

Written Submission to Cambridge City Council

From: Peter Hyman, Cambridge Resident

Date: September 23, 2025

Subject: Comments on the 2025–2029 Energy Conservation and Demand Management (ECDM) Plan and the PCP Program

Introduction

Thank you for the opportunity to submit this written report in advance of the September 23 Council meeting. I am a long-time Cambridge resident and taxpayer and have followed this file closely over the past year. I write today to express my concerns regarding the scale, cost, and implications of the updated ECDM Plan and Cambridge’s continued involvement in the federally promoted Partners for Climate Protection (PCP) program.

This submission expands on points I will raise during my five-minute public delegation and offers further context for Council’s consideration.

Overview of ECDM Requirements

The Energy Conservation and Demand Management Plan (ECDM) is required by the Ontario government under O. Reg. 25/23. Municipalities must publish a plan reporting on energy usage in city operations—including buildings, vehicles, and infrastructure—but there are no mandatory targets or penalties for non-compliance.

Local councils have full discretion to set targets as they see fit. Cambridge’s 2020 plan committed to an ambitious 80% GHG reduction by 2050. The current update appears to maintain this trajectory. However, the province does not require such goals, leaving municipalities free to take a more moderate or cost-conscious approach if they choose.

Voluntary Nature of PCP Participation

The Partners for Climate Protection (PCP) program is a non-binding initiative led by the Federation of Canadian Municipalities (FCM) in partnership with ICLEI Canada. While often presented as a framework for ECDM planning, participation is entirely voluntary.

- Municipalities can withdraw at any time without financial or legal penalty.

- There is no legislative requirement to participate in PCP to meet Ontario's ECDM regulations.
- PCP is aligned with broader global initiatives including the UN Sustainable Development Goals (UNSDGs) and the Paris Accord, which may or may not reflect the values and priorities of our local constituents.

In short, PCP participation is a policy choice, not a requirement.

Comparison of PCP Reporting vs. Ontario Energy Report

The PCP program’s reporting requirements under Milestone 5 are significantly more demanding than those of existing provincial frameworks like the Ontario Energy Report.

Aspect	PCP Milestone 1 and 5	Ontario Energy Report
Program Status	Voluntary – no legal obligation to join or remain	Mandatory – required by Ontario Regulation 25/23
Scope	All energy use and waste across sectors, including corporate communit-wide	Municipal buldings only
Reporting Frequency	Annual/Biannual	Every five years
Cost	\$10,000–50,000 annually	Minimal costs due to narrow scope
Administrative Burden	Reinforces adherence to net-zero goals across all sectors	Focused on practical energy efficiency in buildings
Data Destination	Sent to ICLEI and affiliated partners* (pending clarification)	Sent to Ontario government for provincial planning
Purpose	Supports adoption of global "green" standards and technology	Supports local infrastructure and power grid planning

PCP Reporting Adds Burden Without Advancing Provincial Compliance

In reviewing the relationship between the PCP program and Ontario’s mandated Energy Consumption and Demand Management (ECDM) report, it has become clear that while PCP reporting may appear to support some provincial objectives, it does so by introducing additional and unrelated reporting tasks. These requirements consume more staff time and do not directly contribute to fulfilling the regulatory obligations under Ontario Regulation 25/23.

This disconnect was one of the key factors cited by the City of Thorold, which voted decisively (7–1) in June 2024 to fully withdraw from the PCP program. Council members expressed concerns over:

- Unclear and escalating costs
- Unmeasured and intangible benefits
- A growing sense that internationally driven climate goals were displacing core local priorities

The Thorold decision reflects a pressing question facing municipalities across Ontario:

Are we allocating our limited local resources to serve residents, or to fulfill global benchmarks that were never locally debated or consented to?

Scientific and Policy Considerations

Recent peer-reviewed research raises important questions about the urgency behind global climate targets:

- A **March 2025 study** in *Science of Climate Change* found no compelling evidence of a present-day climate emergency.
- A **September 2024 study** published in *Science* reviewing 485 million years of climate data concluded that current temperatures are near historical lows.

This evolving scientific discourse suggests it is reasonable—especially at the municipal level—to re-evaluate the proportionality and effectiveness of large-scale emissions reduction spending.

Scale of Impact: Canada and Cambridge

Canada contributes approximately 1.5% of total global greenhouse gas (GHG) emissions. Within that, Cambridge’s share is statistically negligible—a fraction of a fraction.

Estimated Local Emissions (Based on Population)

Metric	Value
Cambridge Population (2021)	138,479 residents

Metric	Value
Estimated Annual GHG Emissions (Total)	2,077,185 tonnes CO₂e
Trees Needed to Absorb Equivalent Emissions	~27,003,405 mature trees annually
Share of All Trees in Canada	~0.00849%
Share of Canada's National Emissions (576M t)	~0.3606%
Share of Global Emissions (36B t)	~0.00577%

In contrast:

- China is responsible for 26% of global emissions and continues to expand its coal infrastructure.
- Several of the top emitting nations are not held to the same net-zero enforcement pressures being applied to Canadian municipalities.

While local climate action may be well-intentioned, the global impact of Cambridge's emissions reductions is statistically insignificant. This raises a key policy question:

Should Cambridge ratepayers carry the cost of aligning with global climate frameworks, when our measurable impact is so limited—and when major emitters remain unbound by the same standards?

Financial Transparency and Cost Concerns

The costs of commitment to an ambitious 80% GHG reduction by 2050 are likely considerable and have not been assessed:

- Estimated costs for 2025–2029: **\$10-15 million**
- Projected costs through 2050: **\$40–60 million**

The full financial impact of PCP participation remains unclear. In March 2025, I submitted a Freedom of Information (FOI) request to access detailed PCP-related expenditures. The response indicated that the information would require substantial staff time and incur high search and preparation fees, undermining principles of transparency and public oversight.

Competing Priorities for Cambridge

As a taxpayer and resident, I believe the City's focus should remain on:

- Road maintenance and transit
- Downtown revitalization
- Flooding and Grand River resiliency
- Housing affordability and economic development

Each of these issues represents a direct, visible need in our community. Global emissions accounting frameworks and long-range targets require substantial staff capacity, funding, and reporting, often for outcomes disconnected from daily life in Cambridge.

Recommendations

In light of these concerns, I respectfully offer the following recommendations for Council's consideration:

1. **Formally review Cambridge's continued participation in the PCP program**, with the option to **withdraw** by resolution.
 2. **Adjust the ECDM plan to reflect provincial minimum compliance**, rather than pursuing unmandated global benchmarks.
 3. **Request a detailed financial accounting** of all ECDM and PCP-related spending, including indirect costs such as staff time.
 4. Consider introducing a resolution similar to the City of Thorold's, recognizing that municipal autonomy must remain paramount.
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Conclusion

This submission is not a call to disregard environmental responsibility. It is a call for measured, transparent, and locally accountable policymaking. Cambridge's primary obligation is to its residents—not to global institutions.

I thank you for your time and consideration, and I encourage Council to take this opportunity to pause, reflect, and realign our policy commitments with the real needs of our community.