



**Ecology Action Centre Presentation on Bill No. 57
Environmental Goals and Climate Change Reduction Act
November 1, 2021
Marla MacLeod & Noreen Mabiza**

We acknowledge that we are gathered here today on the unceded and unsundered territory of the Mi'kmaq people, past, present and future caretakers of this land.

I am Noreen Mabiza, Energy Coordinator at the Ecology Action Centre. I am going to speak more broadly to the bill and accountability measures and then my colleague, Marla MacLeod, Director of Programs, will speak more specifically to some of our proposed amendments.

We, the Ecology Action Centre, applaud the Environmental Goals and Climate Change Reduction Act. We are pleased to see this set of wide-ranging targets in legislation. In particular, we are happy to see a commitment to phasing out coal by 2030, the inclusion of an electric vehicle mandate, a commitment to protecting 20 per cent of the province's land and water by 2030, and a focus on equity as a core principle.

Now we need accountability, follow-through and immediate action to address the climate and biodiversity emergencies. Significant financial and human resources will need to be associated with this Act to ensure its rapid and successful implementation. We recognize that many key details will be forthcoming in the Climate Plan. It needs to be released swiftly and contain adequate ambition to ensure targets are met and exceeded.

Section 21: Ensuring strong accountability and transparency mechanisms in the Act are critical to achieving the goals and building the public's trust. We would like to see the following amendment to improve accountability: S (21) (2) that in preparing the report the Minister **MUST** seek advice from the roundtable. We also recommend that the Roundtable be given authority and resources to provide recommendations to the Minister in preparation for the report, and these recommendations will be publicly available. The Roundtable, or those conducting the external review, should be provided with resources, data, and expertise needed to provide a proper assessment of progress on the Act.

In addition to the legislated 2030 and 2050 goals, interim targets must be set (i.e., 2025, 2035, 2040, 2045). The years leading up to 2030 are where we need to see the steepest reductions in emissions. If we do not meet the targets leading up to 2030, we will not be able to mitigate 1.5 degrees of warming. The importance therefore of meeting the 2030 target cannot be





overstated, and we must ensure that robust interim targets and accountability measures are in place to ensure that we are on a pathway for emission reduction.

We are also pleased to see the inclusion of annual progress reports for the Climate plan in Section 8, as these are essential to transparency, accountability and achievement of the targets. Comprehensive progress reports would include: assessments and recommendations, not simply reporting; relevant data; clear articulation of the trajectory toward meeting the targets; explanations of why targets aren't being met (if that's the case) and plans to address any shortcomings.

We also see some key areas that are weak or missing. We need to ensure we're not undermining our own progress by continuing with outdated industries, fossil fuel extraction and relying on unproven carbon capture technologies. Missteps here will continue to increase our emissions and threaten our ecosystems.

In particular, the EAC would like to see the government commit to end all subsidies, supports and development of fossil fuels in Nova Scotia and Nova Scotia's offshore and invest in policies and programs to support oil and gas workers and affected communities transition to a low-carbon economy so as to ensure no one is left behind. We recommend the inclusion of a goal to prohibit all new offshore oil and gas activity as of January 1, 2022, and to phase out all offshore oil and gas activity by January 1, 2025.

We also request the government remove biomass from the Renewable Electricity Regulations, stop counting the burning of biomass as "carbon neutral" or zero carbon emitting (it's not), and ban the use of forest biomass for domestic and foreign export energy generation.

In our written submission, you will find our detailed analysis of the goals in the Act, as well as a list of key issues that are not addressed in this Act, which should be considered for inclusion. While we will not go into this document in detail, we would like to call your attention to the following:

Section 6: We applaud a 53% target, which is the most ambitious climate target in Canada; however, we acknowledge that a target of 58% below 2005 levels would be needed to be in line with our fair share of emissions reductions to keep warming below 1.5 degrees. We recommend increasing the target to 58%. Additionally, we are very concerned about the inclusion, in the 2050 target of the phrase "by balancing greenhouse gas emission with greenhouse gas removals and other offsetting measures". First, greenhouse gas removal technologies are unproven and expensive at scale. They should only be employed once proven and as a last mile mitigation option. Second, offsetting puts the burden of GHG



reductions on other actors and is not a scalable solution to the absolute reductions needed to keep within 1.5 C of warming. Nova Scotia's GHG targets must reflect absolute emission reductions, with a target of zero emissions by 2050.

Section 7 b and e: Both of these energy efficiency goals represent huge missed opportunities. Energy efficiency goals should receive the same priority as the renewable energy target, especially since energy savings deliver significant within-province economic and social benefits which reduce the province's reliance on meeting energy generation goals through imports. We are disappointed to see that this is one of the weaker areas of the legislation despite Nova Scotia's past leadership on energy efficiency. In particular, we would like to see an amendment to modify Goal 7 e) to require all new buildings to be net-zero energy ready and to be zero-carbon-ready by 2030, at the latest. The attached document contains specific wording for 7 e as well as other recommendations to strengthen these goals.

In Section 10 c) we are pleased to see the affirmation of support for implementing the Lahey Report and Ecological Forestry. We are, however, deeply dismayed and profoundly disappointed to see that implementation pushed off for at least two more years. Nova Scotians have been promised a serious reduction in clearcutting for over a decade and the Lahey Report is over 3 years old. The delay in implementing it is unacceptable. As such we call on the government to either: A) Implement the recently released Silvicultural Guide for the Ecological Matrix on all Crown land harvesting immediately. Or B) Institute an immediate moratorium on all forest harvesting on Crown land until the new Ecological Forestry harvesting regulations are ready to be implemented.

In Section 14 a) we are pleased to see a goal supporting low impact aquaculture and improved licensing processes. These are both steps forward and could be done well with widespread stakeholder and rights-holder consultation. However, this goal depends heavily on how the government defines 'low-impact', 'sustainable', and 'environmental impacts.' We urge, in the strongest terms, the inclusion of a quantitative target and associated timeline. We recommend a 5% increase of low impact shellfish and seaweed aquaculture in 3-5 years which is an easily achievable target with the provision of a few key extension services that are currently lacking. It is profoundly disappointing to see no goal to phase open net-pen finfish aquaculture out of our coastal waters. Other jurisdictions are now recognizing the unacceptable level of ecosystem risk and lack of social license this form of aquaculture has and have committed to phasing this industry out of public waters by 2025.

To conclude, we reiterate our call for swift action on the implementation of this Act. Public consultations have shown us that Nova Scotians are ready to get to work on a



rapid transition that leaves no one behind. With stronger accountability measures and amendments to key goals, this Act could live up to its potential to make Mi'kma'ki / Nova Scotia a leader on the environment. It is clear beyond any doubt that we must act fast to ensure a future that protects the communities and natural spaces we love and rely on as a province. We urge you to adopt key amendments to make this so. Thank you.



EGCCRA Detailed Analysis

Friday, October 29, 2021

PREPARED BY
THE ECOLOGY ACTION CENTRE



Ecology Action Centre

Environmental Goals and Climate Change Reduction Act: Analysis of Goals

We are pleased to see this set of wide-ranging targets in legislation. Now we need accountability, follow-through and immediate action to address the climate and biodiversity emergencies.

We see several very positive aspects of the EGCCRA, including a commitment to phasing out coal by 2030, the inclusion of an electric vehicle mandate, a commitment to protecting 20 per cent of the province's land and water by 2030 and a focus on equity as a core principle.

We also see some key areas that are weak or missing. We need to ensure we're not undermining our own progress by continuing with outdated industries, fossil fuel extraction and unproven carbon capture technologies. Missteps here will continue to increase our emissions and threaten our ecosystems. We will be watching for meaningful action and specifics on issues like offshore oil and gas, biomass burning, energy efficiency and open net-pen aquaculture.

Significant financial and human resources will need to be associated with this Act to ensure its rapid and successful implementation.

We recognize that many key details will be forthcoming in the Climate Plan. It needs to be released swiftly and contain adequate ambition to ensure targets are met and exceeded.

Below we provide a detailed analysis. It includes the goals and/or wording in the Act and our analysis. At the bottom, you will also find a list of key issues that are not addressed in this Act, which should be considered for inclusion.

Goal or wording in the Act	Our Analysis/What we would like to see/what we'll be watching
<p>This Act is based on the following principles: (a) the achievement of sustainable prosperity in the Province must include (i) Netukulimk, (ii) sustainable development, (iii) a circular economy, and (iv) equity;</p>	<p>We're very happy to see the inclusion of "equity" as a principle of this Act.</p>
<p>6 The Government's targets for greenhouse gas emissions reductions are (a) by 2030, to be at least 53% below the levels that were emitted in 2005; and</p>	<p>We applaud a 53% target, which is the most ambitious climate target in Canada; however, we acknowledge that a target of 58% below 2005 would be needed to be in line with our fair share of emissions reductions to keep warming below 1.5 degrees.</p>

<p>(b) by 2050, to be net zero, by balancing greenhouse gas emissions with greenhouse gas removals and other offsetting measures.</p>	<p>Additionally, we are very concerned about the inclusion of the phrase "by balancing greenhouse gas emission with greenhouse gas removals and other offsetting measures". First, greenhouse gas removal technologies are unproven and expensive at scale. They should only be employed once proven and as a last mile mitigation option. Second, offsetting puts the burden of GHG reductions on other actors and is not scalable solution to the absolute reductions needed to keep within 1.5 C of warming. Nova Scotia's GHG targets must reflect absolute emission reductions, with a target of zero emissions by 2050.</p>
<p>7 The Government's goals with respect to climate change mitigation and adaptation and the reduction of greenhouse gas emissions are</p> <p>(a) to complete and release a Province-wide climate change risk assessment by December 31, 2022, an update by December 31, 2025, and an update every five years thereafter;</p>	<p>We applaud this goal as NS needs a thorough risk assessment in order to identify priorities for climate adaptation. We are pleased to see the inclusion of a pledge to regularly update this assessment.</p>
<p>(b) to support, strengthen and set targets for energy efficiency programming while prioritizing equitable access and benefits for low income and marginalized Nova Scotians;</p>	<p>This target is a missed opportunity as it is very vague. An energy efficiency goal should receive the same priority as the renewable energy target, especially since energy savings deliver significant within province economic and social benefits which reduce the province's reliance on meeting energy generation goals through imports. We are disappointed to see that this is one of the weaker areas of the legislation despite Nova Scotia's past leadership on energy efficiency.</p> <p>A clear mandatory energy efficiency resource standard is required that maximizes energy savings in future with high electrification, long-term carbon-pricing, and net-zero emissions. Such a standard should include savings attributable to Efficiency Nova Scotia activities and include targets for total energy savings across all fuels, as well as specific sub-targets for electricity and fossil fuel savings. Leading American states like Massachusetts are targeting annual electricity savings equal to 2.7% of electricity sales and 1.3% of fossil fuel sales. The EAC's coal phase out report called for annual electricity savings of 3% of sales by 2030.</p> <p>With Nova Scotia continuing to have high rates of energy poverty, there is also a need for legislated and regulatory requirements for the benefits of energy efficiency</p>

	<p>to reach a large number of low income and marginalized Nova Scotians. This could include dedicating a minimum amount of overall funding to low-income energy efficiency (e.g., 15% of budget).</p> <p>There are several other energy efficiency related goals that should be included in this Act. These could include:</p> <ul style="list-style-type: none"> a. Mandatory home energy labels at point of sale and mandatory energy and GHG reporting and disclosure from large buildings by 2023 b. Implementation of minimum energy and GHG performance standards for existing buildings by 2025 c. Seeing 75% of industrial energy use in Nova Scotia benefiting from energy management systems by 2030 d. Delivering at least \$25 M in commercial building retrofit investments to Canada Infrastructure Bank
<p>(c) to work with municipalities and First Nations in the Province to take immediate and long-term action on their climate change priorities;</p>	<p>The intent of this goal is very positive. We would like to see more specifics.</p>
<p>(d) to build climate change adaptive capacity and resilience by requiring climate adaptation planning across every Government department;</p>	<p>This goal is positive. Provincial coordination will be needed as it is necessary to help individual municipalities respond to funding opportunities.</p> <p>Though we applaud this goal, action must follow. We have had plans that were not able to be acted upon with the Municipal Climate Change Action Plans and cannot afford for this to be the case here.</p>
<p>(e) to adopt the 2020 National Energy Code for Buildings within 18 months of it being published by the Government of Canada;</p>	<p>This is a serious missed opportunity, which threatens to lock-in unnecessary GHG emissions. We would like to see the following amendment: to adopt the 2020 National Energy Code for Buildings and the <u>2020 National Building Code</u> within 18 months of it being published by the Government of Canada, <u>and to require all new buildings to be net-zero energy ready and to be zero-carbon-ready by 2030, at the latest</u></p> <p>The province should also commit to work with the federal government and other leading provinces (British Columbia) to develop a “zero carbon” building code, that</p>

	includes consideration of operational emissions as well as emissions from building materials (embodied carbon).
(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;	We applaud this goal. We suggest extending it to any government buildings that fail to meet increasingly stringent minimum energy and GHG performance standard, and note that such a goal should benefit all buildings in the province.
(g) to encourage landlords who currently lease office space to Government to transition existing office space to meet net-zero energy performance;	This goal offers a good example of public sector leadership. Raising ambition would include requiring minimum energy, GHG, and building comfort requirements for any building or unit that is leased or rented, coupled with a low-income and energy poverty reduction strategy.
(h) to prioritize leased office accommodations in buildings that are climate resilient and meet net-zero energy performance starting in 2030; (i) to decrease greenhouse gas emissions across Government-owned buildings by 75% by the year 2035;	These are good targets.
(j) to develop and implement a zero-emission vehicle mandate that ensures, at a minimum, that 30% of new vehicle sales of all light duty and personal vehicles in the Province will be zero-emission vehicles by 2030; (k) to develop and implement supporting initiatives for the goal in clause (j);	<p>We are very pleased that the provincial government will introduce a zero-emission vehicle mandate as it is a necessary supply side measure needed to increase the number of electric vehicles available for purchase in Nova Scotia. In addition, incentives for both new and used light-duty vehicles will be required to increase access and demand in the province.</p> <p>The target however is low. The new federal target for new electric vehicle sales is 100% by 2035 and the Halifax Regional Municipality target of 100% by 2030. We believe Nova Scotia's ZEV target for the light duty sector should at a minimum match the federal government's ambition for 2035 and set interim targets to ensure that we are on a pathway to achieve new vehicle sale targets.</p> <p>We are pleased with the addition of section (k) to support this goal, as we believe this is an opportunity to create an Electric Vehicle Strategy that would include a plan for developing ZEV charging infrastructure, job training, and manufacturing opportunities.</p>

<p>(l) to have 80% of electricity in the Province supplied by renewable energy by 2030; and</p>	<p>This is an achievable target. In fact, combining with deep energy retrofits, 90% is possible as shown in the Electricity Report commissioned by the EAC in 2019. In order to make this target robust, just and future ready, focus needs to be on increasing supply for wind, solar and energy storage, complete phase-out of natural gas and biomass energy, strong collaboration and coordination with Atlantic provinces and Quebec on regional integration (Atlantic Loop), enhanced energy efficiency programming with target to reach 3% efficiency per year by 2030. Hydrogen development is an important piece, where we need to steer clear of "Blue Hydrogen" which is based on fracked gas, and instead focus on development of "Green Hydrogen" produced from surplus renewable energy. It's important to define what qualifies as clean energy source – biomass is not renewable and causes more emissions than mitigation/capture; carbon capture storage (CCS) is very expensive, uneconomical, faced high failure rate in international cases, and unproven. Money would be better spent in developing wind, solar and energy storage (including thermal energy storage) resources.</p>
<p>(m) to phase out coal-fired electricity generation in the Province by the year 2030.</p>	<p>This is a welcome move. The EAC has been advocating for this for the better part of a decade. We must ensure that this coal phase out is in sync with development of renewable energy and regional integration to balance out the supply using cheap renewables. This would ensure reliability but also affordability. Now, it is important to put dates on decommissioning coal plants in the province. At the same time, in the federal context, the equivalency agreement should be dissolved and made null and void. Nova Scotia should stand as an example for New Brunswick, and collaborate with NB to decarbonize the Atlantic region.</p>
<p>8 (1) The Government shall create a strategic plan, prior to December 31, 2022, to be known as the "Climate Change Plan for Clean Growth" that addresses</p> <ul style="list-style-type: none"> (a) achieving the greenhouse gas emission targets set out in Section 6; (b) adapting to the impacts of climate change and building a climate resilient Province; (c) accelerating the integration of sustainable and innovative technologies and approaches; and (d) clean inclusive growth. 	<p>We are troubled by the frequent use of the word "growth" as it is clear that as a society, we need to rethink the necessity for economic growth. Our current obsession with growth has resulted in the accumulation of enormous wealth for increasingly few and resulted in supply systems becoming more and more exposed to global political, ecological, and social disruption. Sustaining ecosystems that sustain us must be understood as a fundamental economic principle. Wellbeing must be prioritized over GDP and/or included in its calculation.</p> <p>We are, however, looking forward to the release of the climate plan. As this plan has been in development for nearly two years, we would encourage a swifter timeline than a December 2022 release.</p>

<p>(2) The Government shall release annual progress reports on the plan outlined under subsection (1) and review and renew the plan within five years of its release.</p>	<p>We are pleased to see that it will include both mitigation and adaptation measures. For specifics of further elements we would expect to see in a climate plan, please refer to other sections of this document, as well as our briefing note series submitted as part of the recent consultation process: https://ecologyaction.ca/environmental-goals-climate-change-reduction-act-policy-background-resources</p> <p>We are also pleased to see the inclusion of annual progress reports as these are essential to transparency, accountability and achievement of the targets. Comprehensive progress reports would include: assessments and recommendations, not simply reporting; relevant data; clear articulation of the trajectory toward meeting the targets; explanations of why targets aren't being met (if that's the case) and plans to address any shortcomings.</p>
<p>9 The Government's goals with respect to active transportation are (a) to establish a Provincial Active Transportation strategy to increase active transportation options by 2023; and (b) to complete core active transportation networks that are accessible for all ages and all abilities in 65% of the Province's communities by 2030.</p>	<p>We are very pleased to see Active Transportation included in the goals. A Provincial Active Transportation Strategy will be an invaluable tool for coordinating the funding/budgeting and implementation of AT infrastructure and unlocking federal funding. However, it is crucial that that a Provincial Active Transportation Strategy includes soft infrastructure like pedestrian/bike safety education, bike maintenance education, access to bike repairs, and snow clearing plans - allowing for the safe and continued use of hard infrastructure (sidewalks, off-road trails, bike lanes and paved shoulders). Likewise, the strategy should be informed by the voices of underserved and marginalized communities, BIPOC communities and youth to adhere to the government's commitment to equity. The government's commitment to developing the Strategy by 2023 and implementing it by 2030 is an ambitious goal. We applaud the urgency this timeline sets, and recognize this requires strong partnerships with support from all participating departments along with consistent, inclusive public engagement with communities. Much work is ahead.</p>
<p>10 The Government's goals with respect to the protection of land are (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;</p>	<p>This is excellent and will ensure Nova Scotia will meaningfully contribute toward Canada's international commitment to protect at least 30% of our country by 2030. The wording of this goal should stay exactly as originally written. There is still so much we can do through protecting land that would substantially aid with the climate and biodiversity crises, and would help to advancing reconciliation. Inclusive planning for a new protected areas strategy is the necessary next step. We look forward to working with government on this laudable work.</p>

<p>(b) to support the goal in clause (a) with a collaborative protected areas strategy to be released by December 31, 2023;</p>	<p>There is a lot of work to do in order to protect freshwater sources, including wetlands, and groundwater resources. Fortunately, we have many institutions and people whose knowledge and experience can guide planning to protect water, and we call on the government to collaborate with nongovernmental organizations, academic institutions, Indigenous Nations and organizations, and other water-centered community groups when creating a protection strategy and making decisions on freshwater protection.</p>
<p>(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 (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).</p>	<p>We are pleased to see the affirmation of support for implementing the Lahey Report and Ecological Forestry. We are, however, deeply dismayed and profoundly disappointed to see that implementation pushed off for at least two more years. Nova Scotian's have been promised a serious reduction in clearcutting for over a decade and the Lahey Report is over 3 years old. The delay in implementing it is unacceptable. As such we call on the government to either: A) Implement the recently released Silvicultural Guide for the Ecological Matrix on all Crown land harvesting immediately. Or B) Institute an immediate moratorium on all forest harvesting on Crown land until the new Ecological Forestry harvesting regulations are ready to be implemented.</p>
<p>11 The Government's goals with respect to water and air are (a) to develop provincial water quality objectives to guide activities that affect water quality by 2026; (b) to address and mitigate barriers Nova Scotians face to testing and treatment of rural wells by 2026;</p>	<p>We applaud these goals. We encourage the Province to prioritize both goals and address them by 2023.</p> <p>To ensure safe and healthy water for both human use and the local ecosystems, the water quality objectives must include consideration for the quality of surface water (i.e., lakes, rivers, streams, wetlands etc.) and groundwater, and prioritize watershed-based decision making. We call on the Province to commit to encouraging nature-based solutions to help address water quality issues and to supporting existing data collection efforts by investing in community-based water monitoring initiatives and using this valuable data to help guide future decisions on water.</p>
<p>(c) to manage the Province's air zones consistent with the Canadian Ambient Air Quality Standards; and</p>	<p>We do not have the expertise to provide an assessment of this goal.</p>

<p>(d) to review and update the Province's air emission targets and ambient air quality standards by 2025 and conduct reviews and updates every five years or sooner if the Minister so directs.</p>	
<p>12 The Government's goal with respect to environmental assessments is to modernize the environmental assessment process by 2024 taking into consideration</p> <ul style="list-style-type: none"> (a) cumulative impacts; (b) diversity, equity and inclusion; (c) independent review; (d) Netukulimk; and (e) climate change. 	<p>This is positive as the environmental assessment premise and process need a complete overhaul in Nova Scotia. This goal starts to get at key elements that are missing from Nova Scotia's antiquated approach. Proper inclusion of these factors is long overdue and could result in improvements to environmental protection. The needed revamping of the system must be done in collaboration with partners outside government, who have been witnessing and documenting systemic problems with environmental assessments for years.</p>
<p>13 The Government's goal with respect to sustainable procurement is to demonstrate leadership in sustainable procurement by increasing innovation, sustainability, diversity and inclusion in government procurement and considering community benefits attached to procurements.</p>	<p>This is positive; however, it requires specifics.</p>

<p>14 The Government's goals with respect to aquaculture and food are (a) to support low-impact sustainable aquaculture through a licensing process that weighs environmental considerations and includes provincial regulation for potential environmental impacts, animal welfare and fish health; and</p>	<p>We are pleased to see a goal supporting low impact aquaculture and improved licensing processes. These are both steps forward and could be done well with widespread stakeholder and rights-holder consultation. However, this goal depends heavily on how the government defines 'low-impact', 'sustainable', and 'environmental impacts.' We would prefer to see a quantitative target and timeline associated with this such as a 5% increase in 3-5 years - an easily achievable target for low impact shellfish and seaweed aquaculture with the provision of a few key extension services that are currently lacking.</p> <p>It is disappointing to see no goal to phase open net-pen finfish aquaculture out of our coastal waters. Other jurisdictions are now recognizing the unacceptable level of ecosystem risk and lack of social license this form of aquaculture has and have committed to phasing this industry out of public waters by 2025. Nova Scotia should include a commitment to support closed containment, on-land alternative systems for finfish. This would move the province into a leadership role in the industry, contribute to rural job creation, reduce environmental risk, and build on our province's infrastructure and expertise in seafood.</p>
<p>(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.</p>	<p>We applaud this goal; however, the timeline is longer than should be necessary. In particular, we look forward to the development of a Provincial food strategy. We hope it will support municipalities and include such actions as the implementation of a healthy school food program, and other institutional procurement measures, as well as supports for farmers to mitigate and adapt to climate change. Additionally, we recommend that the Province build on HRM's municipal food strategy, JustFOOD, currently in development.</p>
<p>15 The Government's goal to encourage the growth of the circular economy includes, but is not limited to, (a) expanding extended producer responsibility and reducing the use of single-use plastics; (b) reducing solid waste disposal rates to no more than 300 kilograms per person per year by 2030; and</p>	<p>In 2007 the Nova Scotia government set a target of three hundred kilograms of waste per person per year by the year 2015. While there was some early progress, in 2021 Nova Scotians are producing approximately 400 kg per person per year of waste. We would like to see more ambition in this goal – reducing solid waste disposal rates to no more than 200 kg per person per year by 2030. Additionally, we should aim to reduce plastic waste to zero by 2030.</p>

<p>(c) developing a plan, including specific actions and interim targets, by 2023 to meet the solid waste goal in clause (b).</p>	
<p>16 The Government's goals to support business, training and education are</p> <p>(a) to actively encourage innovative, sustainable and green businesses to establish or relocate to the Province and create an environment for innovative, sustainable and green business start-ups;</p> <p>(b) to work with small businesses across the Province to get their input on ways to reduce emissions, including through rebates, targeted investments and other supports;</p> <p>(c) to work collaboratively with businesses, the Nova Scotia Community College and the labour sector to modernize apprenticeship programs to ensure the Province has the tradespeople needed to meet the demands of the clean economy;</p> <p>(d) to support youth to engage in the clean economy through sustainability-based youth employment leadership programs in the Province; and</p> <p>(e) to promote and support climate change education and sustainability through the knowledge and teachings of Netukulimk and environmental stewardship with ongoing curricula renewal, the development of inclusive and accessible resources and professional learning that incorporates diversity and honours Etuaptmuk.</p>	<p>We are pleased to see goals that aim to build an inclusive and green economy in our province however we are disappointed by the lack of a goal that handles the just transition of workers from the fossil fuel industry and affected communities.</p> <p>Including environmental education in the grade school curriculum has been needed for years, for broader societal need than just business development. The Province should work with Indigenous and non-Indigenous partners on this goal in order to benefit from the extensive knowledge, networks, and resources that already exist on these topics. We hope that the Province is now truly open to swift and substantial change in the curriculum, since it is a long time coming.</p>

<p>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.</p>	<p>The intent of this goal is very positive. We would like to see more specifics.</p>
<p>18 (1) The Sustainable Communities Challenge Fund is established. (2) The money in the Fund must be managed and used in accordance with the regulations to create competitive opportunities that encourage communities in their climate change mitigation and adaptation efforts.</p>	<p>The intent of this goal is very positive. We would like to see more specifics. We hope this funding can be accessed by municipalities, First Nation communities, and groups without significant matched funding or other onerous requirements that could be a barrier for many.</p>
<p>19 The Premier shall meet with the Round Table annually to discuss progress on sustainable prosperity and may include at the meeting any member of the Executive Council the Premier deems appropriate. 20 The Premier shall ensure that sustainable prosperity is included in the mandate of every Government department.</p> <p>21 (1) The Minister, in consultation with such members of the Executive Council as the Minister deems appropriate, shall report annually to the House of Assembly on the progress made toward the long-term objective of sustainable prosperity, including progress toward achievement of sustainable prosperity goals and initiatives established pursuant to this Act.</p>	<p>Ensuring strong accountability and transparency mechanisms in the Act are critical to achieving the goals and building the public's trust. We would like to see the following amendment to improve accountability: S (21) (2) that in preparing the report the Minister MUST seek advice from the roundtable. We also recommend that the Roundtable be given authority and resources to provide recommendations to the Minister for in preparation for the report, and these recommendations will be publicly available. The Roundtable, or those conducting the external review, should be provided with resources, data, and expertise needed to provide a proper assessment progress on the Act.</p> <p>In addition to the legislated 2030 and 2050 goals, interim targets must be set (i.e. 2025, 2035, 2040, 2045). The years leading up to 2030 are where we need to see the steepest reductions in emissions. If we do not meet the targets leading up to 2030, we will not be able to mitigate 1.5 C of warming. The importance therefore of meeting the 2030 target cannot be overstated, and we must ensure that robust interim targets and accountability measures are in place to ensure that we are on a pathway for emission reduction.</p> <p>* See Goal 8 for further comments on accountability.</p>

<p>(2) In preparing the annual report referred to in subsection (1), the Minister may seek advice from the Round Table.</p> <p>(3) The Minister shall table the annual report referred to in subsection (1) in the House of Assembly on or before July 31st of the year in which it was completed or, where the House is not then sitting, file it with the Clerk of the House.</p> <p>22 The Minister shall request the Round Table to carry out a public review of this Act and the regulations</p> <p>(a) no later than five years after this Act comes into force; and</p> <p>(b) at any other time the Minister considers appropriate.</p>	
---	--

What Is Missing

Oil & Gas	The EAC would like to see the government commit to end all subsidies, supports and development of fossil fuels in Nova Scotia's offshore and invest in policies and programs to support oil and gas workers and affected communities transition to a low-carbon economy so as to ensure no one is left behind.
Transit	<p>We would like to see a Provincial Public Transit Strategy that centers mobility independence. Making the province accessible by transit for people of all ages and all abilities will provide a viable alternative to driving for everyone.</p> <p>Existing community/rural transit services are legally limited to operation in defined boundaries, making regional transport cumbersome for both operators and passengers, especially seniors going to medical appointments.</p> <p>The lack of rural and regional transit limits the ability to access essential services and participate in community life for people who cannot drive. Planning better integration of existing community transit services and/or creating a provincial transit provider would complement the Provincial Active Transportation Strategy.</p>
Biomass	We repeat our longstanding position and request that the government remove biomass from the Renewable Electricity Regulations, stop counting the burning of biomass as "carbon neutral" or zero

	carbon emitting (it's not), and ban the use of forest biomass for domestic and foreign export energy generation.
Fleets and Heavy-Duty Transportation	We would like to see a GHG reduction strategy for the heavy-duty transportation sector. We see this as a critical opportunity to electrify transit, passenger ferries, fleets and fund innovation for long-haul trucking. In addition to passenger vehicles, this is a key opportunity to reduce emissions from the transportation sector.
Carbon Pricing	Study after study has proven that carbon pricing is a critical tool to achieve emission reductions, including those stated within this act. We would like to see details on the carbon pricing in Nova Scotia within this Act.



An Emergency Response to Nova's Scotia's Environmental Goals and Climate Change Reduction Act

Submitted by Sierra Club Canada Foundation

Presented by Gretchen Fitzgerald, National Program Director, and Tynette Deveaux, Beyond Coal Atlantic Campaign

e·mer·gen·cy 

-NOUN /ə'mɛrjənsē/

an unforeseen combination of circumstances or the resulting state that calls for immediate action.

In order to adequately respond to the climate emergency, EGCCRA must

Add the following interim targets to phase out coal by 2030:

2022 - Nova Scotia will phase out 25% of its coal-fired electricity generation

2025 - Nova Scotia will phase out 50% of its coal-fired electricity generation

2028 - Nova Scotia will phase out 75% of its coal-fired electricity generation

Add under section 7:

Prohibit all new offshore oil and gas activity as of January 1, 2022 and phase out all offshore oil and gas activity by January 1, 2025

Commit the province to joining the global Beyond Oil and Gas Alliance (BOGA) as a sign of this government's climate leadership.

re·new·a·ble



-NOUN /rəˈn(y)ooəb(ə)l/

capable of being replaced by natural ecological cycles or sound management practices.

In order to support sustainable prosperity and clean renewable energy, EGCCRA must

Define renewable energy in Bill 57:

The definition can *only* include those energy sources that will reduce GHG emissions and fully adhere to the criteria of a circular economy and Netukulimk, as currently defined in the bill

Amend section 7 (I) as follows:

100% of the province's electricity is generated from *clean* renewable sources by 2030

Forest biomass for electricity generation *cannot* be included as a renewable energy source until the majority of forests in NS are once again mature old-growth forests.

Add interim target dates as follows:

75% of the province's electricity is generated from clean renewable sources by 2025
Burning forest biomass for electricity generation will be phased out in 2022

Include the following with regards to natural gas:

Require the phase-out of natural gas power generating stations by 2030
Allow no new natural gas generating stations

With respect to hydroelectricity, clarify the following:

Only small scale hydro projects (under 30 MW) may be included as renewable hydro energy
No new environmentally destructive mega hydro projects can be brought on to Nova Scotia's power grid, such as the proposed Gull Island Project in Labrador, which would be integrated into the province's energy grid via the Atlantic Loop

With respect to nuclear power, specify that

No power generated by small modular nuclear reactors can be included in Nova Scotia's electricity mix (i.e. via the Atlantic Loop)