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Sent: November 1, 2021 6:08 PM
To: Office of the Legislative Counsel
Cc: Gretchen Fitzgerald
Subject: Sierra Club Canada Foundation submission on Bill 57 - EGCCRA
Attachments: Sierra_Club_EGCCRA_Response.pdf

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Thank you for sharing this with the Law Amendments Committee considering Bill 57.

Tynette

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

Submitted November 1, 2021

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e·mer·gen·cy

-NOUN /ə'mɛrjənsē/

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

re·new·a·ble

-NOUN /rə'n(y)ooəb(ə)l/

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

Two years ago, many of us who are here today made presentations to the Law Amendments Committee on the Sustainable Development Goals Act. We explained why we needed strong legislated targets and an action plan to respond quickly and effectively to the climate emergency. Very little came of it, except more talk and more promises. We've lost two valuable years in the fight against climate change. We need to make up for lost time.

We appreciate that this new government understands the need for legislated targets to reduce greenhouse gas emissions and increase renewable energy in the province. We believe it's necessary to drill down further to see how those targets can be both strengthened and accelerated.

But first, we're going to have to agree on the meaning of **EMERGENCY**.

Merriam-Webster defines it as **an unexpected and usually dangerous situation that calls for immediate action**. If you look up the word "Emergency" in other dictionaries, you'll find a similar definition.

In the case of the **climate emergency**, it's not really unexpected, though for years big oil and gas companies succeeded in hiding and discrediting reports about it—much like the tobacco industry hid the truth about smoking causing cancer.



Nevertheless, it's clear that an EMERGENCY calls for immediate action. With each goal and target in Bill 57, we must ask ourselves: *Is this in keeping with the call for immediate action? Does this reflect or contradict the meaning of emergency?*

An emergency response also involves going into uncharted territory. Imagine if anyone had told us three years ago that we'd be wearing masks and mandating vaccines and lockdowns. We would have thought you were crazy. But we did it, because it had to be done.

We're asking you to have the courage to lead once again.

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

- 1. Include interim targets to phase out coal, because it matters whether a plant is phased out in 2023 or 2029**

Starting to phase out coal-fired plants now, rather than in five or ten years, is essential for the province's efforts to reduce GHG emissions. It will also accelerate better health for Nova Scotians and sustainable jobs for the province.

NS Power's own modeling projections show that there is very little difference in the cost of meeting a 2030 timeline versus a 2040 timeline (allowed under Nova Scotia's equivalency agreement negotiated with the federal government); the only question is whether we want to begin paying for the phaseout today or delay it further and let our youth pay for it several years from now.

The federal government is a signatory to the international Powering Past Coal Alliance and it has mandated a deadline to get Canada off coal by 2030.

Canada and Nova Scotia must walk the talk on its coal phase-out promises. Shifting our deadline to get off coal from 2040 to 2030 is a necessary and welcome step—one that needs be taken seriously. This requires interim targets to phase out coal. It may surprise people to hear that Alberta will be shutting down its coal-fired power plants by 2023—we've got to catch up!

We know that existing hydroelectric power from Quebec is accessible and affordable to shut down 300 MW of coal-fired electricity next year. That's about one-quarter of our coal and petcoke generation.¹

We ask that the following interim targets be legislated to ensure we achieve the necessary reductions in GHG emissions and clean up our act on coal:

Amend Section 7 (m) of Bill 57, which currently reads:

“7 (m) to phase out coal-fired electricity generation to the Province by the year 2030”

We ask that the following interim targets be added to the legislation:

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

¹ [How We Make Electricity](#), Nova Scotia Power.



2. Stop all new fossil fuel exploration and production in Nova Scotia

This year, the International Energy Agency released its 2021 *Global Energy Review*, which makes it very clear that no new fossil fuel exploration or production can be permitted if we are to meet global energy needs.

In August, the IPCC released a *Special Report*, which has been dubbed a “code red for humanity.” The 2021 UN Environmental Programme *Production Gap Report* also states that fossil fuels must remain in the ground in order to have a chance to have a safe and liveable planet.

The province of Quebec has just committed to stopping all new fossil fuel exploration and production. British Columbia and New Zealand have banned new permits for offshore oil and gas exploration and drilling. Denmark and Costa Rica are championing the Beyond Oil and Gas Alliance.

We must keep fossil fuels in the ground.

At current rates of production, the world is on track to produce twice the volume of fossil fuels that would keep us within the 1.5 degrees of warming by 2030. Nova Scotia can be part of the solution. It can stop extracting fossil fuels, including offshore oil and gas. The oil and gas reserves currently promoted by Nova Scotia—if extracted and burned—would eat up 4% of the world’s carbon budget.²

Right now, there is very little offshore oil drilling occurring in the province. We can afford to take this important stand against climate change.

2 Based on methodology in Paris to Projects Research Initiative. University of Waterloo.
<https://uwaterloo.ca/applied-sustainability-projects>.

Polling conducted in Nova Scotia in May 2021 shows that over 85% of Nova Scotians support a shift away from fossil fuels and support for affected workers. This was clearly demonstrated by the successful campaign to halt the construction of the Alton Gas natural gas storage caverns, the mass mobilization of Nova Scotians against fracking, and the opposition to the Goldboro LNG project.

Nova Scotians do not want fossil fuels contaminating healthy waters, infringing upon Indigenous rights and laws, spending tax dollars that are needed for healthcare and other important programs, and cutting off the path to a safe environment.

In the case of offshore oil and gas, projects started now would have an expected lifespan of decades. A commitment to halt oil and gas drilling now would signal Nova Scotia's climate leadership.

We ask that you:

Add the following commitment to Bill 57 under a new subsection in section 7:
7 (n) 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 ask that Nova Scotia join the global Beyond Oil and Gas Alliance to show its commitment to reducing global greenhouse gas emissions.



3. 80% electricity from renewable sources by 2030 simply isn't enough

Bill 57 needs more ambitious goals for renewable energy. Nova Scotia has tremendous potential for renewable energy. According to a 2018 study, Nova Scotia could generate 62% of its energy from on- and off-shore wind alone. Yet as of 2021, Nova Scotia Power only generates 18% of its energy from wind.

We also have a lot of untapped solar potential. The city of Halifax alone has a greater annual solar PV (photovoltaic) potential than Freiburg, Germany, which is known as Europe's "solar city."

We know that municipalities in Nova Scotia are actively seeking ways to participate in clean energy to meet their own climate targets. Yet Nova Scotia Power continues to put up roadblocks to distributed energy systems. Increasing Nova Scotia's renewable energy targets would help bring about the conversations needed to remove those roadblocks.

We ask that you amend the Bill so that Section 7 (l) reads as follows:

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

And that interim target dates be added as follows:

75% of the province's electricity is generated from clean renewable sources by 2025.

We also ask that renewable energy be defined in Bill 57 to include only 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.



4. Forest biomass for electricity is not a renewable energy source

If we're going to *actually* respond to the climate emergency, we need to get beyond make-believe climate solutions, such as forest biomass—and we need to get the math right.

Burning forest biomass for electricity generation actually emits more GHG emissions than burning coal—in fact, it produces approximately one-and-a-half times more greenhouse gases.

The use of biomass to generate electricity has boosted demand for low-quality wood and wood waste in the province, resulting in an increase in clearcutting, deforestation, and biodiversity loss.

“It takes more than 30 tractor-trailer loads of wood a day to feed Nova Scotia Power’s Port Hawkesbury biomass plant.”³

Emissions from the Port Hawkesbury and Liverpool biomass power plants are *not* included in the province’s GHG emissions accounting. That *must* be corrected.

Not only does forest biomass energy run counter to Nova Scotia’s commitments to reduce GHG emissions and protect healthy forests and biodiversity, but it also increases ratepayers’ electricity costs.

For something to be renewable, it must be renewable within our lifetimes. Currently, less than one percent of forests in the province are over 100 years old. It will take 150 years for old growth Acadian-Wapane’kati forests to grow back. We have transformed our forests from carbon sinks to carbon emitters. This needs to stop NOW.

3 MIT expert: [Carbon-neutral biomass ‘accounting fraud’](#), The Chronicle Herald, November 5, 2018

We ask that

Forest biomass be phased out in 2022

Renewable energy be defined in the Act, and that forest biomass for electricity generation not be included as a renewable until the majority of forests in NS are once again mature old-growth forests.

The province begin counting GHG emissions derived from burning forest biomass to generate electricity—and from clearcutting the province's forests. These must be included in our total GHG budgets.

5. No new natural gas

Natural gas is currently being touted as the ideal bridging source of power between fossil fuels and renewables. We need to clear some things up:

- Natural gas *is* a fossil fuel
- The main component of natural gas is methane, which warms the planet 84 times faster than CO₂—and in a very short period (less than 10 years)
- Methane leaks from natural gas production and distribution, including fracked gas, are a major contributor to global warming

Delaying the transition to clean renewables by building natural gas power plants will set us back years and supersize our GHG emissions with methane.

We ask that the Act:

Require the phase-out of natural gas power-generating stations by 2030

Allow no new natural gas-generating stations



6. No new mega-hydro projects

Mega dam hydro projects contaminate local waters, soils, and fish populations. These large-scale projects produce methylmercury, which poisons local food supplies and the people that eat them; most often, these are Indigenous peoples.

Hydropower plants contribute to climate change through the release of methane when large areas of organic material are flooded and begin to decay.

Stopping the natural flow of rivers for mega hydro projects infringes on traditional territories of Indigenous peoples and is a threat to Indigenous rights, health, culture, and the livelihoods of downstream communities.

Small-scale hydro projects (plants that produce less than 30 MW) are much more manageable and have far fewer impacts on the environment and climate.

We ask that

The Act include only small scale hydro projects (under 30 MW) as renewable hydro energy

The province commits to no new environmentally destructive mega hydro projects, such as the proposed Gull Island Project in Labrador, which would be integrated into our energy grid via the Atlantic Loop.

The province commits to opposing any future power generated by small modular nuclear reactors in the Atlantic Loop

Concluding Remarks

We know that what we're asking of you today is not easy to do, but we know you can do it—we saw it with Nova Scotia's response to the Covid-19 pandemic. Nova Scotians are ready to rise to the occasion, but we need our government to lead.