

CLIMATE WATCH NL

Preliminary Response to The Way Forward on Climate Change in NL

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On March 1, 2019 the Provincial Government released its 2019 climate change action plan entitled *The Way Forward on Climate Change in Newfoundland and Labrador (NL)*. During the announcement Minister Graham Letto strongly emphasized that climate change was real, and that ambitious action was necessary to achieve a low carbon future for NL. The plan outlines many important focus areas, such as the increased adoption of electric cars, the need to decrease the dependency of off-grid communities on diesel, and the need to consider how climate change will impact mental and physical health.

Climate Watch NL will continue to work with the provincial government, recommending policies to achieve ambitious reductions in GHG emissions and to adapt to climate change in our communities. We have released this preliminary response with the aim to suggest concrete ways in which the province could focus climate change efforts, our two primary recommendations being:

1. The setting of S.M.A.R.T. objectives.
2. Annual evaluation and progress reporting.

It is important to understand how this new plan fits into the longer history of climate change policy in NL, particularly the strengths and weaknesses of the plan's immediate predecessor. On mitigation, the preceding 2011 *Climate Change Action Plan* failed to have an impact in terms of emissions reduction significant enough to meet the then 2020 emissions target. Indeed, the plan was never ambitious enough to have reached the 2020 target in the first place. On adaptation, the 2011 plan did succeed in generating several climate change adaptation resources – intended for use by communities. However, the actual uptake of adaptation tools in the 2011 plan, by communities, was hindered by a lack of awareness of said tools and the capacity of communities to utilize said tools was diminished by a lack of inhouse expertise and financial assets.

While we are working on responding in detail to *The Way Forward on Climate Change* in the near future it is immediately apparent that the plan needs to be more specific in what it sets out to do. The plan describes general goals for adaptation and health-related measures, green economy growth, and mitigation, but what is needed now are concrete actions. General goals, with no specific means of evaluation or timelines for completion, are unlikely to generate an effective result. We therefore recommend each action item in the plan be used to develop at least one related Specific, Measurable, Achievable, Relevant, and Time-Based (S.M.A.R.T.) objective that can then be evaluated and/or measured over time.

The new 2019 climate plan sets an ambitious target for GHG emissions reduction in the province by 2030. However, there is little breakdown provided in terms of actual numbers indicating where and how GHG reductions will be achieved. In order to achieve ambitious GHG reductions, clearly defined targets for each sector need to be formulated in terms of numbers and percentages. Action items and

timelines need to be in place to demonstrate how to achieve those reductions and adaptations.

For example, action item 4.3.1 of *The Way Forward on Climate Change* reads: “Develop a comprehensive long-term strategy to increase electric vehicle penetration in consultation with the electric utilities, municipalities and industry.” This is arguably achievable and relevant as a goal, but it is neither time-based, nor specific, nor measurable. By contrast a related S.M.A.R.T. objective for action item 4.3.1 could read as: “Create a network of accessible electric vehicle fast-charging stations by 2023, working with the private sector, communities, and the federal government such that electric vehicle owners can drive across the province and to key locations unimpeded.” This example objective, which we note is purely theoretical in nature, none-the-less has a completion date and an easily measurable outcome which means it can be easily evaluated.

In order to judge the effectiveness of these measures we also see it as urgent that a publicly available evaluation report – at the very least overviews highlights of what has been achieved – be released annually. Annual progress reports would mean that progress towards objectives can be assessed on a regular basis. Only evaluating the plan every 2.5 years, as currently outlined, gives little room to gauge effectiveness and respond accordingly.

The Way Forward on Climate Change does attempt to address some of the challenges that the 2011 plan faced, but we believe more will need to be done in order to overcome those challenges. Below are some of our other preliminary recommendations that could guide the development of subsequent objectives:

1. Set specific and ambitious targets in terms of hard numbers and timelines that are associated with each focus area, that are developed with stakeholders from relevant sectors, and that will ensure the desired reductions by 2030.
2. Establish a network of regional climate change coordinators in NL, where such coordinators do not already exist, to assist communities in adaptation and education on climate change and to evaluate local adaptation measures on a regular basis.
3. Prioritize a multi-level response to adaptation and meet regularly with the federal government, municipalities, appropriate provincial government departments, and representatives from organizations already working on provincial and municipal capacity building in NL.
4. Increase the capacity and authority of the Office of Climate Change to match the ambitious target set out in the plan.
5. Provide greater detail on the nature of measures being taken to understand and reduce climate change’s impact on human health, assess the full range of potential vector-borne diseases, and prioritise preventative approaches to tackle health impacts.
6. Incorporate climate change into environmental assessments of all major development projects on and offshore while considering:
 - a. The impact of the project in terms of total GHG emissions and data on unburnable reserves of fossil fuels.
 - b. The potential impact of climate change on the project in terms of severe weather or other applicable factors.
7. Provide exemptions that allow developers working in cleantech and renewable energy to tie into the grid where necessary and expand the net metering program to allow for small scale renewable projects to be developed on a wider scale.
8. Create retraining programs for workers transitioning to work in cleantech and renewable energy.

9. Make energy-planning expertise available to diesel depended communities.
10. Work with the federal government, municipalities, and the private sector to develop a network of fast-charging electric vehicle stations across NL and develop a public resource listing the locations of these charging stations.
11. Provide rebate programs, tax breaks (either provincially or federally), or zero-interest loans for a period of time to encourage the adoption of electric vehicles and hybrids.