

March 7, 2010

Michelle Mason Manager, Ministry of Energy Ontario Growth Secretariat 777 Bay Street, Suite 425 Toronto Ontario M5G 2E5

Dear Ms. Mason

Re: Places to Grow: Proposed Growth Plan for Northern Ontario EBR Registry Number: 010-8128

Thank-you for the opportunity to provide comments on the Proposed Growth Plan for Northern Ontario (EBR # 010-8128). Since 1972, Environment North has functioned as a regional coalition of environmental organizations and individuals. Through research, education, and community advocacy we promote sustainable communities and conservation of our resources. Our Board and membership is comprised of northern residents, and we are pleased to provide our perspective on the path forward for healthy, sustainable, northern communities.

We believe that a relevant plan for the future prosperity of northwestern Ontario should be framed within two emerging realities: 1) reduction of our dependence on fossil fuels, including economic development that recognizes the reality of rising fuel costs as we reach "peak oil", and 2) adaptation within a changing climate. We believe that true sustainability will result from new socioeconomic approaches that value conservation and stewardship as a benefit to northern communities, not a cost to economic development. The market directed approach currently emphasized in the Growth Plan for Northern Ontario falls short of the lower energy future and decentralization of political decision-making required to ensure a prosperous future for our communities. The role of the provincial government should be to support, not drive, the transition needed in Ontario's north.

We are concerned that the focus of the current Growth Plan will keep northern communities in boom and bust cycles. This is particularly true with the overarching emphasis on mineral development that is currently promoted by the Provincial Government. Industrial-scale development does and will continue to play a role in supporting northern communities; however, there may be only short term gains. One only has to look at the Elliot Lake and Pickle Lake (which was burnt to the ground in 1974 by the MNR in order to clean-up the pollution left by the gold mining industry) communities to see the legacy of mining development if the markets change or the product is exhausted. Both have experienced the social and economic trauma of the Boom

and Bust cycle that is the very nature of resource based communities and is accompanied by the inevitable population, resource and welfare declines. We understand that there is a legacy of abandoned mine clean-up that will require \$500 million of taxpayer's dollars to remedy. Is the overemphasis on an industrial model for economic development fulfilling the needs of all northern families? The "economy" itself is not what is important... it is a tool to ensure healthy, resilient and fulfilled communities. We need to be careful to maintain that perspective and not view economic development as separate from the social and environmental realities that have equal, if not more, contribution to our well-being.

An additional concern with the Growth Plan is the emphasis on globalization and focus on competitiveness in the global market. Many economists, such as Jeff Rubin, predict that the cost of fuel will be so high in the near future, that fundamental shifts will occur in the way products are bought and sold around the planet. For our community, there are extreme risks associated with this reality. For example, we can expect that the cost of food will create even more poverty for northern people, and could result in serious health risks for some. The Consumer Price Index (CPI), which measures the cost of food, shelter, transportation, health care, recreation, clothing and alcohol/tobacco, rose 1.9 % in 2009 – 2010 in Ontario and is inextricably linked to energy, gas and fuel prices. In terms of developing northern economies, it is likely that we will find that foreign markets are much less accessible, and we cannot be competitive, simply due to the costs of moving products great distances. According to Statistics Canada, gas prices have risen 25.6% and 23.9% over the last two years (2008 – 2009 and 2009 – 2010) respectively and overall energy prices have risen 5.9% and 8.2% over the same period, a trend which is not expected to change. A direct result of increasing gas, oil and other fuel prices is the corresponding rise in transportation costs of 7.7% for the period of January 2009 – January 2010. The Growth Plan must acknowledge that fossil fuels are diminishing and a continued dependence on such is detrimental.

We strongly support the Green Energy Act, and the emphasis on renewable and clean energy, not simply "sustained" energy. We believe that the Provincial Government is trying to be very progressive in this approach. The cost of energy is not expected to fall, and alternative energy forms that do not burn non-renewable fossil fuels or pollution are necessary and supported by the public. The IPCC concluded that North America (Canada) is vulnerable to climate change and climate fluctuations which will have a significant impact on social and economic structures. Climate change and its attendant results are inextricably linked with Green House Gasses and we support the Provincial Government's efforts to reduce GHG through renewable energy technology. We are interested to see the Provincial Government develop a green energy procurement program that can stimulate further economic development, particularly if government energy needs in northern Ontario were met by northern, renewable energy projects. We would like to see if greater connection between the Green Energy Act and the Growth Plan.

The Growth Plan frames education as preparing our children for vocations, rather than the real need of education to develop problem-solvers and people who can quickly respond to change. The top in-demand jobs in 2010 did not exist 2004 and the jobs of the future will use technologies that haven't been invented yet to solve problems we don't even know are problems yet (Karl Fisch, Scott McLleod, Jeff Bronman Shift Happens). We need to prepare our children to fill jobs and solve problems that do not currently exist. We trust that anyone can learn the technical skills required in most fields "on the job", we need our education system to go much further and address critical literacy and thinking skills, as well as adaptability to change.

New technical information is doubling every 2 years. This means that for a student starting a 4 year technical degree, half of what they learn in their 1st year will be outdated by their 3rd year (*Shift Happens*). The Growth Plan should harness the creativity and ingenuity of our youth. Despite assurances that young people had been "consulted" regarding the Growth Plan development, the document is not clear as to how young, northern people – the very people who will be most impacted by this 25 year plan – have contributed to, and support, the plan.

Further, Environment North does not support any additional subsidies to either the forest or mineral industry, including lowering regulation requirements in a supposed attempt to make northern Ontario more attractive to investors. According to the Canadian Encyclopedia, resource towns, "which are the most unstable and precarious of Canadian Communities", have benefited from government investment which has improved life in these towns, but a comprehensive approach to planning for these towns future is required to ensure their survival and resilience. Characteristically, these towns are a result of an industry need and typically lack control over their own economic development, are created in areas with little physical or cultural connections and are subject to the vagrancies and fluctuations of foreign markets in which they have no control. Perhaps in the past there was a social contract between corporations and communities, where natural resources were used in exchange for employment. Because of their reliance on foreign economies and the fact that their product is exported out of the region, resource towns derive little economic benefit in the extraction activity, compared to the vast wealth accumulated by investors, other than temporary salaries associated with low skilled jobs. Mid-level management and often skilled workers are often imported from outside the region, we believe this will be the case with the current prospecting and development boom associated with the Ring of Fire development. This boom and bust cycle often generates feelings of insecurity and impermanence which accompany the certainty that the resource is finite. Additionally, we use far more resources and create much less employment than any time in our history. A fundamental re-thinking is required to determine how to use natural resources in ways that best support communities and protect the environment.

Who should make the decisions? Typically, decisions in resource towns often hinge on the corporate interests and are based on the boom and bust cycle. Northern communities need much more say over how to create our own futures. However, we were somewhat alarmed to read that the "Common Voice" group suggested that they should facilitate that conversation. None of the non-governmental groups working on conservation as an economic driver have been part of that exclusive organization. We believe such consultation should be conducted by an organization that is "arm's length".

We have not included point by point recommendations for the plan in this response, as we are most concerned with the guiding principles. We are currently in transition, and Northern Ontario has the opportunity to come out far ahead of other regions.

Sincerely,

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