



Office of the Auditor General of Ontario

Follow-up on
Value-for-Money Audit:
**Climate Change:
Ontario's Plan to
Reduce Greenhouse
Gas Emissions**
Standing Committee
on Public Accounts
Follow-Up on Volume 2,
Chapter 3, *2019 Annual Report*



November 2021

Climate Change: Ontario's Plan to Reduce Greenhouse Gas Emissions

Standing Committee on Public Accounts Follow-Up on Volume 2, Chapter 3, *2019 Annual Report*

On March 11, 2020, the Standing Committee on Public Accounts (Committee) held a public hearing on our 2019 audit of Climate Change: Ontario's Plan to Reduce Greenhouse Gas Emissions. (In November 2018, the Ministry of the Environment, Conservation and Parks had released Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan (Plan), which contained a chapter with Ontario's climate change plan to reduce greenhouse gas emissions.) The Committee tabled a report on this hearing in the Legislature in December 2020. A link to the full report can be found at <http://www.auditor.on.ca/en/content/standing-committee/standingcommittee.html>.

The Committee made 20 recommendations and asked the Ministry of the Environment, Conservation and Parks (Ministry) to report back by April 2021 and asked the Treasury Board Secretariat to report back by August 31, 2021. The Ministry and the Treasury Board Secretariat responded to the Committee on April 1, 2021 and August 30, 2021, respectively. A number of the issues raised by the Committee were similar to the audit observations of our 2019 audit, which we followed up on in 2021. The status of each of the Committee's recommended actions is shown in **Figure 1**.

We conducted assurance work between April 2021 and October 2021, and obtained written representation from the Ministry and Secretary of the Cabinet that effective November 4, 2021, they had provided us with a complete update of the status of the recommendations made by the Committee.

Overall Conclusion

As of August 2021, 36% of the Committee's recommended actions had been fully implemented, and 17% of the recommended actions were in the process of being implemented. There has been little or no progress on 44% of the recommended actions and one action will not be implemented.

Detailed Status of Recommendations

Figure 2 shows the recommendations and status details that are based on responses from the Ministry and the Secretary of the Cabinet, and our review of the information provided.

Figure 1: Summary Status of Actions Recommended in December 2020 Committee Report

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RECOMMENDATION STATUS OVERVIEW						
	# of Actions Recommended	Status of Actions Recommended				
		Fully Implemented	In the Process of Being Implemented	Little or No Progress	Will Not Be Implemented	No Longer Applicable
Recommendation 1	1				1	
Recommendation 2	2	1		1		
Recommendation 3	3	2		1		
Recommendation 4	1			1		
Recommendation 5	3	2	1			
Recommendation 6	3	3				
Recommendation 7	1		1			
Recommendation 8	2			2		
Recommendation 9	1	1				
Recommendation 10	2		2			
Recommendation 11	3	2	1			
Recommendation 12	2	1		1		
Recommendation 13	1			1		
Recommendation 14	1			1		
Recommendation 15	1			1		
Recommendation 16	1			1		
Recommendation 17	1	1				
Recommendation 18	1		1			
Recommendation 19	3			3		
Recommendation 20	3			3		
Total	36	13	6	16	1	0
%	100	36	17	44	3	0

Figure 2: Committee Recommendations and Detailed Status of Actions Taken

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Committee Recommendation	Status Details
<p>Recommendation 1</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should clearly label proposed plans, strategies, and policies on the Environmental Registry as “Draft.”</p> <p>Status: Will not be implemented.</p>	<p>Of the 30 policy proposal notices or updates to proposal notices the Ministry posted on the Environmental Registry between December 4, 2019, and March 31, 2021, 29 (or 97%) of them either had no supporting materials attached or had draft supporting materials that were all clearly marked as draft or for discussion purposes. Only one did not – templates for environmental compliance approvals for municipal sewage collection and stormwater management systems (Environmental Registry #019-1080). While the filenames and web addresses for the draft templates indicated that they were drafts, the documents themselves were not marked as draft or proposed. In the subsequent decision notice, posted March 17, 2021, the Ministry indicated that it was in the process of finalizing the environmental compliance approval templates.</p> <p>The Ministry’s templates for drafting proposal notices indicate that supporting materials (like files and links) can be added to provide readers more information about the notice. While these templates specify that saved files should have simple file names that describe what a document is, they do not direct that added draft documents be marked as draft.</p> <p>In response to our inquiries, the Ministry indicated that it had reviewed its Registry proposal notice templates and determined that further clarification in the templates to direct staff to label draft documents as draft is not necessary. Though members of the public may access linked Registry documents through other means, it is the Ministry’s position that labelling draft documents as such is unnecessary as Registry notices specify whether an attached document has been finalized and the status of the notice.</p> <p>The Ministry told our Office that the Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan (Plan) remains a draft; the Ministry has not yet taken the necessary steps to have the Plan approved. However, the Plan, which was attached to the 2018 proposal notice and is posted as the lead on the Ministry’s main webpage, is still not marked “draft,” and the Ministry has not referred to the plan as “draft” or explained that it is unfinalized in various communications to the public.</p> <p>Rather, the Ministry has publicly indicated that it has implemented aspects of the Plan. For example, the Ministry has announced that initiatives, such as reducing waste and expanding recycling services, improving public reporting of pollution, and improving water quality in Lake Erie, are a key part of, and are delivering on commitments made in, its Plan. In 2019 and 2020, the Ministry released public updates on the Plan, outlining steps that had been taken, progress on commitments, accomplishments made, and next steps.</p>

Committee Recommendation	Status Details
<p>Recommendation 2</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should:</p> <ul style="list-style-type: none"> consider whether the Climate Change Advisory Panel needs a clearly defined mandate with corresponding objectives and targets; Status: Fully implemented. make its advice publicly available for Ontarians. Status: Little or no progress. 	<p>The Plan contained a commitment to establish an advisory panel to provide advice to the Minister of the Environment, Conservation and Parks on implementation and further development of climate change actions.</p> <p>In November 2019, the then Minister appointed 10 members to the Climate Change Advisory Panel for a two-year term. Under the Terms of Reference, the panel's mandate is to provide advice to the Minister on implementing the climate change resilience commitments of the Plan. The two objectives are to provide advice to the Minister:</p> <ul style="list-style-type: none"> on the development and implementation of climate change resilience commitments as outlined in the Plan; and on key areas related to addressing climate change resilience. <p>The mandate of the panel does not include providing advice on plans to reduce greenhouse gas emissions, which was the subject of our audit. No targets are included in the panel's Terms of Reference.</p> <p>Under the Terms of Reference, formal advice from the panel is to be provided directly to the Minister verbally, by letter, and through meeting minutes. To date, the Ministry has not made any advice received from the panel publicly available.</p> <p>In November 2020, the panel submitted its annual progress report to the Minister. Under the panel's Terms of Reference, its annual progress report is to be for public consumption. While this report is not posted on the Ministry's website, the Ministry has advised us that the report is available to the public upon request. The progress report contains information on consultations the advisory panel has held. It does not provide advice on initiatives to address climate change impacts and indicates that the panel will provide specific recommendations to promote climate resilience of communities, infrastructure and homes by November 2021.</p> <p>The Ministry has advised that the Minister may choose to release the final report, or specific sections of it, after receiving the panel's report.</p>

Committee Recommendation	Status Details
<p>Recommendation 3</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should:</p>	
<ul style="list-style-type: none"> • update the integrated energy-emissions-economy model with new information as available; <p>Status: Fully implemented.</p>	<p>The Ministry has revised its integrated model with updated data, including:</p> <ul style="list-style-type: none"> • the Independent Electricity System Operator's 2020 Annual Planning Outlook was used to update electricity sector assumptions; • the Ministry of Finance's budget 2020 Outlook was used to forecast gross domestic product; and • Environment and Climate Change Canada's 2021 National Inventory Report was used to calibrate historical emissions. <p>The Ministry continues to exclude from its business-as-usual 2030 emissions estimate the potential reductions from the existing federal carbon price on industrial emissions. This is because the Ministry plans to replace the existing system with the less stringent provincial Emissions Performance Standards.</p> <p>Since October 2020, the Ministry has started producing internal, monthly updates on Ontario's greenhouse gas emissions outlook based on current policy scenarios. In October 2021, the Ministry revised its internal estimate of business-as-usual forecast and estimated Ontario's 2030 emissions to be 160.9 Mt based on the federal government's \$50/tonne carbon price on fuels. This estimate is coincidentally the same as the 160.9 Mt estimate shown in the Plan's business-as-usual scenario, despite differences in assumptions.</p> <p>The Ministry notes that additional details are needed to identify whether other policies can be incorporated into the integrated model. At the time of our follow-up, Ministry staff were continuing to seek policy guidance.</p>
<ul style="list-style-type: none"> • improve communication and information sharing with other ministries to improve its understanding of planned and proposed initiatives as they occur; <p>Status: Fully implemented.</p>	<p>The Ministry has established an Assistant Deputy Minister-endorsed Director's Level Climate Change Working Group that met quarterly from spring 2019 to spring 2020, and has continued to meet as required to discuss climate change across government and track the implementation of climate change initiatives.</p> <p>At the time of our 2019 audit, we learned that Ministry staff were preparing advice to government on how to meet the Ministry's reporting obligations, including options for releasing an annual, public-facing web report on progress on Plan initiatives, statistics on outcomes achieved to date, and a focus on their social and economic benefits; and a more detailed, web-based update with quantitative results, modelling and analysis of progress toward targets, and timing and performance metrics.</p>
<ul style="list-style-type: none"> • create and publish a regular report with up-to-date information and emission forecasts, in order to publicly track the Ministry's progress towards meeting the 2030 emission-reduction goals. <p>Status: Little or no progress.</p>	<p>In our follow-up, we found that the Ministry had not published a report with up-to-date information and emission forecasts in order to publicly track progress. The Ministry expects to finalize its approach to public reporting, monitoring and evaluating progress against the commitments in the Plan by December 2022. While the Ministry released public updates in 2019 and 2020 on the Plan (including its climate change plan), outlining steps taken and next steps, these updates do not report on: performance metrics; the outcomes of initiatives undertaken to reduce emissions; the status of Ontario's greenhouse gas emissions; or progress made since the release of the Plan towards meeting the 2030 target.</p>

Committee Recommendation	Status Details
<p>Recommendation 4</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should ensure the evidence and assumptions underlying the Environment Plan are based on sound evidence and current information.</p> <p>Status: Little or no progress.</p>	<p>As noted above, the Ministry has initiated some work to update the Plan to be based on sound evidence. However, it had not yet updated the Plan to include detailed actions with emission-reduction estimates supported by evidence.</p> <p>The Ministry updated its assumptions, and at the time of our follow-up, internal estimates indicated its “committed policies” could reduce emissions by 3.4 Mt in 2030 based on a \$50/tonne carbon price. These policies include Emissions Performance Standards, Renewable Content in Gasoline, Transit and Natural Gas Conservation. The Ministry estimated only 0.03 Mt reductions from Natural Gas Conservation (as compared to 3.2 Mt shown in the Plan) based on funding estimated by the Ministry of Energy. Although the Ministry also estimates that a scenario with a \$170/t carbon price, which the federal government has announced for federal policies, could further reduce emissions, the Ministry has not committed to increasing the carbon price of the provincial Emissions Performance Standards to match the federal government’s.</p> <p>The Ministry does not have an expected timeframe for presenting an updated climate change plan to Cabinet for approval.</p>
<p>Recommendation 5</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should:</p> <ul style="list-style-type: none"> • explore opportunities for private sector investment to develop critical infrastructure for electric vehicles in Ontario; <p>Status: In the process of being implemented by December 2021.</p> <ul style="list-style-type: none"> • improve emission-reduction estimates for both hybrid and fully-electric cars; <p>Status: Fully implemented.</p>	<p>In December 2019, the Ministry established an inter-ministerial steering committee on low-carbon vehicles to explore opportunities to support the uptake of electric vehicles in Ontario. The steering committee is co-chaired by assistant deputy ministers from the Environment Ministry, Ministry of Economic Development, Job Creation and Trade, and Ministry of Transportation. The steering committee is to act as a forum to gather perspectives, discuss and evaluate opportunities and risks, and set priorities for cross-ministry work.</p> <p>Inter-ministry staff-level working groups will be formed as needed to enable cross-ministry collaboration on policy development.</p> <p>The Environment Ministry, Ministry of Economic Development, Job Creation and Trade, and Ministry of Energy are supporting the Ministry of Transportation in the establishment of a Transportation Electrification Council. Members include representatives from the industry, academia, and not-for-profit organizations. The stakeholder group will provide input for the development of a provincial Transportation Electrification Policy at meetings, which are to occur between September and December 2021.</p> <p>In July 2019, the Ministry re-evaluated the 2018 Plan’s scenario of 1.3 million electric vehicles. After accounting for overlap with federal vehicle emission regulations in the business-as-usual forecast, the Ministry’s updated integrated modelling estimated potential emissions reductions of 0.9 Mt in 2030 – 1.7 Mt lower than the 2.6 Mt estimate in the Plan.</p> <p>After receiving direction that the Ministry will not implement zero emission vehicle financial incentives or a sales mandate, Ministry staff revised the emission-reduction estimates in January 2021 to exclude any reductions from low carbon vehicles beyond the business-as-usual forecast.</p> <p>Ministry staff continue to seek policy direction regarding zero emission freight and fleet vehicles.</p>

Committee Recommendation	Status Details
<ul style="list-style-type: none"> assess the feasibility of increasing the use of compressed natural gas and calculate the corresponding impact on emissions and take into account the leakage of methane in the production and transportation of natural gas. <p>Status: Fully implemented.</p>	<p>The Ministry concluded that the Plan's action to reduce operator requirements for 24/7 compressed natural gas fueling stations along 400-series highways would have a negligible impact on uptake and therefore no incremental emissions reductions. The Plan estimated 0.2 Mt in emissions reductions. In January 2021, the Ministry removed compressed natural gas trucks from its revised emission-reduction estimates.</p>
<p>Recommendation 6</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should:</p> <ul style="list-style-type: none"> assess the feasibility of increasing the supply and reducing the cost of renewable natural gas in Ontario; <p>Status: Fully implemented.</p> <ul style="list-style-type: none"> consider developing and implementing a pilot program to conduct a price discovery of the renewable natural gas market in Ontario; <p>Status: Fully implemented.</p> <ul style="list-style-type: none"> take into account renewable natural gas leakage during production and transportation. <p>Status: Fully implemented.</p>	<p>The Environment Ministry met with the Ministry of Energy to discuss the Plan's commitment to require utilities to offer renewable natural gas to its customers. The Ministry of Energy, which oversees energy utilities via the Ontario Energy Board, asked the Environment Ministry to relieve it of any responsibilities related to renewable natural gas in the Plan. One utility (Enbridge) did voluntarily apply to offer a renewable natural gas pilot program, which the Ontario Energy Board approved in September 2020. However, Environment Ministry staff also concluded that there would be no incremental emissions reductions from new renewable natural gas projects in Ontario, because the Ministry of Energy does not plan to place any requirements on utilities and because the pilot does not include any subsidies for costly renewable natural gas. Accordingly, the Environment Ministry's emission-reduction estimates as of October 2021 exclude any potential incremental reductions from renewable natural gas.</p> <p>As noted above, the Ontario Energy Board has approved a renewable natural gas pilot program. The Ontario Energy Board stated in its decision that it supports the investigation of the costs and benefits of renewable natural gas.</p> <p>The Environment Ministry's integrated energy-emission-economy model accounts for gas leakage during production and transportation.</p>
<p>Recommendation 7</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should use best practices, such as integrated modelling, to analyze interactions between, and overlap of, various federal and provincial initiatives.</p> <p>Status: In the process of being implemented by 2023.</p>	<p>The Ministry has updated its integrated model with additional federal and provincial initiatives. These include adding the provincial Natural Gas Conservation and the federal Clean Fuel Standard into the integrated energy-emissions-economy model. The Ministry's internal estimate indicates these two initiatives, in addition to Emissions Performance Standards, Renewable Content in Gasoline and Transit, could reduce emissions by 3.5 Mt in 2030. This estimate is 4.9 Mt less than the combined 8.4 Mt reduction shown in the Plan. Although the Ministry also estimates that a scenario with a \$170/t carbon price, which the federal government has announced for federal policies, could reduce emissions from these initiatives by 5.7 Mt, the Ministry has not committed to increasing the carbon price of provincial Emissions Performance Standards to match the federal government's.</p> <p>Because the Ministry has not yet designed Emissions Performance Standards policy details for the year 2030, its estimates are based on approved 2022 details. At the time of our follow-up, the Ministry expects to finalize Emissions Performance Standards by the end of 2023.</p>

Committee Recommendation	Status Details
<p>Recommendation 8</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should:</p> <ul style="list-style-type: none"> • use integrated modelling to account for interactions and overlap with other emission-reduction initiatives; Status: Little or no progress. • finalize the framework for the Emission Reduction Fund. Status: Little or no progress. 	<p>As noted in Recommendation 7, the Ministry now has additional initiatives in the integrated energy-emissions-economy model. However, the Ministry has determined that its integrated model is incapable of incorporating the Emission Reduction Fund. Still, the Ministry preliminarily revised its emission-reduction estimate to a range of 0.3-0.5 Mt. The Ministry told us that it is continuing to improve its emissions forecasting by making use of more robust integrated modelling approaches, and that these estimates will depend on the design of the Emission Reduction Fund.</p> <p>The Ministry also has not used the integrated model to estimate other potential emissions reductions, including from:</p> <ul style="list-style-type: none"> • implementing the GO Regional Express Rail (referred to in the Plan as Transit within Other Policies); • phasing out industrial coal use (which was not in the Plan); and • landfill gas collection (which was not in the Plan). <p>The Ministry continues to look at leading jurisdictions for best practices on the funding, developing and administering of emission reduction funds. The Ministry continues to consider options for the design and development of the Emission Reduction Fund.</p>
<p>Recommendation 9</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should consistently follow the Intergovernmental Panel on Climate Change Guidelines and avoid counting emissions reductions associated with organic waste diversion that occur outside Ontario's borders. Status: Fully implemented.</p>	<p>The Ministry revised its emissions estimates to exclude emissions reductions associated with diverting organic waste that would have otherwise gone to landfills in the United States.</p>
<p>Recommendation 10</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should:</p> <ul style="list-style-type: none"> • determine the feasibility of implementing various energy storage technologies in Ontario; Status: In the process of being implemented by December 2021. 	<p>The Ministry of Energy had indicated that it would require funding from the Environment Ministry for any incremental energy storage. Environment Ministry staff were unable to identify dedicated sources of funding. Accordingly, the Environment Ministry excludes energy storage from its most recent emission-reduction estimates. However, in November 2020, the Environment Ministry released a discussion paper on a potential hydrogen strategy, with ideas on alternative energy storage options. The Environment Ministry engaged with the Ministry of Energy to review input from the hydrogen discussion paper, which includes energy storage. The Environment Ministry expects to work with partner ministries to develop a hydrogen strategy by December 2021.</p>

Committee Recommendation	Status Details
<ul style="list-style-type: none"> explore emerging and new energy storage technologies in order to increase Ontario's capacity. <p>Status: In the process of being implemented by December 2021.</p>	<p>As noted above, the Environment Ministry released a hydrogen discussion paper in November 2020. The discussion paper was developed with input from other ministries. The Environment Ministry is currently analyzing stakeholder input on the hydrogen discussion paper received through the Environmental Registry and has established an industry working group to develop recommendations. The Environment Ministry expects to work with partner ministries to develop a hydrogen strategy by December 2021.</p>
<p>Recommendation 11</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should:</p> <ul style="list-style-type: none"> update the model with more precise emission-reduction estimates from prospective technologies; <p>Status: Fully implemented.</p> <ul style="list-style-type: none"> support the adoption of new and innovative emission-reduction technologies; <p>Status: In the process of being implemented by December 2021.</p> <ul style="list-style-type: none"> continually monitor emerging global emission-reduction technologies that could have an impact in Ontario. <p>Status: Fully implemented.</p>	<p>In November 2020, the Ministry released a discussion paper on a potential hydrogen strategy, with ideas on alternative energy storage options. However, assuming no funding or regulations, Ministry staff estimated that a hydrogen strategy would have negligible emissions reductions. The Ministry has removed emissions reductions expected from Future Innovation and prospective technologies from its forecasts.</p> <p>The Ministry has initiated some work with partner ministries to identify and assess new emission-reduction technologies. A Hydrogen Strategy Working Group reviewed input received through consultation and proposed recommendations for Ontario's hydrogen strategy. The Ministry expects to release its hydrogen strategy by December 2021.</p> <p>The Ministry is part of ongoing, cross-government meetings to support the adoption of emission-reducing technologies. The Ministry states that it will continue to monitor emerging emission-reduction technologies that could have an impact in Ontario.</p>
<p>Recommendation 12</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should work with the Ministry of Transportation and its partner agencies to:</p> <ul style="list-style-type: none"> determine how interacting programs and policies will lead to emissions reductions; <p>Status: Little or no progress.</p> <ul style="list-style-type: none"> update the integrated energy-emissions-economy model with evidence-based, transit-related data and information where applicable. <p>Status: Fully implemented.</p>	<p>The Ministry met with the Ministry of Transportation in January 2021 to discuss emissions reductions from transit. The Ministry states that this is an ongoing process without an implementation date.</p> <p>As noted in Recommendation 3, since October 2020, the Ministry has updated its emission-reduction estimates monthly. Emissions reductions from transit were estimated by Metrolinx and added to the Ministry's integrated model.</p>

Committee Recommendation	Status Details
<p>Recommendation 13</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should work with partner ministries to update its climate change plan to include detailed actions, based on sound evidence and supported by feasibility and cost analysis.</p> <p>Status: Little or no progress.</p>	<p>The Environment Ministry has engaged other ministries but made little progress identifying committed policies and initiatives from other ministries to reduce emissions. For example, the Ministry of Energy was not supportive of initiatives related to renewable natural gas, or natural gas conservation as described in the Plan.</p> <p>The Environment Ministry has updated its internal list of proposed climate change plan initiatives with revised emission-reduction estimates. The Environment Ministry has identified partner ministries and costs for many “uncommitted policies” under consideration. The Environment Ministry does not have an expected timeframe for presenting an updated climate change plan to Cabinet for approval.</p>
<p>Recommendation 14</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should obtain and review an independent assurance report from the vendor of the integrated model for estimating emissions on an annual basis.</p> <p>Status: Little or no progress.</p>	<p>The Ministry has obtained independent assurance reports on the effectiveness of controls related to the data centre in Vancouver that previously hosted the model, as well as the model vendor’s new service provider. While the Ministry did have a description of the security posture of the vendor’s climate modelling platform, it did not have a cybersecurity assessment, penetration testing reports, nor an assurance report on the model vendor’s own technology controls. The Ministry asked for penetration testing and vulnerability assessment reports, but the vendor declined, citing confidentiality concerns.</p>
<p>Recommendation 15</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should work with the Ministry of Agriculture, Food and Rural Affairs to include agriculture-specific initiatives in an updated Environment Plan to reduce emissions.</p> <p>Status: Little or no progress.</p>	<p>The Ministry made no progress on this recommendation until January 2021, and even then, progress including agriculture-specific initiatives in proposed updates to the Plan have been limited. In December 2020, the federal government released an updated climate plan that included funding for various initiatives, such as carbon storage in agricultural lands. In January 2021, the Ministry initiated cross-ministry meetings with the Ministry of Agriculture, Food and Rural Affairs to discuss updating the climate change section of the Plan and how to access federal funding to improve carbon storage in agricultural soils.</p>
<p>Recommendation 16</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should determine and compare costs and net emissions reductions associated with all initiatives included in the Environment Plan.</p> <p>Status: Little or no progress.</p>	<p>The Ministry has not determined and compared the costs and net emissions reductions associated with all initiatives in the Plan. Further, the Ministry does not have an expected timeframe for presenting an updated climate change plan to Cabinet for approval.</p> <p>The Ministry has added additional policies into its integrated energy-emissions-economy model (see Recommendation 7). The Ministry has also been updating its list of policies under consideration. Ministry staff are transparent about the potential lack of emissions reductions from some initiatives under consideration:</p> <ul style="list-style-type: none"> • Hydrogen and Clean Tech – staff estimate that this initiative (to advance hydrogen technology, production and use) will have negligible reductions without funding or regulations; and, • Government Leadership – staff note that this initiative (to prioritize low-carbon and climate resilience in government investment decisions) could have an impact depending on the scale of targets and investments. <p>The Ministry has excluded from its updated internal emission-reduction estimates some high-cost initiatives (Renewable Natural Gas), or not-fully-costed initiatives shown in the Plan (Low Carbon Vehicles Uptake and Innovation).</p>

Committee Recommendation	Status Details
<p>Recommendation 17</p> <p>The Standing Committee on Public Accounts recommends that the Secretary of Cabinet and the Ontario Deputy Ministers' Council should require ministries to use the guidance developed by the Climate Change Leadership Team.</p> <p>Status: Fully implemented.</p>	<p>The Climate Change Leadership Team (CCLT) is a cross-ministry group responsible for embedding climate change in government procurement, building understanding and capacity within government, and creating a process to update internal directives and guidance to help ensure climate change is considered.</p> <p>The Secretary of the Cabinet has provided direction that, on a going forward basis, guidance tools developed by the CCLT and shared with the Deputy Ministers' Council will also, where appropriate, be provided to the Office of the Treasury Board in the Treasury Board Secretariat for distribution for use by ministries in the Multi-Year Planning Process.</p> <p>However, while the requirement from the Secretary of the Cabinet for ministries to use the CCLT's tools has been put in place, the tools themselves have not yet been developed. The Ministry updated the Deputy Ministers' Council on the work of the CCLT in February 2021. The Ministry has advised that four working groups have been established to develop tools and guidance materials:</p> <ul style="list-style-type: none"> • Governance Working Group – to develop a governance framework for considering climate change in decision-making; • Economics Working Group – to develop standard business cases identifying economic drivers for integrating climate change considerations; undertake research on the socio-economic aspects of climate change economic impacts, potential costs and opportunities; and develop standard financial valuation methodology for assessing the costs and benefits of incorporating climate change into decisions; • Research and Knowledge Management and Translation Working Group – to develop materials that will translate climate change data and expertise into easy-to-read and use resources; and • Enterprise Emissions Working Group – to identify enterprise emissions to begin the development of an emissions inventory for government buildings and assets. <p>These groups are to report to CCLT on their progress, and the Secretary of the Cabinet will then invite the Ministry to provide an update to the Deputy Ministers' Council on progress made. The first report back to CCLT was expected in summer 2021. However, in August 2021, the Ministry advised that there has been no formal report back to date and that the next meeting of the CCLT is to be in fall 2021.</p>
<p>Recommendation 18</p> <p>The Standing Committee on Public Accounts recommends that the Treasury Board Secretariat should ensure that ministries highlight and evaluate the emissions impacts of all decisions that may affect greenhouse gas emissions in their submissions to Treasury Board/Management Board of Cabinet.</p> <p>Status: In the process of being implemented by fall 2021.</p>	<p>In December 2019, Cabinet Office updated the template that is used for Cabinet and Cabinet committee submissions. The template prompts ministries to describe the effect that any proposal has on people, households, communities and the environment, including considerations and impacts relating to climate change. Cabinet Office has advised our Office that it has provided ministries with materials that prompt them to include considerations and impacts relating to the environment and climate change (including greenhouse gas emissions) in their Cabinet and committee submissions.</p> <p>However, we reviewed a sample of 14 recent Cabinet submissions that could have an impact on greenhouse gas emissions and found that only four actually followed the updated template and considered emissions impacts.</p> <p>By fall 2021, the Treasury Board Secretariat plans to update all business case templates that ministries use to make submissions to the Treasury Board/Management Board of Cabinet, and provide guidance to ministries to ensure environmental impacts, including greenhouse gas emissions, are identified in relevant submissions and those impacts are highlighted to decision-makers.</p>

Committee Recommendation	Status Details
<p>Recommendation 19</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should:</p> <ul style="list-style-type: none"> develop and implement measurable performance metrics; Status: Little or no progress. publicly report, on a regular basis, on the government's performance metrics and progress towards meeting its 2030 emissions targets; Status: Little or no progress. explain the outcomes of all initiatives aimed at reducing emissions in the annual report. Status: Little or no progress. 	<p>The Ministry has not drafted or implemented performance metrics, and has not met or consulted with partner ministries on their development. The Ministry expects to finalize its approach to public reporting, monitoring and evaluating progress against the commitments in the Plan by December 2022. While the Ministry released public updates in 2019 and 2020 on the Plan (and its climate change plan), outlining steps taken and next steps, these updates do not report on: performance metrics; the outcomes of all initiatives undertaken to reduce emissions; the status of Ontario's greenhouse gas emissions; or progress made since the release of the Plan towards meeting the 2030 target.</p>
<p>Recommendation 20</p> <p>The Standing Committee on Public Accounts recommends that the Ministry of the Environment, Conservation and Parks should:</p> <ul style="list-style-type: none"> update the draft of the Environment Plan with recent integrated modelling and refined emission-reduction estimates; Status: Little or no progress. provide specific timelines and expected emissions reductions for each action; Status: Little or no progress. present the updated draft Environment Plan, which includes subsequent developments before Cabinet for approval as required. Status: Little or no progress. 	<p>The Ministry does not have a timeline for updating its draft of the Plan.</p> <p>The Ministry does not have a timeline for updating its Plan.</p> <p>The Ministry does not have an expected timeframe for presenting a draft Plan to Cabinet for approval.</p>



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