

**Submission to Law Amendments Committee,  
re: Bill 57 - Environmental Goals and Climate Change Reduction Act,  
Law Amendments Hearing Nov.1, 2021**

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From

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Implementation of the 'Lahey Recommendations' must incorporate carbon accounting/modelling to ensure carbon sequestration is increased.

I am pleased that new PC Government of Nova Scotia is putting forth a fully revised of the landmark 2007 EGSPA in the form of Bill 57, the Environmental Goals and Climate Change Reduction Act (First reading October 27, 2021). It is a very important bill and I hope that there will be further opportunities to comment on it before the final version is passed.

For the moment, I simply want to point out in relation to clauses 10 b and c, that one cannot make the assumption that 'implementing the Lahey recommendations' will help to mitigate climate change. In fact, if the impacts of various scenarios on carbon sequestration are not considered, it could negate many of the gains made through reductions in GHG emissions in other sectors.

The **Lahey Report** did not cite or otherwise highlight how the proposed changes in forest practices would affect carbon emissions. To illustrate, the word “climate” is cited 9 times, 8 of them referring to effects of climate change and adapting to climate change, 1 to the “business climate”; there is nothing on climate change mitigation in the Lahey Report.

The **Lahey Report** recommends small- scale wood- energy projects, but there is no accompanying recommendation for Life Cycle Assessments to ensure that they reduce rather than increase carbon emissions.

I and others have expressed particular concern about the impacts of the HPF (**High Production Forestry**) component on carbon sequestration. I am also concerned about effects of ‘intensive partial harvesting’ on carbon sequestration, if partial harvesting is pushed too hard in the Ecological Matrix.

In fact, continued net loss of high volume, Multi-aged-Old Growth Forest across Nova Scotia and particularly on Crown lands in SW Nova Scotia is likely to reduce carbon sequestration by Nova Scotia forests – unless the supply of wood from Crown lands is substantially reduced.

We need comprehensive and fully transparent carbon accounting/modelling to inform the implementation of the Lahey Recommendations in such a way that carbon sequestration is augmented, not reduced.

It is likely that some of this accounting already exists. Lands and Forestry/Natural Resources & Renewables hired a 'carbon modeller' in 2018, but we have yet to see in public any information about his activities or any results.

I suggest that a clause could be added under 10 to require such accounting, and that the Lahey Recommendations must be implemented in a way that increases carbon sequestration in our managed forests.