

EGCCRA and Climate Plan Progress Report: Appendix A Analysis

September 2023

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Ecology Action Centre

EAC Analysis of Appendix A of EGCCRA and Climate Plan Progress Report

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On July 31, 2023 the Province released its [report](#) focused on progress made on the goals in the *Environmental Goals and Climate Change Reduction Act* and on actions in *Our Climate, Our Future: Nova Scotia's Climate Change Plan for Clean Growth*. The Ecology Action Centre reviewed the progress report and in the two charts below we comment on the positive progress and the shortcomings.

Positive Progress Points: EGCCRA and Climate Plan Progress Report, Appendix A

Goal as numbered in Progress Report	Goal as numbered in EGCCRA	Positive Progress Points
3 Increasing the Use of Zero-emission Vehicles	7	The electric school bus feasibility study represents a good first step towards electrification of the provincially owned school bus fleet, comprising over 800 buses. While there are no electric school buses operating in Nova Scotia, this feasibility study represents a key first step in securing federal funding through Infrastructure Canada.
4 Increasing Renewable Energy	7	The establishment of the Green Choice Program is commendable. Through this Program, the large energy buyers in N.S. can procure up to 100% of their energy quota from local renewable energy sources.
		373 MW of renewable energy (onshore wind) has been awarded by the Rate Base Procurement Program (a noteworthy move towards the goal of 500 MW by 2026).
5 Strengthening Energy Efficiency	7	An additional 11 onsite energy managers were instated for municipalities, universities/schools, hospitals, agriculture, seafood and sport fishing.

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		A similar program to the Mi'kmaq Home Energy Efficiency Project being developed for African Nova Scotian communities and is anticipated to launch in 2024.
9 Transportation Efficiency	9	Progress noted in connecting with stakeholders regarding the provincial active transportation strategy, which will be complete by the end of 2023.
		<p>While still in its initial stages, the new Joint Regional Transportation Agency for "the safe, efficient and coordinated movement of people and goods." demonstrates a positive pivot in thinking about transportation in N.S.</p> <p>Further small pockets of funding invested in transit are encouraging, such as funding to create a centralized dispatch system serving 23 community transit providers, offset the rising maintenance, insurance, and fuel costs for community transit services, as well as funding the purchase of more vehicles - including wheelchair accessible vehicles. These are positive steps towards offering province-wide alternatives to personal vehicular travel.</p>
24 Supporting Youth	16	Establishment of a youth climate council through the Clean Foundation is positive.
26 Encouraging Climate Change Education and Sustainability	16	The commencement of a new Grade 11 course on Netukulimk and the Environment 11 is a welcome addition to the public school curriculum, and should be offered in all schools as part of a move to more place-based and outdoor learning.
28 Equity, Climate Action, and Addressing Environmental Racism	17	Establishment of an Environmental Racism Panel is positive.

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Shortcomings: EGCCRA and Climate Plan Progress Report, Appendix A

Goal as numbered in Progress Report	Goal as numbered in EGCCRA	Shortcomings
1 Reducing Greenhouse Gas Emissions	7	<p>Nine months after release of the climate plan, the province continues ongoing review of the Quebec and Vancouver bans on oil-fired heating equipment. No review is needed. A basic understanding of energy poverty necessitates an immediate ban the use of oil-fired residential heating system in new buildings in Nova Scotia.</p> <p>Quebec's ban on residential oil-fired heating systems has been in place for nearly two years, putting an end to the use of a polluting technology that has significantly exacerbated energy poverty in Canada. The continued use of oil-fired heating in buildings constructed in 2023 in Nova Scotia makes a mockery of the provincial government's rhetoric on the twin crises of affordability and climate change.</p>

<p>1 Reducing Greenhouse Gas Emissions</p>	<p>7</p>	<p>Discussion on the Atlantic Loop has mis-represented the actions of federal partners and lacked effective engagement. The province wishes to negotiate a good deal for Nova Scotians, however false statements – the federal government has not made an offer for example, they have – and misleading conduct in the public/media domain do not demonstrate commitment to engaging with the federal government and NSP as stated in the progress report. Clear engagement and effective action are needed for the de-carbonization of Nova Scotia's grid, and for future grid-resilience.</p>
<p>3 Increasing the Use of Zero- emission Vehicles</p>	<p>7</p>	<p>Wait times for EVs are too long in Nova Scotia (they can stretch 2-3 years). This is discouraging EV uptake, and ensuring affordable living is tied to the price of gas in NS.</p> <p>Adoption of a ZEV mandate requiring manufacturers to supply electric vehicles is needed and would lower wait times (ZEV mandates are already in use in 17 US states, as well as B.C. & Que.).</p> <p>The government legislated a ZEV Mandate under EGCCRA in 2021 but has still not implemented it two years later. By implementing this regulation, our modeling indicates N.S. could ensure an additional 65,000 electric vehicles hit the roads in N.S. by 2030. This scenario would result in an additional 5.2 Mt CO₂eq of avoided emissions between 2022 and 2050.</p> <p>No progress in creating fast-charging access for EVs (chargers that allow customers to reach full charge within 15 minutes). New Brunswick boasts more than twice as many EV fast chargers as Nova Scotia, even though it has fewer battery electric and plug-in hybrid vehicles on the road.</p>

<p>3 Increasing the Use of Zero- emission Vehicles</p>	<p>7</p>	<p>The province put out an RFP for a delivery agent to run a \$4 million fast-charging program over four years, with a program launch date of May 2023. However, this tender was not awarded. With Nova Scotia Power barred from making ratepayer funded investment in EV charging infrastructure, provincial investment is urgently needed. The province must immediately develop a strategy for the deployment of fast chargers in Nova Scotia, setting targets for deployment and leveraging federal funding available through the Zero Emission Vehicle Infrastructure Program (ZEVIP).</p>
<p>4 Increasing Renewable Energy</p>	<p>7</p>	<p>Though EGCCRA states a goal of 80 per cent renewable electricity by 2030, and the Climate Plan states a goal of 90% reduction in emissions in the electricity sector by 2035, there is no commitment to align with the Federal goal of net-zero within the electricity sector by 2035.</p> <p>Lack of clear planning could leave money on the table to support this transition. The federal budget in 2023 stated the following relating to being able to access the Investment Tax Credit for Clean Electricity "In order to access the tax credit in each province and territory, other requirements will include a commitment by a competent authority that the federal funding will be used to lower electricity bills, and a commitment to achieve a net-zero electricity sector by 2035." A 90% reduction of emissions in the electricity sector by 2035, instead of a net-zero goal, does not meet this requirement, and may disqualify the province from receiving the tax credit.</p> <p>Support for community solar and changes to the Electricity Act are encouraging, as this increases the quantity of renewables on the grid through rate-based procurement and enables more electricity storage. However, little is being done by the province to evaluate the need for additional storage through batteries, which could enable additional penetration of renewables.</p>

<p style="text-align: center;">4 Increasing Renewable Energy</p>	7	<p>The Climate Plan Report needs to be more specific in its highlights and milestones so that progress can be tracked effectively. Both quantitative and qualitative measures should be used to measure Climate Plan Actions. The report and strategies for measuring progress should be more precise. For example, Action 19's highlight/milestone should include specific details such as the number of funds granted to adopt more solar power, or the mechanisms designed or implemented to deliver these funds.</p>
		<p>We appreciate the province's efforts in developing the offshore wind industry in Nova Scotia and the opportunity to provide feedback on the Offshore Wind Roadmap. While the roadmap provides a general outline of the strategy and actions needed to utilize the province's wind resources, it would benefit from being more explicit and detailed, like roadmaps from other jurisdictions. It is essential to clearly define specific goals, target actions, and proposed activities for the sustainable development of offshore wind in the province.</p>
<p style="text-align: center;">5 Strengthening Energy Efficiency</p>	7	<p>No or slow progress on shared heating systems. Only one system (from 2021) was named in the report.</p>
		<p>The province has supported low-income households in saving money with improved energy efficiency but could go much further. A Universal Service Program recommended by the Affordable Energy Coalition has been effective in several dozen communities in the USA and should be considered here. This program matches rates to income levels, provides emergency relief, arrears management and efficiency programs.</p>
		<p>Although 19 customers enrolled in the voluntary energy-use monitoring, this program needs to be mandatory. It was instated to support owners of commercial and institutional buildings better understand their energy performance and plan for energy efficiency upgrades, and greater participation would generate the needed measurements and action for this goal.</p>

6 Understanding Climate Risk	7	The Coastal Protection Act regulations are still not released, and no progress has been made on the consultation and education process. The province continues to use 'consultation' wording without demonstrating any action towards revisiting the regulations or making progress on this goal.
		Emergency funding needs to be allotted for repairs to Active Transportation routes (including bridges) that are damaged in weather events.
		Little progress was made on investing in or implementing natural infrastructure and nature-based solutions for mitigating and adapting to increased climate change.
8 Updating Buildings Codes	7	The province committed to adopting the new federal building codes, however they lack a clear timeline and plan to reach net-zero ready standards on all new buildings by 2030. A clear plan of action has been well demonstrated for example by B.C. in its climate plan and is required to make timely progress.
9 Transportation Efficiency	9	Transit and active transportation investment is woefully inadequate.
		The province is reporting that 31 per cent of communities with AT plans have received funding to build components of their core active transportation networks; although the term 'communities' is still not measurably defined.
		Outside of HRM, there are over 400 AT infrastructure projects proposed in community plans awaiting design funding to reach shovel-ready status. This backlog of design work is estimated at \$40 million. Additional support is needed in communities that have not yet begun developing AT Plans.
		Likewise, 476 kilometers of progress was made on the Blue Route Network, however this is only a fraction of the total 3000 kilometers planned. A bigger investment is needed to develop the remaining 2524 kilometers and to promote the project.

<p>9 Transportation Efficiency</p>	<p>9</p>	<p>Inaction has also been prohibitive to moving sustainable transportation alternatives forward.</p> <p>Although passed in 2018, Bill 80 – the Traffic Safety Act – still hasn't been proclaimed. In 2021, Minister Masland stated that an additional three to four years were needed to update the supporting information technology system. However there have been no timelines established or subsequent updates. The Traffic Safety Act will provide enabling policy to protect vulnerable road users (I.e. pedestrians and cyclist) like allowing for (like cross-rides and dedicated traffic lights for bikes) speed and red-light cameras to automate enforcement, and codifying vehicular maneuvers that endanger cyclists as punishable offences (like dooring and right-hooks).</p> <p>The progress report does mention action taken by the provincial government to implement an output-based industrial carbon pricing system, but does not mention this provincial government's opposition to including consumer fuels (vehicle fuel and home heating oil) in the carbon pricing regime. Significant time has been spent on the narrative that rural Nova Scotians have to drive and are not open to alternatives, rather than doing the work to provide additional transportation options as proposed in community plans, which would in turn reduce the financial impacts of carbon pricing on individuals and households.</p>
<p>12 Climate Change Adaptation</p>	<p>7</p>	<p>No progress was noted on bringing climate change coordinators to help develop and implement climate change adaptation strategies for municipalities, just the Cape Sable Historical Society.</p> <p>The list of departments completing climate change adaptation plans still does not include Fisheries and Aquaculture – one of the province's largest sectors for employment and GDP. Exports and value derived from seafood processing (under provincial jurisdiction) are already significantly challenged by environmental changes. For example, these changes are reducing some species availability, changing species availability faster than processors can adapt, and contributing to loss of processing facilities (due to fires and floods as well as declining production).</p>

<p>13 Ecological Forestry</p>	<p>10</p>	<p>Although the Triad system framework was instated and guides developed, there is still more work needed to fully implement the Lahey Report, regarding Ecological Forestry on Crown Land. The province deserves credit for continuing to move forward and acknowledging that there is more action needed. Meanwhile, crown land licensees still do not seem to respect the overriding management objective of restoring ecosystem health, but rather seem to be focused on maximizing fiber removals while still staying within the new 'rules.'</p>
<p>14 Protecting Land and Using Nature-based Solutions</p>	<p>10</p>	<p>The Province designated a few new protected areas in 2023. However, at this rate of just a few sites per year, we will not complete the sites from the 2013 Parks and Protected Areas Plan, nor will we reach our legislated goal of 20% land and water protection by 2030.</p>
<p>14 Protecting Land and Using Nature-based Solutions</p>	<p>10</p>	<p>The Province needs to put forward a new and ambitious slate of candidate protected areas in their upcoming 20 per cent by 2030 plan. There is a lack of clear planning and action to define new protected areas; the province needs to nominate them on Crown lands and move them forward quickly for protection designation.</p>
<p>17 Modernizing Environmental Assessments</p>	<p>12</p>	<p>In order to be inclusive, equitable, and propose the best changes possible, the province's public consultation (launched in August 2023) needs to be a good one. This means going beyond just an online survey by reaching out to marginalized communities, and doing more to try to ensure that a diversity of people contribute to the consultation.</p>
<p>18 Sustainable Fisheries and Aquaculture</p>	<p>14</p>	<p>Vulnerability assessments undertaken with funding from the Province by the Centre for Marine Applied Research (CMAR). These were not put out to tender and are high level. The next step needs to be actionable sector plans developed with stakeholders and world leading experts based here in Nova Scotia for our fisheries, aquaculture, and processing sectors with short, medium, and long term objectives and targets for adaptation.</p>