



December 22, 2017

NSBA Response to Saskatchewan Climate Change Strategy

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The Honourable Dustin Duncan, MLA
Minister of Environment
Room 348, Legislative Building
2405 Legislative Drive
Regina, SK
S4S 0B3

Dear Minister Duncan,

The NSBA is a member-driven and focused organization that serves, promotes, and protects business throughout Saskatoon and beyond. Although our origins and roots are in Saskatoon's north end, today we encompass far more than that. From its grassroots origins of a handful of businesses, today's NSBA consists of a membership in excess of 750 companies. Members range from single owner-operator proprietorships to large multinational corporations that employ thousands. Despite this diversity, there is a core element within the NSBA membership that is centered on industrial service and supply.

As a representative of businesses in Saskatoon, and Saskatchewan as a whole, the NSBA has been closely following developments regarding energy and resources at both the provincial and federal levels, particularly as these conversations impact economic development. We have been very vocal in opposition to a federally-mandated carbon tax while understanding that businesses can improve to meet changing environmental standards without damaging their economic viability.

It is through this lens that we have reviewed the recently released government discussion paper "Prairie Resilience: A Made-in-Saskatchewan Climate Change Strategy." We would like to commend the Saskatchewan government for adopting a "Made-in-Saskatchewan" approach to this file instead of caving to pressure to sign on to the federal carbon tax. The NSBA feels that it is important to address the issue of climate change in a manner that will not adversely effect the economy, and we are glad that this approach has also been taken by the Saskatchewan government.

However, the NSBA does have some concerns with the content of the plan and would appreciate further details regarding the regulations that will follow and the financial commitments that the plan will require. We understand that the government intends to hold stakeholder consultations regarding this document and we look forward to participating in that process.

More pointedly, we have heard concerns surrounding the Large Industrial Emitters strategy. Firstly, we have heard concerns that the strategy identified is basically a cap-and-trade system, which was also an option in the federal strategy, and we question why this is an acceptable strategy when it has previously been avoided. Secondly, there are concerns about the potential price of purchasing offsets and credits; namely, whether the price of purchasing these offsets and credits will be set at a level greater or equal to the carbon price specified by the federal government. Lastly, we would encourage the government that any funds raised through compliance measures (e.g. purchasing offsets, etc.) be re-directed to measures directed to reducing CO₂e emissions rather than simply being rolled back into the general revenue.

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As always, we are always available to discuss the contents in this letter. As previously stated, we look forward to participating in stakeholder consultations on this file to further develop the ideas contained within.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Moen', written over a light blue horizontal line.

Keith Moen
Executive Director



SASKATOON'S BUSINESS ASSOCIATION