



VISION 2016 – 2020

Conservation Ontario will be the leader in engaging Conservation Authorities in matters of common interest and in shaping effective policy related to Conservation Authorities

Conservation Ontario Council Report

From: Leslie Rich, Policy and Planning Liaison & Nicholas Fischer, Policy and Planning Officer

Date: September 11, 2018

Subject: Conservation Ontario's Comments on "Developing a strategic assessment of climate change" Discussion Paper

Summary

Further to the introduction of the federal *Impact Assessment Act*, the Canadian government has produced a discussion paper on developing a strategic assessment of climate change to provide guidance to proponents, stakeholders, and Indigenous peoples on how climate change should be considered in federal impact assessments. Conservation Ontario's comments emphasized the need to include adaptation as an additional element of the Strategic Assessment of Climate Change as per the commitments made under the Pan-Canada Framework; equal consideration for assessment of a project's effects on the surrounding ecosystem's resilience to climate change; and establishing a community of practice, where proponents can learn from the experience of others in conducting strategic assessments. It is anticipated that the federal government will release a draft strategic assessment report for comment in the fall of 2018.

Recommendation

THAT Conservation Ontario's comments on "Developing a strategic assessment of climate change" Discussion Paper submitted to Environment and Climate Change Canada on August 31, 2018 be endorsed.

Background

In June, 2016, the government of Canada commenced a review of the *Canadian Environmental Assessment Act* as part of a larger review of Canada's environmental and regulatory reviews. This review proposed improvements to these processes, including increasing government transparency, increased opportunities for meaningful participation, and a broader consideration for all of a project's social, cultural, and economic impacts, rather than scoping consideration to only environmental factors.

On February 8th, 2018 the Canadian Government introduced Bill C-69, “An Act to enact the Impact Assessment Act and the Canadian Energy Regulatory Act, to amend the Navigation Protection Act and to make consequential amendments to other Acts”. The proposed *Impact Assessment Act (IAA)* would replace the *Canadian Environmental Assessment Act*. Conservation Ontario submitted a response to two consultation papers released following the introduction of the proposed IAA, the “Consultation Paper on Approach to Revising the Project List” and the “Consultation Paper on Information Requirements and Time Management Regulations”. Council endorsed these comments at the June 25, 2018 Council meeting. A key aspect of Bill C-69 includes the proposal to replace the current Environmental Assessment approach with federal Impact Assessments (IA).

Current Status

In July, 2018 the Canadian Government released the discussion paper titled “Developing a Strategic Assessment of Climate Change” for industry and stakeholder review and comments. The paper outlines considerations and poses strategic questions related to greenhouse gas emissions (GHGs), climate change and clean growth policies and their potential interactions with Impact Assessments. Through the discussion paper, the government aims to establish a terms of reference for conducting a strategic assessment of climate change, followed by the creation of an expert panel to assist in drafting a strategic assessment report to be published in the fall 2018.

Conservation Ontario submitted the attached response to the discussion paper on August 31, 2018. Conservation Ontario’s response was supportive of the proposed approach to developing a strategic assessment of climate change for federal impact assessments. It was recommended that, in addition to the environmental data and tools incorporated into the single window science portal, Environment and Climate Change Canada (ECCC) establish a community of practice where proponents can learn from the experience of others in conducting strategic assessments. It was further recommended that consideration equally be given to the assessment of a project’s contributions to / or impacts resulting from climate change and the assessment of a project’s effects on the surrounding ecosystem’s resilience to climate change. Lastly, CO’s letter proposed that ECCC should utilize the expertise of CAs on matters relating to climate change resiliency and reducing climate-related hazards and disaster risks to protect and improve human health and well-being.

Conclusion

It is anticipated that a draft strategic assessment report will be published for comment in the fall of 2018. Conservation Ontario will continue to monitor the development of the *Impact Assessment Act* particularly as it relates to the implementation of the *CO Class Environmental Assessment for Remedial Flood and Erosion Control*.



Environment and Climate Change Canada
351 St. Joseph Boulevard, 11th Floor
Gatineau, QC
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August 31, 2018

Re: Conservation Ontario's Comments on Environment and Climate Change Canada's Discussion Paper "Developing a Strategic Assessment of Climate Change"

Thank you for the opportunity to provide comments on Environment and Climate Change Canada's (ECCC) Discussion paper "Developing a Strategic Assessment of Climate Change". Conservation Ontario is the network of Ontario's 36 Conservation Authorities (CAs) which are local watershed management agencies that deliver programs and services that protect and manage water and other natural resources in partnership with government, landowners and other organizations. The comments provided are those of Conservation Ontario and are not intended to limit consideration of comments shared individually by CAs.

As a major landowner and resource management agency, CAs are the proponent or co-proponent of a number of environmental assessments, both Individual EAs and through the provincial Class EA process. Conservation Ontario has managed the *Class Environmental Assessment for Remedial Flood and Erosion Control Projects* (Class EA) since 1993, and as such brings an important perspective to this review, both as proponents of environmental assessments and as a natural hazards regulator for the Province.

Conservation Ontario is supportive of ECCC's effort to develop a strategic assessment for climate change to provide guidance for how climate change commitments should be considered in federal impact assessments. As a part of our 2016-2020 Strategic Plan, Conservation Ontario has committed to advancing work related to managing and adapting to climate change, as well as aggregating CA expertise on climate change as a policy priority at both the provincial and federal levels as it pertains to policy impacting CA business.

ECCC's proposed use of an "evergreen document" will assist with keeping the guidance current; as our understanding of the science evolves. It is agreed that regional assessments are the appropriate level at which to address cumulative effects and Conservation Ontario is supportive of the establishment of a publicly-accessible single window which contains environmental science, knowledge and data. The government is encouraged to incorporate the data of CAs into this portal.

Proposed Elements of a Strategic Assessment of Climate Change

This document proposes that a strategic assessment of climate change should consist of the quantification of a project's Greenhouse Gas (GHG) emissions; GHG emission thresholds; early planning; and impact assessment. In addition to these four proposed elements, it is recommended that adaptation be included as a fifth element in the strategic assessment, referring back to the commitments made under the Pan-Canada Framework. Conservation Authorities are experts in the five areas included in the framework. This includes translating scientific information into action; building climate resilience through infrastructure; protecting and improving human health and well-being; supporting particularly vulnerable regions; and reducing climate-related hazards and disaster risks. The Federal government is encouraged to take advantage of this expertise while developing its strategic and regional assessments.

Early planning

Conservation Ontario is supportive of an early planning and engagement phase to determine whether an impact assessment is required and to scope the factors to be considered in the review. Both the Conservation Ontario Class EA as well as the provincial *Environmental Assessment Act* require early engagement to scope projects which may require an EA. Instituting an early planning stage should assist proponents by providing clear criteria on whether, from a GHG emission perspective, an impact assessment is required.

In addition to an early planning and engagement stage, Conservation Ontario recommends ECCC create guidance documents for various activities which outline how climate change should be considered in a variety of projects subject to federal impact assessment requirements.

Impact assessment

Conservation Ontario is supportive of including considerations for a project's resilience to potential climate change impacts in the impact assessment process. Further, Conservation Ontario recommends that the proposed strategic assessment of climate change consider a project's contribution to surrounding ecosystems and communities' resilience to climate change effects. By considering the vulnerability or resilience of surrounding infrastructure and communities to climate change effects, proponents will be better suited to minimize risk to human life and/or property due to effects associated with the project. It is recommended that equal consideration be given to assessment of a project's effects on the surrounding ecosystem's resilience to climate change as is given to assessment of a project's contributions to / or impacts resulting from climate change. The strategic assessment should be sufficiently flexible to incorporate these considerations in advance of the detailed design phase.

Conservation Ontario is supportive of integrating GHG-related best available technology and best environmental practices (BAT/BEP) into the impact assessment process. It is further recommended that ECCC establish a community of practice, where proponents can learn from the experience of others in conducting strategic assessments. The one window science portal could also assist proponents with utilizing the best available science. Partnerships with academic institutions, Ontario's Climate Change Consortium, etc should be encouraged, wherever practical.

Thank you for the opportunity to provide comments on Environment and Climate Change Canada's "Developing a Strategic Assessment of Climate Change" Discussion Paper. Conservation Ontario is interested in providing feedback on the draft strategic assessment report of climate change, anticipated

to be published in fall 2018. Should you have any questions about this letter, please contact Leslie Rich at extension 226 or Nicholas Fischer at extension 229.

Sincerely,



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c.c. Conservation Authority CAOs