

Alternatives North Comments on “2030 NWT Climate Change Strategic Framework - 2019-2023 Draft Action Plan”

General

As the GNWT acknowledges, the action plan outlines a list of things GNWT is doing right now. It presents no evidence that GNWT understands the striking context so directly presented in the latest IPCC report. We have but a decade to roll back our emissions dramatically. Focused and immediate action is required. The consequences of not doing so are both clear, and dire, and have to do with our ability to continue as something close to a normally functioning society.¹

Existing financial resources and authorities, particularly within the lead Departments of Environment and Natural Resources (ENR) and Infrastructure (INF), guarantee ongoing failure of GNWT to address climate change in the NWT. Minimal new funding was secured for any part of the Action Plan; in fact, anything requiring additional funding is pushed off to the future.

This ‘plan’ appears to only address impacts and adaptation, ignoring mitigation and leaving it to the weak Energy Strategy that has already been adopted (done well in advance of this Action Plan with new funding attached). This is misguided. Mitigation needs to be a front and centre element in any real action plan. We understand that INF is the lead on mitigation but the absence of mitigation in the Climate Change action plan just underscores the lack of coordination and confused authorities that are ongoing.

The Introduction

Already handicapped, the ‘plan’ attempts to achieve the weak vision of a 2030 economy that uses less fossil fuels than 2005(!), and that we be ready to start increasing resilience and adaptation by 2023. We see here another government asleep at the wheel, at the cost of the wellbeing of its citizens.

Describing actions already under way is hardly a “plan.” Not only that, it postpones any real planning to seven years from now.

The priority - future collaboration with partners, is almost meaningless, and is a clear reflection of the “*institutionalization of helplessness*” apparent throughout the ‘plan.’

Related to the above, and as repeated throughout the ‘plan,’ yes, we are a poor, small population living in a big jurisdiction and its cold here. The approach resulting from this view, and indeed the entire ‘plan,’ ignores and refuses to draw upon the incredible opportunities we have, should we choose to act as leaders - amazing financial resources that could be (should be) redirected towards priority climate change programs. We have (probably by far) the greatest per capita government funding of any jurisdiction in the world; we have

¹ A chapter in a recent U.S. report relating to Alaska is relevant. See: https://nca2014.globalchange.gov/report/regions/alaska?fbclid=IwAR1C8inOL_dpo86uxNN25VWZym-nBeXAmRR52FSHZ2iLpaT6bVzPVfnAtCo

legislative and regulatory authority; the power to tax and to demand royalties and fees; and to set and require standards to be met.

Yes, we have the opportunity to exemplify climate leadership, but under this 'plan' it is not going to happen. No new policies, legislation or organizational or structural changes are identified and much of the 'action' proposed is to study or research options, rather than doing anything concrete.

Goal 1 Transition to a low carbon economy

Ties to the 2030 Energy Action Plan (EAP) - the EAP objective includes developing conventional energy, which these days is likely to be unconventional fossil fuels. This is not going to get us where we need to be, is a waste of resources, and reflects the failing Canadian approach. Indeed, were fossils ever to become economic, it would undermine any modest success available from this 'plan'.

Connecting NWT grids to the North American grid has been looked at and rejected at least twice, at a cost of tens of millions of dollars. This idea is wrong from all sides - energy, climate and economics. It wastes limited resources needed for real priorities, and reflects misguided leadership. We would do much better to focus on our actual possibilities and not ill-thought out strategies. While the rest of the world and technology is taking us in the direction of increased energy self-sufficiency at the household and community level, tying the NWT to big grids is definitely a step backwards.

Electricity is NOT our biggest emissions source - transport and heating are much larger users of energy and emitters of GHGs and should be the focus of our efforts.

Objective 6 - replacing diesel with natural gas is so wrong. We implore the GNWT to abandon this approach. Repeated studies reveal clearly that emissions (fugitive and otherwise) from natural gas, mostly and ever more-so fracked, cause natural gas emissions to be as bad and sometimes worse than coal. Industry has vastly understated emissions from natural gas development and references revealing these climate-busting levels are numerous and easily accessible. Why do we need to say this repeatedly? Follow the clarion call presented in the most straight forward manner by the globe's top scientists, including Canadian representation on the Intergovernmental Panel and **move directly to replace fossil fuels with renewable energy.**

GNWT's chosen approach for the carbon tax with the major exemptions and escapes it provides, effectively undermine significant gains that might have been achieved under this paltry level of carbon fees.

Back to the 'plan' Goal 1

Targets and objectives such as "collaborate" and "include climate change consideration in discussions" and "improve" this, "refine" that, and "initiate" something else seem incredibly bureaucratic and measureless - and are ultimately pointless without hard measurability, clear authority to make them happen, and consequences if they don't.

Goal 2 - Improve Knowledge of Climate Change and Impacts

Those provided are all valuable sources of information, and we would hope there is already considerable information available on most of them. Having said that, we already know so much that provides a firm basis for immediate actions.

Due to the vulnerabilities and uncertainties deriving from climate change, renewable resource use should be regulated conservatively to ensure the environment and wild populations have room and capacity to adapt, and to ensure agencies have time to measure and adjust management (unlike the disastrous example provided in the caribou situation). This needs to be a firm principle that is explicitly stated, acknowledged and implemented immediately.

Goal 3 - Ensuring the Sustainability of Ecosystems

Given the rate and degree of climate change (i.e. a train coming down the tracks), this is a formidable goal and we doubt it is within GNWT's capability (or anyone's) to do. However, we could try to support ecosystem viability and resilience in the face of major change and the likely adjustments in ecosystem structure and functioning that will occur.

Managing the Natural Environment - again, daunting. This is an odd break out of these two - sustaining ecosystems and managing the natural environment. This section clearly fails to respond to the climate change audit conducted by the Office of the Auditor General (OAG), and more specifically with regard to understanding the impacts on wildlife and developing plans to mitigate the damage that will occur.

We can manage human demands on the natural environment conservatively in order to support the natural environment's capacity to adjust to massive changes that are and will happen.

Recognize the limitations in both traditional knowledge and western science given the unprecedented change we are facing.

Rather than changing our actions retroactively, anticipate needs for management action by acknowledging vulnerabilities and uncertainties in populations and environment, and act to support capacity for handling the change that natural systems will have to go through due to climate change.

Protect (Support) People (and Communities)

Rather than protect people, *support people and communities* to anticipate and make the changes that will be required, whatever they might be. Bring a community focus to this, as given the vast differences across our jurisdiction, challenges will vary widely. This is about resilience, of course - supporting community leadership, building community capacity, providing knowledge and options, and enhancing capacity to change.

Designing, buildinginfrastructure

It is unbelievable that the requirement for zero/low emissions infrastructure is not clearly identified here.

Actions - Sustaining Ecosystems

Protected Areas are good, but alone, hardly serve the objective. Where are we at with achieving connectedness and representation?

Actions need to be focused more on supporting ecosystem resilience for change, given that change will be unavoidable from global warming.

Actions - Managing Natural Environment

Managing the impact of climate change on the natural environment will be an impossible task. Again, focus on supporting the natural environment as it struggles to find a new equilibrium under the impacts of global warming.

Actions - Protecting People (Supporting People and Communities)

Some good actions here, but the biggest need, supporting community capacity and action (building community resilience), seems ignored. The need to support community leadership may be intended, but is not evident.

Actions - Designing, Building,Infrastructure

Despite several aborted attempts, there is still no NWT building standards / energy efficiency legislation, unlike every other jurisdiction in Canada and despite calls for such legislation by NWT Association of Communities.

The proposed GNWT actions are counter-productive and thus perverse. All will, of course, increase emissions, and involve high development and maintenance costs, combined with the negative costs of failure to redirect these significant resources towards dealing with climate change and facilitating a truly clean economy. This shows no capacity on the part of the GNWT to change in the face of the biggest force for change we have ever experienced!

Page 27 - Cross-cutting Leadership and Communications

Actions - Leadership

The proposed structure is preposterous in the face of resources available under current policies. The plan should not focus on costly bureaucracy. Instead, assign a coordinating lead (person or group or agency) and give them the government-wide authority to do the job. This would be best done through legislation or at a minimum, a Cabinet-approved policy. There is nothing in this section that reflects the seriousness of the OAG climate change audit that highlighted the need for new accountability and authority for climate change leadership.

Resiliency needs to happen at the community level to be most effective. Identify this and how you will support its development and realization.

Actions - Communications

Develop how you will support resiliency through communications of useful and timely knowledge and skills in appropriate formats to support community action / engagement / capacity to change.

Actions - Capacity Building

These are good actions, but as above, there is a need to change approach to include supporting and enabling community leadership and direction on what priorities should be.

Cross-cutting - Economic Impacts and Opportunities

This is something that can't be done well without completing knowledge improvement and recognizing uncertainties and the unpredictability of the economic situation in the face of

global warming. So again, support resiliency (knowledge, options, capacity, ability to change) and the need to move aggressively towards being carbon free in all that we do.

PART 2 - Areas for Future Collaboration

Yes, once again we are a small, poor, low population and vast jurisdiction, however we do have the power to legislate, regulate, subsidize, penalize, enable, require, and set standards. We need to put this capacity to good use against climate change.

Goal 1 - Transition to a low carbon economy

The plan misses the mark here. There are many strategies we could implement. What about renewable energy development for economic reasons, capacity building and local employment. Many actions would be possible: emissions-free infrastructure; building and operations standards; electric vehicle charging stations, vehicle subsidies; etc., etc. The list goes on. For example: Renewable Energy Portfolio requirements for industrial development or offsets somewhere else in the NWT where new emissions from development require them?

Goal 2 - Improve Knowledge....

Improving knowledge is important but we should not hold off on obviously required actions in the meantime.

Goal 3 - Build Resilience and Adapt...

This section also needs a community approach.

The GNWT should drop the Slave Geologic Province road studies - this is not a realistic adaptation activity. It is simply doing the same old that got us here in the first place. Rather, implement Renewable Energy standards for new and existing industry projects, including transportation.

Cross-cutting Leadership and Communications

Again, this section needs a community focus.

Cross-cutting Economic Impacts and Opportunities

Wherever industry is listed in the document as a potential partner, include NGOs / civil society in order to avoid institutional capture, a proven tendency in mineral economies, with unfortunate consequences.

Why not include all non-timber forest products?

Why not include all forms of renewable energy, including ground-source heat where feasible?

Section 2 -

Lots of good stuff here, the real meat of actions needed. An aggressive timeline to bring these actions to completion is needed, rather than leaving them to some unspecified time in the future. This section starts to look more like a real Action Plan but no new funds are allocated and most of the work consists of studies and research.

PART 3 Implementation

This section requires a more aggressive timeline and cannot wait for an unspecified future period. And yes, this is so despite our being a wee, poor, small population and vast jurisdiction that is cold.

Indicators

Goal 1

Typo? Not “diesel” electricity, just electricity.

Where is measurement of legislation achievements, regulatory achievements, provision and results of standards implemented, all the tools government now has under its authority?

Goal 2

Most of the indicators are equivocal, and thus are not helpful. 100 projects sounds great, when in fact, if many ended up as failed projects, it could be a disastrous use of resources.

Cross-cutting Leadership and Communications

Needs a community focus in the indicators.

Public Reporting

This section is very weak. It is not clear if this annual reporting will tie together carbon pricing, the energy strategy and GHG reductions. The lead role in such reporting should come from ENR and it must have the authority to do so under new legislation and/or a Cabinet-approved policy. ENR is the logical choice given that it is supposed to be managing climate change data and information.

Looking Forward

We need to have mitigation front and centre as a part of every action, including adaptation. And yes, again, we are a poor, low-population, vast and cold jurisdiction but we can still innovate and build on what we know and the successes of other small jurisdictions.

The cost of not taking action also needs to be discussed and highlighted.