



June 16, 2008

Mr. Blake Hudema, MCIP
President, Canadian Institute of Planners
116 Albert St., Ste. 801
Ottawa, ON
K1P 5G3

Dear Mr. Hudema:

Re: Proposed Response to CIP Climate Change Policy

The Ontario Professional Planners Institute (OPPI) welcomes and supports this climate change initiative of the Canadian Institute of Planners (CIP). OPPI is addressing climate change effects in many ways:

- the Policy Committee under Jeff Celentano has published research on climate change mitigation and adaptation, as reported in OPPI's e-newsletter in May 2006;
- our members are working within Ontario ministries and municipalities and with other professionals and stakeholders to develop and implement innovative mitigation and adaptation strategies, particularly where upper-tier municipalities are updating Official Plans to bring them into conformity with provincial growth management plans and the 2005 Provincial Policy Statement;
- our Healthy Communities initiative supports the implementation of and addresses adaptation and mitigation strategies;
- the *Ontario Planning Journal* routinely includes articles on responses to climate change;
- OPPI co-sponsored a conference with Clean Air Hamilton and others on "Climate Change and Healthy Communities" in February 2008.

Our members are committed to addressing climate change and are working with other disciplines on mitigation and adaptation policies, particularly in the areas of transportation, storm water management, and public health responses to smog and heat. However, we need more scientific information relevant to regional contexts; technical guidance to help us assess and compare the risks involved; examples of successful efforts that we can use to benchmark the policies and programs we develop; and opportunities to collaborate with professionals in other disciplines.

OPPI believes that CIP can assist Ontario planners by drawing on the technical work of federal scientists to provide information and guidance; developing professional development and training courses; offering workshops, conferences, and web-based presentations; and sponsoring an awards programs to recognize and reward innovation in this area.

The response to climate change will involve both mitigation and adaptation measures. In his recent book, *Commonwealth*, Jeffrey Sachs reviews the literature and categorizes mitigation and adaptation measures in the following way:

Mitigation to reduce:

- 1) deforestation;
- 2) greenhouse emissions from electrical production;
- 3) tailpipe greenhouse gas emissions from automobiles;
- 4) greenhouse gas emissions from major industrial sectors (i.e., steel, cement, refineries and petrochemicals);
- 5) electrical use;
- 6) heating and cooling demands in our building stock.

Adaptation to respond to:

- 1) rising ocean levels (or declining fresh Great Lakes levels);
- 2) habitat destruction;
- 3) increased disease transmission;
- 4) changes in agricultural production;
- 5) changes in water availability (ground and surface water);
- 6) increased natural hazards (storm frequencies and severity);
- 7) changes in ocean chemistry.

These efforts take place in varying contexts, both geographical and political. In Ontario, we must work within existing provincial and municipal programs and structures to develop our responses to climate change.

Here are our primary concerns and recommendations with the Draft Policy:

1. Goals

We recommend amending the goal from:

“the Canadian Institute of Planners aims to ensure every member is committed to tackling the effects of climate change”

to

“the Canadian Institute of Planners aims to ensure that every member has access to the scientific and technical knowledge and methods, professional training, and practice guidance necessary to address the effects of climate change.”

2. Written declarations

The written declarations required by Policy Directive #6 are unprecedented and outside the boundaries of employment and consulting agreements.

Planners make declarations when they sign and seal their reports that they have used sound professional judgment and addressed the public interests involved in the task performed (for

example, Ontario planners must state that their planning opinions are consistent with the 2005 Provincial Policy Statement).

Employees of most municipal and consulting organizations make corporate declarations about the work that has been performed. Planners work with other professionals and scientists, often under their direction, to ensure these declarations are appropriate and meet agreed-upon standards. Many large municipalities and consulting firms also adhere to recognized international standards (e.g., ISO) in their work. Many ministries and municipalities are also developing measures to address climate change in declarations about broader concerns such as sustainable development or public health.

This is the context in which planners work and in which mitigation and adaptation innovation is taking place. It is neither feasible nor helpful to require professional planners to prepare written declarations, separate from these other declarations. Such a requirement may be seen as simply adding another layer of paperwork onto planning decisions.

Furthermore, this requirement sets a dangerous precedent. Why stop with climate change? Why not require a declaration for the effects of planning decisions on aboriginal title and rights or on income inequality or any one of a number of other equally worthwhile goals?

This policy may even require planners to breach the legal requirements of their employment or consulting agreements, our professional code, and Ontario standards of practice with respect to our responsibilities to the public interest and our clients. It may also cause frictions with the professionals in other disciplines and scientists with whom our members work.

We recommend deleting the policy requiring written declarations.

3. Scope of action

With regard to Policy Directive #5, some mitigation and adaptation strategies do not involve the planning profession. We need to be clear as to what we can and cannot do and that much of what we do requires collaboration with other disciplines. The Policy needs to specify what work is being undertaken by whom. This may require exploring and documenting the expectations that other professions and scientists have of the planning profession.

Directive #5 is fine as far as it goes, but without additional wording, it will have the unintended effect of suggesting to our peers that we are the only profession involved in this effort.

We recommend additional wording to address these concerns.

4. Standards of practice

Policy Directive #7 is outside the terms of the CIP/OPPI Affiliates Agreement and its implementation with OPPI will need to be negotiated.

OPPI is anxious to help its members address climate change in a manner that fits within our strategic plans, resources, and administrative framework, subject to agreement on the manner in which the concerns raised in these comments are addressed. In Ontario, we see OPPI as the

primary vehicle for implementing most of the directives. Appropriate flexibility for national vs. affiliate delivery should be built into the policy. OPPI's implementation of this policy may be incorporated within the Healthy Communities initiative.

5. The need for practical toolkits

The main thrust of Policy Directives #7 and #9 should be to help our members become knowledgeable about and effective in addressing mitigation/adaptation measures appropriate to their practice. What would be most valuable to our members, and would best enable the profession as a whole to achieve demonstrable results, would be toolkits that planners can use every day. The recently adopted American Planning Association policy on climate change is an example of what is needed.

We recommend that CIP and its federal government stakeholders draw on the Intergovernmental Panel on Climate Change (IPCC) reports and the recently released Government of Canada publication *From Impacts to Adaptation: Canada in a Changing Climate* to draft a mitigation/adaptation statement that takes into account projected effects across the country and fine tunes the adaptation and mitigation strategies to suit provincial and regional contexts. The affiliates could then take this statement and define policy approaches suitable to their legislative settings.

We also recommend CIP benchmark what planners can actually achieve. When this material is available, OPPI will work with CIP to consider how benchmarking may be used to help educate and inform planners and assist planners in using these findings in their practice within Ontario's legislative and policy framework.

6. Avoiding silos

There is a synergy between the approaches required to address climate change and the approaches necessary to address other matters of crucial importance such as healthy communities, water management, conservation, and energy planning.

Ontario planners do not want climate change to become a new policy silo. That is the value of a comprehensive approach like the Ontario Provincial Policy Statement (PPS), which requires that all critical issues be considered together, as described in part III of the PPS. Effective policy needs to address this synergy. OPPI's implementation of this policy may be incorporated within the Healthy Communities initiative.

7. Visioning

Helping community members envision what a sustainable community will look like and how it will function under various circumstances is an important contribution that CIP can make to address effective climate change policy. Visioning is properly a planning function.

We recommend that CIP address the subject of visioning in its policy.

8. Guidance on setting priorities

Not all communities will be able to adapt to the effects of climate change. For some, mitigation and adaptation measures may be too costly or technically prohibitive. Triage methods for setting priorities may be required to decide which effects can be addressed and which cannot be addressed.

We recommend that CIP research appropriate methods and providing guidance to the affiliates and members on the application of triage to the use of mitigation or adaptation methods for addressing the effects of climate change.

Sincerely,

A handwritten signature in black ink that reads "George McKibbin". The signature is written in a cursive style with a large initial 'G' and a long, sweeping tail on the 'n'.

George McKibbin, MCIP, RPP
Chair, Policy Development Committee
Ontario Professional Planners Institute