

Ontario's Climate Change Expectations for Projects Undergoing Environmental Assessment

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Ontario's Ministry of the Environment and Climate Change (MOECC) continues to roll out its Climate Change Action Plan with its proposed greenhouse gas (GHG) guide for projects that are subject to the province's Environmental Assessment Act. The draft guidance document, "Consideration of Climate Change in Environmental Assessment in Ontario", strives to incorporate climate change mitigation and adaptation considerations into the environmental assessment (EA) planning process.

The draft guide encourages proponents to estimate a proposed project's GHG emissions, assess its potential impacts on carbon sinks, and consider alternatives to minimize those impacts. Proponents are also encouraged to assess the effects of a changing climate on the proposed project. These climate change considerations are intended to improve the adaptability and resiliency of a project undergoing an EA, while maintaining the ecological integrity of the local environment.

On September 12, 2016, the draft guide was posted to the Environmental Registry (EBR Registry #012-5806) for a 45-day public review and comment period.

Application of the Guide

Proponents will be encouraged to consult the Guide, once approved, to prepare terms of reference for an EA or complete an EA study. Proponents of streamlined projects under class EAs are also encouraged to consult the Guide if the approved class EA has no climate consideration method or if that method "does not meet Ministry expectations". MOECC will be encouraging proponents to determine early on in the EA process whether there are likely to be relevant climate change considerations to address.

Assessing a project's effect on climate change

To support the EA process, the Guide references case studies, approaches, and methods for incorporating climate change considerations into project planning. This information will be updated and amended to reflect future policy developments and new methodologies. Since the Guide is not prescriptive, a proponent is not limited in its choice of methodology, approach, or modelling information for an EA.

The table below summarizes the approaches proposed in the Guide for assessing a project's effect on climate change.

Assessing a Project's Effect on Climate Change	
Questions to consider	Suggested approaches for proponent
How might a project generate GHG emissions or affect carbon storage or the removal of carbon dioxide from the atmosphere?	<ul style="list-style-type: none"> ◆ Consider all direct and indirect GHG emissions that would be generated or indirectly stimulated by the project ◆ Consider changes in local hydrology and vegetation that may change carbon sequestration and storage capacity
To what extent have the project's effects on the atmosphere been taken into account in project planning?	<ul style="list-style-type: none"> ◆ Review existing features that may reduce GHG emissions ◆ Identify impact management measures intended to limit the project's interference with natural features ◆ Describe contributions to or investments in natural spaces projects that offset or mitigate the project's climate effects
Are there alternative methods to implement the project that would better take into account any adverse contributions to a changing climate?	<ul style="list-style-type: none"> ◆ Consider alternative methods to project implementation to reduce GHG emissions or any negative effects on carbon storage or removal of carbon dioxide from the atmosphere ◆ Consult industry standards, best practices, and best available technology to identify alternative methods
How might a project give rise to climate effects, positive or negative, on Aboriginal people and/or communities?	<ul style="list-style-type: none"> ◆ Work with Aboriginal communities to identify a project's potential climate change concerns or opportunities ◆ Involve the community to create and implement impact mitigation measures to address concerns

Assessing the effect of climate change on a project

The proposed Guide also encourages proponents to consider the future effects of a changing environment on the project. Such a review is intended to identify any environmental effects that could be exacerbated by climate change, leading to greater risk to the surrounding environment. The effects of climate change can include property-specific concerns such as flooding, regional fluctuations such as changes in agricultural productivity, and system-wide effects on water demand and electricity consumption. Where the potential effect of climate change on the project is uncertain, a proponent should consider the variation of the effects, identify the expected range of effects, and determine the level of certainty of these predictions.

The table below summarizes the approaches proposed in the Guide for assessing the effect of climate change on a project.

Assessing the Effects of Climate Change on a Project	
Questions to consider	Suggested approaches for proponent
How potentially vulnerable is the project to a changing climate?	<ul style="list-style-type: none"> ◆ Consult existing project plans and documentation, historical and present climate data, and future projections ◆ Examine the effects of variation in climate parameters, such as temperature and precipitation on the proposed project, and its alternatives over time ◆ Identify climate changes that aggravate environmental effects of the project and measures to manage those effects
Does the project contribute to the vulnerability or resilience of surrounding ecosystems to climate change?	<ul style="list-style-type: none"> ◆ Consult historical and present climate data and projections of future climate in the area of the undertaking or project ◆ Examine the effects of projected changes in climate conditions based on whether or not the project is implemented
Are there potential effects that climate change may exert on the project that may pose a risk to the environment?	<ul style="list-style-type: none"> ◆ Review existing features of the project and detail those that may reduce climate change risk ◆ Consult existing project plans, plus present and future climate data, to carry out such a consideration ◆ Consider environmental effects of a project may be greater when coupled with projected climate changes
Are there alternative methods of carrying out the project that could lessen the negative effects of climate change on the project, thereby reducing the risk to the local environment?	<ul style="list-style-type: none"> ◆ Consult industry standards, best practices and best available technology for existing project plans ◆ Assess future climate change risks in the area of a project that may necessitate consideration of alternative methods ◆ Consider climate adaptation measures that increase resilience of any aspect of project design, operation, and function that could be susceptible to climate variability
Could the project result in disruption to lands or waters associated with Aboriginal cultural resources?	<ul style="list-style-type: none"> ◆ Consider whether climate change could exacerbate the project's anticipated environmental effects and pose additional challenges to Aboriginal communities

Next steps

The Guide will be available for public review and comment on the Environmental Registry until October 27, 2016.

It remains to be seen if the MOECC will introduce similar guidance documents to consider climate change implications in the Environmental Compliance Approvals process.

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