



MANITOBA ECO-NETWORK

3rd Floor 303 Portage Ave., Winnipeg MB R3B 2B4
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August 2020

Attention: Laura Rempel
Planner, City of Winnipeg

RE: OurWinnipeg Policy and Implementation Plan

The Manitoba Eco-Network (MbEN) appreciates this opportunity to comment on the *OurWinnipeg* policy and implementation plan. Since 1988, MbEN has promoted positive environmental action by supporting people and groups in our community. MbEN has recently transitioned our programming to focus more on policy advocacy, engagement in consultation processes and developing capacity building tools that benefit the environmental non-profit sector and our member groups. We welcome more opportunities in the future to work with the City of Winnipeg in the development of new policies, plans and programs.

After reviewing the most recent version of *OurWinnipeg* we have found that many of our comments from the submission we made in July 2019 are still applicable. We are pleased to see commitments throughout *OurWinnipeg* to strengthen community partnerships, empower community organizations, and increase opportunities for community-led action. We strongly support the City's commitment to taking on a stronger environmental leadership role. The City should be leading by example and helping foster a more collaborative approach to municipal governance. To this end, we are pleased to see policies that support meaningful, inclusive and informed community engagement and commitments to collaborative climate action.

This new iteration of the policy continues to indicate the City of Winnipeg is moving in a more sustainable direction and we appreciated seeing some changes (such as the addition of new definitions) based on our previous feedback. The range of online engagement tools provided and the willingness of City staff to meet with interested organizations during this consultation period was also appreciated. We feel many of the problems we identified last year have still not been addressed. Our comments focus on these ongoing issues and provide suggestions that will improve transparency and public engagement, strengthen environmental commitments and better align the *OurWinnipeg* policy with the Sustainable Development Goals (SDGs) on which it is based.

Public Engagement:

- We understand the difficulties associated with public consultation in the current pandemic situation and that the consultation process has been delayed as a result. Consulting with the public during the busiest time of the summer has prevented many individuals and NGOs from meaningful engagement. We recommend that any future consultations the City embarks on offer more time for public responses and resources for community consultation activities.

- Undertaking the *OurWinnipeg* consultation at the same time public engagement is occurring for the *Complete Communities Direction Strategy* limited the capacity of the public and NGOs to participate meaningfully. These engagement processes should have occurred at different times, with the *Complete Communities* consultation occurring after the higher level *OurWinnipeg* policy was finalized.
- More background information should have been provided to the public detailing the changes made to the *OurWinnipeg* policy as a result of consolidating previous policies including the *Sustainable Waste and Water Directional Strategy* and *A Sustainable Winnipeg Direction Strategy*. We heard from members of the community who found it difficult to compare the current version of the policy with its previous iteration to determine if any policy gaps existed.
- There is a need for a public engagement report summarizing the public feedback received during both the 2019 and 2020 consultation periods. It is unclear what scope of public feedback was received, how this information was considered and how it was incorporated into the *OurWinnipeg* policy. If the City is going to adopt a process of “decision-making that is transparent, accountable and evidence informed” there is a need to apply these principles to the policy development process as well.

Sustainable Development Goals as the Basis of the Policy:

- The City of Winnipeg is taking a positive step forward by using the SDGs as the basis of the *OurWinnipeg* policy. The SDGs recognize the need for policies and plans that address social equity issues, health, education and economic growth in a way that also addresses pressing environmental issues like climate change and the protection of water resources. By taking such an approach in the revision of the *OurWinnipeg* policy, the City has signalled a commitment to moving in a more sustainable direction. However, we feel the *OurWinnipeg* policy does not strongly enough capture the intent and content of many of the SDGs, particularly those considered to make up the “environmental resilience” category.
- The term “environmental resilience” does not adequately capture the elements of SDGs 6, 7, 12, 13, 14, and 15 that this section is intended to reflect. Of these, only SDG 13 and 14 explicitly mention resilience, and both include this approach as one of many necessary steps in the move towards a more sustainable society. MbEN recommends changing this section title to “environmental sustainability” to better reflect the range of policies that are included and ensure *OurWinnipeg* is focused on taking proactive measures that enable Winnipeg to be more than just “resilient” to climate change, but instead shift society towards a more sustainable future.
- Applying the SDGs to the *OurWinnipeg* policy is not an exercise that should involve selective adoption of certain elements of the SDGs. It is an opportunity to develop policies that reflect the full content and intent of the goals as applicable in Manitoba and implement meaningful change.

Organization and Structure of Document:

- MbEN feels the high-level approach taken in some policies made it difficult to understand how such policies would work in practical application. We suggest general



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policies be updated to include more measurable goals and data collection commitments in order to improve the transparency and compatibility of the *OurWinnipeg* plan.

- The addition of a colour/category legend to the Policy Index on page 10/11 would be helpful (such as the one that appears on page 13) so it is easier to understand which of the six main goals listed policies correspond with.
- There is a need for more detailed maps in the *OurWinnipeg* policy. The single map currently included in the policy is not adequate and lacks reference to many important details including the location of parks, green spaces, and active transportation options. Maps provide an important visual means of communicating information and are an important resource for the public to have access to. Maps that contain proposed future projects also add transparency and accountability to the development approval process.

Recognition of Environmental Rights:

- The *OurWinnipeg* plan needs to recognize Manitobans' environmental rights. Using language that reflects the principles associated with this important category of human rights without explicit recognition is not enough. It is long past time for the City of Winnipeg to join the growing number of Canadian municipalities, including the Manitoba communities of The Pas, Whitemouth, Dunnottar, Thompson, Stonewall, Shamattawa and Selkirk, that have recognized the "right to a healthy environment". Recognition of environmental rights in *OurWinnipeg* would demonstrate environmental leadership and long-term planning in the intergenerational public interest.
- Human health and well-being are directly connected to the health of our surrounding ecosystems and therefore any commitments in this regard should recognize the importance of environmental protection and environmental rights to maintaining a safe, clean, healthy and sustainable environment.

Need for More Transparency:

- We were concerned with some of the changes in terminology that were introduced in the current iteration of *OurWinnipeg*. For example, decision-making is now described as "evidence-informed" (44) instead of "evidence-based"; references to "gender based analysis" were removed; and "integrated life-cycle planning" changed to "integrated planning and service delivery". More transparency is needed in terms of why such changes were made and what the changes will mean in practical application.
- There are many policies that include reference to coordination between different levels of government, partnerships with community organizations, and collaborative developments. There is a need for more transparency in terms of the role the City will play in such partnerships, how the hierarchy of decision-making will be determined, and where funding will come from, especially in relation to community based policy development and delivery.
- More transparency is required in *OurWinnipeg* in terms of how the various policy commitments will be monitored and evaluated for effectiveness. More clarity is needed

about the “sustainability goal indicators” (19) that will be used including how such indicators will be developed and if the community will be consulted.

- MbEN feels that transparency could be further improved by making a commitment in *OurWinnipeg* to Open Government and Open Data Principles. There is a need for more policies that ensure data is open by default and access is facilitated under the FAIR principles (findable, accessible, interoperable and reusable). The creation of an independent auditor position focused on assessing sustainability could help with existing transparency issues.

Environmental Commitments:

- Meaningful adoption of the SDGs requires stronger environmental commitments. Beyond the problematic “environmental resilience” language discussed above, it is unclear how the proposed policies will fulfill the environmental goals included in SDGs 6, 7, 12, 13, 14, and 15, especially in the areas of waste and water management.
- We feel more commitments can be made towards the protection of water resources and recommend the inclusion of more transparent policies that specifically address water conservation and water pollution and include clear targets, measurement processes and enforcement mechanisms. MbEN also feels Policy 2.18 should be revised to better address the resilience of Winnipeg’s drinking water system. There is a need to consider source alternatives to Shoal Lake and have clear and transparent plans in place to address any sudden changes in water quality or quantity.
- Proposed policies committing to climate change action, such as in Policies 2.1, 2.3, 2.8 aimed at GHG reductions, should be revised to meet, at a minimum, Canada’s Paris Climate Summit Commitment.
- More commitments need to be made to monitoring and improving air quality in Winnipeg. For example, Policy 2.7 should be revised to include stronger and more transparent commitments to improving air quality.
- The commitment to “increase and diversification of neighbourhood scale renewable building energy production” in Policy 2.13 is appreciated, however, MbEN would like to see the City make stronger commitments to becoming a renewable energy developer and provider.
- MbEN would like to see stronger commitments to improving the community’s resilience to extreme heat and cold (ex. frozen pipes, heat stroke, infrastructure resilience) and the creation of new infrastructure that can better adapt to environmental change.
- There is a need for policy commitments that specifically address the development of bike paths and the need for a better bike path network that is connected throughout the city. Although a picture of a bike lane was included (28) there are no specific references to bicycle lanes in the proposed *OurWinnipeg* policies. Complete networks are required to adequately support active transportation, the incremental improvements that have been introduced so far are not an effective means of supporting sustainable change.
- Policy 2.9 should also include forms of active transportation, particularly cycling, as a component in conjunction with an improved public transit system to reduce reliance on the personal automobile.



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- The City needs to use its “direct influence” resulting from municipal sanitation and solid waste management responsibilities to adopt more sustainable water management approaches. We recommend more specific commitments in terms of sewage treatment and nutrient additions to Lake Winnipeg. There is a need for *OurWinnipeg* policies to address more than just “solid” waste by making commitments that address liquid waste, gaseous emissions and particulates, and microwastes (ex. microplastics). MbEN recommends a commitment to more frequent waste audits for the Brady landfill.
- MbEN recommends stronger policy commitments be made in terms of “waste minimization” [Policy 2.16]. We would also like to see a commitment to the development of a City-wide composting program and commitments to the reduction of single use plastics and bags. Our overall policy commitment in the area of waste management should be one that will facilitate movement towards Winnipeg becoming a zero waste society.
- MbEN supports the City’s commitments to supporting local and sustainable food production (ex. Policy 4.5) and recommends revising such commitments to more clearly identify how the City intends to support the production of and access to locally produced foods. MbEN would like to see specific commitments to increasing the use of community gardens, including commitments to improve the ability of community garden organizations to secure long term leases. MbEN would also like to see commitments in *OurWinnipeg* to address zoning issues and improve the ability of citizens to convert lawn space into productive garden space.
- Policies 2.19-2.21 and 2.22 should include the conservation and promotion of diverse natural pollinator populations as a critical component in enabling sustainable local agriculture.
- A successful *OurWinnipeg* requires a commitment to implementation and enforcement. For example, we would like to see commitments to the use of more enforcement mechanisms like financial penalties for non-compliance violators. The funds from such penalties could then be used to provide community organizations with funding for collaborative environmental projects.

Built Environment:

- MbEN feels strongly that in order for the City to truly take on a role of environmental leadership, there is a pressing need for better assessment of new developments and construction projects through the use of environmental impact assessment and life cycle assessments that considers impacts cradle to grave. MbEN would strongly recommend the inclusion of policy commitments to improve the City’s assessment approach.
- We would like to see more policies aimed at improving energy efficiency, including commitments to adopting the latest versions of national building and energy codes (NBC and NECB), using tools like MyHEAT, and changes to how external impacts are monitored and measured in existing and new developments.

- MbEN recommends the inclusion of more commitments in *OurWinnipeg* to creating a built environment that supports optimal health outcomes. There is a need to design and develop healthy and inclusive built and natural environments that facilitate access to basic needs, encourage active lifestyles, and strengthen social connections.

Conclusion:

MbEN strongly supports the City's vision of Winnipeg as "a thriving sustainable, and resilient city, grounded in a strong commitment for human rights, that is welcoming and contributes to an equitable, and high quality of life for all". We are confident the next iteration of the *OurWinnipeg* policy will achieve this goal. MbEN continues to see the potential of *OurWinnipeg* and we encourage you to incorporate the improvements suggested in our submissions in order to improve transparency, accountability, and strengthen environmental commitments.

There is a need for revision of the *OurWinnipeg* policy to include more appropriate terminology (ex. replace "environmental resilience" with "environmental sustainability"), stronger environmental protection and climate commitments, and specific discussion of enforcement mechanisms. There are many commitments in the *OurWinnipeg* policy that will support the work of community organizations, foster environmental leadership and emphasize the need for collaborative action and the development of meaningful partnerships. There will be a need for corresponding commitments to sustainable and accessible funding opportunities for the community organizations involved in such collaborative and leadership action.

This revision of *OurWinnipeg* is an opportunity for the City to take on a stronger environmental leadership role and create a more sustainable and collaborative governance process. It is an opportunity to set a real example for Manitobans and move beyond the minimum environmental and health standards set by the Government of Manitoba, one that should be embraced Winnipeg's municipal government.

MbEN appreciates this opportunity to contribute our input to the *OurWinnipeg* consultation process. We look forward to and welcome future opportunities to collaborate with the City of Winnipeg.

Sincerely,

Heather Fast, Policy Chair
Glen Koroluk, Executive Director