



MANITOBA ECO-NETWORK

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Prairies Economic Development Canada (PrairiesCan)
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Re: The Building a Green Prairie Economy Act

The Manitoba Eco-Network appreciates the opportunity to provide feedback on the development of a framework “to coordinate local cooperation and engagement in the implementation of federal programs across various sectors with the objective of building a green economy in the Prairie provinces”. The main purpose of our submission is to emphasize that the Prairie provinces, especially Manitoba, need to be considered separately as each has unique characteristics and economic challenges that need to be addressed in the development of a multi-jurisdictional economic plan under the [Building a Green Prairie Economy Act](#) (the Act). Although the discussion paper focused on the outcomes the framework might assist in producing, we also provide some comments on the elements the framework should include to create more sustainable economic outcomes in the Prairies.

Ensuring a Balanced Perspective:

One major concern we have with the development of a framework that will have significant economic implications in the Prairie provinces, is the fact that there seems to be an emphasis on engaging with government officials and “the private sector and representatives of employers and employees in that sector” (s 3(1)). As an environmental non-profit organization that seeks to engage in environmental matters from a public interest perspective, we ask that diverse voices be included in decisions that will impact the environment and economy for all citizens living in the affected area. More inclusive language in the Act would be our preference, however, the participation of the public and non-government organizations can still be emphasized and should be encouraged in related regulations and policy documents. In Manitoba, community non-profit networks and associations require more support from government and have been calling for change.¹ There is a need for the framework and related programs to help fill gaps in support and allow grassroots organizations to meaningfully participate.

Purpose of the Framework:

Based on the discussion paper and other commentary, the purpose of the framework is to prescribe a decision-making process which directs how federal funds will be spent in the development of the green economy. It will also provide processes for coordination and engagement in the implementation of the Act and any related programming.

¹ Manitoba’s Community Non-Profit Networks & Associations, “Non-Profits Make Manitoba’s Communities Thrive” (2023), online: <https://mbeconetwork.org/wp-content/uploads/2023/05/Non-Profits-Make-Manitobas-Communities-Thrive-policy-recommendations.pdf>

While these appear to be useful goals, the development of a coordinated federal funding program should also consider existing economic and governance challenges in the Prairie provinces and how to fix them. For example, there has been a historic lack of coordination when it comes to government spending across the Prairies. Billions of dollars have been spent on irrigation and water infrastructure in Alberta, Saskatchewan, and Manitoba with little consideration of cumulative effects and potential impacts on the water needs of other jurisdictions. There is a need for more collaborative and coordinated environmental governance across the Prairies that goes beyond economic concerns.

The coordination we need in the Prairies involves coordination of the energy sector and addressing barriers to a more connected energy grid, which may be difficult to achieve considering the high level of privatization of energy companies operating in Alberta. There is also a need for collaborative measures to go beyond the construction of new developments. To achieve a “green economy” we cannot ignore Demand Side Management (DSM) and need a more coordinated effort to achieve energy savings across the Prairies. As highlighted in our previous submission to Environment and Climate Change Canada on the implementation of the Clean Electricity Regulations, we do not support the development of small-scale nuclear reactors and see little merit for carbon capture as a means of greening our economy.²

The Eco-Network also wants to emphasize that there are significant differences between the prairie provinces. We need to develop a framework that does not assume the interests of Manitobans are automatically aligned with the interests of Saskatchewan and Alberta. Manitoba is often ignored in federal environmental discourse, but the considerable differences in the current economies, societies and environments of the prairie provinces requires recognition and consideration in federal programming. There is no “one size fits all” solution for the Prairies.

What does it mean to be “Green”?

After review of the Discussion Paper and the Act, it remains unclear what exactly is meant by a “green economy”. Clarification of this term and other important phrases captured in the Act would provide more transparency and provide the public with more insight into the philosophical underpinnings of the Act and the framework. The process of defining these terms should involve considerable public engagement. Terms or phrases that require more discussion and clear definitions include, but are not limited to:

- Green economy
- Economic sustainability
- Growth

The resulting definitions should not perpetuate the status quo. They must emphasize the consideration of sustainability, i.e., improvement in the state of sustainability broadly. The implicit or customary definition of terms like “growth” that do not reflect modern understandings of sustainability must be expanded in the framework. For example, there are recognized limits to growth, which makes GDP/GNP a poor measurement. There is a need to expand current

² Manitoba Eco-Network, Letter to ECCC Re: Proposed Frame for Clean Electricity Regulations (August 17, 2022), online: https://mbeconetwork.org/wp-content/uploads/2022/08/MbEN-Comments_Frame-for-Clean-Electricity-Regulations_August-17-2022.pdf

understanding of terms like “growth” to capture the new reality of the ongoing climate crisis and recognition that spending to restore the environment and build climate resilience is an important element of a green economy.

There is also a need for better understanding of how the Act and resulting framework will ensure the “greening” of the prairie provinces helps Canada meet its national and international commitments. For example, how will the framework and associated programming address the fact that Alberta currently generates a third of Canada’s greenhouse gas emissions? How is the framework going to facilitate the reduction of GHGs in the prairie provinces so we can meet our obligations associated with the Paris Accord? Similarly, how will the framework ensure the prairies contribute to achieving Canada’s commitments under the Kunming-Montreal agreement on biodiversity? Especially if there are going to be new natural resource developments with the potential for significant environmental impacts (e.g., nuclear, mining).

The Eco-Network also suggests being cautious when discussing large-scale hydroelectric generation in conjunction with “green energy”. Too often the significant environmental and socio-economic impacts of hydroelectricity are ignored, and political discourse around green energy and the economy is no exception. New and/or increased hydroelectric generation should not be promoted without acknowledgement of the historic and ongoing negative consequences for northern Manitoba and the many impacted Indigenous communities living there.

Clarity is also needed in terms of how the framework will help facilitate the implementation of the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP). This is an important opportunity to incorporate the elements of UNDRIP into the new federal policies and programming associated with the Act. As noted in the discussion paper, “participation of all Prairie Canadians is important, including Indigenous peoples, women, youth, 2SLGBTQQIA+, Canadians with disabilities, newcomers to Canada and immigrants, members of Official Language Minority Communities, members of racialized communities, youth, and other underrepresented groups.” (7)

Elements of the Framework:

The Act identifies six areas to promote economic sustainability, growth, and employment in the Prairies (s 3):

- addressing the limited or non-existent transportation options in small cities and communities, and advancing innovative solutions for public transportation services in those cities and communities;
- fostering job creation and skills transfer, as evidenced by increased employment, in Prairie regions that rely on traditional energy industries to enable them to build a net-zero emissions green economy and mitigate their impact on climate change;
- prioritizing projects that generate natural infrastructure and a clean environment, such as tree-planting initiatives, solar energy projects and environmental management of the boreal forest, and that make use of all sources of energy, including nuclear energy;
- supporting the continued development of clean energy in fields such as agriculture, forestry, transportation, manufacturing and tourism;
- establishing programs and projects that stimulate a green economy, in a way that takes into account local circumstances, and the participation of local businesses, governments and civil society organizations; and

- preparing infrastructure projects that facilitate adaptation to climate change and mitigation of its adverse effects.

Although more clarity around the scope of these areas would be helpful, there seems to be potential for sustainable outcomes. However, there needs to be more emphasis on the environmental and sustainability focused elements of the framework. For example, the prioritization of projects that “generate natural infrastructure and a clean environment”, should focus on avoiding unnecessary environmental impacts and facilitating environmental restoration and better management of natural resources (i.e., DSM). This means more emphasis on tree-planting, solar energy, adaptive management, a circular economy, not mining and nuclear energy projects.

There is also a need for the framework and associated programming to address environmental governance and the practices that should be adopted by all governments involved to ensure sustainable outcomes are achieved. This requires clarity and benchmarks for achieving cooperation and collaboration between stakeholders and governments involved in implementation of the Act. What will happen if the commitments made by participating governments are not fulfilled? Who will be responsible for facilitating government coordination?

Similarly, there is a need for more transparency and more detailed requirements related to government reporting and review of the framework/programming to ensure planned outcomes are achieved. The Eco-Network suggests the adoption of more regular reporting and review requirements such as an annual adaptive management review/program adjustment, SWOT (Strengths, Weaknesses, Opportunities, and Threats) Analysis, and an expenditure/ investment assessment³.

Meaningful Public Engagement:

The Eco-Network supports the goal of “economic growth that works for everyone” identified in the Discussion Paper. This is not to say we support continual growth. Instead, it means careful consideration of the economic, social, and environmental impacts on all stakeholders affected by economic decisions and sometimes requires government to say “no” to new developments. To us, this requires a commitment to openness and engagement with all interested stakeholders, including members of the public and non-governmental organizations, at all stages of the process including the development and elaboration of the framework. It also requires ensuring a diverse range of voices are heard from all provinces and are not drowned out by highly funded private industries.

In the draft framework, it would be very helpful to provide more insight on how programs and projects will be established “in a way that takes into account local circumstances, and the participation of local businesses, governments and civil society organizations”, as discussed in section 3(e) of the Act. One way to encourage and support engagement, particularly when seeking the input of non-governmental organizations and Indigenous governments/organizations, involves the provision of funding. Economic discussions are difficult and require considerable time and effort

³ An investment assessment process which rewards opportunities that, firstly, maximize enhancements to all the elements of sustainability and that, secondly, avoids the status quo or the degradation of any element of sustainability.

to engage in. It can be very difficult to engage without financial compensation for time spent and/or the expert assistance needed to meaningfully engage.

The Eco-Network encourages you to consider the development of participatory funding, and suggests you provide engagement opportunities that allow for a variety of ways to participate (both online and in-person), facilitate access to information in plain language – including background information, and are followed up with “What We’ve Heard” reports and other updates on the progress of the framework/program development. The creation of a funded government unit/position to support public and Indigenous engagement would also be very helpful. Having a real person available to the public to answer questions is always appreciated.

Conclusion:

The Eco-Network recommends the development of a framework under the *Green Prairie Economy Act* that is responsive to rapidly changing circumstances and is flexible, in a predictable way, to allow for different emphasis in different parts of the Prairies. There is a need for the framework and resulting programming to be developed based on a balanced perspective to ensure all citizens in the prairie provinces benefit and Manitobans are not once again left out of important federal environmental initiatives. We urge you to think carefully about what a “green economy” means to Canadians and make sure emphasis is placed on the environment and sustainability. We need federal programming to shift the Prairies in a more sustainable direction, not provide private industry with more opportunity to greenwash the environmental destruction caused when economy overshadows the environment.

Sincerely,

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About the Eco-Network:

Since 1988, Manitoba Eco-Network has promoted positive environmental action by supporting people and groups in our community. The Eco-Network’s programming focuses on policy advocacy, engagement in consultation processes and developing capacity building tools that benefit the environmental non-profit sector and our member groups. We are a public interest environmental organization seeking to promote and facilitate good environmental governance and the protection of Manitoba’s environment for the benefit of current and future generations.