

Missing Values:



An Environmental Review of the 1999 - 2000 Ministry Business Plans

Prepared by:

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The Conservation Council of Ontario
February, 2000



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Council of
Ontario

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This report has been prepared as a research report to the Conservation Council of Ontario. It has been approved for release by the Board of Directors of the Council.

Contributions from the members of the Council were solicited in the preparation of this review, however the report's conclusions and recommendations are those of the principal author.

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Executive Summary



At the heart of any government is its values: the beliefs which drive the policy and actions of the government.

At the heart of a good government is the ability to integrate society's predominant values into its policies and actions.

In December 1999, the Ontario government published its 1999 - 2000 Ministry Business Plans. These plans outline the government's commitments for the upcoming year.

This paper applies Ontario's environmental values to a review of the 1999 - 2000 Ministry Business plans of thirteen ministries. The ministries were selected because they are all required to produce a formal Statement of Environmental Values under the Environmental Bill of Rights, and to apply these values in all major decisions that might affect the environment. The review compares the commitments of the Business Plans with the commitments outlined in the Statements of Environmental Values.

The results are disappointing. For the fourth consecutive year, the published Ministry Business Plans have failed to take into account the Statements of Environmental Values.

This year, the omission is made worse by the fact that Management Board Secretariat had promised the Environmental Commissioner of Ontario that it had added environmental considerations into the 1999-2000 business planning framework for all ministries. The Commissioner reported in her 1998 report that, "in preparing next year's Business Plans, each EBR ministry is being asked to describe its strategy for honouring its Statement of Environmental Values".

The Chair of Management Board, Chris Hodgson, has indicated that the guidelines for 1999 - 2000 did include the requirement that ministries affected by the EBR develop a "high level strategy" to address how the ministry is honouring its Statement of Environmental Values, and that ministries are instructed to refer to their key strategies in the published business plans and annual reports (see Appendix 1).

The review of the 1999-2000 Business Plans for each of the thirteen ministries shows that ten ministries have, at best, only a cursory reference to their Statement of Environmental Values and many of their proposed activities demonstrate a complete disregard for the environment.

The Ministry of the Environment and the Ministry of Natural Resources have done the best job of integrating the SEV into their Business Plans. This is understandable, given that they both have environmental protection as a core business.

The Ministry of Energy, Science and Technology incorporated its SEV into the section on energy, but completely overlooked environmental issues and values in the science and technology section.

In some instances, ministries have set up, or are proposing, agencies to take over the traditional supervisory functions of the government. The Technical Standards Safety Authority under the Ministry of Consumer and Commercial Relations is a case in point. The Ministry's Business Plan makes no mention of its responsibility in the management of fuel storage facilities, even though it is the most significant commitment

listed in its Statement of Environmental Values. In these cases, the Ministry still has the overall responsibility for the issue, and it should be reflected in its business plan.

The most serious failure is in the area of land use planning and the protection of natural areas and prime agricultural land.

- Municipal Affairs and Housing makes no reference to the protection of natural areas and agricultural land. It does include a commitment to change the Ministry's role in planning from "reviewing and approving" to one of "advising municipalities on how to prepare or review their own planning documents", and a commitment to "work toward a strong housing market and construction industry that contribute to economic prosperity".
- Transportation has devoted 85 per cent of its budget to highways and road safety. There is no direct reference or support for public transit.
- Management Board has committed to selling \$200 million in real estate assets. Included in this package is 4,000 acres of agricultural land in the Pickering area.

In short, the poor level of integration of the Statements of Environmental Values into the Ministry Business Plans has led to commitments that will have a significant effect on the environment, both in the immediate future and in terms of the long term sustainability of Ontario's economy and society.

The lack of attention to controlling urban sprawl through government policy and ministry activities is a major factor behind the recent controversy over development proposals in the Oak Ridges Moraine. The government policy statement under the Planning Act on the protection of natural heritage features and sensitive groundwater recharge areas is clear. The Ministry of Municipal Affairs has a mandate and a responsibility to show leadership in this area.

In the long run, increased urban sprawl will result in the unnecessary loss of prime agricultural land, natural areas, and ecological functions. Ontario's food security will be diminished through an increased reliance on imported produce. Natural recreation opportunities will be diminished, and the integrity of wildlife ecosystems and corridors will be compromised. The demand for groundwater will increase, and the recharge capability of the aquifers will decrease. The demand for precious and non-renewable resources (such as aggregates and gasoline) will increase. Increased dependency on automobiles and longer trip times will lead to increases in air emissions which cause climate change and contribute to respiratory problems.

These are all serious consequences of bad planning. They can be easily corrected by re-establishing a provincial commitment to promoting compact development, urban re-development and intensification, and healthy community planning.

The government is currently preparing the next round of business plans for the 2000 - 2001 fiscal year (starting April 1, 2000). This report concludes with a list of recommendations for how the government and the ministries can begin to address and incorporate environmental values into their business plans, policies and programs.

Summary of Conclusions and Recommendations

1. **Business Plans are a good initiative in that they are an effective means for communicating government priorities and commitments.**

Whether they improve the accountability of government, as Management Board Chair Chris Hodgson says, remains to be seen. It depends on how well the government responds to the analysis and recommendations in reports such as this one.

2. **Ten of the thirteen Business plans reviewed in this study failed to incorporate adequate recognition of Ministry Statements of Environmental Values.**

Four ministries failed to incorporate environmental values into their business plans but did include commitments that will have a major negative impact on the environment. They are:

- **Economic Development and Trade** (climate change as a trade barrier)
- **Management Board** (sale of 4,000 acres of agricultural land)
- **Municipal Affairs and Housing** (urban development)
- **Transportation** (highway development)

Five ministries failed to incorporate environmental values into their business plan, the absence of which may have significant environmental implications. They are:

- **Agriculture, Food and Rural Affairs** (pollution, energy, biotechnology, and rural development)
- **Consumer and Corporate Relations** (fuel storage and groundwater contamination)
- **Energy Science and Technology - Technology section** (technology development and biotechnology)
- **Health and Long Term Care** (hospital incineration, environmental carcinogens)
- **Northern Development and Mines** (northern development and mineral development)

Three Ministries incorporated environmental issues and values into their plans, but in each case there is substantial room for improvement:

- **Energy, Science and Technology - Energy section**
- **Environment**
- **Natural Resources**

3. **The government lacks the capacity to react to emerging environmental crises.**

- Many of the issues identified in this report are likely to become more serious over the course of the next ten to twenty years.
- The development oriented ministries are the most poorly equipped to handle environmental issues. These ministries are: Agriculture, Food and Rural Affairs, Economic Development and Trade, Municipal Affairs and Housing, and Transportation.

4. **The government's unsustainable approach to economic growth and development will lead to significant environmental impacts.**

- weak provincial planning is allowing urban sprawl and the continued loss of significant natural and agricultural areas;
- the government is promoting rural development without consideration of environmentally appropriate development;

- the emphasis on highway development, combined with the absence of support for public transit and rail, will further promote urban sprawl and a car-dependent society. This will inevitably lead to increased energy consumption, a decline in air quality, and an increase in greenhouse gases.

5. The omission of environmental values in the 1999-2000 business plans contravenes the requirements of the Environmental Bill of Rights and the Management Board guidelines.

- The government has reneged on the commitment it made to the Environmental Commissioner in 1999 to include strategies for honouring SEVs in the 1999-2000 business plans.
- This failure to meet the requirements of the EBR takes on additional significance when compared with the current government's attempt to require future governments to raise taxes and/or approve a deficit budget (the Taxpayer Protection and Balanced Budget Act). The purpose of the Environmental Bill of Rights is to ensure that governments operate in an environmentally sustainable manner; or, in other words, that they do not incur an ecological deficit. If the government will not respect previous legislation outlining the requirements for good governance, how can it expect that future governments will respect its legislation?
- the Conservation Council of Ontario will consider applying for a formal review of the Ministry Business Plans under the Environmental Bill of Rights if the environmental values are not addressed in the 2000-2001 business plans.

6. Major changes are required to the business plans to fully integrate environmental sustainability into the government's mandate.

- Integrating environmental values is not a simple matter of adding a statement that "the ministry will consider its SEV in all major policy decisions that affect the environment". Nor is it a matter of adding a couple of research and education programs.
- Integrating environmental values means that each ministry needs to re-evaluate its entire business plan in order that its goals, targets, and commitments fully reflect Ontario's goals for a healthy environment.

7. Ministry Statements of Environmental Values do not adequately reflect the purposes of the Environmental Bill of Rights.

- The Ministry of Agriculture, Food and Rural Affairs does not identify any environmental issues as they relate to the Ministry.
- The Ministry of Energy, Science and Technology's SEV contains no environmental values for the Technology section of the ministry
- Few of the SEVs directly address the purposes of the Environmental Bill of Rights as laid out in Sections 2 (1) and 2 (2)
- For those ministries that choose to revise their SEV according to the core businesses of their business plan, the requirement should be to apply all the purposes of the EBR to each core business.

Recommendations

The following recommendations are made in an effort to assist the province to meet its requirements under the Environmental Bill of Rights, and to facilitate the integration of environmental values with the current economic agenda of the government.

Recommendation #1: Provincial Vision Statement

The Province should develop and adopt a Provincial Vision Statement that encapsulates and reflects the aspirations of the people of Ontario for individual health and well-being; healthy communities and cultures; clean and healthy ecosystems; and a prosperous and sustainable economy.

Recommendation #2: Ministry Vision Statements

Ministries should revise their Vision Statements in order that they reflect an awareness of all appropriate provincial goals, including the health of the environment.

Recommendation #3: Statements of Environmental Values

The Province should enforce the requirement under the Environmental Bill of Rights that ministries explain how the purposes of the Act will be applied to their ministry through their Statements of Environmental Values.

Recommendation #4: Integrating Environmental Values into Ministry Business Plans

The Province should demonstrate a significant commitment to Ontario's Environmental Values in the 2000 - 2001 business plans.

Recommendation #5: Documenting Environmental Considerations

Each Ministry with a Statement of Environmental Values should publish an annual summary of how it has considered these values in its activities.

Recommendation # 6: An Environmental Plan for Ontario

The Province should develop a cross-ministry environmental plan that will indicate how each ministry is contributing to solving the most significant environmental and conservation problems facing the province.

Recommendation # 7: Public and Stakeholder Consultation

The Province should seek to improve its public and stakeholder consultation processes in order to develop an improved understanding of the predominant social values and goals, and to assist in reflecting these values in its business plans, strategies, policies and new initiatives.

1. Background



In 1996, the Government of Ontario has introduced the concept of “Ministry Business Plans” to Ontario. A business plan is a guiding document and explicit performance commitments from each ministry. The intention is to ensure that ministry performance is consistent with the priorities and directions of the current government.

At the same time, in the words of Management Board Chair Chris Hodgson, Management Board is committed to “promoting accountability and openness in government operations by making business plans and performance measures available to the public”.

Copies of the current business plans can be found on the Management Board web site at <http://www.gov.on.ca/MBS/english/press/plans99/index.html>

For those of us in the environmental sector, Ministry Business Plans provide us with the opportunity to analyze how the government will be able to ensure the future health of the province’s environment and the long-term sustainability of our economy and society.

This paper provides an overview of significant environmental commitments within each ministry, and a comparative analysis of the government’s ability to address significant environmental concerns. It is prepared in support of the Conservation Council’s work in support of effective environmental strategies for Ontario.

How Business Plans are Prepared

In looking at the environmental commitment of the Ontario government’s ministry business plans, it is important to understand the context in which the ministry’s operate. The following description is taken from a letter from Management Board Chair, Chris Hodgson, and the Business Planning and Allocation Guidelines (see Appendix A.)

In preparing their business plan, each ministry must follow the Business Planning and Allocation Guidelines of the Management Board Secretariat. In the 1999 - 2000 planning cycle, the guidelines included instructions to the ministries affected by the EBR that they develop a “high level strategy” to address how the ministry is honouring its Statement of Environmental Values. Approved business plans are communicated to the public by way of published business plans and annual reports. Ministries are asked to refer to their key strategies in the writing of these documents.

A new requirement for the 2000 - 2001 planning cycle is that ministries have been asked to provide details on the positive and negative impacts on the environment for any new proposal.

According to the 2000 - 2001 guidelines, the ministries were required to submit their business plans to Management Board on January 10. The final business plans are scheduled to be approved by the Cabinet on March 31.

Ministries are then required to produce “published business plans”, the purpose of which is “to support the government’s commitment to be open and accountable to the public” (Section 1 -15). The published business plans are to be released after the Budget.

Last year, the 1999 - 2000 business plans were released in December. They were posted on the internet on the Management Board web site, and made available through Publications Ontario free of charge. In addition, the plans were posted on the Environmental Registry. The registry notice includes an interesting interpretation that "Ministry Business Plans are administrative in nature, and under EBR s.15(2) are not required to be placed on the Registry". In other words, the government does not consider business plans to be subject to the requirements of the EBR for a thirty day public comment period **before** they are implemented because they are merely administrative documents and do not include policies or proposals that might seriously affect the environment.

The registry also includes a note on the consultation process for the business plans:

The business planning process is an ongoing one, and although posted plans are final, public comment is being sought and can be considered within the next year's planning process. Comments on individual Business Plans should be submitted to the individual ministry contact name listed under each plan. Comments on Business Plans should be submitted by February 29, 2000.

Accordingly, this review is being submitted to the thirteen ministries prescribed under the Environmental Bill of Rights .

Requirements of the Environmental Bill of Rights (EBR)

http://www.ene.gov.on.ca/envision/env_reg/ebr/acts%20and%20regs/index.htm

The Environmental Bill of Rights sets out the requirements for the provincial government with respect to environmental management and public participation in government decisions that may significantly affect the environment.

The EBR was proclaimed in February 1994. It is similar to the current government's Taxpayer Protection and Balanced Budget Act in that it binds future governments to act in what is considered to be a responsible manner.

The founding principles of the EBR are stated in its Preamble :

The people of Ontario recognize the inherent value of the natural environment.

The people of Ontario have a right to a healthful environment.

The people of Ontario have as a common goal the protection, conservation and restoration of the natural environment for the benefit of present and future generations.

While the government has the primary responsibility for achieving this goal, the people should have means to ensure that it is achieved in an effective, timely, open and fair manner.

The purposes of the Act are:

- to protect, conserve and, where reasonable, restore the integrity of the environment by the means provided in the Act;
- to provide sustainability of the environment by the means provided in the Act; and
- to protect the right to a healthful environment by the means provided in the Act.

EBR, Section 2 (1)

These purposes include the following:

1. The prevention, reduction and elimination of the use, generation and release of pollutants that are an unreasonable threat to the integrity of the environment.
2. The protection and conservation of biological, ecological and genetic diversity.
3. The protection and conservation of natural resources, including plant life, animal life and ecological systems.
4. The encouragement of the wise management of our natural resources, including plant life, animal life and ecological systems.
5. The identification, protection and conservation of ecologically sensitive areas or processes.

EBR, Section 2 (2)

The second set of principles in section 2 (2) are of particular importance in that they provide a framework for the ministries to identify environmental issues relevant to their ministry and assess the environmental implications of their activities.

Statements of Environmental Values (SEVs)

http://www.ene.gov.on.ca/envision/env_reg/er/sevs/index.htm

Statements of Environmental Values are a means for government ministries to record their commitment to the environment and be accountable for ensuring consideration of the environment in their decisions. The EBR requires a Statement of Environmental Values (SEV) from 13 government ministries. The SEV explains:

- How the purposes of the EBR will be applied when decisions that might significantly affect the environment are made in the Ministry; and
- How consideration of the purposes of the EBR will be integrated with other considerations, including social, economic and scientific considerations, that are part of decision-making in the Ministry.

Section 7. of the Act describes how each of the prescribed ministries is required to prepare a Statement of Environmental Values.

Within three months after the date on which this section begins to apply to a ministry, the minister shall prepare a draft ministry statement of environmental values that,

(a) explains how the purposes of this Act are to be applied when decisions that might significantly affect the environment are made in the ministry; and

(b) explains how consideration of the purposes of this Act should be integrated with other considerations, including social, economic and scientific considerations, that are part of decision-making in the ministry. 1993, c. 28, s. 7.

The EBR further requires that...

The minister shall take every reasonable step to ensure that the ministry statement of environmental values is considered whenever decisions that might significantly affect the environment are made in the ministry. 1993, c. 28, s. 11.

Therefore, it is reasonable to conclude that the Environmental Bill of Rights requires Ministries to consider their environmental values in the preparation of business plans.

As the former Environmental Commissioner of Ontario has documented in the past three Annual Reports, this requirement has not been met.

The Environmental Commissioner's Review of SEVs and Business Plans

<http://www.eco.on.ca/>

The former Environmental Commissioner of Ontario, Eva Ligeti, included a review of SEVs and Ministry Business Plans in each of her annual reports from 1996 through to the latest 1998 Annual Report.

- 1996 The 1996 Annual Report reviewed how five ministries had applied their SEVs in their Business Plans: Management Board Secretariat; Citizenship, Culture and Recreation; Economic Development, Trade and Tourism; Health; and Labour. Only the Ministry of Labour had included a commitment to environmentally sound practices and greening its programs:

Each Ministry acknowledged in their SEVs that much of their activity has environmental significance, but they gave little consideration to their stated environmental goals in carrying out that activity during 1996.

This lack of attention to SEVs is unacceptable. Environmental accountability requires political and administrative will. Otherwise, the Statements of Environmental Values remain more rhetoric than institutional principles and practice.

Environmental Commissioner Eva Ligeti,
1996 Annual Report, April 1997
p 58

- 1997: The 1997 Annual Report of the Environmental Commissioner found that the Business Plans had an even poorer level of environmental recognition and commitment:

In my 1996 Annual Report, I recommended that ministries make every effort to apply the environmental values contained in their Statements of Environmental Values (SEVs) and integrate them into their business plans. Our review of these plans revealed that commitments to the environment in the ministry SEVs are not reflected in the majority of the 1997 business plans. In fact, the plans of only three ministries (MOE, MNR, and the Ministry of Northern Development and Mines) mention their ministry's responsibility for the environment. The 1997 plans are even weaker than last year's in terms of integrating the environment into ministry business.

Environment Commissioner Eva Ligeti,
1997 Annual Report, April, 1998
p 18

- 1998: The most recent report of the Environmental Commissioner found little progress in integrating SEVs into Business Plans:

In my annual report last year, I found that commitments made in the Statements of Environmental Values by provincial ministries were not reflected in their 1997 Business Plans. I encouraged ministries, when developing their 1998 Business Plans, to reflect how environmental health has been incorporated into the core businesses of the ministry. However, the majority of the 1998 plans show no improvement in this area.

Environment Commissioner Eva Ligeti,
1998 Annual Report, April, 1999
p 35

The Commissioner reported one positive development, a commitment from Management Board to incorporate environmental considerations into the 1999-2000 business plans:

There was a positive development related to business planning in 1998. Management Board Secretariat has informed me that it has added environmental considerations into the 1999-2000 business planning framework for all ministries. In preparing next year's business plans, each EBR ministry is being asked to describe its strategy for honouring its Statement of Environmental Values. I look forward to seeing these strategies in the 1999-2000 Business Plans.

Environment Commissioner Eva Ligeti,
1998 Annual Report, April, 1999
p 36

Applications for Review

Part IV of the Environmental Bill of Rights details the formal process whereby any two citizens of Ontario can request a review of an existing policy, Act, regulation or instrument that they believe should be amended, repealed or revoked in order to protect the environment.

The following Ministries are prescribed for Part IV of the EBR:

- Agriculture, Food and Rural Affairs
- Consumer and Commercial Relations
- Energy, Science and Technology
- Environment
- Municipal Affairs and Housing
- Natural Resources
- Northern Development and Mines

Accordingly, the above Ministries could face a request for review if their business plans do not reflect an appropriate recognition of their Statement of Environmental Values.

Additionally, those ministries that have not adequately addressed the purposes of the EBR in their Statement of Environmental Values, in particular the five points laid out in Section 2 (2) of the Bill, could be subject to a request for a review.

2. 1999-2000 Ministry Business Plans



In December 1999, the Ontario government released its 1999 - 2000 Ministry Business Plans. The plans are prepared internally by government staff with no opportunities for consultation or public input.

The complete set of twenty five plans can be found on the Management Board website (<http://www.gov.on.ca/MBS/english/press/plans99/index.html>).

The purpose of this review is to assess the environmental implications of the current plans, and the degree to which the business plans reflect the stated environmental values of the ministry. The review has been scoped to include only the thirteen ministries that are required to produce Statements of Environmental Values under the Environmental Bill of Rights (see Table 1).

Table 1 Ministries With Statements of Environmental Values	
Ministries with Business Plans	Statement of Environmental Values
Agriculture, Food and Rural Affairs	X
Attorney General	
Children's Secretariat	
Citizenship, Culture and Recreation	X
Ontario Seniors' Secretariat	
Ontario Women's Directorate	
Community and Social Services	
Consumer and Commercial Relations	X
Correctional Services	
Economic Development and Trade	X
Education	
Energy, Science and Technology	X
Environment	X
Finance	
Francophone Affairs	
Health and Long-Term Care	X
Intergovernmental Affairs	
Labour	X
Management Board Secretariat	X
Municipal Affairs and Housing	X
Natural Resources	X
Northern Development and Mines	X
Ontario Native Affairs Secretariat	
Solicitor General	
Tourism	
Training, Colleges and Universities	
Transportation	X

Limits of the Review

This review summarizes the major commitments in each Business Plans that may have a significant impact on the environment. It then compares these commitments to the promises made in the ministry's Statement of Environmental Values to determine whether the plan adequately reflects the requirements of the Environmental Bill of Rights.

The review does not provide a detailed analysis of the government's track record and the stated accomplishments that are included in the Business Plans. For this analysis, please refer to the annual reports of the Environmental Commissioner of Ontario and to "Ontario's Environment and the Common Sense Revolution: A Four Year Report" , published by the Canadian Institute of Environmental Law and Policy.

Note: Reference to page numbers of the business plans and SEVs have been included throughout this section, however the business plans were downloaded from the internet and there may be some discrepancies in page numbers.

Ministry of Agriculture, Food and Rural Affairs

Minister: The Hon. Ernie Hardeman
Deputy Minister: Frank Ingratta

1999 - 2000 Budget: \$365 million
Number of Staff: 775

Highlights

Vision

The Ministry's vision is "to foster competitive, economically diverse and prosperous agriculture and food sectors and to promote economic development and job creation in rural communities (p 2)."

The statement has been revised slightly to include the reference to "job creation". There is no reference to the environmental sustainability in the vision statement.

The Ministry expands on the vision by saying its priorities are:

- value added agriculture, increased exports, and an improved agriculture and food trade balance;
- investment and economic development in Ontario's agriculture, food and rural sectors; and
- access for rural southern Ontario resident's to provincial economic development initiatives.

Again, the environment, sustainable agriculture, and sustainable rural development are not part of the Ministry priorities.

Core Businesses

The ministry has four core business areas: Research and Technology Transfer, Investment and Market Development, Rural Economic Development, and Risk Management.

Under Research and Technology, the Ministry works with the University of Guelph (and others) to develop and transfer innovative technologies to industry stakeholders.

The Ministry actively promotes economic development in rural areas. Its goal is for Ontario to have a higher rate of growth in employment and business start-ups that the national average for rural areas.

If there is any consideration of the environment in the plan, it falls under the category of "Risk Management". The ministry is working to put in place nation-wide food inspection standards that ensure consumers are protected while enhancing the industry's competitiveness in Canada and abroad. The ministry is also working with other ministries on a comprehensive provincial food safety strategy as well as helping develop industry-driven programs that assure the continued safety and quality of Ontario food (p 4).

However, the 1999-2000 commitments make no mention of the food safety strategy. The only commitment is to complete risk assessments for all fruit and vegetable commodities produced and marketed in Ontario (p 11).

Consistency With the Statement of Environmental Values (SEV)

The Ministry's Statement of Environmental Values was revised in December 1998 to reflect the priorities of the Ministries Business Plan.

The SEV outlines the purpose of the Environmental Bill of Rights and how these purposes will be applied to the decision making process of the Ministry. Unlike other ministries, there are no issues or commitments identified in the SEV.

Worse still, the Ministry includes a description of its Core Businesses as an appendix to the SEV. The description contains seven economic statements and only one reference that could be interpreted to include an environmental component (food safety).

In short, the OMAFRA's Statement of Environmental Values contains no statements of environmental values, does not identify any environmental issues related to the Ministry's mandate, and does not provide any environmental commitments.

The SEV itself is entirely inadequate, and therefore cannot be expected to provide any direction for the business planning process.

Comments

The Ministry places an overwhelming emphasis on economic development. There is no commitment or support for improving the environmental performance of the agriculture sector.

The Ministry's new Statement of Environmental Values is completely devoid of any environmental values. It needs to include a section on the issues and environmental objectives for the ministry, similar to the sections included in other ministry SEVs.

The new SEV was approved in December 1998 and replaced the original 1994 statement, which was also weak but at least referred to one of the then strategic directions of the Ministry, "Environmental Sustainability". In the original SEV, the Ministry sought to "ensure an environmentally responsible and sustainable agriculture and food system by working in cooperation with the industry, governments and agencies and stakeholders". This strategic direction is missing in the current SEV and business plan.

Food safety is a priority in the Ministry Business Plan, but here the emphasis is on industry-driven programs. There is no mention of public, or consumer input to these strategies, nor is there any mention of the scope of the strategies and whether they would include genetically modified foods and pesticide residues. The Ministry needs to pay equal attention to the growing public concern over genetically-modified organisms

Within its emphasis on economic development, the Ministry should include a commitment to support the development of the organic food industry as part of its commitment to value-added agriculture and rural economic development.

Key Issues	Coverage in 1999-2000 Plan
preservation of prime farmland	none
pesticide reduction	none
groundwater contamination	none
groundwater quantity	none
genetically-modified organisms	none
organic agriculture	none

Ministry of Citizenship, Culture and Recreation

Minister: The Hon. Helen Johns

Deputy Minister: Naomi Alboim

1999 - 2000 Budget: \$393 million

Number of Staff: 1,020

Highlights

Vision

The Ministry's vision is "to make Ontario one of the best places in which to live, work and raise a family by promoting qualities of fairness, creativity and activity and by contributing to building Ontario communities in which self-reliance and voluntary action go hand in hand" (p 1).

While it does not mention the environment specifically (or any individual aspect of a healthy community) the vision supports public involvement in community environmental projects.

Core Businesses

The Ministry is responsible for protecting Ontario's heritage (p 3). This responsibility includes natural heritage alongside cultural, architectural and archeological heritage. To this end, the Ministry works closely with the Ontario Heritage Foundation.

The Ministry also oversees the Trillium Foundation, and has guaranteed \$100 million in annual funding to the province's charitable and not-for-profit organizations (p 6). The environment is a recent addition to the Trillium Foundation's mandate.

The ministry seeks to promote partnerships as a key to developing self-reliance in its sectors. It's *Volunteer @ction.online* has helping voluntary organizations develop community-based information technology networks. Environmental groups such as the Conservation Council of Ontario, the Sustainability Network, and the Evergreen Foundation are managing projects under this program.

The environmental component of these programs is not mentioned in the Business plan.

Consistency with the Statement of Environmental Values (SEV)

The Ministry's SEV includes a section on Core Business Environmental Objectives (SEV p 4.):

Cultural heritage conservation, in contributing to cultural, social and economic development, is also compatible with environmental protection.

MCZCR will continue to strive, through its policies and programs, to promote the conservation and development of Ontario's cultural and archival heritage in a manner which promotes sustainability of the environment.

As part of Ontario's land use planning and environmental assessment processes, MCZCR will provide information to proponents and approval authorities on cultural heritage resources.

Recreation enhances the quality of community and personal life. Active, healthy lifestyles and a healthy, natural environment are both compatible and mutually supportive.

MCZCR will continue to promote, through its policies, programs and services, recreational opportunities and practices which support the purposes of the Environmental Bill of Rights and healthy communities.

The Archives of Ontario has corporate responsibilities related to recorded information management.

MCZCR, through the Archives, will encourage environmentally sensitive policies and practices that support the purposes of the EBR within the government related to the management of recorded information in all media.

The Ministry is concerned about the impact of its operating practices and procedures:

The Ministry will follow Management Board practices and procedures related to environmental conservation and management.

The Ministry's SEV does not mention any specific issues, and does not directly mention its role in natural heritage protection.

The Business Plan does not describe the Ministry's role in promoting environmental protection and voluntarism in its programs.

Comments

The Ministry has long maintained a balanced and integrated approach to its mandate, recognizing the diversity of Ontario's citizenship and culture. The environment has always been considered in its mandate and activities, reflecting an awareness of the importance of a healthy environment to the health and well-being of the Ontario public.

Both the Business Plan and the Ministry's SEV could be more explicit in stating the Ministry's role and activities in promoting a healthy environment.

Key Issues	Coverage in 1999-2000 Plan
natural heritage	unclear
environmental voluntarism	unclear
healthy environment as a part of a healthy community	unclear

Ministry of Consumer and Commercial Relations

Minister: The Hon. Robert W. Runciman
Deputy Minister: Sandra D. Lang

1999 - 2000 Budget: \$126 million
Number of Staff: 1,150

Highlights

Vision

The Ministry's vision is to promote a fair, safe and informed marketplace which supports a competitive economy in Ontario (p 2).

The Ministry's mission (p 2) is to:

- provide for high standards of consumer protection, public safety and business practices
- support business growth and the investment climate
- provide services that are relevant to, and in keeping with, the evolving marketplace
- facilitate the provision of consumer information and education.

Core Businesses

The Ministry has five core businesses: **Consumer Protection and Public Safety, Gaming and Alcohol Control, Commercial Registries, Vital Statistics, and Business Standards.**

There are no environmental commitments or issues raised in the Business Plan

Consistency with the Statement of Environmental Values (SEV)

In its SEV, the Ministry endorses the purposes in the Environmental Bill of Rights and recognizes that a competitive marketplace involves sensitivity to the environment (SEV p 1).

Ministry programs have several objectives that promote environmentally responsible decisions. These include (SEV p 1):

- reducing air emissions related to storing and handling hydrocarbon fuels and pressurized liquids and gases.
- reducing discharges of contaminants into the soil and water supply, related to storing, handling or using hydrocarbon fuels and pressurized liquids and gases.
- evaluating and adopting safe, new, environmentally sound technology in the storage, handling, and use of hydrocarbon fuels and pressurized liquids and gases.
- encouraging environmentally responsible design, construction, maintenance, recycling and disposal techniques in regulated industries
- reducing, reusing and recycling materials required to deliver ministry programs; environmentally responsible procurement; and water and energy conservation in ministry activities.

Through these objectives, the ministry applies the purposes of the EBR on an ongoing basis.

Further, the Ministry recognizes that any area of its activity could have a significant affect on the environment (SEV p 2). Ministry activities involving decisions that may affect the environment include:

- Setting Strategic and Operational Priorities
- Proposing legislation, regulations, or other items for Cabinet approval
- Developing and reviewing policies and programs
- Administering and enforcing legislation
- Developing codes and standards
- Reviewing designs and site plans
- Approving equipment and appliances
- Organizational operations

There is no mention of the SEV or any environmental concerns in the Ministry's Business Plan.

The emphasis on storing and handling of hydrocarbon fuels and pressurized liquids and gases reflects the old structure of the Ministry, where the Fuel Safety Branch supervised the storage and handling of gasoline, natural gas, and other fuels. This responsibility has since been transferred to the Technical Standards Safety Authority, but the overall responsibility and accountability still rests with the Ministry.

The Technical Standards Safety Authority publishes its own annual report and business plan, which can be found on their web site (www.tssa.org). The 1999 - 2000 business plan for the Authority contains process-related commitments and no reference to fuel storage or the rehabilitation of contaminated sites.

Comments

The Ministry needs to include environmental commitments in its Business Plan, in particular with respect to fuel storage and environmentally responsibilities in regulated industries. Safe fuel storage and the rehabilitation of abandoned fuel storage sites remains an important issue if the government is to meet its commitment to the protection of Ontario's groundwater resources. Even though responsibility for the management of fuel storage has been passed on to the Technical Standards Safety Authority, the Ministry still retains ultimate responsibility for the issue, and therefore should include targets for the management of storage facilities and the cleanup of leaking underground storage tanks.

The Ministry should include targets and progress reports on its efforts to promote environmentally responsible design, construction, maintenance, recycling and disposal techniques in regulated industries.

One area missing from the SEV and the Business Plan is outreach to the commercial sector on environmental responsibilities and opportunities, and promoting environmental products to consumers. The Ministry could play a lead role in promoting consumer and commercial support for environmentally-preferable products.

Key Issues	Coverage in 1999-2000 Plan
fuel storage	none
rehabilitation of contaminated sites	none
environmental responsibilities in regulated industries	none
consumer and commercial support for a green economy	none

Ministry of Economic Development and Trade

Minister: The Hon. Al Palladini
Deputy Minister: Daniel Burns

1999 - 2000 Budget: \$110.5 million
Number of Staff: 375

Highlights

Vision

The Ministry's vision is of an Ontario where its people continue to enjoy a high quality of life supported by well-paying jobs. The Ministry states it will "pursue our vision with vigour and implement our mandate from the people of Ontario to stimulate economic growth, create more jobs and establish strong competitive advantages to ensure a more prosperous future for us and our children (p 2).

There is no reference to the environment or sustainable development in the plan

Core Businesses

The ministry has three core businesses: employment and business development, investment, and trade.

Under the heading of Employment and Business Development, the Ministry states that it contributes to a positive business climate that supports economic development and growth by, among other things, "promoting the removal of barriers to business" (p 3).

Later, the Ministry is more direct about what it means by "barriers to business":

We will also identify and remove barriers to business growth and investment through continued support and partnerships with sectors and key business clusters. For example, we will engage in discussions on global climate change to ensure that the concerns of Ontario industries are addressed in the Canadian greenhouse gas emission reduction implementation plan.

(p 7.)

Under the Goals and measurements of success for the Ministry, one of the goals is "improved government responsiveness to business issues. with a 1999-2000 commitment to a ten per cent improvement in "customer satisfaction over previous survey results (1997-1998)" (p 8).

Consistency With the Statement of Environmental Values (SEV)

In its Statement of Environmental Values, the Ministry makes several important commitments to integrate environmental values into its work.

The Ministry of Economic Development and Trade seeks a productive and efficient economy that (SEV p 2):

- encourages sustainability of the environment;
- creates wealth through moving to higher value-added activities;
- has a goal of full employment;
- protects and respects workers' rights;
- allows all members of the community to participate fully; and
- sustains a high level of public services.

The Ministry of Economic Development and Trade will integrate the purposes of the EBR with its mandate by (SEV p 2):

- applying the purposes of the Environmental Bill of Rights in its decision-making process;
- promoting a productive and efficient economy that is sustainable to the environment;
- supporting the establishment and expansion of green industries;
- implementing an Environmental Bill of Rights awareness program for Ministry of Economic Development and Trade staff;
- increasing awareness in its client groups, through the information it provides and the decisions it makes, of the benefits of economic development that is sustainable in the environment;
- supporting the development of environmentally sound production and processes; and
- encouraging waste reduction and conservation in its physical operations and day-to-day business activities.

None of these commitments are reflected in the Ministry Business Plan

Comments

The Ministry is clearly designed to be a champion for business interests within government. It sees environmental controls as a barrier to economic growth. Statements to the effect that the Ministry views greenhouse gas emission reduction as “a barrier to business growth” are unacceptable.

The Ministry may indeed have a mandate from the people of Ontario to stimulate economic growth and jobs, but it should realize that the people of Ontario also want to see a healthy and sustainable economy -- one that does not generate wealth at the expense of human and environmental health.

There is no reference to the Ministry’s Statement of Environmental Values in the Business Plan, nor is there any indication it was even considered in the development of the plan.

The Ministry needs to include specific commitments relevant to the implementation of its SEV; in particular the expansion of green industries and the greening of existing industries.

Key Issues	Coverage in 1999-2000 Plan
green economic development (environmentally-sound technologies, processes and products)	none
environmental management systems in businesses	none
monitoring and reporting on the environmental performance of Ontario business and economic sectors	none

Ministry of Energy Science and Technology

Minister: The Hon. Jim Wilson
Deputy Minister: Kenneth W. Knox

1999 - 2000 Budget: \$145.6 million operating + \$16.6 million capital
Number of Staff: 250

Highlights

Vision

The Ministry wants to build “a culture of continuous improvement and a successful economy in Ontario through investment in innovation, technology and a competitive energy system” (p 2).

The vision does not include any reference to environmental sustainability.

Core Businesses

The Ministry has two core businesses: Energy, and Science and Technology.

The Ministry is committed to “ensuring a safe and reliable energy supply for Ontario by focusing on efficient transmission, distribution and use of energy; by emphasizing the need for environmentally sustainable energy; and by supporting the development and use of new energy technology...” (p 2).

The Ministry says it will develop policy and a regulatory framework that protects energy users, promotes jobs and investment, streamlines the regulatory process, fosters competition in electricity *removes barriers for new, more environmentally benign sources including renewable generation, and develops an environmentally sustainable energy system emphasizing efficiency and conservation* (p 5). (emphasis added).

The Ministry’s 1999-2000 commitment to increasing the use of renewables is to “ensure that the competitive energy market enhances the ability of renewable energy suppliers to find customers.

Under Science and Technology, the Ministry seeks to promote economic development in the research and high-tech fields. Last year, the Ministry appointed a task force to study the biotechnology industry and to recommend ways to advance biotechnology research and development in Ontario. The task force predicted the biotechnology sector in Ontario could be worth as much as \$1 billion within five years and outlined a plan to help the province capture its share of investment (p 4).

Consistency with the Statement of Environmental Values (SEV)

In its SEV, the Ministry lists strategic directions that will guide the Ministry's activities:

1. promotion of a safe, secure and competitively-priced supply of energy;
2. encouragement of environmentally sustainable energy production and use;
3. encouragement of efficient energy production and use and conservation of energy to promote economic development, increased jobs and investment in Ontario;
4. promotion of a competitive energy market with investment opportunities for new generators, co-generation, renewable and cleaner forms of energy production;

5. identification of opportunities to invest in science and technology and to use provincial investment to leverage financial support by the private sector and other parties to benefit the economy and people of Ontario in an environmentally sustainable manner;
6. help to Ontario businesses, institutions and individuals to adopt new technologies and enhance their ability to innovate, to promote economic development and to create jobs.

Strategic Directions #'s 1, and 6 are economic, not environmental values. Strategic Direction #'s 4 and 5 are economic directions with an environmental qualifier. That leaves only Strategic Directions #'s 2 and 3 as a commitment that adequately reflects an environmental value.

As a result, the Ministry does not have an adequate statement of environmental values for its core business of Science and Technology. This may explain why there are no environmental values included in the Science and Technology section of the Ministry's Business Plan.

Comments

The Ministry's commitment to an environmentally sustainable energy system is commendable. However, the Ministry's free-market approach leaves many unanswered questions. In particular:

- Will the Ministry include emission caps, as recommended by the Ontario Clean Air Alliance and the OntAIRio Campaign?
- How will the Ministry promote renewable energy and conservation efforts?

The Ministry should also include targets for green energy. This would provide a means of measuring the success of the Ministry's free-market approach to facilitating renewable energy production in Ontario.

Further, the Ministry should include targets for energy efficiency in Ontario homes and buildings.

The Ministry's Science and Technology section contains no reference to environmental sustainability, and places no environmental or ethical parameters on its support for scientific research and high tech.

Key Issues	Coverage in 1999-2000 Plan
ENERGY	
air quality	none
climate change	none
green energy	inadequate
energy efficiency and conservation	inadequate
SCIENCE AND TECHNOLOGY	
environmental technology	none
environmental and health concerns of biotechnology	inadequate

Ministry of the Environment

Minister: The Hon. Tony Clement
Deputy Minister: Stindar (Stein) K. Lal

1999 - 2000 Budget: \$164.8 million operating + \$208.4 million capital
Number of Staff: 1,460

Highlights

Vision

The Ministry's vision is "an Ontario where human health, recreation, commerce, and industry are sustained by clean air, water and land." The vision equates a healthy environment with pollution control. The Ministry's core businesses, however, includes both "Environmental Protection" and "Conservation and Stewardship."

Core Businesses

The Ministry has two core businesses: Environmental Protection, and Conservation and Stewardship.

Under the core business of Environmental Protection, the Ministry works to ensure cleaner air, cleaner water, cleaner land and healthier ecosystems for the health and welfare of all Ontarians (p 4).

Key commitments for environmental protection include:

- expand Drive Clean program to other regions and to include heavy-duty trucks province-wide (p 10);
- finalize a water quality index for Ontario (p 10);
- 45 per cent of high level PCBs in storage will have been destroyed by the end of 1998 (compared to the 1994 base year quantity of 18,600 tonnes) (p 11).

In its Conservation and Stewardship role, the ministry encourages environmentally sustainable use of water, land, energy and material resources (p 4).

Key commitments are

- reduce non-hazardous waste going to disposal in 1998 by 38% relative to 1987 (p 11);
- reduce 12,000 tonnes of toxic substances and wastes through partnerships (p 11).

The latter commitment really belongs in the Environmental Protection section.

Significant Changes

There have been several significant changes in the Ministry's Business Plan over the past three years which reflect the strengthening of the economic values and a weakening of the environmental commitment.

The Ministry's vision continues to change. It's still not as good as the original 1997 version that called for "a healthy, natural environment for everyone to enjoy", but this years version is a little better in that it recognizes that life and the economy are sustained by a healthy environment.

Ontario's commitment to addressing climate change is still weaker than it was in 1997

- In the 1997 - 1998 Business Plan, the Ministry committed to "achieve Ontario contributions to the national target of stabilizing greenhouse gas emissions at 1990 levels by the year 2000.

- In 1998-1999 climate change was given as an example of an “an emerging issue” (1998-1999, p 2), with no specific commitment.
- The current Plan refers to the commitment of \$10 million dollars to develop the “next wave of climate change actions” (p 7). The funding “will ensure Ontario’s interests and concerns are adequately addressed within national and international climate change processes, while building on actions already underway to reduce greenhouse gas emissions”. No details or specific commitments are provided.

Consistency with the Statement of Environmental Values

The Ministry identifies a number of guiding principles for the Ministry (SEV p 1, 2):

The Ecosystem Approach

The Ministry will adopt an ecosystem approach to environmental protection and resource management. This approach views the ecosystem as composed of air, land, water, and living organisms, including humans, and the interactions among them.

When making decisions, the Ministry will consider: the cumulative effects on the environment; the interdependence of air, land, water and living organisms; and the interrelations among the environment, the economy and society.

Environmental Protection

The Ministry’s environmental protection strategy will place priority first on preventing and second on minimizing the creation of pollutants that can damage the environment. When the creation of pollutants cannot be avoided, the Ministry’s priority will be first to prevent their release to the environment and second, to minimize their release.

In the event that significant environmental harm is caused, action will be taken to ensure that those responsible for the harm remediate it and to prevent a recurrence.

The Ministry will exercise a precautionary approach in its decision-making. Especially when there is uncertainty about the risk presented by particular pollutants or classes of pollutants, the Ministry will exercise caution in favour of the environment.

Resource Conservation

The Ministry will seek to ensure a safe, secure and reasonably priced supply of energy in an environmentally sustainable manner and will place priority on improving energy efficiency. It will also promote energy and water conservation, as well as encourage the use of the 3RS- reduction, reuse and recycling - to divert materials from disposal.

The Business Plan makes a direct reference to its Statement of Environmental Values, saying that the SEV “influences every aspect of our decision-making, internal management practices and approach to public participation” (p 7).

Whether the Ministry’s plan for Environmental Protection adequately reflects the value statements of pollution prevention and the precautionary principle is debatable. For example, not mentioned in the Business Plan achievements is the fact that the Pollution Prevention Office was phased out last year.

The Ministry’s responsibility to ensure an environmentally sustainable energy system reflects the time when the Ministry of the Environment also included the energy portfolio. This responsibility has since been

transferred to the Ministry of Energy, Science and Technology. Therefore the Ministry's conservation mandate now covers water conservation, and materials recycling and conservation.

Water conservation is not mentioned in the Ministry's Business Plan and the Ministry's role in land use planning (or its role in protecting significant natural areas) is not even mentioned.

Comments

The Ministry of the Environment is one-half of the tag team with lead responsibility for the health of Ontario's ecosystems (the other half being Natural Resources). If Ontario is to show a strong commitment to a healthy environment, it should be reflected in clear goals, targets, and commitments in the business plan of the Ministry of Environment.

The Ministry's plan is far from clear. Some of the promises made in the text are missing from the section on Key Performance Measures. For example:

- reference is made to building on existing activities [p 8] and the role of Drive Clean in reducing 200,000 tonnes of greenhouse gases annually [p 7]), but there is no firm commitment to reducing greenhouse gases;
- reference is made to a SWAT team in the Message from the Minister (P 2), but there is no goal or target for enforcement;
- reference is made to "imposing some of the strictest pollution penalties in Canada" in the Message from the Minister (p 2), but there is no follow-up with concrete commitments;
- The Ministry praises the efforts of the Remedial Action Plan partners, but there is no goal or commitment for the restoration of the Areas of Concern or any other degraded areas.

Other issues are missing entirely:

- groundwater (quantity and quality), although there is a vague commitment that "municipal water supplies (will) meet Ontario's health-related standards for drinking water" (p 10);
- land use planning, and, in particular, the Oak Ridges Moraine;
- acid rain, still a significant problem in Ontario;
- household hazardous materials;
- transboundary transfers of hazardous waste.

Hazardous waste should be managed under the Environmental Protection core business, and the Ministry's commitments should reflect the Ministry's value of "pollution prevention" as opposed to the significantly weaker approach of "stewardship" (p 11). The Ministry needs to develop stronger goals and targets for the reduction at source of hazardous materials and the safe treatment and long-term disposal of hazardous waste.

Groundwater quantity was a significant issue for the Ministry last year, however there is no mention of it in the Business Plan. The Ministry needs to address the sustainable use of groundwater resources, both through permits for use and through the management of aquifer recharge areas such as the Oak Ridges Moraine.

Overall, there is little in the Ministry's Plan that leads to confidence that there will be any improvement in Ontario's pressing environmental issues. Of the seventeen major commitments for 1999-2000, seven involve research and communications, two relate to streamlining decision-making processes, leaving eight that relate to meeting environmental targets (under smog, water and sewage, PCBs, solid waste and hazardous waste).

Recent changes in the Ministry structure have also diminished the visible commitment to environmental goals. The Pollution Prevention Office has been folded into the "Delivery Support Section", and the Green

Industry Office and Clean Production Services have been merged into the “Development and Client Services Section”. Clarity and accountability have been replaced with titles that promote confusion.

Finally, the Ministry does not communicate or consult effectively with the environmental community, public, or other stakeholders. Regular consultation on the Ministry’s Business Plan and on individual issues is essential if the Ministry wishes to develop a truly effective approach to environmental management with the support and partnership of the environmental community. The Ministry manages a multi-sector steering committee for the Anti-Smog Action Plan, but most other issues are managed with minimal if any consultation.

The Ministry needs to restore the State of the Environment reporting process as a cost-effective way to compile and communicate information on environmental trends to the public.

Key Issues	Coverage in 1999-2000 Plan
ENVIRONMENTAL PROTECTION	
air quality (smog)	poor - moderate
indoor air quality	none
climate change	inadequate
acid rain	inadequate
groundwater	poor (monitoring only)
drinking water quality	moderate - good
pollution prevention (hazardous waste)	inadequate
hazardous waste transfers	none
enforcement	poor (SWAT team reference)
solid waste disposal	none
sewage	moderate
restoration and cleanup	none
RESOURCE CONSERVATION	
solid waste reduction	moderate
hazardous waste stewardship	moderate
water conservation	none
land use (eg. Oak Ridges Moraine)	none
OTHER	
State of the Environment reporting	none - poor

Ministry of Health and Long-Term Care

Minister: The Hon. Elizabeth Witmer
Deputy Minister: Jeffrey C. Lozon

1999 - 2000 Budget: \$20.2 billion operating + \$504 million capital
Number of Staff: 9,475

Highlights

Vision

The Ministry's vision is to provide quality health care that everyone in the province can rely on (p 2). The Ministry wants to promote "wellness and disease prevention to keep people from becoming patients in the first place.

Core Businesses

The Ministry's core businesses are community services (including health promotion, long-term care and home care), professional services, institutional services, and policy and planning.

In the field of health promotion and illness prevention, the Ministry has developed an Ontario Tobacco Strategy and the Heart Health Program and is investing in programs like Healthy Babies, Healthy Children and the Ontario Breast Screening Program (p 11).

Consistency with the Statement of Environmental Values

The Ministry Business Plan states that, "as one of the ministries covered under the Environmental Bill of Rights, the ministry has an obligation to consider and incorporate environmental concerns into its policy decision making" (p 11).

There are no supporting actions in the Business Plan that reflect the environmental determinants of health.

The Ministry's SEV states: "The Ministry plays a major role both in preserving our physical and social environment and in protecting Ontarians from existing and potential health hazards posed by environmental contaminants" (SEV, P 1).

Key commitments in the SEV are:

- **an Advisory and Education Strategy**, to advise and to monitor through surveillance and investigation (local boards of health) existing and potential health hazards posed by environmental contaminants
- **a Cancer Control Strategy**, to move to effective prevention and promotion activities in the control of cancer and support the elimination of pollutants and carcinogens as causative agents.
- **an Environmental Housekeeping Strategy**, to conserve resources, prevent pollution, promote environmentally sound policies and practices, and promote the corporate greening of ministry programs, practices and activities of all its employees.
- **an Aboriginal Health Policy**, including recognition of the interrelationship between the environment and individuals as being essential to the survival of all aboriginal people.

Of the above strategies, there is a reference to only the Aboriginal Healing and Wellness Strategy in the Ministry Business Plan (p 6).

There are two other strategies in the SEV which reflect the impact of the social environment on health problems: a Substance Abuse Strategy, and a Tobacco Strategy. The Ontario Tobacco Strategy figures prominently in the Ministry Business Plan.

Comments

The Ministry has a strong commitment to illness prevention and long-term health. This commitment is reflected in its current priorities of the Ontario Tobacco Strategy, the Ontario Heart Health program and the Healthy Babies, Healthy Children program. Unfortunately, the Ministry's environmental commitments seem to have fallen by the wayside.

The Ministry recognizes its "obligation to consider and incorporate environmental concerns into its policy making" (p 11). However, the Ministry's Statement of Environmental Values correctly identifies proactive measures that the ministry could take. These measures should be reflected in the Business Plan.

In the 1998 Annual Report of the Environmental Commissioner, "Open Doors: Ontario's Environmental Bill of Rights", the Environmental Commissioner details the Ministry's lack of progress in meeting its SEV commitments. The Commissioner recommended that the Ministry of Health should:

- participate in reviewing and commenting on MOE's standard setting activities for environmental contamination;
- actively provide its expertise and contact networks to support MOE on environmental projects;
- upgrade or phase out polluting hospital incinerators.

To the best of our knowledge, none of these recommendations have been implemented.

Key Issues	Coverage in 1999-2000 Plan
environmental determinants of health	none
environmental carcinogens	none
hospital incinerators	none
aboriginal health and the environment	poor

Ministry of Labour

Minister: The Hon. Chris Stockwell
Deputy Minister: Jill Hutcheon

1999 - 2000 Budget: \$95 million
Number of Staff: 1,345

Highlights

Vision

The Ministry's vision is that of "a quality-focused organization helping to make Ontario's workplaces better. We believe that safe, fair and harmonious workplaces are essential to the economic well-being of the people of Ontario. They signal to the world that Ontario is open for business, resulting in new investment, growth and jobs." (p 2)

Although the vision makes no direct reference to the environment, it includes the concept of a "safe" workplace, which must include safety from exposure to harmful substances.

Core Businesses

The Ministry has three core businesses: **Occupational Health and Safety, Employment Rights and Responsibilities**, and **Labour Relations**.

Under Occupational Health and Safety, the Ministry's main emphasis appears to be on worker safety, with a target set of an average 6 per cent yearly reduction in the rate of lost-time injuries (p 7). The Ministry does plan to undertake a consultation process for updating Ontario's occupational exposure limits.

Consistency with the Statement of Environmental Values (SEV)

In its SEV, the Ministry of Labour highlights three areas of responsibility:

- **Occupational Health and Safety:** the Occupational Health and Safety Act provides for regulations and policies for controlling worker exposure to hazardous chemical, biological and physical agents in the working environment (SEV p 1). The ministry regulates concentrations of these agents in the work environment, provides information to workers, and encourages the substitution of hazardous substances with those that are less hazardous (SEV p 1, 2). The Ministry also reminds employers of their responsibilities to the natural environment when complying with the requirements to protect workers.
- **Employer Reprisals (Whistleblower Protection):** the Ministry is responsible for the Ontario Labour Relations Board, which hears complaints by workers who feel they have been dismissed, disciplined, penalized, coerced, intimidated or harassed as a result of their participation in any activities under the Environmental Bill of Rights (EBR). The EBR provides enhanced protection for workers who take action in respect of the environment (p 2).

Comments

The Ministry has already made good on its commitment to update occupational exposure limits (OELs) that restrict the amount and duration of workers' exposure to hazardous chemicals in the workplace. The updated OELs will correspond to the latest exposure limits recommended by the American Conference of Governmental Industrial Hygienists (ACGIH). Affected substances include asbestos, benzene, silica and lead (November 16 Ontario Ministry of Labour Press Release "Ontario To Update Occupational Exposure Limits For Hazardous Chemical Substances").

Consistent with the SEV commitment to promote less hazardous alternatives, the Ministry should include a target for the reduction of hazardous materials in the workplace. This target could be achieved in conjunction with the Ministry of the Environment's efforts to support pollution prevention.

Key Issues	Coverage in 1999-2000 Plan
substitution of hazardous substances	none
occupational exposure to hazardous chemicals	moderate
employee / employer education	none

Management Board Secretariat

Minister:	The Hon. Chris Hodgson
Deputy Minister:	Michele Noble
1999 - 2000 Budget:	\$903 million operating and \$16 million capital
Number of Staff:	2,060

Highlights

Vision

The Management Board's vision is to make the Ontario Government the best run public service in the world in order to provide service excellence and value for money to the people of Ontario (p 2).

Core Businesses

Management Board has four core businesses: Corporate Controllership ("corporate head office" of the Ontario Public Service), Information and Information Technology, Business Support Services (shared services between ministries) and Realty Services (managing government real estate assets).

Of these, Realty Services has the most direct potential to affect the environment. MBS plans to sell \$200 million worth of real estate assets (p 11), although there is no detail provided as to whether these "assets" include arable farmland as well as surplus buildings.

Management Board is also actively promoting the use of internet technology within government.

Consistency with the Statement of Environmental Values

The Management Board's Statement of Environmental Values lays out several commitments for incorporating environmental values, including:

- **The Green Workplace:** the MBS-led Green Workplace program supports the protection and conservation of a healthful environment by encouraging all government employees to be environmentally responsible in their activities at work. The program promotes 3Rs (reduce, reuse and recycle) energy and water conservation and environmentally sensitive purchasing. The Green Workplace is a temporary program that has been extended for a year to help Ministries become self-sufficient in environmental matters (SEV p 3).
- **procurement:** MBS procurement policies incorporate environmental considerations such as waste reduction, reuse and recycling in the development of product specifications for significant purchases (SEV p 3).
- **information technology:** MBS encourages the use of telecommunications and computers to reduce the amount of paper and travel which supports the protection and conservation of the natural environment (SEV p 3).
- **property development and management:** the Ministry endeavours, in the management and renovation of existing buildings and the construction of new buildings, to observe waste reduction practices and conservation of resources (SEV p 3). New building projects will continue to be designated as green demonstration sites to allow evaluation and showcasing of new environmentally-designed products (SEV p4).
- **The Ontario Realty Corporation (ORC) and the MBS Class Environmental Assessment:** the ORC has assumed some realty operations of MBS. The corporation is governed by the MBS Class Environmental Assessment, which lays out a thorough and consistent approach for purchases, construction, planning applications (under the Planning Act) and sales of real property.

No reference is made to the SEV in the MBS Business Plan.

Further, there is no mention or commitment to the continued greening of government operations and buildings in the Business Plan.

Comments

MBS is to be commended for its leadership in developing the Business Plan approach. It has, as the Management Board Chair, Chris Hodgson, points out, promoted accountability and openness in government operations by making business plans and performance measures available to the public (p 1).

As the lead agency in the business plan process, MBS should make sure that all ministries incorporate their environmental commitments and responsibilities into the business plan process.

Further, MBS needs to review its own role in meeting its commitments to the Environmental Bill of Rights. Several aspects of the MBS Statement of Environmental Values appear to have fallen by the wayside.

Of particular concern is the disposal of \$200 million in real estate assets. No detail is given on what those assets are. Should it include the government's holdings of prime agricultural land in the Pickering area (the Seaton lands), then the disposal of these lands will carry major environmental consequences. A search of the Ontario Realty Corporation's (ORC) web site shows that the ORC has listed 4,000 acres of land that is zoned for agricultural use, as well as several rural/residential sites.

The Green Workplace, according to Management Board Chair Chris Hodgson, is still running successfully with recycling activities (fine paper, newspaper, polystyrene etc.) in over 760 workplaces. However, there is no mention of the program in the business plan, nor are there any goals or targets for conservation, waste reduction and procurement. Government procurement guidelines indicate that the government "encourages proponents to take an active role in implementing environmentally sound business practices and producing goods and services that lessen the burden on the environment in their production, use and final disposition" ("Sample RFP for Goods", section 6.5, <http://www.psb.gov.on.ca/mbs/psb/psb.nsf/english/goodsrfp.html>). Since the provincial government is easily one of the largest purchasers of supplies in the country, Management Board should play a stronger leadership role in promoting the transition to a more sustainable economy.

The growth in internet technology has potential to reduce the need for large print runs of publications and for improved communications and public awareness and consultation. The environmental impacts and benefits of internet technology are not mentioned in the Business Plan, and have likely given little consideration.

Key Issues	Coverage in 1999-2000 Plan
greening the government workplace	none
procurement	none
information technology	moderate
waste reduction and energy efficiency in government properties	none
conservation of farmland and natural areas (Ontario Realty Corporation)	none

Ministry of Municipal Affairs and Housing

Minister: The Hon. Tony Clement
Deputy Minister: W. Michael Fenn

1999 - 2000 Budget: \$1.546 billion
Number of Staff: 1,165

Highlights

Vision

The Ministry's vision is an Ontario made up of strong communities, each with dynamic local economies and an attractive quality of life, featuring:

- efficient local governments that are committed to excellence, accountable to taxpayers and responsive to local needs;
- a housing market that is healthy and competitive and promotes construction and development of affordable housing by the private sector (p 2).

The vision does not include any reference to the Ministry's role in land use planning, in particular its role in promoting efficient use of land to promote the conservation of natural and agricultural lands and the conservation of energy in urban design and transportation.

Also, governments are accountable to their constituents (in particular the voters) and not just taxpayers. It may be a minor point, but it is a reflection of the economic priorities that drive the ministry.

Core Businesses

The Ministry's are: Local Government, Land Use Planning, the Housing Market, Social Housing, and Building Regulations.

Under Land Use Planning, the Ministry says its role "will continue to evolve from reviewing and approving local land use decisions to advising municipalities on how to prepare or review their own planning documents (p 7).

Under the Housing Market, the Ministry says it will "work toward a strong housing market and construction industry that contribute to economic prosperity (p 8).

Consistency With the Statement of Environmental Values (SEV)

The Ministry's Statement of Environmental Values was revised to reflect the amalgamation of Housing with Municipal Affairs. The new SEV includes an environmental principle for each of the Ministry's core businesses.

LOCAL GOVERNMENT: Environmental Principle 1.

Through clarifying the role of the provincial and municipal levels of government as a means of increasing efficiency and accountability the ministry will encourage environmentally responsible decision making by municipal governments.

LAND USE PLANNING: Environmental Principle 2.

The ministry, through land use planning and policy direction, will assist communities to better protect their resources for their economic use and/or environmental benefits by:

- providing tough environmental protection;
- recognizing the inter-relationship which exists between environmental, economic and social factors;
- providing better ability ("one window" planning services) to identify planning documents and development applications that are not environmentally sound; and
- promoting Alternative Development Standards which encourage a more efficient use of land and public resources (including infrastructure and natural resources) in private sector development.

SOCIAL HOUSING: Environmental Principle 3.

OHC will promote energy efficiency and water conservation in public housing.

PRIVATE RENTAL HOUSING REGULATION: Environmental Principle 4.

The ministry will promote energy efficiency and water conservation in existing rental stock through fostering a regulatory system which provides for adequate maintenance and which eliminates disincentives to investments in energy conservation.

BUILDING REGULATION: Environmental Principle 5.

The ministry will establish standards for health, safety and accessibility and where appropriate maintain cost-effective construction standards for energy and water conservation.

None of these commitments are reflected in the Ministry's Business Plan.

Comments

The Ministry needs to do a better job of incorporating its environmental values into its annual business plans. It needs to ensure that the provincial interests of land, energy and water conservation are met through the provincial land use planning process. It needs to improve its reporting on land use trends and their environmental, social, and economic implications for the province.

The devolution of provincial planning interests to the municipal level has significantly reduced the Ministry's role in promoting environmentally-sound urban development. Recent planning decisions in the Oak Ridges Moraine, compounded with a lack of provincial commitment to protecting the moraine, would lead to the conclusion that the Ministry's streamlining of the planning system has only served to speed up an inherently flawed planning process that is incapable of providing adequate protection for the province's significant natural areas and prime agricultural land.

Lest we forget, these are some of the key commitments in the 1997 Policy Statement under the Planning Act:

- 2.1.1 Prime agricultural areas will be protected for agriculture. Permitted uses and activities in these areas are: agricultural uses; secondary uses; and agriculture-related uses. Proposed new secondary uses and agriculture-related uses will be compatible with, and will not hinder, surrounding agricultural operations.
- 2.3.1 Natural heritage features and areas will be protected from incompatible development.
- 2.4.1 The quality and quantity of ground water and surface water and the function of sensitive ground water recharge/discharge areas, aquifers and headwaters will be protected or enhanced.

The Ministry should incorporate targets and commitments for each of these policies in its business plan.

Neither the Ministry of Municipal Affairs and Housing, or the Ministry of Agriculture, Food and Rural Affairs publishes any statistics on the loss of ecological and agricultural land to urban development.

No commitments or progress reports are included in the Business Plan concerning the Ministry's efforts to promote energy and water conservation in Ontario's homes and buildings. The Ministry needs to include commitments in this area that reflect efforts to strengthen the Building Code and the environmental performance of the housing industry.

Finally, the Ministry has dropped all references to the development of "healthy communities" -- an important concept that integrates environmental, social and economic values at the community level. In the 1994 Ministry of Housing SEV, healthy communities were defined as communities which "offer economic and social opportunities and respect the natural and cultural environment". The healthy communities approach should be restored in subsequent plans.

Key Issues	Coverage in 1999-2000 Plan
MUNICIPAL AFFAIRS	
prime farmland	none
significant natural areas	none
regional planning	none
energy conservation	none
healthy community design	none
environmentally responsible local government	none
HOUSING	
energy efficiency	none
water conservation	none
land conservation	none
pollution prevention	none
environmentally excellence in the housing industry	none

Ministry of Natural Resources

Minister:	The Hon. John C. Snobelen
Deputy Minister:	Ron Vrancart
1999 - 2000 Budget:	\$364.1 million operating + \$46 million capital
Number of Staff:	3,380

Highlights

Vision

The Ministry's vision is "the sustainable development of Ontario's natural resources to meet today's needs, and to ensure these resources are available for future generations. Through the sustainable development of natural resources, MNR contributes to the environmental, social and economic well-being of the people of Ontario" (p 2) .

As it is written, the vision is development-oriented (albeit "sustainable development") and does not explicitly include the conservation and protection of significant ecological features and endangered species.

The Vision section does, however, mention the Ministry's role as custodian of our natural heritage: "MNR is responsible for making sure the province's rich endowment of natural assets is managed in a way that ensures Ontario's Living Legacy will be passed on undiminished for future generations to enjoy" (p 2).

Core Businesses

MNR has three core businesses: **Natural Resource Management, Public Safety and Emergency Response**, and **Geographic Information**.

Under Natural Resource Management, the Ministry "strives to achieve a balance between use and protection, to ensure a broad range of values is recognized, and to develop ways of making decisions openly and integrating the delivery of programs" (p 3) .

The Ministry has published the Living Legacy strategy and is committed to its implementation, providing interim protection for the recommended new provincial parks and conservation reserves and working toward placing these areas into regulation under the Provincial Parks Act and the Public Lands Act (p 6).

The Ministry will continue to work with the forest industry to update forest management plans, and to track and report on the area of productive Crown forest and harvest area which has been successfully renewed (p 6).

The Ministry will work to legally recognize heritage hunting and fishing activities (p 6).

The Ministry promises to continue working to ensure that prices charged for resources secure a fair return to the public and provide an important source of reinvestment in our resources.

Specifically, the Ministry has made the following commitments for 1999 - 2000 (p 8, 9):

- achieve a benchmark of 96 per cent reforestation rate, based on independent audit results;
- stock 8.5 million fish;
- maintain a standard of 8.1 million visits to provincial parks (10 year average);
- meet the standard of 90 per cent compliance with resource laws and regulations (as reported through the Compliance Activity Reporting System);

- seek to develop recovery plans for two additional endangered species under the Endangered Species Act for a total of 18 plans (this has been done with the announcement of the addition of the Prothonotary Warbler and King Rail to the Endangered Species Act).

Consistency with the Statement of Environmental Values (SEV)

The Ministry's Business Plan says it will "continue to consider its Statement of Environmental Values when making environmentally significant decisions" (SEV p 6).

The Ministry's SEV sets out the following goal and objectives:

Goal:

To contribute to the environmental, social and economic well-being of Ontario through the sustainable development of natural resources.

Objectives:

- to ensure the long-term health of ecosystems by protecting and conserving our valuable soil, aquatic resources, forest and wildlife resources as well as their biological foundations;
- to ensure the continuing availability of natural resources for the long-term benefit of the people of Ontario; that is, to leave future generations a legacy of the natural wealth that we still enjoy today;
- to protect natural heritage and biological features of provincial significance;
- to protect human life, the resource base and physical property from the threats of forest fires, floods and erosion.

Healthy Ecosystems are Secured

The achievement of this outcome is a necessary precondition for maintaining social and economic benefits, and sustainable development, in the long term.

- healthy populations and communities of terrestrial and aquatic life will be safe-guarded over geographical area and time;
- the integrity of natural processes and the inherent productivity of the land and water base will be protected;
- renewable resources will be available on a continuing, long term basis;
- the variety of life - biological diversity - will be conserved.

Land and Natural Resources are Planned and Managed in an Orderly Way

- The ministry has a stewardship responsibility on Crown land and will ensure that development decisions recognize alternative opportunities and implications, resource use occurs within a framework of well defined rights and responsibilities, and that misuse is penalized;
- the ministry encourages the application of stewardship principles on private land through its participation in the municipal planning process.

Allocation of Natural Resources is Efficient and Fair

- The first priority in resource allocation will be to ensure the sustainability of the resource and associated natural processes;
- obligations to Aboriginal people will be recognized in policy and practice;
- allocation of available resources among alternative uses will be based on the best available information and science and will also recognize the full range of social, economic and environmental values of the resources, and that, in some cases, no development may be the best decision;
- allocation of available resources among alternative users will recognize existing rights, reflect sound analysis and be procedurally fair;
- assuming these four criteria are met, allocations which lead to higher value added products, and/or services, are preferred.

Economic Development Associated with Natural Resources is Secured and Enhanced

- Economic development must be environmentally sustainable.
- economic activity can range from primary production to manufacturing to service industries;
- new opportunities are to be pursued and repositioning efforts of existing industries will be supported, provided the resource base is sustainable;
- the identification of new or enhanced opportunities will be based on the best available information, option analyses, and a reasonable assessment of risk.

Significant Natural Heritage Features and Landscapes are to be Protected

- Priority is given to identifying and protecting, through appropriate means, provincially significant features and landscapes.
- A Variety of Natural Resources Based Recreational Opportunities are Available
- A diversity of opportunities for experience, enjoyment appreciation and use of natural environments is to be available

The Crown Captures a Fair Return for the Use of Natural Resources

- Return to the Crown must reflect: the value of the resource to the user, the need to invest in maintaining the resource base, the need for competitive resource based products and service industries, the intrinsic value of the resource, and the right of the public to receive a return for use of public resources. The Crown Receives a Fair Return for its Natural Resource Information, Knowledge, Expertise and Technology
- Return to the Crown must reflect the value of the natural resource information, knowledge, expertise and technology to the user; and the need to invest in maintaining and developing this information and expertise.

Human Life, Property and Natural Resource Values are to be Protected

- Priority is to protect human life and to avoid social disruption;
- hazards to be managed include forest fires, flooding, physical instability, (e.g. unstable slopes, soils, brine wells, abandoned oil and gas wells), unsafe natural resource practices and threats to human health from wildlife;
- protection of natural resources from damage by forest fires and flooding will be emphasized in high risk and high value situations.

Degraded Environments are to be Restored and/or Rehabilitated

- The restoration and rehabilitation of degraded environments is recognized as having an important role in securing healthy ecosystems.
- restore is defined here as taking back to a previous state. Rehabilitate is defined as taking back to a healthy state. While society has taken significant steps to protect natural environments, there may be some cases where past damage is such that full restoration and extensive rehabilitation may not be biologically or economically feasible.

Ontarians Demonstrate Widespread Understanding and Acceptance of the Need to Follow the Principles and Practices of Sustainable Development

- Enhanced understanding of the principles and practices of sustainable development both by the public and within MNR, will lead to more informed decision-making, and should foster public acceptance for shared responsibility in achieving sustainable development.

Many of these commitments are reflected in the Ministry's Business Plan and in the Living Legacy strategy. The chosen solutions have often been the subject of heated debate, but the Ministry cannot be faulted for avoiding its commitments.

Missing from the Business Plan commitments are any references to Aboriginal rights, the restoration of degraded areas, and education on the principles of sustainable development.

Comments

Overall, the Ministry has done a good job of integrating its core businesses with its Statement of Environmental Values. Many of the issues the Ministry is responsible for receive some degree of coverage in the Business Plan.

That said, the Ministry has been criticized for its interpretation of these values, in particular through the Lands for Life process which resulted in some contentious decisions. One of them, opening up mineral exploration in protected areas, is reported as one of the key achievements for the Ministry of Northern Development and Mines (MNDM p 5).

Another, more recent initiative is the proposal to allow hunting in wilderness parks. The change in MNR parks policy carries a significant social and environmental impact. Whether it is consistent with the Ministry's Statement of Environmental Values is debatable, but it certainly holds major implications for the integrity of the province's protected wilderness areas.

The recognition of heritage hunting and fishing may prove to be a contentious issue for two reasons. First, the SEV states that obligations to Aboriginal peoples will be recognized in policy and practice. This would certainly apply to heritage hunting and fishing where Ontario's First Nations hold the strongest claim to heritage rights. Second, the SEV states that the first priority in resource allocation will be to ensure the sustainability of the resource and associated natural processes. Hunting and fishing activities will still need to be subject to the limits of sustainable harvest.

Land Information Ontario is an excellent initiative, but surprisingly it does not include any commitment to environmental reporting. This would be a cost-effective addition to its mandate that would provide the public with reliable information on land use trends, in particular with respect to the development of natural and agricultural areas.

The Ministry needs to address the restoration of degraded areas, which is mentioned in the SEV but not included in its Business Plan.

Finally, the Ministry needs to provide opportunities for public comment on its Business Plan and the major activities planned for the upcoming year. Publication of a regular State of the Resources report would provide the public with information on current trends in resource management and land use in the province. It could be coordinated through Office of Lands Information Ontario.

Key Issues	Coverage in 1999-2000 Plan
Nature	
provincially significant areas	moderate
wetlands	none
locally significant natural areas	none
endangered species	moderate
restoration and stewardship	poor - moderate
Resources	
sustainable forestry	moderate
aggregate resources	none
full-cost accounting	poor
tourism	moderate - good
game management	moderate
Other Issues	
enforcement	moderate
aboriginal rights	poor
state of the resources reporting	poor - moderate

Ministry of Northern Development and Mines

Minister: The Hon. Tim Hudak
Deputy Minister: Cameron D. Clark

1999 - 2000 Budget: \$127.5 million operating + \$225.2 million capital
Number of Staff: 775

Highlights

Vision

The vision of the Ministry of Northern Development and Mines is of a Northern Ontario economy and a provincial minerals sector which are healthy, competitive and sustainable (p 2).

The explanatory paragraph on a “healthy, competitive and sustainable northern economy” does not include any environmental statement. The explanatory paragraph on a “healthy, competitive and sustainable minerals sector” includes a commitment to “environmentally responsible exploration and mining activities that preserve Ontario’s vast natural heritage for the enjoyment of our children and future generations” (p 2).

Core Businesses

MNDM has two core businesses:

- To promote northern economic development and coordinate the delivery of programs and services in the North
- To enhance mineral sector competitiveness and ensure the sustainable development of Ontario’s mineral resources.

The Ministry says that “improving highway conditions in the North is of utmost priority. Good highways quite literally pave the way for economic development” (p 6). \$202 million is allocated for road improvements, a \$46 million increase over record funding levels of \$156 million in the previous years.

The Ministry provides extensive subsidies to the mining industry. Included in this year’s commitments are:

- \$4 million for the Ontario Prospectors Assistance Program (doubled from last year)
- *Operation Treasure Hunt* a two year \$19 million geophysical and geochemical survey program to identify new targets for mineral exploration.

“The Ministry will work with the Ministry of Natural Resources to define areas of high mineral potential within proposed parks and protected areas. We are developing regulations for environmentally sensitive exploration on these lands and putting in place a process to deregulate significant finds out of parks in a way that will ultimately result in an enlargement of parkland” (p 7).

The Ministry is also working with other ministries, industry and the public to develop a mineral policy for Ontario that reflects economic, environmental and social considerations.

The Ministry will put in place regulations for closure plans and rehabilitation of lands including detailed provincial standards and new financial assurance requirements. It promises to launch a \$2 million program as part of a \$27 million, four year commitment to Ontario’s environment. This program will start to clean up the physical and environmental hazards on many abandoned mines sites across the province (p 7).

Under Key Performance Measures, the Ministry takes the unique approach of listing performance measures under different categories than its core businesses. These categories are: **Client Satisfaction**, **Investment Climate**, **Northern Ontario Heritage Fund Corporation**, and **Northern Highways**. None of these categories include any environmental commitments.

Consistency with the Statement of Environmental Values (SEV)

The Ministry of Northern Development and Mines Statement of Environmental Values does not provide much detail in terms of environmental commitments. Under the heading of Goals and Objectives (SEV p 2), it does list four points that have been integrated into the Ministry's overall goals and objectives:

- mitigation of the short term effects of mining on the environment
- eliminating the long term effects of mining on the environment
- ensuring continuing availability of mineral resources for the long term benefit of the people of Ontario
- protecting of natural heritage and biological features of provincial significance.

The third point is of dubious environmental merit. If it refers to developing closed loop recycling of mineral resources, then it is an environmental value. More likely, it refers to continued exploration and development of mineral resources.

In any event, these goals are not adequately reflected in the Ministry's business plan. In particular, the move to open up protected areas to mineral exploration and development fly in the face of the commitment to protect the natural heritage and biological features of provincial significance.

Comments

The Ministry needs to improve its recognition of environmental issues and to address them with firm commitments in the Business Plan.

Also missing in the Ministry's plan is any sense of community development and community-based economic development. The Ministry needs to revise its vision to recognize environmental values and the goal of healthy and economically viable communities.

The Ministry's claim that Ontario is a world leader in environmentally sustainable exploration and mining (p 4) is suspect at best. The Ministry is opening up protected areas to mineral exploration and has weakened the environmental requirements and ministry oversight of mining operations.

At the same time as the Ministry has committed \$2 million this year (and \$27 million over four years) to mine rehabilitation, it has weakened the requirement for mining companies to post a bond for mine rehabilitation before commencing operations. Now, companies need only demonstrate that they have an adequate financial rating before they proceed with the development of a mine.

The \$27 million for mine rehabilitation is a drop in the bucket. MNDM estimates have placed the cost of cleanup at \$300 million and the Mining Association of Canada at one time estimated the cost for cleanup in Ontario to be \$3 billion (Tom Spears "Waste Cleanup will be \$3 billion in 20 Years Ottawa Citizen October 25, 1990). The question of who should pay for the cleanup costs is another issue altogether.

Key Issues	Coverage in 1999-2000 Plan
NORTHERN DEVELOPMENT	
protection of environmentally significant areas	none
sustainable development	none
healthy communities	poor
MINES	
resource conservation	none
protection of ecologically significant areas	none
short term environmental effects	none
long term environmental effects	none
OTHER ISSUES	
aboriginal rights	poor

Ministry of Transportation

Minister:	The Hon. David Turnbull
Deputy Minister:	Jan Rush
1999 - 2000 Budget:	\$539 million operating + \$824 million capital
Number of Staff:	5,356

Highlights

Vision

The Ministry of Transportation works to support a positive business climate by managing and maintaining a safe, efficient, reliable transportation network (p 2).

The vision does not include any reference to minimizing the environmental impact of transportation. Further, the vision should be broader than to support a positive business climate.

Core Businesses

The Ministry's core businesses are **Road User Safety, Provincial Highways Management, and Transportation Policy and Planning.**

Of the Ministry's total approved allocations (operating and capital), \$1.363 billion, over 85 per cent (\$1.163 billion) is earmarked for provincial highways and road user safety.

Under Transportation Policy and Planning, the Ministry says it will "promote and support intelligent transportation systems through partnerships with municipalities, local governments and the private sector" (p 14). It also promises to "continue with provincial efforts to develop climate change strategies for the transportation sector that protect the environment and secure Ontario's economic well-being" (p 14).

That said, the only requirement the Ministry uses for measuring a reliable, efficient, accessible and integrated transportation system is "the percentage of population living within 10 kilometres of a major provincial highway corridor (p 19). The ministry's commitment for 1999-2000, unchanged from previous years, is that 90 per cent of the population will have access to major provincial highway corridors (p 19).

The Ministry does not include any direct reference to public transit and rail service in its Business Plan, other than to report the transfer of GO Transit from provincial control to the Greater Toronto Services Board.

Consistency with the Statement of Environmental Values (SEV)

The Ministry's SEV contains a far better mission statement than the one included in the Business Plan.

"We will facilitate the mobility of people and goods, and promote the development of industries that provide transportation systems, services, and products, in ways that reflect the needs of Ontario's diverse population and support the broader economic, social and environmental objectives of the province."

(SEV, p 1)

This mission statement recognizes the importance of transportation to people as well as business, and it includes a direct reference to meeting provincial environmental objectives.

The following extensive list of commitments is included in the Ministry's SEV (SEV pp2 -4):

1. The Natural Environment

The Ministry believes that the protection of air, water, and land resources is necessary to sustain future generations and the long term survival of plants, animals and aquatic life. To put this value into action, the following measures will be taken:

- The Ministry will seek to reduce transportation-related air emissions. The Ministry will seek ways to reduce transportation-related discharges of contaminants to water.
- The Ministry will continue to study ways to improve salt management practices and to minimize releases to the environment.
- The Ministry will promote the efficient and prudent use of water in its activities.
- Transportation will be planned with a view to conserving and preserving lands whenever possible and practical.
- When planning or facilitating the development of transportation in Ontario, the Ministry will seek to protect natural habitats whenever possible and practical.

2. Environmental Concerns in Decision-Making

The Ministry believes that the environment is an integral part of its activities, including policy and project development, and the operation of transportation facilities.

To put this value into action, the following measures will be taken:

- The environment will be an integral component of the transportation planning process.
- Transportation planning in Ontario will be carried out in concert with other community needs and aspirations.
- The purposes of the EBR will be integrated into strategic planning, day to day activities and long-term decision-making, in order to foster a commitment to environmental protection within both the freight and passenger transportation sectors.
- The Ministry will strive to create an environmentally skilled and informed workforce.

3. Integrated Transportation Planning

The Ministry believes that a healthy environment depends on sound planning. To put this value into action, the following measures will be taken:

- The Ministry will promote the integration of transportation and environmental planning.
- The Ministry of Transportation will promote an integrated transportation system and the use of public transportation and other alternative forms, including non-motorized transportation options in Ontario.
- In the planning process, the environment will be considered an integral component of the economic and social fabric of the province.
- The Ministry will explore a variety of alternatives, including a range of transportation modes and options and public private partnerships, before committing to a specific course of action.
- The Ministry will consider energy efficiency when planning transportation systems.

4. Public Participation

The Ministry believes that public participation is vital to sound environmental decision-making. To put this value into action, the following measures will be taken:

- The Ministry will encourage the public to become aware of its planning process and participate in transportation planning in Ontario.
- The Ministry will strive to create working relationships with professional, community, and advocacy groups to ensure that transportation decisions incorporate a wide level of community involvement and benefit from a range of environmental information and expertise.
- The Ministry will seek to achieve a planning process that is open to comment and scrutiny by the public, stakeholders and transportation partners.

5. First Nations and Other Aboriginal Peoples

The Ministry believes that it should understand and recognize the environmental values of First Nations and other Aboriginal peoples.

To put this value into action, the following measures will be taken:

- First Nations and other Aboriginal Peoples will be recognized as being important sources of information on the environment.
- First Nations and other Aboriginal Peoples will be consulted on issues of interest, as identified either jointly or separately, by the Ministry, First Nations or other Aboriginal Peoples.

6. Research and Development

The Ministry believes that research and development is important to the protection, enhancement and care of the environment. To put this value into action, the following measures will be taken:

- The research and development of environmentally-compatible transportation technologies and methods will continue to be a priority of the Ministry.
- The Ministry will continue to develop environmentally-sensitive design, construction and maintenance techniques.

7. Greening

The Ministry believes in the wise use and conservation of materials in all facets of its operations. To put this value into action, the following measures will be taken:

- The Ministry will encourage the reduction, reuse and recycling of materials in all facets of its business.
- The Ministry will be conscious of the energy efficiency of its buildings and transportation fleet.
- The Ministry will seek to ensure the environmental acceptability of new products recommended for use.
- The Ministry will give preferred status to environmentally friendly products and processes.

8. Education and Promotion

The Ministry believes that raising the awareness of its partners and the general public regarding environmental issues is an important component of environmental protection. To put this value into action, the following measures will be taken:

- The Ministry will seek to influence its partners (federal, provincial, municipal, business, etc.) to be aware of the environment in their respective decision-making processes.
- The Ministry will continue to make the public aware of the various transportation options available to them to promote sustainability of the environment.

Suffice to say, none of these commitments are reflected in the Ministry's Business Plan.

Comments

Transportation is of utmost importance to all Ontarians, not just business. It is also a major contributor to environmental pollution and unsustainable urban development patterns. The Ministry needs to change its vision to reflect a commitment to provide "the **people of Ontario** with a safe, efficient, reliable and environmentally sound transportation system".

The Ministry also needs to get rid of the standard it uses to measure a reliable, efficient, accessible and integrated transportation system, namely: "ninety per cent of the province's population lives within ten kilometres of a major provincial highway corridor". The standard clearly reflects the lack of environmental values in the Ministry's Business Plan.

The Ministry has virtually eliminated all environmental commitments from its Business Plan. Only a passing reference remains to the Ministry's participation in the development of climate change strategies, but even here, as with the Ministry of Economic Development and Trade, the Ministry sees its role as one of promoting Ontario's economic well-being.

Combined with the \$202 million capital expenditures from Northern Development and Mines, the Province is spending over \$1 billion on roads and highways, with no commitment to public transit.

The only reference to public transit is the transfer of GO Transit to the Greater Toronto Services Board. The Ministry provided \$106.5 million dollars to seed future GO Transit needs, but has transferred all responsibility for operating the service to the GTSB and the municipalities.

The Ministry has committed to "continue with provincial efforts to develop climate change strategies for the transportation sector that protect the environment and secure Ontario's economic well-being" (14). However, there is no specific commitment for reducing the transportation sector's contribution to greenhouse gases and the overall emphasis on highway development will be one of the greatest contributing factors to increases in automobile use and air emissions in Ontario.

Key Issues	Coverage in 1999-2000 Plan
transportation-related air emissions	poor
discharges of contaminants to water	none
road salt	none
the conservation and preservation of land in transportation planning	none
the integration of transportation and environmental planning	poor
promoting an integrated transportation system and the use of public transportation and other alternative forms, including non-motorized transportation options	poor
research and development of environmentally-compatible transportation technologies and methods	none
energy efficiency in the Ministry's buildings and transportation fleet	none
preferred status to environmentally friendly products and processes	none
public awareness of transportation options that promote sustainability of the environment.	none

3. Implications for Environmental Issues



There are many important environmental issues currently threatening the future health of Ontario's environment and the sustainability of our economic and social development.

As the Environmental Bill of Rights states in its Preamble, the people of Ontario have the right to expect that the government will address environmental concerns.

The people of Ontario have as a common goal the protection, conservation and restoration of the natural environment for the benefit of present and future generations.

While the government has the primary responsibility for achieving this goal, the people should have means to ensure that it is achieved in an effective, timely, open and fair manner.

In this section, the commitments of ministry business plans are collated according to the purposes of the Environmental Bill of Rights as stated in section 2 (2), namely:

1. The prevention, reduction and elimination of the use, generation and release of pollutants that are an unreasonable threat to the integrity of the environment.
2. The protection and conservation of biological, ecological and genetic diversity.
3. The protection and conservation of natural resources, including plant life, animal life and ecological systems.
4. The encouragement of the wise management of our natural resources, including plant life, animal life and ecological systems.
5. The identification, protection and conservation of ecologically sensitive areas or processes.

NOTE: This is not a qualitative analysis of the commitments made by each ministry. It is merely a "surface scan" of the commitments made in the ministry business plans. For a detailed environmental analysis of past performance, please refer to the Annual Reports of the Environmental Commissioner of Ontario, or to "Ontario's Environment and the Common Sense Revolution: a Four Year Report", published by the Canadian Institute of Environmental Law and Policy.

1. Pollution Prevention

The prevention, reduction and elimination of the use, generation and release of pollutants that are an unreasonable threat to the integrity of the environment.

Positive

Ministry of the Environment

- expanding Drive Clean to other regions and to include heavy trucks province-wide (p 10)
- 45% of high level PCBs in storage will have been destroyed by the end of 1998 (compared to the base year quantity of 18,600 tonnes).
- will reduce non-hazardous waste going to disposal in 1998 by 38% relative to 1987.
- will reduce 12,000 tonnes of toxic substances and wastes through partnerships.
- will introduce an enforcement SWAT team to investigate polluters

Ministry of Labour (LAB)

- updated occupational exposure limits that restrict the amount and duration of workers' exposure to hazardous chemicals in the workplace.

Negative

Ministry of Economic Development and Trade (MEDT)

- identifies Canada's greenhouse gas emission reduction implementation plan as a "barrier to business growth and investment".

Ministry of Energy, Science and Technology (MEST)

- there is no guarantee that competition in electricity will "remove the barriers for new, more environmentally benign sources including renewable generation", or that it will "develop an environmentally sustainable energy system emphasizing efficiency and conservation" (p 5)
- the ministry provides makes no commitments and gives no targets for either renewable energy or conservation.

Management Board Secretariat (MBS)

- the Ontario Realty Corporation has listed for sale 4,000 acres of agricultural land in Pickering
- there is no commitment to procurement or greening government.

Ministry of Municipal Affairs and Housing (MMAH)

- the Ministry says its role "will continue to evolve from reviewing and approving local land use decisions to advising municipalities on how to prepare or review their own planning documents
- there is no commitment to promoting compact development or to pollution prevention in either municipal planning, or the housing industry.

Ministry of Transportation (MOT)

- 85 per cent of the Ministry's budget (\$1.163 billion) is earmarked for provincial highways and road safety
- vague commitment to continue with provincial efforts to develop climate change strategies, but with no commitment to reduce the contribution of transportation to the release of greenhouse gases.

Probable Result

Without the support of MEDT, MEST, MBS, MMAH, and MOT in particular, Ontario's greenhouse gases will likely increase due to continued inefficiencies in energy consumption, polluting energy sources, urban sprawl, and increased reliance on highways.

Outside of the Ministry of the Environment, only the Ministry of Labour included any reference to pollution prevention activities. There is no commitment to pollution prevention within industry, especially with respect to eliminating the generation and use of hazardous materials.

2. Genetic Diversity

The protection and conservation of biological, ecological and genetic diversity.

Positive

Natural Resources

- the Ministry is developing recovery plans for two additional endangered species

Negative

Agriculture, Food and Rural Affairs / Energy, Science and Technology

- OMAFRA and MEST are both promoting the benefits of biotechnology, which alters the natural genetic structure of organisms in order to achieve desired characteristics. No mention is made of whether the ministry considered its environmental values in developing their biotechnology programs.

Municipal Affairs and Housing

- the increased development of natural areas and lack of provincial commitment to control urban sprawl will further reduce the available natural habitat

Government -Wide

- the lack of a government-wide commitment to pollution prevention (see above) may lead to increased industrial, agricultural, municipal and other sources of pollution.

Probable Result

The government is poorly prepared to handle public concern over genetically modified organisms. Without critical research and an independent review process, the government runs the risk of losing credibility in its core business of Risk Management.

The protection of endangered species requires an integrated approach that seeks to protect the remaining habitat areas as well as rehabilitate and restore degraded areas. With the lack of clear provincial leadership in protecting habitat, the development pressures on natural areas will continue

3. Resource Conservation

The protection and conservation of natural resources, including plant life, animal life and ecological systems.

Positive

Natural Resources

- 8.5 million fish will be stocked

Negative

Agriculture, Food and Rural Affairs

- no mention is made of foodland preservation. Instead, the business plan talks of supporting rural economic development.

Citizenship, Culture and Recreation

- the Ministry does not include any reference to its role in natural heritage protection.

Energy, Science and Technology

- the only commitment to conservation is through increased competition. No details, targets, or commitments are given.

Environment

- no mention is made of the conservation of water to reduce the demand on groundwater aquifers or municipal filtration plants and sewer systems.

Management Board Secretariat

- no mention is made of government procurement procedures in the Business Plan, although it is a commitment in the Ministry's SEV.

Natural Resources

- will legally recognize heritage hunting and fishing;
- does not identify any conservation measures or targets for game species, or natural resources.

Probable Result

The conservation of Ontario's resources, including energy, water, and timber and mineral resources will be a low priority for the government. Over the long-term, this will likely lead to inefficiencies in Ontario's economy, increased costs to the consumer, and higher pollution from solid and hazardous wastes, and air emissions.

4. Sustainable Development

The encouragement of the wise management of our natural resources, including plant life, animal life and ecological systems.

Positive

Natural Resources

- the Ministry has signed 10 new Sustainable Forest Licences.
- the ministry is committed to achieving 96 per cent reforestation rate.

Negative

Agriculture, Food and Rural Affairs

- the Ministry looks only at economic development issues, at the expense of environmental and social values.

Consumer and Commercial Relations

- the Ministry seeks to promote a fair, safe and informed marketplace which supports a competitive economy in Ontario. The Business Plan does not mention any environmental commitments.

Economic Development and Trade

- the Ministry seeks to stimulate economic growth, create more jobs and establish strong competitive advantages.
- the Ministry views greenhouse gas reductions as a barrier to business growth.

Energy, Science and Technology

- views increased competition as the solution to promoting renewable energy and conservation.

Management Board

- is promoting the sale of 4,000 acres of agricultural land for development

- does not include any mention of government internal environmental management systems or procurement policies.

Municipal Affairs and Housing

- the Ministry is eliminating its role and responsibility in reviewing local land use decisions and regional planning.
- MMAH seeks to promote a strong housing market and construction industry that contribute to economic prosperity

Natural Resources

- the Sustainable Forest Licences are part of MNR's plan to convert Crown Management Units into forestry operations.
- Living Legacy opens up protected areas to what have traditionally been non-conforming uses -- forestry, mining, hunting and fishing.

Northern Development and Mines

- promotes and subsidizes mineral exploration in protected ecological areas.

Transportation

- the Ministry seeks to expand Ontario's road system.
- the Ministry measures an effective transportation system by the percentage of people within ten kilometres of a major highway.

Probable Result

The government's overwhelming emphasis on economic development over environmental and any other values ensures that there will Ontario will be facing an "ecological deficit" in future years.

5. Ecosystem Protection

The identification, protection and conservation of ecologically sensitive areas or processes.

Positive

Natural Resources

- the Ministry has protected 378 new parks and protected areas (2.4 million hectares) which brings Ontario's total protected lands to more than 9.5 million hectares;

Negative

Municipal Affairs and Housing

- the business plan contains no targets or commitments for the protection of ecologically significant areas.

Natural Resources

- the Business Plan does not mention that the Ministry plans to open up wilderness areas to forestry, mineral exploration, and hunting and fishing.
- the Ministry does not intend to provide public reports on the trends in habitat development and/or restoration.

Northern Development and Mines

- Along with MNR, NDM is opening up protected areas to mineral exploration.

Probable Result

Mixed results. In some areas, such as parks and protected areas, the government will be able to show progress. Stewardship activities, although not covered in the MNR Business Plan, may also lead to habitat restoration and management.

On the negative side, the Oak Ridges Moraine stands out as an example of the Province's failure to protect an ecologically significant region. In addition, the plan to allow non-conforming uses in protected wilderness areas seriously compromises the ecological value of these areas. Ecological protection requires quality as well as quantity.

The likely net result is an erosion of the quality of protection that is afforded to ecologically significant areas, which will lead to further development pressures.

4. Conclusions and Recommendations



Conclusions

1. **Business Plans are a good initiative in that they are an effective means for communicating government priorities and commitments.**

Whether they improve the accountability of government, as Management Board Chair Chris Hodgson says, remains to be seen. It depends on how well the government responds to the analysis and recommendations in reports such as this one.

2. **Ten of the thirteen Business plans reviewed in this study failed to incorporate adequate recognition of Ministry Statements of Environmental Values.**

Four ministries failed to incorporate environmental values into their business plans but did include commitments that will have a major negative impact on the environment. They are:

- **Economic Development and Trade** (climate change as a trade barrier)
- **Management Board** (sale of 4,000 acres of agricultural land)
- **Municipal Affairs and Housing** (urban development)
- **Transportation** (highway development)

Five ministries failed to incorporate environmental values into their business plan, the absence of which may have significant environmental implications. They are:

- **Agriculture, Food and Rural Affairs** (pollution, energy, biotechnology, and rural development)
- **Consumer and Corporate Relations** (fuel storage and groundwater contamination)
- **Energy Science and Technology - Technology section** (technology development and biotechnology)
- **Health and Long Term Care** (hospital incineration, environmental carcinogens)
- **Northern Development and Mines** (northern development and mineral development)

The remaining ministry, Citizenship Culture and Recreation, also failed to incorporate its Statement of Environmental Values into its Business Plan, but its commitments were not seen to carry any significant environmental implications. The Ministry has the potential to be a strong motivator of environmental citizenship and its efforts in this area should be highlighted in the next business plan.

For each of the three Ministries that did incorporate environmental issues and values into their plans, in each case there is substantial room for improvement:

- **Energy, Science and Technology - Energy section**
- **Environment**
- **Natural Resources**

Note that the Ministry of Energy, Science and Technology is included in both the second and third categories for different sections of its Business Plan. It is unfortunate that the Ministry would choose to refer to its Statement of Environmental Values for energy and not for technology.

3. The government lacks the capacity to react to emerging environmental crises.

Many of the issues identified in this report are likely to become more serious over the course of the next ten to twenty years. These issues include urban sprawl, the urban environment, climate change, smog, food safety, energy consumption, groundwater quality and quantity, and hazardous waste.

The development oriented ministries are the most poorly equipped to handle environmental issues. These ministries are: Agriculture, Food and Rural Affairs; Economic Development and Trade; Municipal Affairs and Housing; and Transportation.

4. The government's unsustainable approach to economic growth and development will lead to significant environmental impacts.

More than merely being unprepared, the emphasis on economic growth, the cuts in provincial budgets and staff, and the transition of provincial responsibilities to municipalities, the corporate sector and the public, will ensure that the provincial government will be the major contributor to the growth in environmental problems and an unsustainable future for Ontario. In particular:

- weak provincial planning is allowing urban sprawl and the continued loss of significant natural and agricultural areas;
- the government is promoting rural development without consideration of environmentally appropriate development;
- the emphasis on highway development, combined with the absence of support for public transit and rail, will further promote urban sprawl and a car-dependent society. This will inevitably lead to increased energy consumption, a decline in air quality, and an increase in greenhouse gases.

5. The omission of environmental values in the 1999-2000 business plans contravenes the requirements of the Environmental Bill of Rights and the Management Board guidelines.

There is an unaccountable gap between the Management Board guidelines and the published business plans. Clearly, published plans do not reflect an adequate consideration of how government policies and decisions affect the environment. Somewhere, the system is failing us. Management Board, in particular, has the responsibility for ensuring that the business plans are consistent with the laws that govern government. However, the role of individual ministries in interpreting the guidelines, and of the Cabinet in approving the final business plans, cannot be overlooked.

In short, the government has reneged on the commitment it made to the Environmental Commissioner in 1999 to include strategies for honouring SEVs in the 1999-2000 business plans.

This failure to meet the requirements of the EBR takes on additional significance when compared with the current government's attempt to require future governments to raise taxes and/or approve a deficit budget (the Taxpayer Protection and Balanced Budget Act). The purpose of the Environmental Bill of Rights is to ensure that governments operate in an environmentally sustainable manner; or, in other words, that they do not incur an ecological deficit. If the government will not respect previous legislation outlining the requirements for good governance, how can it expect that future governments will respect its legislation?

In preparing this review, the Conservation Council of Ontario considered applying for a formal review of the Ministry Business Plans under the Environmental Bill of Rights. Given that the business plans were released in December, three-quarters of the way through the calendar year, we see little point in calling for a review of these plans.

Instead, the Conservation Council will review the 2000-20001 plans to determine whether any significant progress has been made. We will decide at that point whether a formal request through the office of the Environmental Commissioner is justified.

6. Major changes are required to the business plans to fully integrate environmental sustainability into the government's mandate.

Let no one underestimate the changes that are required in the current business plans for them to be consistent with the ministry Statements of Environmental Values.

Integrating environmental values is not a simple matter of adding a statement that "the ministry will consider its SEV in all major policy decisions that affect the environment". Nor is it a matter of adding a couple of research and education programs.

Integrating environmental values means that each ministry needs to re-evaluate its entire business plan in order that its goals, targets, and commitments fully reflect Ontario's goals for a healthy environment.

7. Ministry Statements of Environmental Values do not adequately reflect the purposes of the Environmental Bill of Rights.

a) Failure to Address Environmental Values

The Ministry of Agriculture, Food and Rural Affairs does not identify any environmental issues as they relate to the Ministry. Also, the Ministry of Energy, Science and Technology's SEV contains no environmental values for the Technology section of the ministry

b) Failure to Address the Purposes of the EBR

Few of the SEVs directly address the purposes of the Environmental Bill of Rights as laid out in Sections 2 (1) and 2 (2), in particular:

1. The prevention, reduction and elimination of the use, generation and release of pollutants that are an unreasonable threat to the integrity of the environment.
2. The protection and conservation of biological, ecological and genetic diversity.
3. The protection and conservation of natural resources, including plant life, animal life and ecological systems.
4. The encouragement of the wise management of our natural resources, including plant life, animal life and ecological systems.
5. The identification, protection and conservation of ecologically sensitive areas or processes.

Instead, the standard approach has been to include a general statement to the effect that the ministry acknowledges the purposes of the EBR and will consider them along with other aspects of the ministry's mandate.

Most ministries have included specific issues and commitments, but there is no indication whether the list is complete.

c) Changing SEVS to match Business Plans

Two ministries that have recently changed their Statement of Environmental Values are Agriculture, Food and Rural Affairs, and Municipal Affairs and Housing. In both cases, the Ministry has changed the SEV to be consistent with the business plan, however the results are quite different.

In the case of the Ministry of Agriculture, Food and Rural Affairs, the Statement of Environmental Values contains no statements of environmental values. Nor is there any mention of the many important

environmental issues that the agriculture and food sector are faced with. The end result is that the Business Plan is consistent with SEV in that neither of them contain any reference to the environment.

For Municipal Affairs and Housing, the changes are more positive. The Ministry has changed the SEV to reflect its current core businesses, and the environmental values and commitments that apply to each core business. Unfortunately, the business plan still doesn't reflect the Ministry's new values.

For those ministries that choose to structure their SEV according to the core businesses of their business plan, the requirement should be to apply all the purposes of the EBR to each core business.

Recommendations

The Province of Ontario is legally bound by Section 7. of the Environmental Bill of Rights to develop statements of environmental values that reflect the purposes of the EBR, and by Section 11. to incorporate the ministry statements of environmental values into ministry business plans.

There should be no need to make any recommendation other than to fulfill the current legal obligations.

On the other hand, the Environmental Bill of Rights leaves much room for interpretation. The government's comment on the Environmental Registry that business plans are "administrative in nature" is a good case in point. For an administrative document, it contains many significant commitments that carry serious environmental consequences. Therefore, more important than meeting the administrative and legal requirements of the EBR, the government has a moral responsibility to ensure that the principles, objectives, and values of the Environmental Bill of Rights are carried out in practice, and that the results be measurable.

The task of securing a sustainable and healthy future for Ontario is not an easy one. It requires that we find solutions that meet Ontario's economic, environmental, and social goals.

For the environmental community, our goals are to ensure that Ontario has a healthy environment; that the province's economic and social development is environmentally sustainable, and that the environment is a positive contributor to the health and well-being of the people of Ontario.

These goals are not incompatible with the current provincial government goals of economic prosperity and efficient government. They are, however, incompatible with the current business plans and proposed activities of the government. The challenge for our government is, as it has always been, to find ways of supporting all of society's major goals, not just a select few. Ontario needs a consistent and universally held set of values that are reflected in the plans and activities of all ministries. The interpretation of these values and the priorities may change over time, but the public should be able to monitor our progress towards each and all of these goals.

Therefore, the following recommendations are presented as a starting point for dialogue between the environmental community and the provincial government on how it can best incorporate environmental and social values into its current economic agenda.

Provincial Vision Statement

Recommendation #1:

The Province should develop and adopt a Provincial Vision Statement that encapsulates and reflects the aspirations of the people of Ontario for individual health and well-being; healthy communities and cultures; clean and healthy ecosystems; and a prosperous and sustainable economy.

The groundwork for this type of vision statement can be found in the publications of the former Premier's Council on Health, Well-Being and Social Justice. The Council, along with the Ontario Round Table on Environment and Economy, were instrumental in bringing social, economic, and environmental interests together to work on cooperative plans.

Ministry Vision Statements

Recommendation #2:

Ministries should revise their Vision Statements in order that they reflect an awareness of all appropriate provincial goals, including the health of the environment.

Ministries that favour one set of goals and values without properly addressing the other values of our society run the risk of being in conflict with other ministries. They also run the risk of moving the province in a direction that will be untenable in the long run, creating further problems that will be expensive to correct.

In the case of the environment, the current emphasis on urban development and highways in the absence of environmentally-sound provincial, regional and municipal planning will result in long term increases in energy consumption and air pollution that will be costly and difficult to correct.

Integrated and complete vision statements for each of the ministries is the first step in the development of better business plans for the ministries. It will help to frame the more difficult task of developing consistency in all government programs and inter-ministerial support for all new initiatives.

Statements of Environmental Values

Recommendation #3:

The Province should enforce the requirement under the Environmental Bill of Rights that ministries explain how the purposes of the Act will be applied to their ministry through their Statements of Environmental Values.

Currently, there is too much ambiguity and variation in how the Ministries interpret the requirements of the EBR. Guidance is needed, and it should be provided by Management Board with the participation of the Environmental Commissioner and with opportunities for public consultation.

Just as the business plans are designed to improve government accountability, so too should the statements of environmental values provide a clear sense of the environmental and conservation issues that each ministry is responsible for, and how they intend to address them.

In making future revisions to their SEVs, the Ministries should be required to :

- consult with the public above and beyond the minimum requirements of the EBR for the revision of the SEV;
- include a vision statement for the ministry that incorporates the goal of a healthy environment;
- include a clear description of the ministry's core businesses;
- identify the major issues and environmental values pertaining to the core businesses;

- identify other significant issues and values not related to the Ministry's core businesses but within the Ministry's jurisdiction;
- include specific commitments or goals within each core business for achieving the environmental values.

The Ministry of Agriculture, Food and Rural Areas would be a good candidate for testing this model. The Ministry's current SEV has been revised to reflect the Ministry's core businesses, but it has neglected to include any environmental issues, values, or commitments other than a vague commitment to "consider" environmental values in decision-making..

Integrating Environmental Values into Ministry Business Plans

Recommendation #4:

The Province should demonstrate a significant commitment to Ontario's Environmental Values in the 2000 - 2001 business plans.

As per Section 11 of the Environmental Bill of Rights, those ministries with Statements of Environmental Values must ensure that these values are properly reflected in their 2000 - 2001 business plan. Section 11 of the EBR requires that the Minister take every reasonable step to ensure that the ministry statement of environmental values is considered whenever decisions that might significantly affect the environment are made in the ministry.

Management Board holds the lead responsibility for implementing this recommendation. It is their guidelines that the ministries must follow in preparing their annual business plan.

Recognizing that governments cannot easily turn on a dime, the priorities for the upcoming business plans should be to address major environmental shortcomings in the current plans, and to incorporate a range of positive environmental initiatives in each of the ministries.

Based on the analysis of the effects of government commitments in the 1999 - 2000 business plans, the two most urgent changes required for 2000 - 2001 are:

- reinstate the provincial role in controlling urban sprawl and protecting significant agricultural and ecological areas
- correct the imbalance between highways and transit

These two actions alone would go a long way to demonstrating Ontario's commitment to minimizing pollution, conserving valuable resources (energy and farmland), protecting nature (Oak Ridges Moraine), and creating healthy communities (integrated community design).

Each of the 13 ministries with Statements of Environmental Values should look to include new environmental initiatives. Such actions could include:

- initiatives to support compact, energy efficient development;
- support for public use of transit systems, through tax incentives;
- support for renewable energy and conservation, either through incentives or through emission caps and green energy quotas;
- support for environmental technology, coupled with improved standards and enforcement;
- environmental leadership in economic sectors;
- government procurement.

In subsequent years, the goal should be to develop a greater harmony between the Province's economic development goals and the environmental values (and others) by analyzing the environmental impact of all major development initiatives (as required under the EBR).

Documenting Environmental Considerations

Recommendation #5:

Each Ministry with a Statement of Environmental Values should publish an annual summary of how it has considered these values in its activities.

Section 11 of the Environmental Bill of Rights requires that “the minister shall take every reasonable step to ensure that the ministry statement of environmental values is considered whenever decisions that might significantly affect the environment are made in the ministry”.

Currently, there is no documentation of whether this condition has been met or not.

An annual report, produced in concert with the business plan, would serve as an effective means of ensuring that ministries consider their environmental values on an ongoing basis. An alternative approach which has been recommended in the past by the Conservation Council and other organizations, is the publication of State of the Environment reports that integrate government reporting and environmental monitoring into a public report.

An Environmental Plan for Ontario

Recommendation # 6:

The Province should develop a cross-ministry environmental plan that will indicate how each ministry is contributing to solving the most significant environmental and conservation problems facing the province.

Given the difficulty ministries appear to be having integrating environmental values into their plans, it may require that the Province develop a comprehensive environmental plan with the participation of all relevant Ministries and their programs. In this way, each ministry would be able to identify how its actions would contribute to achieving Ontario’s environmental goals.

Management Board guidelines already require the development of “high level strategies” on environmental issues. These strategies should be published and integrated into the cross-ministry environmental plan.

One way the government’s environment plan could be structured is along the lines of the purposes of the Environmental Bill of Rights:

1. **Pollution Prevention:** The prevention, reduction and elimination of the use, generation and release of pollutants that are an unreasonable threat to the integrity of the environment.
2. **Genetic Diversity:** The protection and conservation of biological, ecological and genetic diversity.
3. **Resource Conservation:** The protection and conservation of natural resources, including plant life, animal life and ecological systems.
4. **Sustainable Development:** The encouragement of the wise management of our natural resources, including plant life, animal life and ecological systems.
5. **Genetic Diversity:** The identification, protection and conservation of ecologically sensitive areas or processes.

This recommendation is consistent and supportive of the government's approach to business planning. It provides another level of analysis which will lead to better ministry plans, and more cost-effective government.

Public and Stakeholder Consultation

Recommendation # 7:

The Province should seek to improve its public and stakeholder consultation processes in order to develop an improved understanding of the predominant social values and goals, and to assist in reflecting these values in its business plans, strategies, policies and new initiatives.

Public involvement in the planning process is essential. The dissolution of high-level advisory bodies such as the Round Table on Environment and Economy and the Premier's Council meant the Province lost an invaluable and cost-effective source of advice on how to integrate economic, social, and environmental values. The Province needs to revive a process that will allow for various stakeholders to work with the ministries in the development of a coordinated, cost-effective, and cooperative approach to managing Ontario's future.

A Final Note

The health of our environment has always been, and will always be, a priority for the citizens of Ontario. Our government needs to demonstrate a clear commitment and a thorough and integrated approach to creating environmentally-sustainable development in Ontario.

In spite of the tremendous shortcomings this paper has found in the current set of ministry business plans, there is reason for hope.

Ministry business plans have provided us with an unparalleled opportunity to analyze a government's commitment to achieving the values and goals of our society. The transparency and accountability this process provides is to be lauded.

If the government is as serious about environmental health as it is about economic prosperity and government efficiency, then it will use the recommendations in this paper to improve the transparency and accountability on environmental goals as well as economic ones

Many of the glaring weaknesses and contradictions pointed out in this report are not new. They have been with us since the industrial revolution, if not before. To ask any government to harmonize environmental and economic values is no small task. Therefore, we should look for positive signs of change, and work with the ministries to help them integrate environmental values into their programs.

The Conservation Council of Ontario, and others in the environmental community, will await the government's response to this report. We hope there will be the opportunity for consultation with the government prior to the approval and release of the 2000-20001 business plans. We will be looking for concrete improvements in the environmental commitments and values of the next round of business plans. We will also be looking for a commitment from the government to implement long-lasting changes in the environmental accountability of the government and its ministries

Sources of Reports Mentioned



Ministry Business Plans

Internet: <http://www.gov.on.ca/MBS/english/press/plans99/>

Publications Ontario,
880 Bay Street, Toronto ON M7A 1N8. Tel: (416) 326-5300

Out-of-town customers except Ottawa call: 1-800-668-9938
In Ottawa, call (613) 238-3630 or toll-free 1-800-268-8758
Telephone service for the hearing impaired is available toll-free throughout Ontario at 1-800-268-7095

Statements of Environmental Values

Internet: http://www.ene.gov.on.ca/envision/env_reg/er/sevs/index.htm

Annual Reports of the Environmental Commissioner of Ontario

<http://www.eco.on.ca/english/index.htm>

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Ontario's Environment and the Common Sense Revolution: A Fourth Year Report

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Appendix 1: Management Board Response to a Request for Information

In response to a verbal request for information on the Business Planning and Allocations Guidelines and additional issues, the attached letter was received from the Chair on the Management Board of Cabinet, Chris Hodgson, on February 17, 2000.

Included with the letter was a copy of the 2000-2001 Business Planning and Allocations Guidelines. These are the sections on environmental commitments referred to in the letter:

Section 1 - 7:

Ministries affected by the Environmental Bill of Rights (EBR) should include a high level strategy to address how the ministry is honouring its Statement of Environmental Values (SEV). This is required to assist the Environmental Commissioner in monitoring the progress in Ontario.

Section 1 - 16:

FORMAT (for Published Business Plans)

Order of Headings

- Message from the Minister
- Ministry Vision
- Core Businesses
- Annual report on key achievements for 1999-00
- Key commitments and strategies for 2000-01
- Key performance measures
- 1999-00 ministry spending by core business - interim actuals
- 2000-01 approved allocations
- Who to call

Section 2 - 9

Ensure that the proposal briefing note provides details of positive and negative impacts on the following stakeholder groups, if applicable, and that the impacts are identified (✓) in columns "AU to BJ" of the *BPA Proposal Summary*:

- | | |
|------------------|------------------|
| • federal | • women |
| • municipal | • small business |
| • seniors | • environment |
| • disabled | • North |
| • children | • rural |
| • youth/students | • Toronto area |
| • families | • aboriginals |
| • unemployed | • Francophones |

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Bureau du
président

**Mr. Chris Winter
President
Conservation Council of Ontario
43 Sorauen Avenue
Toronto, Ontario
M6R 2C8**

Dear Mr. Winter:

In response to your request to my office, I am pleased to provide you with a copy of the 2000-01 Business Planning and Allocations Guidelines. These guidelines were issued to ministries in the fall and were used in the preparation of their business plan submissions to Management Board for this coming fiscal year.

I would like to draw your attention to the section in the guidelines relating to the development of key strategies. Ministries affected by the Environmental Bill of Rights (EBR) have been instructed to develop a high level strategy to address how the ministry is honouring its Statement of Environmental Values (page 1-7). The same requirement was articulated in last year's guidelines. As an additional requirement this year, ministries were asked to provide positive or negative impacts on the environment for any new proposal (page 2-9).

Approved business plans are communicated to the public by way of published business plans and annual reports. Ministries are instructed to refer to their key strategies in the writing of these documents (page 1-16). The finished product is posted on the website of each ministry, made available in hard copy through Publications Ontario and is referred to on the Environmental Registry.

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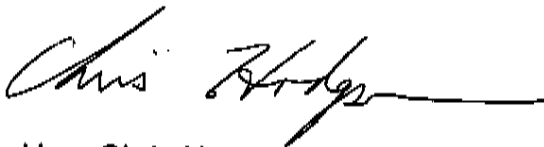
-2-

With respect to your enquiry about the status of the Green Workplace initiative within the Ontario Public Service, the program is still running successfully with recycling activities (fine paper, newspaper, polystyrene etc.) in over 760 workplaces.

I hope this information meets your requirements. If you have any further questions regarding business planning, I encourage you to contact David Fulford, Director of the Business Planning and Expenditure Management Branch at (416) 327-2022.

The information you requested on whether the Ontario Realty Corporation's sales target of \$200 million includes any lands that are currently used for agriculture has been noted and will be provided to you shortly.

Sincerely,



Hon. Chris Hodgson
Chair, Management Board of Cabinet

Attachment

c: Honourable Tony Clement
Minister of Municipal Affairs and Housing