progress*’, with little reporting on how much progress has been made under each of these sub-items. This gives the impression that the item is on track for completion when in fact alternate plans may be necessary.

Some suggestions for alternative assessment framings include:

- Ensuring that all sub-items have their own progress report assessment;
- Listing each short-term action on a clear numerical scale (eg. 1-5) to allow for more nuance between ‘complete’ and ‘not started’;
- Including an additional assessment column, such as one that indicates whether or not the completion of an item is on schedule or behind schedule

These commitments are multi-year and multi-decade endeavours. Council and the public require a more detailed assessment of where greater resources are needed, and where significant barriers are blocking action. Without this, commitments risk languishing in the ‘*In Progress*’ category for years or even decades. But with a better sense of what we are doing well, and where barriers exist, staff and Council can work together to remove these barriers and problem-solve.

2. Accuracy

In addition to transparency, the metrics Toronto is meeting its Net Zero goals must be recorded accurately. TEA was disappointed to see that Item #9 of the Short-Term Implementation Plan, “Increase existing bus and streetcar service levels to encourage shifts to low-carbon, sustainable transportation” was listed as ‘*In Progress*’ despite significant reductions in transit service and fare increases in this year’s budget.

This assessment glosses over the significant barriers faced by the city in improving and expanding transit - a key plank in the City’s Net Zero Strategy. Council must understand the harmful impact of their decision to cut transit service in this year’s budget, and how this directly undermines the specific commitments they have made in their climate plan. If a progress report does not directly name the impacts of actions

like budget and service cuts, it will be impossible for Council to not only be held accountable, but also to understand how to remove barriers to climate action. An honest progress report is an opportunity to confront these barriers together.

3. Integrating Carbon Budget into Annual Reporting

Finally, assuming that City Council pass item 2023 IE3.4: The Carbon Accountability framework, annual reporting on Net Zero Short-Term Implementation Plans would benefit greatly from estimated overall emissions decreases or increases expected from each of the items listed in both the Short-Term Implementation plans as well as Council Directions, assuming that the item is subject to such an assessment.

Conclusion

In conclusion, TEA supports the release of the TransformTO 2022 Annual Report. We recognize it for the milestone it is, and that it is just a very early step in the iterative process leading up to Net Zero by 2040.

If Toronto is to meet their Net Zero Strategy targets, the city's carbon and climate action reporting systems need to be seen as credible and impartial, much like the City's financial reporting. This would reduce the likelihood of progress reports being seen as politicized. Greater granularity and accuracy in future annual reports would be significant steps towards that direction, and would be instrumental in flagging significant barriers to TransformTO before progress is derailed.

Sincerely,



How-Sen Chong
Climate Campaigner
Toronto Environmental Alliance