

# WCO | WIND CONCERNS ONTARIO

August 15, 2014

**To: all Conservative Members of Parliament in Ontario**

**Subject: wind power and the 2015 federal election; important policy background information**

As you have probably observed in your own riding, opposition to large-scale wind power generation remains an important political force in rural Ontario. The Ontario Liberals discovered that in the recent election. Attempts to reclaim former Liberal seats in rural Ontario failed. Many new wind projects have been built, approved or proposed since the 2011 federal election—That means more areas of rural Ontario are concerned about this policy issue than in the last federal election. Given the pace of construction currently underway in many parts of Ontario, concern can only be expected to grow by the time of the 2015 federal election.

To this point, the federal government has been successful in positioning this as a provincial issue. Opponents to wind turbines looked to the Ontario PCs who were committed to addressing their concerns: they saw wind turbines as both a major barrier to restarting the Ontario economy and as a public health issue. Now, the Ontario PCs are not able to act on these concerns, and Ontario residents will continue to look for support from other levels of government, including members of the federal Conservative caucus, to provide solutions to the real problems caused by wind turbine projects in their communities

The Ontario PCs understood that opposition to large-scale wind power generation projects made both political and policy sense. It is important that the Conservative platform going forward reflect that understanding going into the 2015 election.

Here are two important facts.

- 1. Wind Power is not 'Green'**- Wind energy is not a reliable source of power. This is because wind blows largely during night hours and in the spring and fall – periods of low demand for electricity. In day time and summer peak demand days, the blades are frequently not turning because there is no wind. Because it is intermittent, installed wind power capacity needs to be backed up by another source of power that can be turned on whenever the wind is not blowing, and off when it is. In Ontario, this back-up capacity is provided by natural gas power plants—another source of greenhouse gases.

The Liberals' argument that wind power was a factor in shutting Ontario's coal plants is not supported by the facts. Coal plants have been able to close as refurbished nuclear plants returned to the power grid. As environmental groups come to understand the scope of damage that wind turbines are doing to migrating birds and other endangered species, support among the environmentalists for large-scale wind power is decreasing. In fact, some groups are realizing that opposition to wind turbines have become a boat anchor in their efforts to build support for efforts to combat global warming. Only in remote communities that would otherwise be dependent on diesel generators for power, do wind turbines actually reduce carbon emissions.

- 2. Wind Power Kills Jobs** - While the Ontario Liberals have promoted wind power as a means to create jobs, the truth is that any jobs created are highly-subsidized, short-term positions related to the construction phase of the wind towers. While ongoing employment is limited, the higher electricity rates that result from the subsidies paid for wind power continue to kill jobs and harm Canadian businesses' ability to compete as long as the turbine continues to exist. European countries have already learned this costly lesson and are rapidly backing off massive subsidies for wind power. The Ontario Liberal government seems to be committed to charging ahead with these wrong-headed programs even though the scenario of higher power rates, business failure and job losses experienced in Europe is now being repeated here. Given the importance of the economic performance of Ontario to the whole country, these misguided economic policies should be an important concern to the federal Conservative government.

There is limited time available before the next election to move to policy positions that are more aligned with basic Conservative policy positions, and which demonstrate a commitment to preventing further damage to Ontario's role in the Canadian economy, while addressing concerns of residents in key rural Ontario constituencies.

The following sections identify areas where policy changes from the federal Conservatives would be well received by voters in rural Ontario:

**Eliminate Accelerated Depreciation for Wind Turbine Equipment** – While there can be policy value in providing accelerated depreciation for equipment that actually reduces carbon emissions, the facts do not support the application of this special tax treatment to wind turbines which, at the most, operate at 29% or less of rated capacity. Republicans in the US Congress have been at the forefront in North America by ending these subsidies to the US wind industry over the objections of the White House---it is time for the federal Conservatives to take similar steps. Currently these tax measures are just generating additional profits for foreign companies or organizations with close ties to the provincial Liberals who are making profits on the backs of Canadian electricity

users. If tax dollars are going to be used to promote initiatives to address climate change, they should be directed at projects where the proponent claiming the tax credit can actually prove that it produced the desired results.

**Subsidies to Wind Projects**— The federal government also continues to provide subsidies to wind projects, without follow-up on the impact of these projects on the host communities. Many health issues have been documented among residents who lived near the Suncor-Acciona wind project near Ripley (Bruce County) which receives federal subsidies. We understand that problems were identified in a draft post-operational report on this project that was prepared in 2009 but never been finalized and released. Another report on a subsidized project near Harrow (Essex County), problems has been identified problems as well—in that case, unacceptable levels of deaths among migrating birds. No studies have been completed on the subsidized Enbridge project near Tiverton (also Bruce County) but again health problems have been well documented with this project and follow up is under way by the local Medical Officer of Health. Despite this evidence and extensive mediated dialogue at the community level, Enbridge refuses to address the concerns of the affected people. This is the same company that maintains they will be a responsible corporate citizen in the development of the Northern Gateway pipeline.

Problems with people living among these turbines are now well known which places the federal government in the position of providing support to activities that are doing harm to communities. Full post-operational reviews of the projects are long overdue and need to be completed and released. Federal subsidies should be ended for projects where there are serious problems that have not been addressed by the company receiving the subsidy.

**Air Safety** — After the Lac-Megantic rail disaster, the federal Transport regulators acted to strengthen rail safety rules to deal with a new type of oil shipment. We hope that it will not take an airplane to hit a Canadian wind turbine to get the federal government to act on the air safety issues that these structures are creating around many airports. Accidents that have happened in the United States should be sufficient to prompt some tough new standards that only seem logical given other restrictions on heights of buildings in flight paths. To this point, the input from NAV Canada into the Ontario Ministry of the Environment reviews of wind turbine projects have been sufficiently vague to allow approvals to be granted despite the obvious dangers. Only recently has steps been taken to remove wind turbines from around the Chatham-Kent airport. Many other airports and aerodromes are affected—some under the direct jurisdiction of the federal government and others that have other status. The federal government

has responsibility for regulating air safety and needs to move beyond the role of a passive observer when wind turbines are built next to airports. Area residents are deeply concerned about this issue and need to see that the federal government is fulfilling its general responsibilities to regulate all aviation safety.

**Weather Radar:** Turbine projects will interfere with the ability of the Exeter and Montreal River weather radar stations to provide accurate weather forecasts. The matters were raised with Environment Canada during the review of the projects but the responses from the Department confirmed that potential for problems but did not provide clear direction that would have forced the proponent to alter the projects to avoid interference with the radar stations. Now that the projects are under construction, solutions to the problems are being sought even though the problem is recognized world-wide. It would be more appropriate for the federal government to have established separation requirements between wind turbines and weather radar installations to existing protect capabilities to generate accurate weather forecasts rather than developing mitigation measures that may or may not work. The federal government is responsible for providing weather warnings to Canadians and the government should be protecting the infrastructure supporting this important service against developments that are known to cause problems.

**Health Canada Study**– It is possible that the results of the long awaited study of wind turbine noise and health effects by Health Canada, to be released this fall, will not provide conclusive evidence of health issues related to wind turbines. In that case, it will very likely become a political problem for Conservative MPs in rural Ontario. Enough people have been affected by health problems related to wind turbines (documented in a CBC documentary film *Wind Rush*, and a Sun Media news documentary *Down Wind*) that this conclusion will not be credible in rural Ontario. People have been waiting for these studies to respond to their concerns and if the study fails to point to some root causes for these health issues many of your constituents will be extremely disappointed. The Conservative government needs to be ready with decisive measures to demonstrate its concern about these issues, and to propose further action. Further study will not be seen as a credible response with the problems that people who are living among these wind turbines are experiencing.

**Set-Backs from Residences** – Preliminary results from the University of Waterloo health study demonstrate a connection between distance from homes to wind turbines and the existence of health issues, as a result of the environmental noise and vibration (infrasound) produced by wind turbines. This work points to one area where the federal government should act. As experience with wind turbines in densely populated areas

grows, other countries are enacting larger set-backs for wind turbines from homes, schools and places of work. A 2-km set-back is becoming a the new standard in jurisdictions concerned about health effects while 5-km set-backs are under discussion in other areas. In the province of Quebec, for example, local jurisdictions have been allowed to enact a 2-km set-back.

The Ontario regulations that have become the de facto national standard are not based on science and in fact were suggested to the government of the day by the wind power industry. There is no sign that the Ontario Liberal government will act to deal with these issues in the absence of federal regulation; and using the precautionary principle, larger set-backs could be implemented while research into the causes of wind turbine health continues. Establishing a set-back of 2 km as a national standard would address the concerns of most Ontario residents while allowing wind turbine development to continue in less populated parts of the county where larger set-backs are possible.

**Migrating Birds** – The federal government has responsibilities under international treaties to protect migrating birds, for example, and indeed the [Auditor-General](#) has noted that the government has not met key commitments in this area. As shown by the Wolfe Island turbine project, the installation of an almost continuous line of dense wind turbine along the shores of Lake Ontario, Lake Erie and Lake Huron promises to cause real damage to migrating bird populations. Included are many rare or endangered species that the government is committed to protecting. Another example is the tip of Prince Edward County in Ontario, where a wind power project is planned for an Important Bird Area in the middle of two Crown-owned properties---this location, called “Point to Point” has the been the subject of efforts by the community to create a protected area for decades. The time to act is now with the federal government purchasing the wind project site to consolidate the protected area.

A huge wind power project is also proposed for Amherst Island, another Important Bird Area. These areas meet the federal government guidelines as areas where wind power projects should not be located: the government needs to demonstrate its authority and responsibility on this issue. Guidelines that seasonally restrict operation of other wind turbines that affect migrating birds would be another area where action is warranted.

**Noise Modeling** – The modeling used by Ontario in evaluating wind turbine projects is flawed in that it measures average not actual noise levels, effectively ignoring the cyclical nature of the sound. The impact of low frequency noise/infrasound emitted by the projects is also not currently considered. The Ontario government has begun to acknowledge this but will not have a protocol in place until 2015. Individual citizens and municipal governments are being forced to pay out-of-pocket to engage experts in noise

measurement to highlight the flaws in these assessments. In other jurisdictions, post implementation studies are showing that the actual noise produced by wind turbines exceeds the theoretical models used by the Ontario government and the wind industry with operations at wind turbines being curtailed to comply with noise standards. National standards that mandate proper evaluation of true nature of wind turbine noise would be an important contribution to addressing this concern.

**Measures to Address Energy Poverty** – Some countries in Europe are introducing special tax measures to recoup excess profits being paid to wind companies at the expense of individual users of electricity. Similar measures could be introduced here to generate funds to provide support for many seniors living on fixed income who are being forced from their homes by rising energy costs that are rising far more rapidly than their CPP and other pension benefits. A program of this nature would force the wind industry to take responsibility for the damage that their push for profits has caused for individual Canadians.

## **Conclusion**

As shown through the examples provided above, there are opportunities for the federal Conservative government to reduce the highly negative impact of wind turbine projects on the Canadian economy. At present, the federal government is providing key support for activities that are not living up to the “Green” promises advanced by their promoters without any serious cost-benefit analysis. Essentially, the programs are just adding to the industry’s profits, while damaging the Canadian economy by limiting growth in the important province of Ontario.

The Conservative government is being criticized for focusing on issues that are not important to ordinary Canadians. Initiatives to address real concerns of your constituents, such as the impact of wind turbines, will be well received by residents throughout rural Ontario who are being ignored by the Ontario Liberal government.

We would like to discuss these options with you further and ask that you work through the federal Conservative caucus to promote these options on behalf of your constituents.

Thank you,

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*Wind Concerns Ontario is a province-wide advocacy organization whose mission is to protect the health, safety and quality of life of the people of Ontario from industrial wind turbines.*

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