

# Gitanyow Climate Test

Intersection of Climate, Major Projects, and  
Indigenous Reconciliation



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## Intersection of Climate, Major Projects, and Indigenous Reconciliation



**Tara Marsden**

*Hlimoo Sustainable Solutions  
Gitanyow Hereditary Chiefs*



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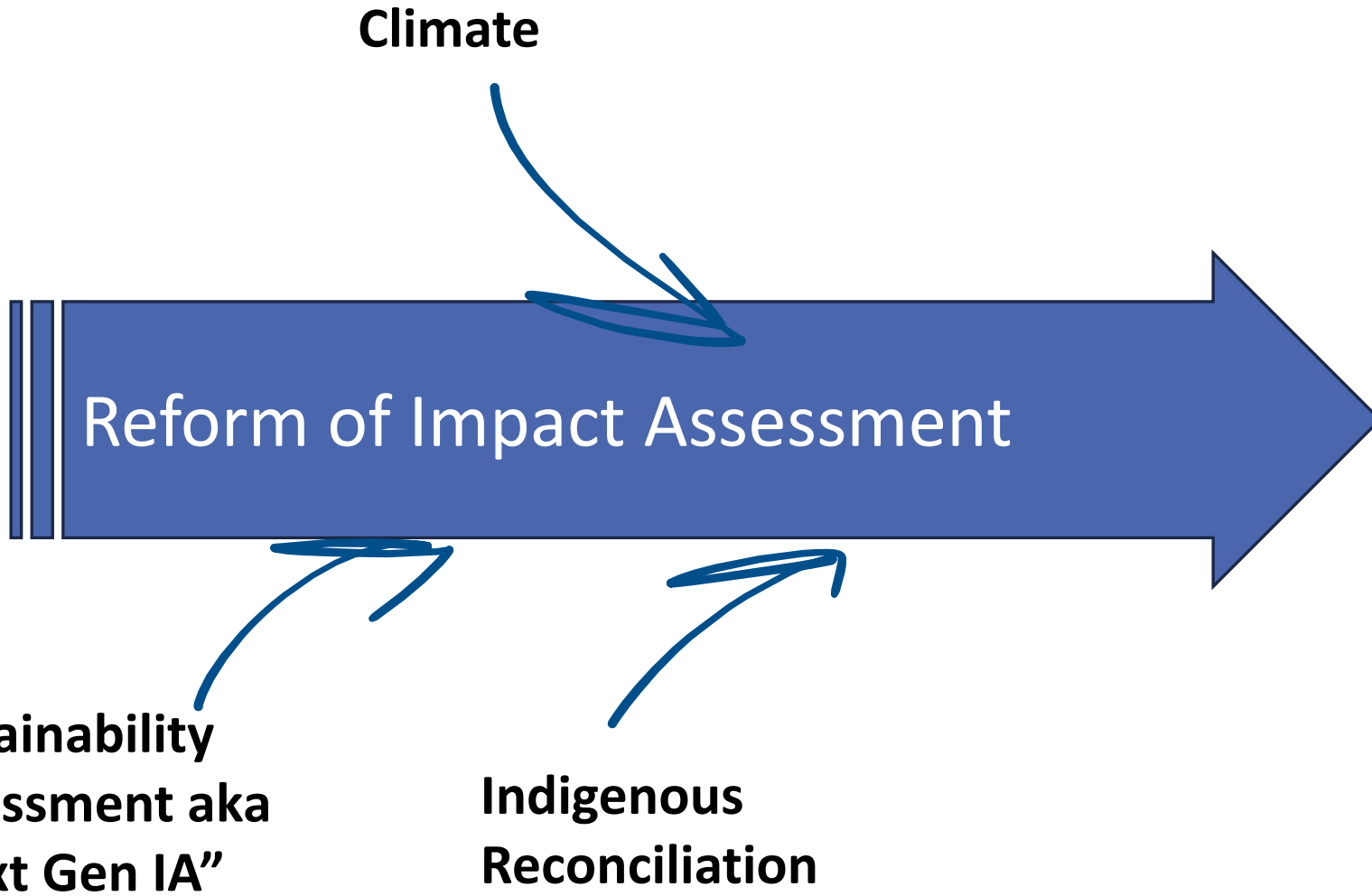


Canada: federation of 10 provinces and 3 territories

Jurisdictional split over major project matters

*Impact Assessment Act (Canada)*

*Environmental Assessment Act (BC)*



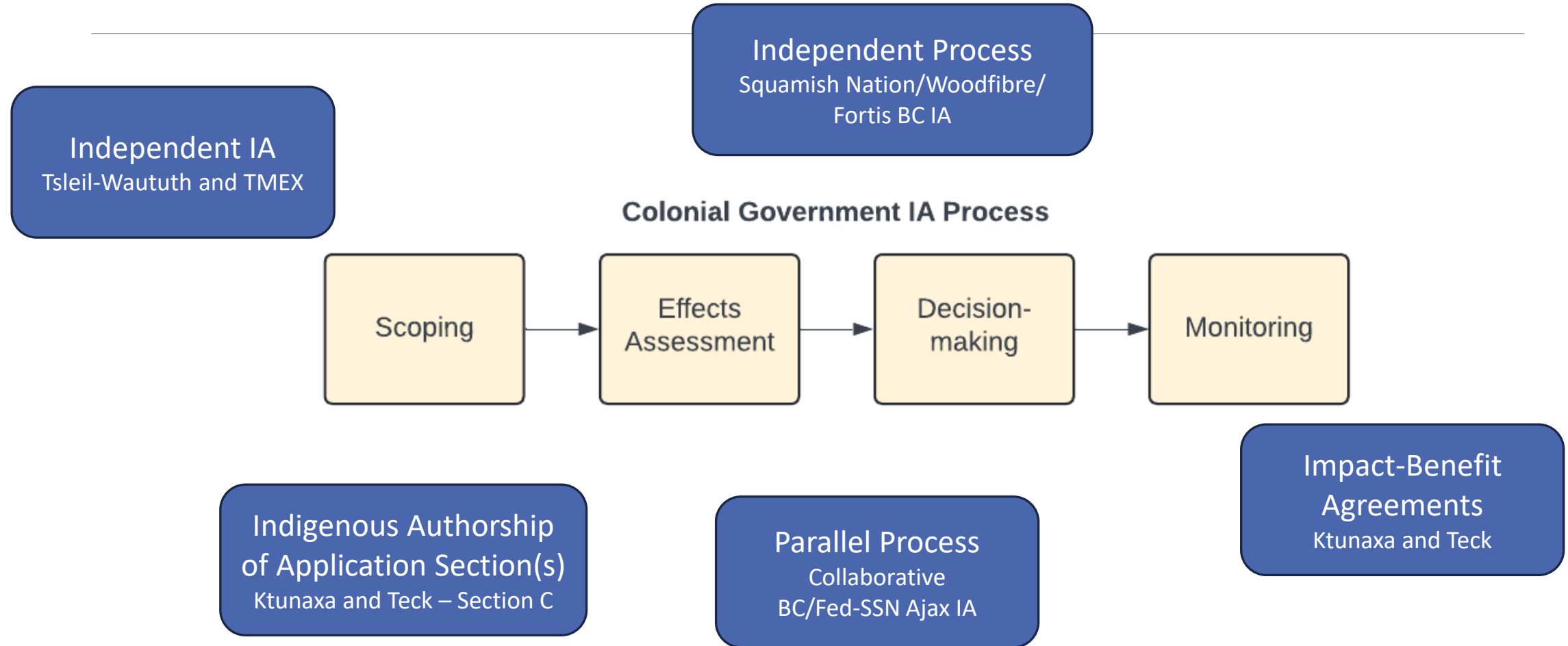
# Climate in Impact Assessment

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- global political movement
  - UNFCCC, Kyoto, Paris
- IA guidance
  - FPTCCCEA 2003, IAIA 2018
- Canada climate policy advances and pullbacks
- academic critiques and reviews
  - Limited scope of assessment
  - Information collected, projects approved... for the most part
  - Limited influence on projects and decision-making
- climate deregulation, while climate worsens



# Indigenous-led Impact Assessment





# Gitanyow

Traditional territory in northwestern BC;  
6,200 km<sup>2</sup>

Members divided into 8 “Wilp” (house  
groups); matrilineal hereditary system

Gitanyow territory, or “Lax’yip”, is unceded



**Eskay Creek Mine**



**Red Chris Mine**



**PRGT Gas Pipeline**



**Ksi Lisims LNG**

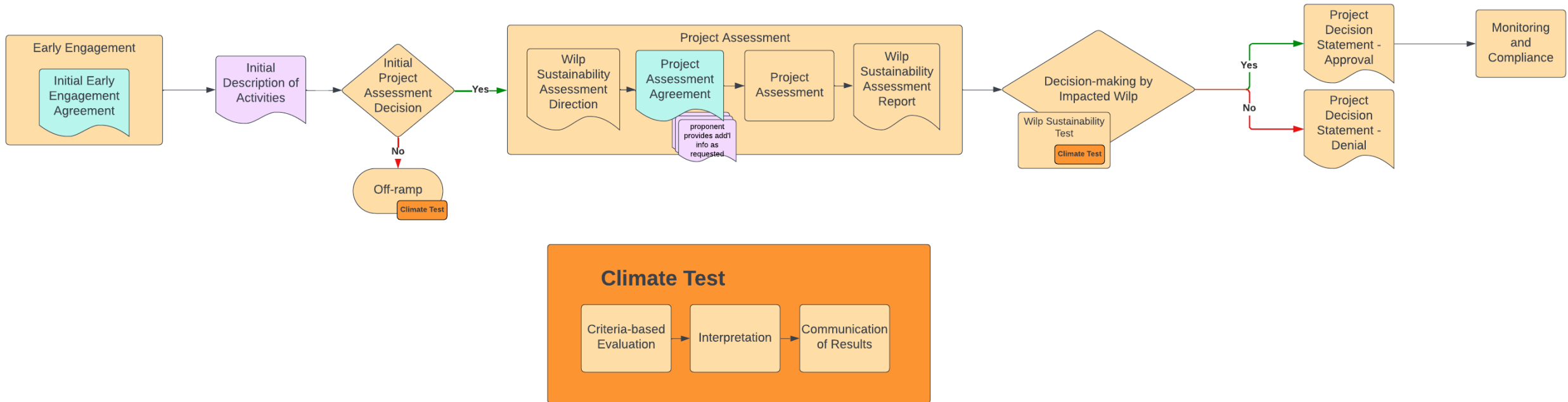


# Wilp Sustainability Assessment Process

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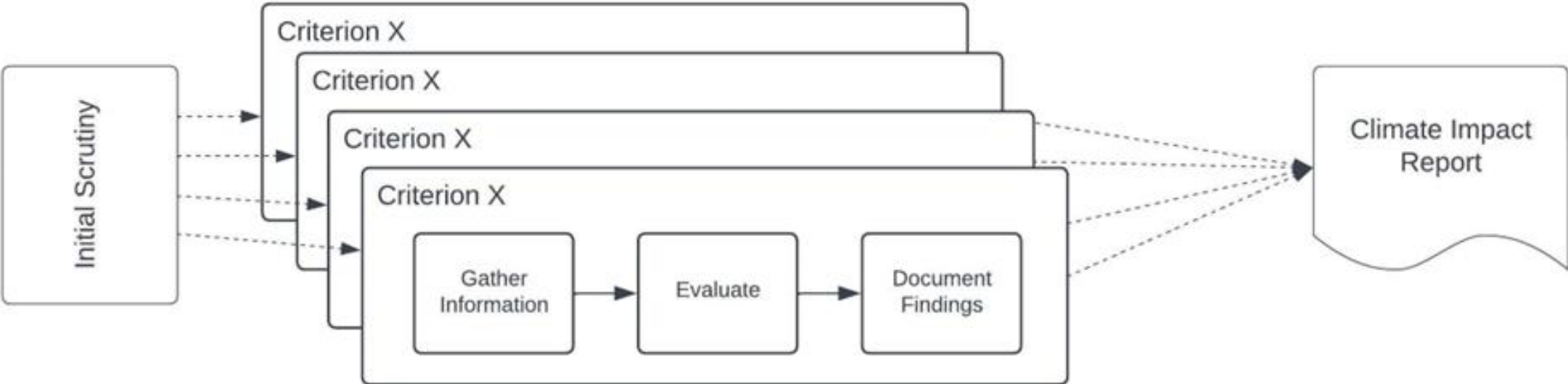
- established in 2021
- an Indigenous-led, sovereign review process
- runs parallel to government IA process(es)
- enables Gitanyow to:
  - address its own interests and concerns
  - inform its own decision-makers and community
  - exert sovereignty over its territory and interests

# Wilp Sustainability Assessment Process

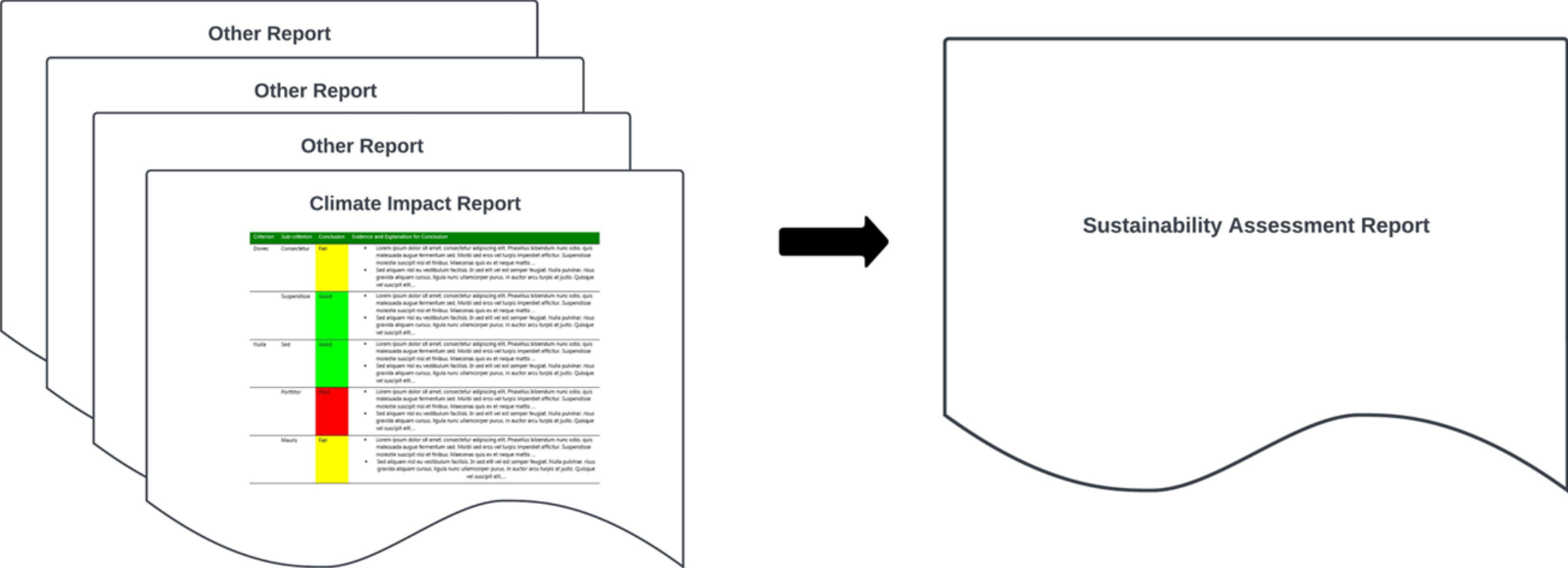


# Gitanyow Climate Test Procedure

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# Climate Report Informs WSAP Report



# Gitanyow Climate Test: Criteria

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## 1. Project Design and Mitigation

- a) ambitious design
- b) adherence to mitigation hierarchy
- c) plan for improvement
- d) implementation and effectiveness monitoring
- e) confidence in explanation
- f) climate lock-in

## 2. Climate Impact

- a) comparison to peers
- b) scope 3 performance
- c) relative to climate targets and carbon budgets
- d) other climate effects
- e) distributional inequities

## 3. Economic viability

## 4. Proponent ESG Performance

# Illustration of the Test (Eskay Creek)

Climate Impact	Comparison to Peers	Good: Clearly better performance than peers	<ul style="list-style-type: none"><li>- The project is anticipated to be one of the lowest GHG emitting gold mining projects per ounce in Canada and globally largely due to the high grade of ore, availability of clean electricity, and brownfield nature of the mine site. These three characteristics provide for superior climate performance compared to peers.</li><li>- Despite growth in ore removal plans, Skeena has adjusted its design and energy management to be able to maintain their projected carbon intensity to 0.2tCO<sub>2</sub>e/oz Au.</li><li>- The proponent signals caution towards use of carbon offsets and capture and storage to address unmitigated climate impacts, solutions that are frequently suggested by major project proponents but of questionable real value. Skeena's caution in this respect is atypically refreshing.</li></ul>
	Scope 3 Performance	Fair: Moderate unmitigated scope 3 impacts.	<ul style="list-style-type: none"><li>- The project is associated with a variety of scope 3 emissions, such as off-site traffic, employee commuting, indirect emissions associated with the production of physical inputs to the mine, and downstream activities (i.e., transportation and shipping of ore to customers, crushing, smelting, manufacturing). Skeena's 2023 ESG report provides an estimate of Scope 3 emissions (262 t CO<sub>2</sub>e), but it is unclear how comprehensive this Scope 3 emission estimate is, and Skeena has expressed limited interest in influencing these emissions.</li></ul>

# Illustration of the Test (Ksi Lisims incl. PRGT)

Project Design	Adherence to Mitigation Hierarchy	Fair: Partial adherence to mitigation hierarchy	<ul style="list-style-type: none"><li>- While electrification will avoid and minimize a substantial proportion of what Ksi Lisims would otherwise cause in terms of climate impacts, the heavy reliance on offsetting is a strategy that shifts the responsibility of addressing the project's impacts to offset markets, offset verifiers, and governments.</li><li>- PRGT adheres to mitigation hierarchy; the pipeline's mitigation is mostly limited to energy efficiency-related measures (i.e., avoidance and minimization).</li></ul>
	Climate Lock-in	Poor: Project would lead to the long-term locking-in of sizeable climate impacts	<ul style="list-style-type: none"><li>- By their very nature, gas pipelines and LNG facilities lock-in climate impacts from their own infrastructure and activities, but also from that associated with upstream and downstream activities.</li><li>- Once developed, Ksi Lisims and associated development will have substantial inertia: proponents and government will be very reluctant to close early, investors will need decades of operation to receive a return on investment, and the technology and consumption facilitated by this development (i.e., use of gas) can reasonably be expected to be locked-in for a long time.</li><li>- Repurposing of this infrastructure for use with low-carbon alternatives (e.g., hydrogen, ammonia) is speculative.</li></ul>

# Discussion

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- Fulsome, multi-dimensional test, informing Gitanyow leadership
- Addresses deficiencies in government IA processes
  - limited scope of climate assessment, e.g., lifecycle GHG emissions
  - IA process deficiencies, e.g., project splitting
- Gitanyow can't change global trajectory of climate change, but part of 'cumulative effect' of solutions
- Gitanyow can't force proponents to participate, and so potential data limitations
- Triggered by, and structured to, the government IA process; subservience
  - e.g., timelines, jurisdictional targets
- Some overlap of criteria, despite attempts to minimise duplication
- Some criteria may not go far enough

# Where to from here?

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Continue to apply test to inform Wilp decision-making

→ learning by doing

Scanning for other tests around the world

# Acknowledgements

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Gitanyow Hereditary Chiefs

Graeme Reed (Assembly of First Nations)

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Karine Peloffy (Ecojustice)

Nikki Way (Energy Transition Fund)

West Coast Environmental Law



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# Let's continue the conversation!

Message me your questions or comments in the IAIA26 app.

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