

Hon. Wally Schumann
Chair, Ministerial Committee on Energy and Climate Change
Wally_Schumann@gov.nt.ca

and

Hon. Robert C. McLeod
Minister, Environment and Natural Resources
robert_c_mcleod@gov.nt.ca

January 19, 2018

RE: Comments on “Climate Change Strategic Framework, Draft for Public Comment”

Dear Minister Schumann and Minister McLeod,

Thank-you for the opportunity to comment on the draft “Climate Change Strategic Framework.” As before, we address this response to both of you in your respective roles as Chair of the Cabinet Committee on Energy and Climate Change, and as Minister (ENR) for the lead department on climate change, because the draft strategy has implications for energy and climate change policy as a whole, and is not just limited to any one department or portfolio.

We have also reviewed the October 2017 report of the Auditor General to the NWT Legislative Assembly on “Climate Change in the Northwest Territories,” and attended the public meetings of the Auditor General reporting, and ENR and Department of Infrastructure (INF) leadership responding to this audit held earlier this week at the Legislative Assembly building.

Our comments:

1. Climate change and energy policy “silos” are creating confusion and chaos
 - There has been improved integration of the 2030 Energy Strategy with the Climate Change Strategic Framework, but not so with the Department of Finance’s Carbon Pricing discussion paper. Carbon pricing is not mentioned despite the potential to help meet the desperate, poorly acknowledged and unaddressed need for identifying the financial resources to implement this work.
 - The Framework will depend on an Action Plan, that itself will depend on being assigned the required resources through the legislative budgeting process. Clearly, this will in total be a 4-year plus delay from the end of the GHG Strategy in 2015 when this process began. With the

urgent requirement for action (which you acknowledge), such delay is costly for people and communities, our ecosystems and our economy.

- The recent Auditor General of Canada's Climate Change Program Audit concluded that the GNWT "did not address long standing, identified deficiencies that affected its ability to lead on climate change," including authority for the lead department to fulfill its mandate, and resources required to do so.
- At a 17 January 2018 public meeting on the Audit with ENR and INF leadership presenting and responding to questions from the Standing Committee on Government Operations, despite apparent agreement on the AG's conclusions, there was zero commitment or indication of how these sources of failure with previous climate change strategies will be resolved.
- To be absolutely clear, you cannot expect success without resolving the fundamental reason the Auditor General has identified for past, repeated failures on climate change mitigation and adaptation in the NWT. The consequences of ongoing failure ramp up dramatically each year. Similarly, legislation and regulations that are undergoing development or amendment, such as the Mineral Resources, Water, Forestry Management, Environmental Protection, Environmental Rights and Protected Areas law, should be developed to be consistent with and support the Climate Change Framework.
- Considering the impact of this Framework across GNWT decision-making would also be compatible with the ideals of the Land Use Sustainability Framework.

2. The Framework falls far short on addressing a number of specific considerations, that we must presume will be addressed in the action plan yet to be developed.

- For example, we need to show leadership in areas like atmospheric decarbonization actions such as adoption of holistic agricultural practices proven to increase soil carbon as we develop this new economic diversification and approach to food security in the NWT.
- We recommend incorporation of climate change considerations into all stages of the environmental assessment process, including support for structures such as the Mackenzie Valley Land and Water Board, and that a clause be put into the approval conditions of all development activities to authorize GNWT to modify development conditions as climate change unfolds and we learn more about the impacts and opportunities for adaptation.
- Wildlife species management plans should include a precautionary approach particularly in assigning harvest levels, with the potential for quick responsive change in relation to impacts of climate change.

3. Effective action should be front-end loaded, rather than back-end loaded as indicated in the Framework.

- The Framework seems to explicitly acknowledge the urgency of required action, yet comprehensive actions are planned for delayed implementation to the later stage of the term of applicability.
- This approach should be reversed, to ensure early, effective actions that address the need for the biggest and easiest reductions to be achieved now, rather than later.
- In our previous submission to the earlier draft, we made recommendations on how the Auditor General's recommendation on authority could be addressed. Given the lack of a response in the new draft, we offer an alternative suggestion for your consideration:
- Mitigation and adaptation, two necessary consequences of climate change, are not the same thing. Recognizing that the energy and infrastructure expertise resides now within INF, and that FIN has expertise in critical fiscal policy, assign the mandate AND AUTHORITY for government-wide climate change mitigation policy to those two departments. In acknowledgement of the diversity of responses required for climate change adaptation in areas such as health, culture, municipal governance, environment and so on, assign ENR the coordination lead on climate adaptation, while requiring every department to develop and implement their own customized adaptation policy. This could be achieved through adoption of an Executive Council policy providing this authority and direction. At the same time, continue to rely on ENR for climate change science expertise with increased resources to do so.

4. The energy targets are weak

- Canada's over-all goal of 30% reductions in emissions over 2005 levels (Pan Canadian Framework) have been shown to be inadequate to meet the goals of the Paris climate accord. A science-based approach requires a 50% reduction each decade from each region around the world. Matching the Pan Canadian framework is a slight improvement over the previous strategies, but is still inadequate to meet the Paris accord. Adopting a goal which does not meet Canada's commitment does not seem either a reasonable or an honourable approach for our government to take.

5. The framework ignores the carbon price as a source of funding

- As mentioned above, the framework still does not mention the price on carbon that will be in place starting in 2018. We have suggested in previous submissions that 90% of this carbon revenue be directed towards investments in the transition to renewable energy. By year five

of the program, the carbon price could be generating close to \$50 million per year for investment in renewable energy, but the energy strategy does not mention how the GNWT plans to distribute this funding.

6. Natural Gas is not an option as a pathway to renewable energy

- In our previous submission we suggested the GNWT should do further study on the intention to shift to natural gas. Subsequently, conclusive research has confirmed the danger of this approach (associated fugitive emissions equivalent to that of coal), and that shifting to natural gas in the pathway to renewable energy is not a valid strategic consideration. We refer you to <http://theenergymix.com/2018/01/17/nasa-points-to-natural-gas-industry-as-clear-culprit-in-methane-spike/> to begin accessing this research.
- On the other hand, renewably-sourced natural gas, (biogas) has significant potential as a renewable fuel that can be stored through our long winters. Biogas is the most technically feasible way to address renewable transportation in the remote North where the full electrification pathway is not yet viable due to the enormously high cost of seasonal battery storage. The GNWT should do a study to determine the climate impact of methane leaks in the supply chain and identify potential sources and secure handling of renewable sourced biogas.

7. Need to ensure climate change response takes precedence in all GNWT policies and decision making.

- The Framework indicates that it is intended to be consistent with, and supportive of, the objectives and actions in other relevant strategies and plans, including many plans and strategies that it is obviously and dramatically inconsistent with. This internal inconsistency undermines the credibility of the Framework. Remove this, or ideally put in appropriate acknowledgement that these other strategies must be amended to align with the Climate Change Framework if they are GNWT plans.
- To be consistent with the Paris Agreement, the GNWT reduction targets would have to be modified as suggested above (point 2).

Minister Schuman, in your role as Chair of the ministerial committee, and Minister McLeod, as Minister of the lead department, from our perspective (and that of the Auditor General of Canada), you must work with Cabinet to promptly deal with two priorities:

1. Either through legislation (a Climate Change Act) or Executive Council policy, resolve the identified lack of departmental authority for fulfilling GNWT's mandate on climate change adaptation and mitigation; and

2. Immediately develop a responsible financial plan to ensure implementation of the Framework and achievement of the goals. This would include our earlier recommendation to create an advisory committee or committees made up of representatives from all energy sectors to support the GNWT as it allocates the revenue from the Pan Canadian Framework and Carbon Tax.

The people and communities of the NWT are anxious to get started on effective actions on climate mitigation and adaptation, and your timely leadership is essential. There is a sense that because of its systemic nature, this can be transformative work that will yield benefits on many fronts, from improved health to competitive advantages in our economic diversification and development. We look forward to working with you and all people of the NWT to realize opportunities and minimize costs through early and effective action.

Respectfully,

A handwritten signature in blue ink, appearing to read "R. Samley". The signature is fluid and cursive, with a large loop at the end.

For Alternatives North

cc: All Members of the Legislative Assembly

alfred_moses@gov.nt.ca

bob_mcleod@gov.nt.ca

Caroline_Cochrane@gov.nt.ca

Cory_Vanthuyne@gov.nt.ca

Daniel_McNeely@gov.nt.ca

frederick_blake@gov.nt.ca

glen_abernethy@gov.nt.ca

Herbert_Nakimayak@gov.nt.ca

jackson_lafferty@gov.nt.ca

Julie_Green@gov.nt.ca

Kevin_O'Reilly@gov.nt.ca

Kieron_Testart@gov.nt.ca

louis_sebert@gov.nt.ca

michael_nadli@gov.nt.ca

robert_c_mcleod@gov.nt.ca

RJ_Simpson@gov.nt.ca

Shane_Thompson@gov.nt.ca

tom_beaulieu@gov.nt.ca

Wally_Schumann@gov.nt.ca

Paul Guy, Chair, Deputy Minister's Coordinating Committee on Energy & Climate Change
Paul_Guy@gov.nt.ca

Rob Marshall, Manager, Climate Change Programs, ENR Rob_Marshall@gov.nt.ca

John Vandenberg, Assistant Deputy Minister, INF John_Vandenberg@gov.nt.ca

Andrew Stewart, Director, Energy, INF Andrew_Stewart@gov.nt.ca

Robert Sexton, Energy Policy & Planning, INF Robert_Sexton@gov.nt.ca

Kelley Bluck, Director, Fiscal Policy, FIN Kelly_Bluck@gov.nt.ca

carbon_pricing@gov.nt.ca