



**Written Comments by the Climate Action Network of Canada on:**

***Incorporating Climate Change Considerations in Environmental Assessment: General Guidance for Practitioners (Draft 12.0).***

For:

Environmental Assessment Branch  
Nova Scotia Environment & Labour  
P.O. Box 697  
Halifax, NS B3J 2T8  
Phone: (902) 424-2574  
Fax: (902) 424-0503  
E-Mail: [ea@gov.ns.ca](mailto:ea@gov.ns.ca)

July 2003

## **About the Climate Action Network of Canada**

---

The Canadian Climate Action Network (CANet) is made up of more than 100 organizations across Canada (including the David Suzuki Foundation, Greenpeace, the Pembina Institute and the Sierra Club of Canada amongst others) working to protect the environment from harmful human interference of the atmosphere resulting in climate change.

The Climate Action Network believes that to effectively begin reducing greenhouse gas emissions, slow climate change, and make the transition to a 21<sup>st</sup> Century economy based on the efficient use of primarily renewable energy, Canada must meet its commitments under the Kyoto Protocol. This action is the minimum necessary to send a strong signal to Canadians that we are moving from rhetoric to action in addressing climate change.

More information about CANet is available at: <http://www.climateactionnetwork.ca> .

## **CANet and Consultations**

---

CANet is pleased to be invited to comment on this guide and welcomes future opportunities to work with government and related institutions as a consultant on climate related matters.

## CANet's Comments

---

CANet is pleased to see a movement towards the inclusion of greenhouse gas (GHG) emissions and climate change considerations in the process of environmental assessments in Nova Scotia. In creating the general guide for environmental assessment (EA) practitioners, the inter-governmental group has begun the vital process of creating a concrete and practical approach to the complex and far-reaching problem of global climate change.

**Good to See  
Action on  
this Front**

EA is one approach which can, if done in certain ways, help bring about more ecologically desirable results than might be achieved in its absence. Should EA's not be properly carried out, however, they risk under- or misinforming decisions. In this regard, the norms and standards of practice in any given jurisdiction are of paramount importance. As such, CANet has less to say about the details of issues and procedures contained in the guide as they seem mostly, though not entirely, sufficient. Instead, it is mostly concerned to see how the issues and procedures raised in the guide will be implemented in practice.

**Implement-  
ation Norms  
are Key**

It is good to see, for example, the notions of promoting 'best practices' and comparing project projections to industry profiles. However, will norms and standards be established for EA practitioners to look out globally for technologies, procedures or designs that greatly surpass the incremental improvements seen in collective industry profiles? Or will they simply look at what has historically been done in Nova Scotia? Some of these are well-known, others are more obscure. CANet members are typically well versed in available solutions and success stories and could be consulted. Perhaps the move to foster an international electronic EIA network will also help in this respect. Regardless, they are often not only advantageous to implement for ecological reasons but also for mid- or even short-term economic ones.

**Look Broadly  
for  
Economical  
Solutions  
(They Exist!)**

This last consideration leads to a questioning of the rationale behind screening out projects with 'low' emissions not only on ecological, but likely also on economic grounds. Low is a relative adjective, of course, but Figure 2.3 of the guide indicates that the authors of the guide use it to describe some projects in a way that CANet would not. One major amendment to the guide that we would therefore like to see would be the assessment of GHG considerations for more 'low' emissions projects as well. Another reason to lower the EA threshold for projects is, as the guide points out, the inevitable legislative increases in carbon constraint in the future. A 'low' emissions project that will exist for a long time might not presently be a liability but will likely be one over time, further increasing the importance of finding, or inventing, better practices now.

**High  
Standards  
Are Valuable**

Along these same lines, the guide’s expectations that EA’s should review “project plans in relation to jurisdictional climate change policies or objectives”, is a significant statement highlighting the need for a vision larger than that of the proposed project and an idea of how this picture might progress in the future. As mentioned in the guide, targets and guidelines are non-existent or sketchy at the moment in most jurisdictions, despite a clear ecologically desirable direction. Proposing a coordinated vision of future plans is of course outside of the mandate of EA’s to do directly. However, we hope that the guide sees the role of the EA to affect this indirectly when it stated that EA’s “may” alert public-interest decision makers to the “climate context in which the project is being proposed”. Given the importance of climate change, the word ‘may’ has to be changed to ‘must’ and practice norms established accordingly.

**The Big Picture**  
— EA’s MUST inform decision makers on climate considerations

Given the far-reaching nature climate change, and the need for more encompassing and whole-system solutions, one possibility might be for the inception of EA’s done on a collection of interrelated proposals. CANet proposes this as one possibility in helping resolve a lack of coordination and planning towards a low-carbon future.

**Multi-project EA’s?**

Action on reducing or avoiding GHG emissions is still blessed with time and a wealth of available solutions which are both ecologically and economically attractive. As such, it should still be the priority. Unfortunately, however, we are past the point of avoiding the effects of anthropogenic climate change altogether. Indeed, CANet believes that we are already witnessing them. The guide nicely points out the climate change impacts on projects can be cumulative, and that there is still a lesser degree of knowledge as to specific local impacts. Further incorporation of climate considerations into EA’s across Canada will hopefully be a further stimulus for the need for research in this area. Having noted this, the Nova Scotia Environment Act is based, in part, on the ‘Precautionary Principle’ (i.e. a lack of absolute scientific certainty is not a reason not to take action) and this must be the emphasis when it comes to the potential public effects of projects.

**Emphasize the Mounting Pain of Inaction**

It is an explicit element of CANet’s platform that there should be a curtailing of the growth of the fossil fuel industry in a fair and equitable manner by ending subsidies for further development, phasing out coal powered electricity generation, and preventing further exploration and development in frontier and offshore areas. CANet will be watching to see how the EA process incorporates GHG and climate impact considerations into the looming oil and gas development off the shore of Nova Scotia. These projects will test the influence of EA’s significantly and we feel strongly that a rigorous research and assessment in all proposed oil and gas projects is a minimum imperative.

**Oil & Gas Dev’t Will Significantly Test the Influence of EA’s in NS**

## Summary & Conclusions

---

### Climate Considerations in Nova Scotian Environmental Assessment

The Climate Action Network is pleased to see the advent of climate change considerations in environmental assessment in Nova Scotia as it promises to help in the effort to reduce emissions and climate impacts. CANet hopes that the standards and norms of EA practice are to be high and believes that maintaining such standards is not only ecologically but economically desirable. Solutions to minimize or avoid GHG emissions abound but are not always well-known and as such should always be broadly sought. Given the existence of economical solutions and the inevitable eventual increase in legislated carbon constraint, it is important for a greater range of projects to undergo assessments than proposed in the guide. It is also important that a norm be established for the mandatory informing of decision makers of climate considerations related to all proposals. EA practitioners would also be greatly aided by standards, targets, and increased knowledge on precise climate impacts. They would also be greatly aided by an established 'vision' in this respect. Given a lack of whole-system project coordination, CANet suggests that interrelated proposals be assessed collectively as emissions and impacts can often be better addressed at this level.

### EA's and Sustainable Development in Canada

While EA's are a potentially useful tool, they have limitations. Chief amongst them is their scope of action. Namely, EA's do not decide between projects 'A' or 'B'. They simply assess A and B individually in order to determine if they can be done differently (i.e. more sustainably) and can only recommend whether or not they should be done at all. Of course, political realities are such that recommendations to prevent projects are not a given. EA's are therefore a fundamentally reactive, not a proactive, tool in this respect and do not guarantee ecologically successful development. Thus, while a government using EA's to react to the many projects that come its way could reduce their impact, if it takes the EA process seriously and promotes rigorous standards of practice, it risks overlooking alternative, proactive plans and visions which can bring about environmental and economic "win-win's".

Having a concerted vision of alternative means to achieve desired goals is particularly important when it comes to reducing our GHG emission rates. The Climate Action Network has co-sponsored a major study showing how Canada can meet its Kyoto targets and progress to a 50% reduction in country-wide GHG emission rates by 2030 while

saving \$200 billion in the process and creating jobs through energy efficiency and demand-side management (see our website). Approaching climate change and economic development in this manner is qualitatively different than simply trying to minimize the emissions and impacts of the various proposals that hit government desks. It is perhaps not surprising in light of this, that while CANet is pleased to see climate considerations incorporated into EA's in Nova Scotia – and, in fact, would like to see the process duplicated elsewhere in the country – it sees EA's as necessary yet insufficient for sustainable development in Canada.