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Clean Future  
126 Portland Street  
Dartmouth, NS B2Y 1H8

July 26, 2021

Dear Clean Future Engagement Coordinator,

On behalf of the Ecology Action Centre, I am pleased to offer our submission regarding the Sustainable Development Goals Act (SDGA) and the Climate Change Plan for Clean Growth (CCPCG). Like many Nova Scotians, our organization values opportunities for input and engagement, especially where it concerns the shaping of a healthier, more sustainable, and more prosperous future for our Province.

In considering our recommendations for goal inclusion, we reflected on the framework the new legislation sets in motion. We also considered how, and in what capacity, our feedback may propel action on the SDGA regulations and the climate plan. Three themes arose and form the heart of our input. They underscore our view that now is both a time and an opportunity for a transformational shift in thinking. They are:

1. *Bold and Accountable Leadership*: Given the climate crisis we face as a global community, it is more important than ever that legislation, regulations, and plans enable action that is meaningful, measurable, and transparent. We can no longer afford vague half measures and unkept promises. The way forward requires bold leadership and clear accountability. This means that falling short of stated goals must create a cascade of new actions designed to assess, address, and revise pathways to achieving targets. It also means signaling that the path forward requires robust reporting. In its current form, the SDGA utilizes vague language regarding reporting requirements. Such language does not establish accountability as a guiding principle. In this sense, accountability must be redefined and proactively applied rather than used after-the-fact to report on unmet goals. Identifying objectives and pathways in the pursuit of goals and ensuring that detailed assessment reports are mandatory as opposed to optional are ways in which accountability can be formally supported by the legislation.

The incorporation of accountability is also about broadening decision maker understanding as a means for moving past world views that are limited by unconscious bias. Roundtables, such as those identified in the SDGA, must be populated using an inclusive lens since climate change exacerbates disparities and inequities. The voices of those who have been historically marginalized, such as the Nova Scotia Mi'kmaw, African-Nova Scotians and our youth must have a seat at the table so they can be included in the decision making. A sustainable future must afford equitable ownership in any process.

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Bold and accountable leadership sets a needed tone for all audiences that the climate emergency is a priority. It also reinforces public confidence in the government, in the SDGA and climate plan, and in the immediate need for change.

2. *Re-thinking Economic Growth*: The COVID-19 pandemic has laid bare the fragility of the economic systems we have built. In our quest for ever increasing efficiency and profit, decentralization, diversity and redundancy in many of our markets and supply chains have been lost. This strategy has accumulated enormous wealth for increasingly few and resulted in supply systems becoming more and more exposed to global political, ecological, and social disruption. A key aspect of a transformational shift requires us to reconsider our approach and remember economic systems serve society and social needs not the other way around. We can no longer reduce the resiliency of our economic systems, especially now as we face increasing challenges from climate change, biodiversity loss, and growing inequity.

Tackling these challenges will require a swift move towards more adaptive systems and space for a diversity of economic actors to test sustainable solutions. We have the capability to design economic strategies that support regenerative practices, enable prosperity, and do our part to keep our planet healthy. The linchpin to this transformational approach is recognition and respect for the simple fact that our economy is embedded in nature, and not an external force unto its own. Wellbeing must be prioritized over GDP and/or included in its calculation. Sustaining ecosystems that sustain us must be understood as a principle of economic growth.

3. *Being Active Allies*: A future grounded in sustainable practices requires us to reconsider our approach when it comes to bringing Indigenous people and members of other marginalized communities together. In addition to a seat at the table, which is a must to ensure a positive, sustainable, and prosperous collective future, there must also be an effort to adopt and adapt Indigenous knowledge within our framework for action and decision making. Fortunately, we do not have to look far for guidance. There is compelling precedent for the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP) implementation at a provincial level, if we consider actions taken in British Columbia. There is also useful precedent at a federal level. Implementation in this manner is a must. However, so too is the inclusion that we as a Province will honour the Indigenous rights established in UNDRIP as a guiding principle for the SDGA.

The global community has already begun to demonstrate acceptance of lands and waters where Indigenous Peoples have the primary role in protecting and conserving ecosystems through Indigenous laws, governance and knowledge systems. Nova Scotia

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can do this too. Moving forward in this way can only benefit our Province and reinforce our efforts to achieve our climate goals.

Respectfully, we urge you to consider the concept of transformational thinking and how the above themes may lead us in this direction. We can create new legislation, new regulations, and new goals, all of which are vital. However, if we do not transform our thinking and, by consequence, our actions, we cannot truly enable the changes required to secure a future worthy of the next generation and those thereafter.

Once again, we value this opportunity and look forward to future discussions involving the vital pursuit of sustainability. Please note that our submission material is detailed on the following page.

Sincerely,



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## Submission Materials

Our knowledgeable team, extensive research, and hands-on involvement enabled the development of 21 goals recommended for inclusion in the Regulations of the SDGA. Additionally we have written 10 briefing notes, listed below, describing certain of the recommended goals or specific issues in detail, including how these could be implemented in the short-term.

### [21 Goals to Advance the Environmental and Economic Well-being of Nova Scotia](#)

Our 10 briefing notes address:

1. [Renewable Electricity](#)
2. [Energy Efficiency](#)
3. [Active and Public Transportation](#)
4. [Solid Waste and Plastics](#)
5. [Protected Areas](#)
6. [Offshore Oil and Gas and Just Transition](#)
7. [Aquaculture](#)
8. [Local Food Systems](#)
9. [Nature Based Climate Solutions](#)
10. [Accountability](#)

Additional resources used to inform our recommendations include:

- [A Multi-Jurisdictional Comparative Analysis of Sustainability Mandates of Electricity](#)

This 2021 report prepared by East Coast Environmental Law explores whether sustainability mandates held by electricity regulators in Canadian and New England jurisdictions offer useful models for law amendments in Nova Scotia that would give a sustainability mandate to Nova Scotia's electricity regulator, the Utility and Review Board (NSUARB). It also analyzes key legislative language and proposes amendments to the Public Utilities Act or Electricity Act or corresponding regulations and explains how those amendments would further the EAC's goals for electricity reform in Nova Scotia.

- [A Legal Analysis of the SDGA regulations](#)

This study, which we commissioned from East Coast Environmental Law, gives legislative analyses of five of our proposed goals, detailing if and how Nova Scotia's laws would need to change in order to implement the goals. The five goals analyzed are those pertaining to: renewable electricity, inclusive deep energy upgrades, energy efficiency, ending environmental racism, and protecting water. Additionally, the report examines Accountability and enforcement mechanisms for the SDGA as a whole

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- [The Green Jobs Report](#)

This 2019 report prepared for EAC by Gardner Pinfold Consulting explores the jobs and economic costs and benefits of select climate goals proposed by EAC.

- [Accelerating the Coal Phase Out: Nova Scotia and the Climate Emergency](#)

This 2019 report prepared for us by Ralph Torrie charts the path for a low-carbon electricity system in Nova Scotia. It proposes a scenario that leads to 90% renewable electricity, a complete phase-out of coal power, and significant increases in energy efficiency and electric transportation – all by the year 2030.

- [Electric Vehicle Adoption in Nova Scotia 2020 – 2030](#)

This 2020 report written by Dunsky Energy Consulting details the provincial landscape for electric vehicles and demonstrates the need for provincial intervention in order to drive electric vehicle uptake at a rate that will allow us to meet our provincial GHG targets and our national EV targets.