

February 11, 2022

**Re: 2022 Budget Consultations**

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The Canadian Environmental Law Association (CELA) is a non-profit specialty legal aid clinic funded by Legal Aid Ontario and a member of the Green Budget Coalition.<sup>1</sup> In response to Ontario's 2022 Budget consultations, CELA provides the following recommendations on environment, health, climate and equity for consideration in Budget 2022:

1. The Minister of Finance should restore funding to Conservation Authorities. Schedule 6, The changes to conservation ushered in under Bill 229 set back watershed planning and implementation of an ecosystem-based approach by decades. Funding is required to ensure that the current mandate of the province's 36 conservation authorities is maintained and enhanced.
2. Ontario should restore funding to the Ministry of the Environment, who can then fund educational programs as required under section 2.1(b) of the *Environmental Bill of Rights, 1994*. Ontarians cannot meaningfully exercise environmental rights that they do not know exist, or do not know how to use effectively to protect the environment and their health.
3. The Environment Commissioner should be re-funded as a separate office from the Auditor General of Ontario.
4. Spending should not be allocated for new nuclear projects, including Ontario Power Generation's plans to build a small modular reactor at the Darlington Nuclear Site, for the reason they are too costly and too slow to respond to the urgency of climate change, and socially just, economical, and scalable renewable alternatives presently exist.
5. Funding should be allocated to lead service line removal. The biggest remaining source of lead in drinking water is lead service lines. Funding is required to complete mapping of all lead service lines by 2025, removal of 75% of lead service lines by 2030, and

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<sup>1</sup> Online: [www.cela.ca](http://www.cela.ca); <https://greenbudget.ca/>

removal of 100% of lead service lines by 2035.<sup>2</sup>

6. Ontario should allocate funding for energy efficiency projects for lower income households, particularly the Low-Income Energy Network (LIEN) programs. Funding should be prioritized for the lower-income and least efficient homes, delivered in no-cost and turnkey energy retrofits.
7. Given the severity of the climate change crisis, Ontario should implement a new and ongoing program to monitor and assess landscape level changes in key habitats – wetlands, grasslands, and forests, ensure that all infrastructure programs require that negative impacts to ecological connectivity be prevented and mitigated, and that mitigation of impacts to ecological connectivity is a requirement in all projects that trigger Environmental Assessments.
8. Significant funding must be allocated to support the development and establishment of Indigenous-led conservation and protected areas (IPCAs). Funding is needed to support First Nations that wish to protect their lands and resources while growing and diversifying their economies.
9. Funding should be restored to public health units given the impact of the COVID-19 pandemic so that they are better able to improve the tracking of and response to heat related deaths increasing with the climate crisis.<sup>3</sup>

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<sup>2</sup> Jacqueline Wilson, Counsel at CELA, *Blog: Get the Lead Out! CELA's Submission Addressing Removing Lead from Our Drinking Water*, online: < <https://cela.ca/blog-get-the-lead-out-celas-submission-addressing-removing-lead-from-our-drinking-water/#:~:text=A%20clear%2C%20mandatory%20approach%20is,lead%20service%20lines%20by%202035>.

<sup>3</sup> Conrad Oliver, CELA Student, *Blog: Tracking of Heat-Related Deaths*, online: <https://cela.ca/blog-tracking-of-heat-related-deaths/>.