

On the implementation of a climate change strategic framework in the Northwest Territories: recommendations

Ecology North's response to

The Government of the Northwest Territories' draft for public comment
« Northwest Territories (NWT) 2018-2030 Climate Change Strategic Framework »

January 19, 2018

Introduction

Ecology North is encouraged by the draft 2018-2030 Climate Change Strategic Framework. The vision and the three main goals are promising and they generally align with our thinking as an organization heavily involved in northern climate change work. It is hopeful to see proactive thinking in terms of adaptation moving forward. Though the goals are promising, the lack of action planning attached to the goals, is generally where the framework falls short.

We're particularly heartened that the gravity of climate change in the north has been acknowledged in this Framework – from our perspective this is very positive progress. At the same time, we believe acknowledgement needs to go further, to the role governments have played by refusing to act appropriately based on the gravity of the situation. With that acknowledgment needs to come a pledge to act immediately. Acknowledgement is only the first step in finding solutions, and acknowledging this urgency to act across the GNWT, in particular with leadership needs to happen now.

Below are 10 key recommendations for the consideration of ENR:

1. Action and urgency:

Though the three goals of the Framework are encouraging, there is no action plan associated with them, and the framework is not specific enough to lead clearly to action. For instance:

- Who is the framework for?
- What is it going to do?
- How is the work going to be done?

With some more clarity and elaboration on these fundamental questions, the Framework could better frame future actions. Currently, the Framework is written at such a high level, that it has proven difficult to comment without seeing the associated actions and achievements. Improving knowledge of climate change impacts (goal #2) should absolutely not be used as an excuse for inaction. Though continued research and knowledge gathering is important, we know enough about the harmful impacts of climate change to take urgent action now.

Additionally, there will be an influx of federal money related to climate change in the coming years, and it is important not miss out on any opportunities. By looking at the Framework, we'd like to be able to see clearly where priorities are, and how to get the most value from any money that might come in the future. The action plan should then clearly detail those actions. We are disappointed by the speed of this whole process, the lack of resources allocated to climate change, and the fact that there are no indications an action plan will be resourced in 2018/19 budget.

- **Ecology North recommends a swift follow-up action plan based on the Framework.**
- **Ecology North recommends clarifying and specifying the Framework to set the stage for the coming action plan.**

2. Financial Planning:

In conjunction with an action plan follow-up, outlining a budget will be very important. Where finances for the action plan will come from, as well as where they should ideally be spent, is critically important to strengthen the Framework. There seems to be disconnect between the timing of this document, and the funding cycles of the federal government and the realities of GNWT finances. A strategy for money allocation needs to come with the action plan.

- **Ecology North recommends a swift follow-up financial plan to accompany the action plan.**

3. Targets:

Ecology North appreciates that the urgency of switching to renewable energy is clear in the Framework, and recognizes the importance of tying together adaptation and mitigation. Our concern lies in that the numbers set for the targets do not seem to come from concrete science – the rationale for the target choices is not clear.

The targets stated in ‘Transitioning to a Lower Carbon Economy’ are adequate; however, they do not show strong leadership. We are pleased to see that industry and transportation have targets, but there is no clear path identified to reach those targets (again, noting the need for an action plan). Additionally, targets are back loaded to later dates – where we could create more sense of urgency by moving targets forward.

Finally, the targets currently in the Framework do not align with the targets set by Canada. The Framework should be discussing Canada’s targets, and working to at least match, if not exceed them.

- **Ecology North recommends more ambition with regards to targets, possibly exceeding Canada’s targets.**

4. Carbon Pricing:

Carbon pricing is briefly mentioned in the Framework; however, there is no indication of how it will practically integrate into the Framework. There are

opportunities for a carbon tax to leverage significant federal investments, and help to reach the targets proposed in this framework.

- **Ecology North recommends specifying the role of carbon pricing moving forward. (ie. How can carbon tax revenues support meeting targets proposed)?**

5. Emissions Reporting:

There is little mention in the Framework of how the GNWT will report on emissions.

- **Ecology North recommends specifying GNWT emission reporting mechanisms. Reporting on activity should be consolidated across government and could be handled through a secretariat.**

6. Industry Participation:

There is little indication in the Framework of how industry will be motivated to contribute its share to mitigation/adaptation activities.

There is no mention of adaptation efforts that address industry in Appendix D (preliminary adaptation efforts to address climate change impacts). Current industrial activities, new industrial activities, and abandoned mining and oil and gas sums are all impacted by climate change and will require an adaptation response. If this section is to help develop the first action plan on adaptation as stated, this is a major omission.

- **Ecology North recommends clarifying the role of industry in carrying out the Framework goals, especially with regards to adaptation.**
- **Ecology North recommends that climate change, and the GNWT's Framework must be incorporated into all stages of Environmental Assessment processes.**

7. Community adaptation needs

From our perspective, Ecology North noticed a disproportionate focus on energy needs, and less detail than we'd hoped to see on community adaptation needs.

Although it is important to acknowledge the role of mitigation and we agree with the decision to include targets in this Framework, more of the report could be devoted to community adaptation needs. There are only small sections on health

and safety, culture and heritage, and infrastructure. The ENR meetings in the regional centres provided many valuable insights from community members.

In terms of community adaptation needs, though adaptation planning is an important step (pg 31) through our work with communities we are aware of many adaptation plans already completed. The bigger need is quick action, information, and education about the biggest hazards.

- **Ecology North recommends proportionally outlining community adaptation concerns, and following the concerns with proposed actions.**

8. Mainstreaming Climate Change in the GNWT

This document suggests that ENR serves as the lead department for climate change. We support this, but would add that ENR can show strong leadership on climate change by mainstreaming climate change across all departments. GNWT must show leadership by identifying clear pathway and authority to GNWT department(s) to fulfill the GNWT mandate to Climate Change.

“Section 1.4: links to other plans and strategies” indicates that the climate change strategic framework supports other plans such as NWT Oil and Gas Strategy and Mineral Development Strategy. We strongly suggest that this should be turned on its head and other government plans and strategies should be mandated to support the Climate Change Framework to achieve the targets and action set forth.

Climate change must be incorporated into all decisions that GNWT makes, a failure to do this will result in a disjointed response to climate change a failure of this plan.

An example of the challenge of the wording proposed considers the addition of one significant new mine to NWT. This has the potential to more than offset any reduction from industry or government as a whole. It is clear that different government departments are working against each other, and are siloed. It would be prudent to see a plan for how this will be addressed (as well as context for how potential new industrial developments will help NWT reach its industrial and overall greenhouse gas targets).

- **Ecology North recommends mainstreaming climate change mitigation, targets and adaptation into existing, updated and new plans and strategies moving forward.**
- **Ecology North recommends that the NWT’s Financial Management Board should consider climate change implications in every spending decision.**
- **Ecology North recommends positioning the Framework as a GNWT-wide document.**

- **Ecology North recommends a GNWT wide plan for how other departments could start to mainstream climate change.**

9. Climate Change Secretariat

Ecology North believes strongly in the need for a climate change network that includes participation and inclusion of citizens and groups throughout the NWT. This Framework must suggest a progressive cross departmental/governmental/societal working model to recommend solutions and provide an independent examination of climate action. A strong and vibrant climate change network would allow for improved communication and knowledge coordination within the NWT. This network must be resourced and provided with a clear and strong mandate for change. A strong secretariat would provide actions for section 4.4 Information management, communication and Outreach, which is clearly lacking in solutions to the identified need.

Climate change is affecting nearly every single action in the Northwest Territories. Climate change can be mainstreamed for individuals, businesses, and organizations, ensuring that no decision is made without looking through the lens of climate change. At the same time, coordination of resources and adaptation efforts across sectors will ensure maximum efficiency. The following actions might also improve coordination and the outlook on climate change:

- Work with all GNWT departments to mainstream climate change in decision-making, and help them to do so.
- Provide similar guidance to non-government organizations, to help those outside the GNWT mainstream climate change in all decisions.
- Provide leadership by example within ENR, and publicize the information and results.
- Celebrate and build on successes (both internal and external) to help generate awareness and build hope for the future.

Many key players and community members currently involved with adaptation efforts believe that some sort of governing board or climate change network would be a benefit and an opportunity for the Northwest Territories. The GNWT can take advantage of this opportunity and public need, to help forward that process and make it a reality.

- **Ecology North recommends that within the Framework, ENR mindfully opens doors for a NWT specific climate change network that will have:**
 - **A clear terms of reference, direction, and strong leadership from ENR;**
 - **Membership from all GNWT departments plus Indigenous governments, NGOs, industry, and community representation;**

- **Effective communication structures between territorial, community, and Indigenous governments, networks and alliances, academia, and industry;**
- **Strong, competent governing body that will guide the larger network.**

10. Omissions

There is little discussion of how climate change is interlinked and will impact the financial bottom line of the healthcare system, transportation systems, energy, and emergency management.

- **Ecology North recommends that in the forthcoming action plan, the GNWT begin incorporating life cycle costing, and societal costs of climate change inaction into bottom line financial decisions.**

Conclusion

The NWT, and ENR have a chance to be leaders together. We have a chance to innovate, and build many jobs around climate change mitigation and adaptation. The lack of a clear action plan and a financial plan in conjunction with this Framework do not reflect the urgency of the problem, nor the ambition to be leaders. There is a lot of early and ripe opportunities to take action, and we should be capitalizing on them. Ecology North supports ENR in its efforts to address climate change, and hopes that our recommendations will be strongly considered for adding more weight to this important document.