

# CASA's Potential: Clean Air Strategy and the Current Context

Revised: June 21, 2016

## Background

CASA's origins lie in the 1991 Clean Air Strategy for Alberta, which set out the basic shape of CASA's work: a multi-stakeholder, consensus based organization that develops recommendations on air quality issues. The original strategy was developed through a series of round tables. CASA has proven its worth in areas such as the electricity sector, flaring and venting, particulate matter and ozone, ambient monitoring strategic planning and odour management. It is currently working on Non-Point Source emissions, particularly those that impact the exceedances or approaching exceedances of the new Canadian Ambient Air Quality Standards (CAAQS).

The work of CASA's "sister" organization, the Alberta Water Council (AWC), is named in the *Water for Life* strategy, which came out of a series of consultations across the province. There is a close tie between the work set out in the Water Strategy and the work of both Alberta Environment and Parks and the Alberta Water Council. There is a clear line of sight between the various players, the initiatives underway and the Strategy. Furthermore, the Alberta Water Council is named in several of the delivery pieces of the *Our Water, Our Future - A Plan for Action*, based on the Water Conversations held by the province in 2013.

In 2009, CASA was asked for, and developed, a series of recommendations for a renewed Clean Air Strategy for Alberta. These were delivered to the Alberta Government, which in turn responded in 2012 with "*Clearing the Air: Alberta's Renewed Clean Air Strategy*". It also included an Action Plan that set out a number of goals and actions that would need to be implemented to achieve the strategy.

The strategy was intended to anchor the work of the Government of Alberta and partners including CASA in much the same way that the previous Air Strategy had and the *Water for Life* Strategy does for the Water Council. Despite efforts on clarifying roles of partners and associate areas of work focus, questions remain.

## The Current Context

Although some of the work set out in the Clean Air Strategy Action Plan is underway, such as the Non-Point Source project, the Strategy and Action Plan have not played a defining role for setting a new clean air agenda for Alberta partly because of changing federal and provincial priorities and

context. Effective in 2015, the focus of air quality management changed from provincial airsheds to national airsheds and provincial air zones, and the implementation of the new, more stringent CAAQS for PM<sub>2.5</sub> and ozone. The release of the first assessment report of CAAQS compliance in September 2015 signaled that Alberta has some challenges in terms of meeting the new CAAQS standards and management action trigger level in most of its air zones. As such, the focus of provincial air quality management has now shifted to achievement of existing CAAQS for fine particulate matter and ozone with new CAAQS to be announced in 2020 for SO<sub>2</sub> and NO<sub>2</sub> that are anticipated to result in additional air quality management challenges.

There are other current factors at play that impact the ways in which air issues are addressed. The Land-use Framework's (LUF) planning processes and regional air management frameworks, the Integrated Resource Management System (IRMS), the creation and subsequent dissolution of the Alberta Environmental Monitoring, Evaluation and Reporting Agency (AEMERA), the creation of the Alberta Energy Regulator (AER), the Provincial Government's priority on the Climate Leadership Plan, a new provincial government with new priorities, and a drastic reduction in the price of oil and gas have all resulted in changes to, and shifts in, air quality management processes and priorities. The basic air quality management tasks are the same: monitoring ambient levels, controlling and managing air emission sources through regulatory and non-regulatory tools, understanding how air emissions impact air quality and human health and the environment,, developing air quality management approaches, tools and requirements to protect the health of Albertans and the environment while also considering the economic impacts of air quality management to both society and emitters. In the current fiscally constrained reality, it is more essential than ever that action on air and climate be seen as parts of a single air quality and environmental management system and be levered for maximum environmental advantage.

## **CASA's Future Role**

CASA has and can continue to play an effective and supportive role in the development of good air policy recommendations and plans that have the credibility and support which is an inherent outcome from the CASA process. Stakeholders need to share responsibility in developing and implementing the strategies necessary to address today's complex air quality issues. However, there is a need to better align the work that CASA undertakes with the priorities of its members, particularly the government members, if it is to remain relevant and effective. Given the stated priorities of the provincial government in the Clean Air Strategy and other key elements such as the Climate Leadership Plan, and the importance of maintaining good air quality, CASA needs to focus on identifying those key air quality management issues where it can provide the most value-added

Many of the elements of CASA's 2009 report *Recommendations for a Renewed Clean Air Strategy* and the 2012 government approved *Clearing the Air* strategy continue to be very relevant. A review of these documents in today's context is however desirable to identify priorities and how CASA could assist in advancing these priorities. The review should determine if there are any needed changes in the strategy based on today's current air quality context with recommendations to fill any key gaps in

the air quality management system the Clearing the Air Strategy was meant to inform. The review should include a specific focus on possible air quality management synergies that would result in improved air quality benefits from the actions under the Climate Leadership Plan.

The provincial government has been clear that the first wave of actions and decisions based on the Climate Change Leadership Plan are being developed at a pace and in a manner that does not lend itself to the established CASA process. Given this reality, it is a better use of CASA's time and energy to focus on the subsequent waves of initiatives and tools that will follow behind the first round of government decisions on the Leadership Plan. Initially this would involve assessing the air quality co-benefits of the Leadership Plan and looking for both gaps and opportunities within and between the air quality and human health impacts of the climate plan and of the air strategy. As the province moves ahead with the air quality management, air monitoring and climate policy files, CASA can provide valuable advice and recommendations on how to leverage the overall reductions of both CO<sub>2</sub> and criteria air contaminants, identifying synergies, gaps, and ways in which the structure and approach to reductions can provide opportunities for further reductions than actions on one file alone.

## Next Steps

The proposed path forward is to strike a working group that will work, between now and the December Board meeting, with several goals:

- Review the 2009 CASA recommendations for a renewed Clean Air Strategy for Alberta and the 2012 Clean Air Strategy in the current context of influencing pieces such as the Climate Leadership Plan with a view to identifying synergies, gaps and ways in which CASA can provide added value to goals and actions.
- If encountered, identify discrete pieces of work, CASA could address given its unique attributes.
- The group would consist of 2 or 3 members from each caucus, and would work in a fairly efficient way to meet the December timeline.
- Recommendations may be brought forward on any area the group encounters, but a focus could be on:
  - Opportunities for synergy – ways in which the joint implementation of the Clean Air Strategy and the Climate Leadership Plan could result in better overall emissions reductions, air quality and/or reduced costs
    - Specific actions that lend themselves well to CASA's strengths
    - Areas where CASA might consider shifting its way of working to fit better within the current environment.
  - Identification of gaps – areas where neither strategy addresses air issues in a meaningful manner.
    - Recommendations for further work in areas where CASA could provide value.

# Anchoring CASA's Work for the Next 1 – 3 years

