



MANITOBA ECO-NETWORK

3-303 Portage Ave., Winnipeg MB R3B 2B4
Tel: 204-947-6511 Fax: 1-866-237-3130 www.mbeconetwork.org

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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 is currently transitioning 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.

It should be noted that the timing of your request and the very tight timeframe for comments has restricted the feedback we were able to provide and is a reflection of the Policy Committee of our Board of Directors, as we did not have time to solicit feedback from our member groups. Our feedback has thus been limited to the comments provided below.

General Comments:

- We commend the City of Winnipeg for using the Sustainable Development Goals (SDGs) Framework to update the *OurWinnipeg* policy and implementation plan. 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.
- MbEN was pleased to see numerous commitments throughout the *OurWinnipeg* policy and implementation plan to strengthen community partnerships, empower community organizations, and increase opportunities for community-led action. We hope this important commitment will translate into more funding opportunities and access to resources for the community organizations involved in such partnerships and collaborative community projects.
- MbEN feels there is a need to reorganize the *OurWinnipeg* objectives and policies. The current organization of the document makes it difficult to identify the full scope of policy changes in certain important areas. It would be helpful if the policies were grouped by subject matter in separate categories such as: materials management, climate change, and water protection. It is further difficult to know what has been lost with the current policies, as contained in *A Sustainable Winnipeg Direction Strategy* and *Sustainable Waste and Water Directional Strategy*.
- The scale of policy statements also made it difficult for comparative purposes. The mixture of high-level policies in the same category as very specific policies with clear

targets and timelines makes it difficult to understand how certain policies are related and how such policies will fit together in the overall policy framework. MbEN also feels the high-level approach taken in some policies made it difficult to understand how such policies would work in practical application. MbEN suggests updating general policies to include more measurable goals and data collection commitments in order to improve the transparency and compatibility of the *OurWinnipeg* policies.

- We were pleased to see the list of key terminology in the Glossary. However, the lack of definition for many important terms such as “circular economy”, “climate equity” and “integrated planning and service delivery” made it difficult to understand the scope and potential impact of some policies without an indication of how the City defines such terms. MbEN would welcome the opportunity to provide additional comments on the completed list of terminology.

Leadership and Good Governance:

- MbEN commends the City’s commitment to taking on a stronger environmental leadership role. MbEN agrees the City should lead by example and help 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, the facilitation of community partnerships and commitments to collaborative climate action. To set a real example in *OurWinnipeg* and move beyond the standard set by the Provincial Government, the City should embrace this opportunity.
- Leadership and good governance involves acting in the intergenerational public interest, and we would like to see more policies that reflect this important characteristic. We suggest that one significant means of demonstrating environmental leadership and acting in the intergenerational public interest would be the recognition of environmental rights in *OurWinnipeg*. The city should be commended for recognizing the need for further consideration of human and group rights and should take the opportunity to join the growing number of Canadian municipalities, including the Manitoba communities of The Pas, Whitemouth, Dunnottar, Thompson, Stonewall, Shamattawa and Selkirk, that have demonstrated environmental leadership and recognized the “right to a healthy environment”.
- We are pleased to see commitments to the empowerment of community leaders and the utilization of community partnerships in implementation and delivery of services. In this regard, we feel there is a need for stronger policy commitments to more predictable and sustainable funding opportunities and access to resources that will better enable our civil service, the citizens of Winnipeg and other community organizations to undertake such collaborative action.
- In terms of the policies discussing decision-making processes, MbEN requires greater transparency in terms of what “evidence-based” decision-making is going to look like in practical application. We also felt there was too much emphasis on the “evidence-based” aspect of decision-making. MbEN feels that “transparency” and “accountability” are equally important elements of decision-making and should be equally emphasized. Proposed planning practices such as “gender based analysis” and “integrated life-cycle planning” require more detailed descriptions which would help improve the transparency of the *OurWinnipeg* policies.

- 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 “evidence-based sustainability indicators” 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). It may be that the City requires an independent auditor of Sustainable Development.

Environmental Resilience:

- The term “environmental resilience” for this section does not adequately capture the elements of SDGs 6, 7, 12, 13, 14, and 15 that this section is supposed 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 better reflect the range of policies that are included and ensure *OurWinnipeg* is focused on taking proactive measures that enable Winnipeg not just to be “resilient” to climate change, but instead to shift society towards a more sustainable future.
- While “environmental resilience” may not be the appropriate section title, we are supportive of policies aimed at improving environmental resilience to climate change and environmental disasters. 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. Vulnerability assessments for climate change should be standard practice and we note Canadian cities such as Ottawa, Montreal, Hamilton, Kingston, Vancouver and Halifax have declared climate emergencies.
- We were pleased to see numerous policies committed to climate change action and recommend commitments, such as those in Policies 21, 37 and 43 aimed at GHG reductions, be revised to meet Canada’s Paris Climate Summit Commitment. MbEN would also like to see more clarity in terms of how various policy commitments to mitigate climate change impacts, such as through “valuing, preserving and creating natural ecosystems within the built environment” will work in practical application. Suggested approaches include the incorporation of EGS into planning/zoning decisions and building environmental accounting into financial management practices.
- Although there are recognized linkages between air quality and GHG emissions, such as the fact that air pollution and greenhouse gases can be released from the same sources, MbEN recommends revision of Policy 26 to include stronger and more transparent commitments to improving air quality that go beyond the reduction of GHG emissions.
- MbEN recommends stronger policy commitments be made in terms of materials management (our preferred term to “waste management”). 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 materials management should be one that will facilitate movement towards Winnipeg becoming a zero waste society.

- We recommend more specific commitments in terms of sewage treatment and nutrient additions to Lake Winnipeg. There is also 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 also recommends a commitment to more frequent waste audits for the Brady landfill.
- MbEN was pleased to see commitments to the increased use and diversification of renewable energy production at the local scale and suggest the addition of transparent commitments to renewable energy, such as the promotion of renewable energy use (such as solar) by public institutions like colleges and universities. MbEN would also like to see the City commit to becoming a renewable energy developer and provider.
- MbEN would like to see more policies aimed at improving energy efficiency, including commitments to improving building codes, using tools like MyHEAT, and changes to how external impacts are monitored and measured in existing and new developments.
- 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 feel more commitments can be made towards the protection of water resources and recommends 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 58 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.
- MbEN was pleased to see commitments to sustainable and active transportation and recommends the addition of new commitments that specifically address the development of bike paths and the need for a better bike path network that is connected throughout the city. 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. MbEN also feels there is a need for more clarity in terms of how the City views “sustainable transportation” vs “active transportation”. In some policies the terms appear to be used interchangeably and MbEN strongly recommends revisions to more clearly address these two important but different approaches to improving the City’s transportation network.
- MbEN supports the City’s commitments to supporting local and sustainable food production 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.
- 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.

Economic Prosperity

- We were unable to extensively review this section but would like to emphasize the importance of commitments to support local food production and urban agriculture. As discussed previously, MbEN recommends the inclusion of stronger commitments in relation to community gardens and landscape development that supports food production.

Good Health and Well-Being

- We were unable to extensively review this section but would again like to emphasize the importance of the City stepping into an environmental leadership role and specifically recognizing environmental rights. 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 to maintaining a safe, clean, healthy and sustainable environment.
- 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.
- MbEN supports commitments in this section to locally sourced food production and distribution. As discussed above, this should include specific commitments in relation to community gardens and landscape development that supports food production.

Social Equity

- We were unable to extensively review this section but were pleased to see commitments to improving access to environmental justice, reconciliation and meaningful relationship building. More clarity in terms of how this will be accomplished would provide more transparency. MbEN also recommends the addition of specific commitments to increasing the funding opportunities and access to resources available for the Indigenous organizations and ENGOs involved in such processes.

City Building

- We were unable to extensively review this section but would like to commend the City's commitment to participate in regional development planning in order to contribute to the achievement of sustainability objectives that go beyond the City's geographic boundaries.
- MbEN would also again like to emphasize the need for commitments in *OurWinnipeg* to an expanded use of environmental assessment processes and updates to building codes that will better support sustainable change.

Overall, MbEN feels the *OurWinnipeg* policy and implementation plan represents a positive step forward. MbEN commends the City on its use of the SDGs as a basis for updating *OurWinnipeg*. MbEN was pleased to see many commitments that support the work of community organizations, foster environmental leadership and emphasize the need for collaborative action and the development of meaningful partnerships. MbEN emphasizes the need for inclusion of corresponding commitments to sustainable and accessible funding opportunities for the

community organizations involved in such collaborative and leadership action. MbEN has also recommended a range of other improvements, such as the substitution of more appropriate terminology (ex. find a better title for the section than “environmental resilience”), a need for more clarity and transparency about the proposed approaches, stronger climate commitments, and the need for specific discussion of enforcement mechanisms. This revision of the *OurWinnipeg* policy and implementation plan is an opportunity for the City to take on a stronger environmental leadership role and create a more sustainable and collaborative governance process. 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 and if given adequate time and resources, we would be willing to engage member organizations in the process.

Sincerely,

Glen Koroluk
Executive Director
Manitoba Eco-Network