

**Environmental Registry of Ontario Submission on Behalf of The Clay Brick Association of Canada and Masonry Works Council of Ontario**

ERO Number: 019-5769

Re: Emissions Performance Standard (EPS) Program Regulatory Amendments for the 2023-2030 Period

The masonry industry in Ontario understands that it has a role to play in reducing the provinces' overall GHG emissions through the year 2030. Carbon pricing will undoubtedly work to reduce the GHG emissions emitted in Ontario across all sectors. The steady increase in the carbon tax ensures that status quo will be too expensive for Ontario businesses to maintain. Although the carbon tax is applied broadly for emitters across the province different sectors and industries will be affected differently by the proposed emissions standard. Small and medium size enterprises (SME), such as the clay brick manufactures in Ontario, may fall into a competitive disadvantage as larger corporations with significantly more resources reach emissions targets. Ontario's masonry industry recommends that the Sector-Wide Performance Standards and Stringency Factors consider the competitive disadvantages that SME's face while working to achieve the EPS.

The masonry industry in Ontario recommends:

- 1. Assistance in reporting for SME's:** the proposed changes to the EPS mean that that carbon accounting methods will be required to change. Establishing accurate methodology is critical in ensuring that emitters can take the proper steps to reduce emissions. For SME's developing and implementing a reporting structure may require extensive time and financial resources. We recommend that the Provincial Government expand assistance to SME's to assist in the development of reporting processes.
- 2. Assistance in GHG Reduction Research and Development for SME's:** As the price on carbon steadily increases through the year 2030 SME's across Canada will be required to make significant operational changes to remain competitive. As larger industries take advantage of globally integrated research and development resources alongside government assistance the risk of SME's being left behind increases. We recommend that the Provincial Government recognize the competitive disadvantage SME's will be placed at as the price on carbon increases and expand assistance for research, development and implementation of carbon reducing technology.

The masonry industry plays an important role within the Ontario economy. The vast majority of Canadian masonry producers, contractors and distributors operate and are headquartered within the province. Our members account for a \$3.7-billion-dollar economic impact in Ontario, while contributing 1.9-billion to the province's GDP. We are proud to contribute to the Ontario economy and in turn are a key driver for jobs throughout the province. In 2016, the masonry industry accounted 16,000-person years of employment. The masonry industry is a key player in the construction industry and offers a made in Ontario solution to addressing the challenges of a growing province.

Sincerely,

**Scott Jeffries**Chair  
Clay Brick Association of Canada**Andrew Payne**Executive Director  
Masonry Works Council of Ontario