



“When it comes to giving, some people stop at nothing.”

Vernon McLellan

December 2012

There is no SAGE meeting in December in lieu of the SSRP meeting noted below.

Public Consultation for the South Saskatchewan Regional Plan. Please consider attending on December 6th, Coast Lethbridge Hotel, 4 p.m to 8 p.m.

Upcoming at [SACPA](#), **How do we save the earth?** Presented by Lorne Fitch on December 20th, 12 noon until 2 p.m.

Suffield National Wildlife Area Facing Oil & Gas Development

With global demand for natural gas and oil expected to steadily increase, there is mounting pressure to exploit parks and protected areas. Cenovus (formerly EnCana) has made an application to develop a natural gas project in the Suffield National Wildlife Area (NWA), involving over 1000 wells and related infrastructure.

Suffield NWA was established in 2003 to protect endangered native prairie and the many species of animals and plants at risk in the area, including at least 15 federally listed species threatened with extinction. In 2009 a Joint Review Panel concluded that the “fact that a national wildlife area was created to protect the ecological integrity of this land and the species that occupy it, suggests

that great care must be taken to preserve its attributes.” Unlike national parks, National Wildlife Areas (NWA) and Migratory Bird Sanctuaries (MBS) do not extend below the surface, making them vulnerable to mining and oil & gas exploitation.

Despite extensive environmental assessment that has identified many adverse environmental impacts of the project, the outcome of the permitting decision is not clear - though it is expected that a final decision on the Cenovus permit application is forthcoming.

Allowing Cenovus to develop this wildlife area is expected to result in direct and indirect losses of habitat; fragmentation

of habitat and opening up of remote wilderness areas; decreased habitat effectiveness and increased intra- and inter-specific competition; surface water and/or groundwater/aquifer contamination; interruption of hydrologic regimes; soil/substrate contamination; introduction and proliferation of invasive species; air pollution; and noise disturbance to wildlife.

You have an opportunity to help protect the integrity of this unique, fragile native prairie and to show that Canada’s NWAs are meant for conservation – not industrial development. Federal Minister Kent (Environment) and Minister Mackay (Defence) might be interested in hearing from you.

Green Micro-Loans: A gift that keeps giving.

[Kiva](#) is a leading organization that provides micro-lending to international pioneers, including [green micro-loans](#). Individuals, groups of individuals or businesses can loan directly to people around the world for any number of initiatives. Green energy, energy efficiency, and organic agriculture are a few examples of the types of projects seeking micro-funding.

Loan requests can range from \$25 to a few thousand dollars. Since 2005, Kiva has organized almost \$340 million in loans to 850,000 lenders, with

a repayment rate of 99%. Repaid loans become ‘Kiva Credit’ in your own account, which can be loaned again to another project.

Green micro-loans are also becoming popular within regions, where loans are provided to green businesses to help stimulate the development of green jobs in the local community. [Vancity](#), for example, has aided in the investment of over \$72 million in Vancouver organizations that improve quality of life from a social and environmental perspective.

Community Supported Agriculture

Community Supported Agriculture (CSA) has become a popular way to buy locally grown food directly from a farmer (or rancher). There are many benefits to the individual consumer and the community.

The premise is that an individual family may buy ‘shares’ in the harvest from the garden of a local family farm. The type and amount of food will vary between good or bad years, though every effort is made to provide value for the ‘share’.

From a community perspective, a CSA supports family farming

and local food security/sovereignty as a result. Local food, grown organically can reduce greenhouse gas emissions compared to food that has been picked, refrigerated and transported many hundreds or thousands of miles to your table. Community farmers are also more likely to be better stewards of water and their own land.

The food is also picked fresh and delivered to a regular location at a regular time. I give two green-thumbs up for my experience with a Lethbridge CSA, Noble Gardens, last season (www.noblegardenscsa.com/)

Survey Shows Public Trust of Environmental Groups

The University of Calgary's School of Public Policy recently conducted a survey on energy literacy in Canada.

The results show that academics and 'environmental groups and activists' are considered more trustworthy than industry when it relates to energy issues. Academics scored 61.3% support and environmental groups 53.3%, compared to oil & gas companies at 31.1%. Government trust fell in at 43%,

The survey indicated that 77% of respondents were very or somewhat con-

cerned about the impact of energy generation on the environment.

On the other hand, a majority of respondents did not have a clear idea of where energy comes from and the potential impacts - Albertans had one of the lowest understandings of how electricity was generated in the province (which is 70% coal on a yearly average).

The study suggested a negative response for coal and nuclear as sources of electricity generation, with natural gas and renewables seen more positively.

CFO Project Team Disbands

The Confined Feedlot Operations (CFO) project team under the Clean Air Strategic Alliance (CASA) disbanded after presenting its final report.

Feedback from SAGE on the final report was presented to CASA. The report was seen as a positive move towards better addressing CFO emissions, with a recommendation to monitor air emissions from individual CFO operations and better determine the concentration of specific emissions.

It was generally recognized that there is more work to be done in improving air

quality around CFO operations - this may be accomplished through proposed government plans for airshed management in Alberta through its 'Clean Air Strategy'.

Other specific recommendations were to embed Best Management Practices (BMP) within CFO licensing requirements; to identify all CFO operations in the province by type, size and region (currently obscured by a lack of clarity of definition and practices around grandfathering CFO operations); to link water licensing to CFO permits; to monitor manure storage and leakage to the eco-

Climate Reality at SAGE

Lori Harasem shared with SAGE the latest presentation from the [Climate Reality Project](#), supported by her intense training last summer with Al Gore and a team of scientists. It was a stunningly visual presentation of recent weather events that are intensifying in both frequency and magnitude due to anthropogenic global warming. Supported by research and Al Gore's recent book *Our Choice* [reviewed in the SAGE [May 2012](#) newsletter], the presentation showed what is to be our climate reality.

If you are interested in having Lori present, or training to become a presenter yourself, go to [Climate Reality Canada](#) or contact Lori at loriharasem@yahoo.ca

system; and to establish more comprehensive monitoring practices.

Better statistics on animal numbers, health impacts, and cumulative effects on air (emissions), soil (contamination) and water (groundwater contamination and pathogens in surface water) are essential for improved CFO management. Furthermore, a means of upgrading grandfathered operations to best practices, and clearer processes for decommissioning and closure of noncompliant operations are required. (See attached letter to the Government of Alberta).

Interesting Links:

Fuel for Thought: The Economic Benefits of Oil Sands Investment for Canada's Regions <http://www.conferenceboard.ca/>

In the Shadow of the Boom: How Oil Sands Development is Reshaping Canada's Economy <http://www.pembina.org/pub/2345>

Climate Change: Do the Math! (by James Byrne, et al., U of Lethbridge) <https://vimeo.com/53979295>

The Underlying Threat: Addressing Subsurface Threats in Environment Canada's Protected Areas <http://www.naturecanada.ca>

Southern Alberta Group for the Environment (SAGE)

A Leading Voice for a Healthy and Environmentally Sustainable Community.

Visit us at: <http://sage-environment.org/>

If you are interesting in getting involved, contact us at:

sage-communications@sage-environment.org

TANSTAAFL (2011)

Edwin Dolan recently published a revised version of TANSTAAFL or 'There Ain't No Such Thing As A Free Lunch'. As a self-proclaimed 'libertarian', he offers an argument for environmental protection through improved economic signals and tort litigation.

The book begins with an acknowledgement that a 'throughput' economy is not appropriate in a world with finite resources and sinks for pollution; and that the GNP is not a measure of wellbeing but, rather, a measure of throughput. An interesting suggestion he makes is "to split the current single GNP figure into two components. The first – call it Type I GNP – would measure that fraction of GNP which was produced with *renewable* resources and *recyclable* wastes. Type II GNP would then measure the total value of production which was based on the exhaustion of irreplaceable resources and the production of indestructible wastes" (p.14). Economist Herman Daly similarly calls the Type II GNP 'uneconomic' growth, because it does not consider the externalities to society and the environment, nor does it consider opportunity costs for future generations that might better value the resources we are squandering today.

As a libertarian, Dolan eschews government involvement in the activities of citizens and the market, and he gives short shrift to altruism and voluntarism: "The first warning light flashes when I hear the call for self-sacrifice and self-restraint as the means for resolving the environmental crisis. Any economist worth his salt knows that altruism is notoriously weak as a force for social change, and that the goal of avoiding ecological disaster will be more easily and rapidly reached by methods which harness the strong human motivations – the greed, avarice, and self-interest of individuals within the ranks of business, government, and consumers. We simply do not have time to wait for an ethical revolution before we clean up" (p.18).

Dolan offers a clear statement of his position that involves a market solution and tort litigation to curb the wild excesses of corporate greed: "A policy that requires people to pay full costs provides an incentive for people not to pollute or deplete resources beyond the point where the costs of doing so exceed the benefits. That will be true regardless of the mechanism used to generate the appropriate price signal: a free-market purchase from the original owner of rights to use a source or sink, a tax per unit of pollution that accrues to a government treasury, or the purchase of a pollution permit from a third party under a cap-and-trade program. In contrast, the interpretation of TANSTAAFL as an ethical maxim is driven by justice. ... Common law focuses on compensation for value received and restitution for harms done" (p.25). He does, however, acknowledge that "A free market is not a 'Drill Baby, Drill!' paradise where business is free from government regulations, free to seek subsidies from the public treasury, and free to shift costs to anyone unlucky enough to live downstream or downwind. A market economy is not truly free unless it includes effective mechanisms to ensure that everyone, whether acting as producer, consumer, or agent of the government, respects the persons and property of others" (p.45).

Dolan repeats this perspective later on in the book: "The bottom line? Paying for pollution is a good idea. It is good for the planet. It is efficient. Since it is impossible to live without having an impact on the environment, it is only fair people should pay for the resources they use and environmental harm they cause, whether their impact is large or small. ... In short, full-cost pricing is necessary, but not always sufficient for achieving environmentally appropriate outcomes. ... Finally, material incentives need to be backed up [by] individual responsibility. ... We must keep in mind that the TANSTAAFL principle is not just a guideline for policy, but also a moral imperative" (p.77).

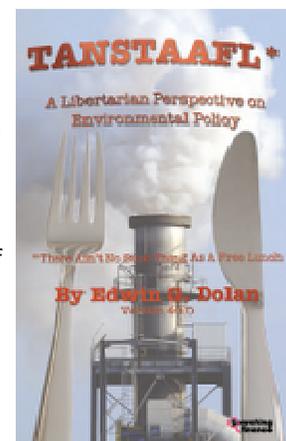


This is what makes TANSTAAFL interesting: Like most people on the right, he would like the 'invisible hand' to do the work rather than government, though he admits that the government will have to guide the invisible hand through full-cost accounting of the costs of polluting the environment and depleting non-renewable resources. He also doubts voluntaristic altruism and questions the ability of government to dictate ethical values, though he remains faithful to the power of litigating against people and corporations who have done harm to individuals.

In other words, he espouses John Locke's libertarian rights to property, suggesting that what is owned will be used well - which is typical of this position - but he also champions the *duties* to abstain from harming others; to abstain from taking property of others; to leave what is in the commons in as good a condition .

In a time when governments are responding to corporate lobbying that limit the awards from court decisions in tort litigation, it seems that Dolan's mechanism to encourage better corporate behaviour is being diminished. From his perspective, to expect people to abstain from harming others and taking more than one needs from the common without legal deterrents is the sort of altruism he doubts earlier in the book.

Dolan also does not offer much in the way of converting a 'throughput' economy into a 'spaceship' economy though he suggests the latter is required to sustain human civilization. Nonetheless it is interesting to read the perspectives of environmentalism from the right.





A leading voice for a healthy and environmentally sustainable community

Box 383 Lethbridge AB T1J 3E9

2 November 2012

Hon. Verlyn Olson QC
Minister, Alberta Agriculture and Rural Development (AARD)
228 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6

Dear Minister Olson:

Regulations under *Agricultural Operations Practices Act (AOPA)*, legislation dealing with livestock operations and manure management, will expire in 2014. It is our understanding that AARD is considering what changes may be needed to the regulations as well as to the *Act* itself. We are writing to encourage you to undertake a full review of *AOPA*. We also are providing suggestions for improvements we would like you to consider.

Environmental impacts of confined feeding operations has been an issue of concern for the Southern Alberta Group for the Environment (SAGE) since the mid 1990s when we first became aware that our region was in the process of developing the highest concentrations of feedlots in North America and that unacceptable levels of contamination of air and water were occurring. In 2002, when the Natural Resources Conservation Board (NRCB) assumed responsibility for regulating confined feeding operations under *AOPA*, we had high expectations of improvement in prevention and mitigation of environmental contamination. Some gains have been made however there is still need for improvement in regulation of confined feeding operations.

According to the *Oldman State of the Watershed Report (2010)*, there are over 500 confined feeding operations in the Oldman Watershed and the large majority of these are in the lower prairie portions of the watershed. Irrigated portions of the County of Lethbridge have the highest density of feedlots, pig barns, and poultry facilities. Water quality in the prairie subbasins of the Oldman Watershed is determined to be of poor to fair quality due to excess nitrogen, phosphorus, suspended solids and fecal coliforms. Our region also has a very high rate of water-borne enteric pathogens. There is little doubt that livestock operations are contributing to degradation of water quality and to human health problems. Air quality is also degraded due to odour and dust, particularly in areas of high concentration of confined feeding operations.

Key suggestions for improving the legislation that regulates livestock operations follow.

- Revise the purpose statement of *AOPA* to include a public interest mandate, with less focus on promoting growth of the livestock industry. There are many examples where growth of livestock operations has superseded or compromised human health and environmental considerations. This is not sustainable.

- Expand the definition of “affected person” or “directly affected party” under *AOPA* to include not only neighbours of the confined feeding operation, but also any person or group who has a legitimate interest, representation of which is necessary for a fair decision. This is particularly relevant to consideration of cumulative effects.
- Include a requirement to assess cumulative environmental effects in decisions about approval or expansion of confined feeding operations.
- Change *AOPA* to require that all confined feeding operations, including those constructed before 2002 when *AOPA* was first introduced, are required to meet *AOPA* requirements within a set time frame. Decommission operations that fail to meet requirements within the established time frame.
- Provide more clarity to the Natural Resources Conservation Board (NRCB), who is responsible for approval and compliance of livestock operations under *AOPA*. This includes ensuring measures that protect the environment are required and not discretionary.
- Require that manure application be limited not only by nitrate-nitrogen concentration but also by phosphorus concentration and salinity to control accumulation of phosphorous and salts in soil and runoff into surface water. There is ample scientific information to support this change.
- Improve requirements for operators to monitor effects of operations on water (surface and groundwater), air and soil and require that monitoring data collected under *AOPA* is independently verified and is public information. Operation-specific monitoring would complement improved monitoring by government to determine regional effects on air and water quality.
- Change *AOPA* to allow NRCB to issue fines and administrative penalties. This would allow more effective and timely enforcement action against violators of *AOPA*. Currently prosecutions done through the courts take months if not years and fines are not sufficient disincentive to ‘bad’ operators.
- Provide more effective requirements and tools under *AOPA* to suspend and decommission operations that are inappropriately sited or that fail to comply with enforcement orders.

We encourage you to undertake a full review of *AOPA* and would appreciate serious consideration of our suggestions for improving the legislation. Please keep us informed of your decisions and opportunities for input.

Yours sincerely



Braum Barber
Chair

Cc Hon. Diana McQueen, Minister, Alberta Environment and Sustainable Resource Development
Hon. Fred Horne, Minister, Alberta Health and Wellness