October 31, 2021

RE: Comments Bill 57, Environmental Goals and Climate Change Reduction Act

Via email: legc.office@novascotia.ca

Dear Minister Halman and Members of the Legislative Assembly:

Please accept these comments regarding the October 27, 2021, First Reading of Bill 57.

I sincerely appreciate your government's work in bringing Bill 57 forward. It holds the promise of strengthening the ability of Nova Scotians to work with all levels of government to create the ambitious goals we require to meet the challenges of this time.

My comments (underlined) relate to the following:

4 (b) the achievement of sustainable prosperity is a shared responsibility among all levels of government, the private sector and all Nova Scotians.

I feel it is important to specifically name community organizations in addition to all levels of government and the private sector. Community organizations are an important part of the charitable and service sectors of our economy and bring to the forefront volunteer contributions toward the achievement of goals.

7 (f) to require any new build or major retrofit in government buildings, including schools and hospitals, that enters the planning stage after 2022, to be net-zero energy performance and climate-resilient;

As with other dates mentioned in Bill 57, the date needs to be further specified. After 2022 could be read as starting January 1, 2023, or April 1, 2023.

In this clause, if there are buildings currently in the planning stage, every opportunity needs to be taken to convert plans to Net Zero when possible and as plans move forward.

I read this as a requirement for only provincial government buildings, schools and hospitals. This goal would be improved if the requirement was extended to all municipal buildings. It is my understanding that the Province can set standards at the municipal level. When I served as a councillor for an eight-year term (2012-2020) with the Municipality of the County of Kings, a decision could have been made to build a Net Zero municipal building. Despite the availability of federal grants to support, council hesitated to take that plunge. While an energy-efficient design was selected, it appears to me that council failed future generations in as much as the highest standard was not supported and the opportunity to lead by example was missed.

10 (a) to conserve at least 20% of the total land and water mass of the Province by 2030 as protected areas and other effective area-based conservation measures, including Indigenous Protected and Conserved Areas, in a manner consistent with national reporting criteria;

While conserving at least 20% of the total land and water mass by 2030 is an improvement on the prior government's goal, more is possible and needed. With 2030, less than 10-years away, I would suggest setting a more ambitious goal on a stratified schedule. For example, 20% by 2030, 25% by 2040, 30% by 2050.

Two examples of immediate opportunities to conserve more of the total land and water mass than currently planned are:

- Expanding the recommended boundaries for the Ingram River Wilderness Area. The forests in this area have two stands shown to contain trees that are over 400 years old. However, the boundaries currently proposed do not include one of these stands (the one close to Panuke Lake). I understand the local community is very much in support of an expansion of the boundaries to include both of these stands. The entire 15,800-hectare area should be legally protected.
- Ensuring the 267.62-hectare area that MLA lain Rankin, while Minister of Lands and Forestry, offered for sale to a private developer, and known to Nova Scotians as Owls Head Provincial Park, is rescued.

10 (c) to implement by 2023 an ecological forestry approach for Crown lands, consistent with the recommendations in "An Independent Review of Forest Practices in Nova Scotia" prepared by William Lahey in 2018, through the triad model of forest management that prioritizes the sustainability of ecosystems and biodiversity in the Province; and

10 (d) to identify by 2023 the percentage allocation of Crown land dedicated to each pillar of the triad model of forest management referred to in clause (c).

Much ecological damage and loss of biodiversity will occur between the passing of Bill 57 and the date targeted (2023) for implementation of Lahey's 2018 recommendations, Therefore, I urge the government to include in the Act a halting of any clearcutting until the triad model of forest management is finally enforced. The economic downfalls of halting clearcutting pale in comparison to the losses that will occur during the next two fiscal years if clearcutting continues. As I write, logging has begun on over 258-hectares at Rocky Point Lake, Digby County. This is crucial habitat for the endangered Mainland moose. This clearcutting is destroying some of the last wildlife connectivity between the Tobeatic and Silver River Wilderness Areas.

At the very least, the date for implementation of Lahey's recommendations in Bill 57 needs to be advanced to 2022.

14 (b) to develop a Provincial food strategy for enhanced awareness of, improved access to and increased production of local food to achieve 20% consumption of local food by 2030.

Inclusion of school food programs and school gardens needs to be specifically mentioned in this section regarding a Provincial food strategy. This will provide the leaders of tomorrow (today's generation of school-aged children) with hands-on experience and knowledge regarding local food production and consumption and the importance of building food security into everyday practices.

17 The Government's goal with respect to diversity, equity and inclusion is to initiate in 2022 ongoing work with racialized and marginalized communities to create a sustained funding opportunity for climate change action and support for community-based solutions and policy engagement.

I strongly support the inclusion of this clause. However, I do feel that more needs to be done right now to acknowledge, through immediate action and support, those calls of the Assembly for immediate protection of areas in need of conservation. For example, a year ago, the Assembly demanded that any operations at Fourth Lake be halted until a full mainland moose assessment is done. This is one opportunity of many which I urge the new government of Nova Scotia not miss.

Please do not hesitate to be in touch if you wish to discuss the above in more detail.

Sincerely,

Pauline Raven

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CC John Lohr, MLA Kings North, Minister of Municipal Affairs and Housing