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December 11, 2015

Premier Brad Wall

Via email: [premier@gov.sk.ca](mailto:premier@gov.sk.ca)

**SES LETTER TO PREMIER WALL ON A PROPOSAL FOR A PROVINCE-WIDE GREENHOUSE GAS REDUCTION STRATEGY**

Dear Premier Wall,

The global community has emerged from the climate change summit in Paris (UNFCCC) with a strong resolve to reduce greenhouse gas emissions. More than 185 nations have filed pledges with the United Nations specifying the reductions they will make. The Paris negotiations have underlined the urgency with which climate change must be addressed, and the need for every jurisdiction to do its part.

The Government of Canada has promised a nation-wide greenhouse gas emission reduction of at least 30% below 2005 levels by 2030. This target was filed with the United Nations this summer by Prime Minister Harper, and Prime Minister Trudeau has described it as the minimum bar for emission reduction. Saskatchewan's share of this emission reduction target would presumably be 26 million tonnes annually. To put this in context, Saskatchewan emissions in 2005 were 69.5 million tonnes, and a 30% reduction from that level would mean Saskatchewan emissions would need to drop to 48.8 million tonnes by 2030 to be in compliance. That is 26 million tonnes below current greenhouse gas emission levels in Saskatchewan, which now stand at 74.8 million tonnes per year.

Prime Minister Trudeau has signaled that a more ambitious reduction target might be set after consultation with the provinces. That is made more likely by the widespread acknowledgement at the United Nations that current emission pledges by industrialized countries and developing countries fall far short of what is needed to achieve the UN target of holding global average temperature increases to well under 2 degrees Celsius. The Saskatchewan Environmental Society would strongly support a more ambitious emissions reduction target. Canada's current target and the targets set by many other countries are a step forward, but they are



still insufficient to avoid extremely dangerous consequences from climate change.

**Whether the current national target remains in place or a more ambitious target is set, we want to encourage the Saskatchewan government to come forward with a comprehensive plan for making big reductions in the province's annual greenhouse gas emissions. To date your government has only specified some actions that will be taken in the electricity generation sector. However, to be successful, such a plan will need to address all the large emission sources in our province.**

We therefore want to turn to the public policies needed to achieve a 26 million tonne greenhouse gas emission reduction in Saskatchewan over the next 10-15 years. Simply put, that constitutes a 35% reduction over current emission levels.

Thirty-four percent of Saskatchewan greenhouse gas emissions come from the oil, natural gas and mining sector. The largest single source of emissions in that sector is 13 million tonnes (CO<sub>2</sub>e) of methane emissions per year, associated primarily with the extraction of oil from the ground, and subsequent pipeline and equipment leaks. Methane is a highly potent greenhouse gas. We therefore recommend you follow the lead of the United States Environmental Protection Agency and the Alberta government by targeting a 45% reduction in overall releases of methane throughout the oil and gas sector. For example, Saskatchewan should follow North Dakota's 2014 decision to ban the venting of methane gas during oil extraction. We could also follow North Dakota's example of developing the in-province pipeline infrastructure needed to fully utilize the commercial products contained in solution gas. Without this infrastructure too much natural gas is simply "burned off" as a waste product each day, as so often happens in Saskatchewan's oil patch. Finally, we encourage you to put in place improved financial incentives to make utilization of 'flare gas' for electricity generation financially viable.

The transport sector accounts for 21% of Saskatchewan's greenhouse gas emissions. To cut transport emissions we encourage you to introduce financial incentives for Saskatchewan residents to purchase super-energy efficient cars and hybrid vehicles. We also encourage Saskatchewan's government to work co-operatively with municipalities to invest in public transit, winter sidewalk maintenance (to facilitate walking), cycling paths, and other infrastructure designed to offer a clear alternative to private vehicle traffic. Finally, as an immediate gasoline-saving measure, we urge you to reduce the speed limit on Saskatchewan's divided highways to 100 km/hr, a move that would correspond to Manitoba's speed limit.

Twenty-one percent of Saskatchewan greenhouse gas emissions are produced by the electricity generation sector. Your government made a very positive announcement pertaining to this sector on November 23<sup>rd</sup>, 2015 – setting a goal of ensuring that 50% of



Saskatchewan's electrical generating capacity will come from renewable power sources by 2030. SaskPower has indicated that the newly announced plan should translate into a 40% reduction in greenhouse gas emissions by that year. We commend you on this announcement.

Now that this target has been set, we encourage you to implement the specific public policies needed to bring it into effect, including the adoption of a modest feed-in-tariff for renewable power. Today, more than 70 countries have a feed-in-tariff for renewable energy, a policy measure that ensures all producers of renewable power will be able to sell their electricity onto the grid at a price that fully covers their cost of production, and is guaranteed for approximately 20 years. If you adopted this kind of policy measure, it would create many high-quality jobs in the renewable energy sector in Saskatchewan.

One option for financing a feed-in-tariff would be to increase the price of electricity SaskPower charges its large commercial and industrial customers. The rates currently paid by these customers are only half those charged to Saskatchewan's residential customers. This results in large commercial and industrial customers having little economic incentive to conserve energy or install renewable power on their own premises.

The primary source of greenhouse gas emissions in Saskatchewan's electricity generation sector is coal-fired power plants, although emissions from natural gas-fired electrical generation are on the rise. We note that your November 23<sup>rd</sup> SaskPower announcement still envisions 3,500MW of fossil fuel-powered electrical generating capacity in Saskatchewan by 2030 – a similar amount to what is now in place, but presumably with somewhat lower emissions per unit of power produced. However, that is still a very large fossil fuel commitment to be planning for, and we encourage you to reduce it. As you expand wind, solar, biomass and hydro production in Saskatchewan, we urge you to simultaneously implement a plan for phasing out all of Saskatchewan's existing conventional coal-fired power plants. We envision the only exception being the coal-fired carbon capture unit at Boundary Dam.

In addition to Saskatchewan's in-province renewable energy mix, we encourage you to further increase hydro imports from Manitoba and to expand co-generation of electricity at Saskatchewan potash mines – using each as a replacement for burning coal. We also encourage you to follow the lead of U.S. states like California and Vermont by investing heavily in electricity efficiency. Energy conservation investments consistently pay excellent financial returns, and would help reduce the need for new generating capacity as Saskatchewan's population grows. We suggest the Government of Saskatchewan aim for 500MW of electricity conservation by 2025.

In addition, we encourage your government to consider a fundamental change in the way electricity is priced in Saskatchewan, so that instead of rates going down as more electricity is



consumed, they go up as more electricity is consumed.

The sector that touches all Saskatchewan citizens is buildings – both homes and commercial premises. Three policy measures that would reduce emissions here include provincial government incentives for home energy conservation retrofit, better incentives for installation of solar panels on homes, farms, offices and industrial buildings, and the adoption of energy efficiency standards as part of the Saskatchewan building code. The latter measure should aim to ensure that all new building construction is done to high energy efficiency standards. For example, in the residential sector, Energy Star should become the requirement for all newly built homes.

Sixteen percent of Saskatchewan's greenhouse gas emissions are in the agricultural sector. Here, three good steps would be to: a) encourage the use of cropping systems that increase soil organic matter, thus sequestering carbon; (b) increase use of legumes in crop rotations to minimize need for synthetic nitrogen fertilizers; and c) incent purchase of highly fuel-efficient farm equipment. Two further steps would be to discourage overgrazing of pastures, so that Saskatchewan pastures can sequester more carbon, and to encourage the utilization of manure for biogas production, which in turn can be used for electricity generation.

Finally we recommend that, as an overarching policy that will foster conservation in all sectors of the economy, Saskatchewan follow British Columbia's lead by introducing a revenue-neutral carbon tax aimed at encouraging energy efficiency and discouraging consumption of fossil fuels.

Thank you for giving consideration to these policy recommendations. We hope they will help you to develop an ambitious greenhouse gas reduction agenda. We need a plan that demonstrates that Saskatchewan will be a leader on the climate change file.

Sincerely,

A handwritten signature in cursive script that reads 'Ann Coxworth'.

Ann Coxworth, Board Member

A handwritten signature in cursive script that reads 'Peter Prebble'.

Peter Prebble, Director of Environmental Policy

A handwritten signature in cursive script that reads 'Allyson Brady'.

Allyson Brady, Executive Director