



**GOLDER**

# **The impacts of a project on Climate Change – Additional Considerations**

**OAIA ANNUAL CONFERENCE**

October 30, 2019

# Climate Change and ESIA's

## OTHER CONSIDERATIONS

- The current ESIA structure for is not compatible with a climate change assessment
- Guidance in GHG assessments is insufficient to overcome challenges for major projects
- FPTCCCEA (2003) guidance document seeks to understand:

*How will projects affect climate change?*

*How will climate change affect conclusions of predictions of effects during operation?*

# Climate Change Adaptation in Impact Assessment

## WHERE DO THESE ASSESSMENTS FIT IN?



**Observed Climate Change**

**Projected Climate Change**

**Impact of Climate Change on Project**

**Impact of Project on Climate Change**

**Document Effects of Climate Change on Project**

**Identify Thresholds for Adaptation**

# Relevant Climate Guidance - Provincial

## PLANNING AND PERMITTING

Existing methodologies and guidance are in varying states between provinces; many provinces refer to federal guidance

- Ontario's Guide to Considering climate change in the environmental assessment process
- Guide to Considering Climate Change in Environmental Assessments and Project Development in Nova Scotia
- Alberta's 2008 Climate Change Strategy (Alberta Environment and Sustainable Resource Development)

# Stakeholder Expectations

## SIGNIFICANT QUESTIONS

- Stakeholders are increasingly raising reduction targets (or lack thereof) as a gap in applications
- In some cases this is being used as a tactic to prolong or delay review and/or approval of applications
- How do we address how any proposed projects can pass an impact assessment when the project adds GHG emissions in a jurisdiction that has GHG reduction targets?

# GHG's – Reduction Targets vs Project Goals

NEW TOOLS ARE NEEDED

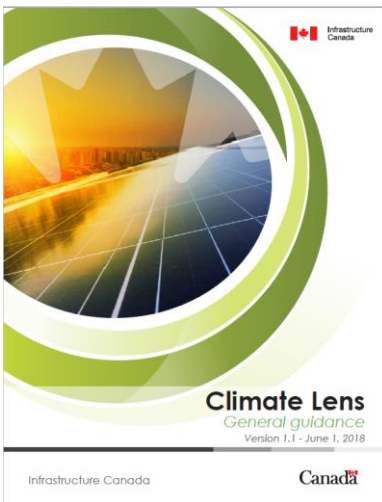


# Relevant Climate Guidance - Federal

## PLANNING AND PERMITTING



The Strategic Assessment of Climate Change will provide guidance to proponents, stakeholders, Indigenous Peoples and decision-makers on how climate change policies and commitments should be considered in impact assessments



Climate Lens outlines assessment requirements for large infrastructure funding applications based on accepted practices

# Determining Significance

## ASSESSMENT MEASURES



Direction

Magnitude

Extent

Duration

Frequency

Irreversibility

—

✓

✓

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✓

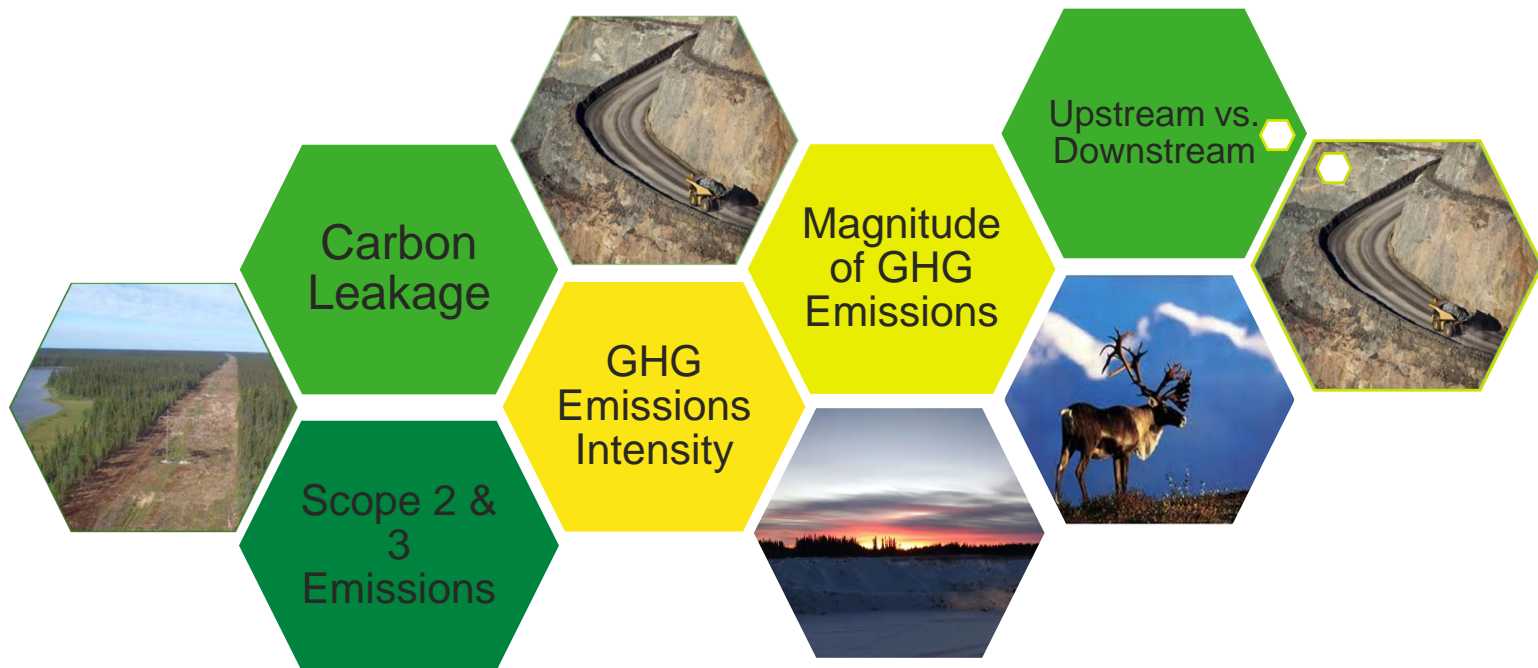
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Assessment measures compatible for GHG and Climate Change assessments: **Magnitude, Extent & Frequency**



# Climate Change Issues when Scoping

## ADDITIONAL CONSIDERATIONS



# Lime and Cement

## LEAKAGE



- BC carbon tax resulted significant increase in imported cement
- Giscombe CAS review comments and need for intervention by BC Environmental Assessment Office
- Ontario imports impacts from cap and trade/carbon pricing

# LNG

## INTENSITY

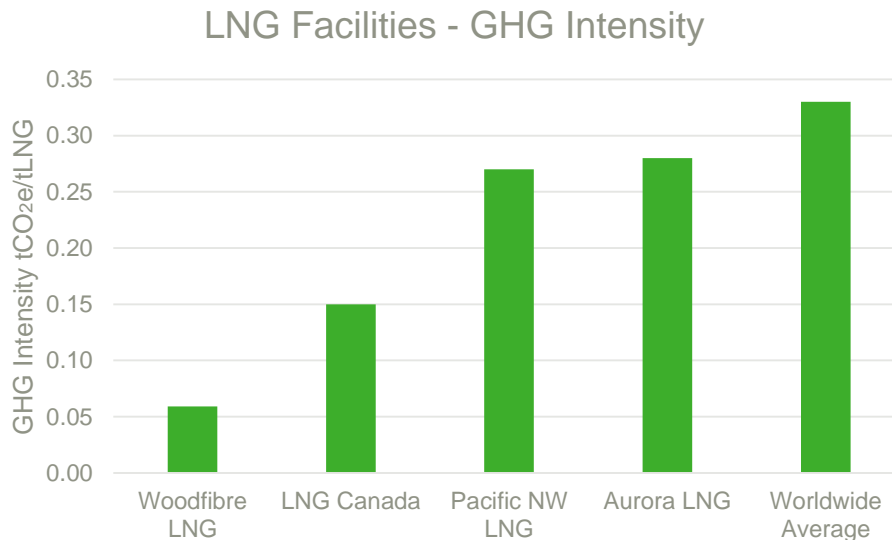


Photo: Amber Bracken, the Globe and Mail, B.C. regulator asks Chevron's Kitimat LNG to detail terminal's environmental impact (Oct 2019)

- IEA forecasts that natural gas demand will rise by 60 in Asia by 2024
- LNG will cause BC to miss reduction targets if all planned facilities are constructed
- Intensity benchmarking demonstrates how production at lower GHG intensities will decrease global GHG emissions

# Opportunities/Challenges

## INTENSITY BENCHMARKING



- LNG Canada's emissions determined to be 'significant' – est'd 6.6% of BC 2011 emissions (2015)
- The 0.16 tCO<sub>2</sub>e/tLNG produced has to be met annually when the facility is operational, but offsets can be used
- If Kitimat LNG does not meet 0.16 tCO<sub>2</sub>e through design that does not imperil EAO/ministerial approvals

# Upstream Example

## EXTENT



- Current guidance lacks magnitude assessment
- NEB forecasts have been made in absence of required infrastructure
- Where should additionality measured?
- Lack of Proponent Control

# Summary and Recommendations

## ADDITIONAL CONSIDERATIONS

Current guidance/practice is incompatible with GHG and climate change assessments.

Consistent methodology for application of climate change assessments in IA and Sustainable Development must be developed considering:

- Leakage
- Intensity
- Technology
- Global Impacts

# Thank you



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