

Sustainability-based Assessment of Project-related Climate Change Impacts: A Next Generation EA Policy Conundrum

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Abstract

There has been a steady growth in Canadian scholarship and advocacy regarding sustainability-based approaches to environmental assessments (“EA”). However, to what extent and in what circumstances would a sustainability-based EA inevitably confront some of the same conceptual and technical challenges that bedevil more traditional EA models? In this paper, we consider and critique the capability of a sustainability-based EA to consider the specific issue of a project’s climate change impacts from its greenhouse gas (“GHG”) emissions. Using the Pacific NorthWest LNG Project as a case study, we compare and contrast the current EA regime and the sustainability-based EA regime first proposed by Gibson. We found that, while the sustainability framework improves upon the current regime in certain areas (such as more stringent trade-off rules for justifying significant adverse effects), the framework is not immune to many of the problems and issues that plague the current EA regime. Our analysis suggests that, on the complex and global issue of climate change, project level EAs alone (whether they include sustainability criteria) may not be an effective tool in making sure that industrial developments help, not hinder, Canada’s capability to meet its commitment to reduce GHG emissions. Any reform to the federal EA regime that tries to incorporate the sustainability framework must be attentive to the weaknesses within that framework in addressing the complex and global phenomenon of climate change. Accordingly, such reforms must also be part of a more comprehensive effort to design a GHG reduction regime that can provide concrete GHG benchmarks for project EAs.