

August 12, 2021

Ministry of Environment and Climate Change Strategy  
PO Box 9047 - Stn Prov Gov  
Victoria, BC  
V8W 9E2

Re: Comments on the Draft Climate Preparedness and Adaptation Strategy

The Burnaby Board of Trade (BBOT) is the leading chamber of commerce in Burnaby, BC and the economic development partner for the City of Burnaby. As a convener for business and community leaders, a catalyst for economic and sustainable growth, and a champion for business interests. For over 15 years, the BBOT has been the leading chamber of commerce speaking on environmental issues, developing resources and programs to encourage sustainability amongst small businesses, and advocating for climate action that engages the business community, so we thank you for the opportunity to provide comment on the Draft Climate Preparedness and Adaptation Strategy.

With climate-related disasters unfolding this summer across the globe, from floods in Europe and Asia, to heat waves and wildfires here at home, it is clearer than ever that a robust strategy to prepare for and adapt to climate change is necessary to mitigate the impacts on people, communities, infrastructure, core services and businesses.

This submission is informed by the work of a task force which was convened from our membership specifically to provide feedback on this draft plan. The task force represented a variety of business sizes and sectors including manufacturing, energy, utilities, and post-secondary education. In addition, the Burnaby Board of Trade surveyed its membership on climate impacts, and the results -- which are summarized in this submission -- demonstrate that businesses are already struggling to manage impacts ranging from insurance recovery, staffing issues, and equipment and infrastructure failure.

We believe that the comments outlined below will help to strengthen the Climate Preparedness and Adaptation Strategy and ensure that the business sector is fully mobilized and supported to adapt to the future climate and transition to a low carbon economy.

## **1. Advancing Climate Ready Infrastructure**

Infrastructure provides a fundamental underpinning to our economies and communities, but is exposed to climate-related damage and degradation. This is why we support the focus of the Climate Preparedness and Adaptation Strategy on building resilience in our infrastructure.

That said, an area of particular concern is our electrical grid, which does not seem to have been given adequate attention in the draft strategy. As climate change is contributing to an increase in the severity and frequency of weather events, we should expect potentially more frequent power disruptions and outages as

such weather damages or strains our power grid. Power disruptions directly impact businesses and economic output as most production and business activities are unable to proceed without reliable power.

This concern has been recently illustrated by the reported damage to BC Hydro electrical infrastructure serving power to Vancouver Island and the Sunshine Coast. Shortly after the unprecedented heat wave in early summer, BC Hydro noticed bulging in some of its submarine cables and was forced to take these pieces of infrastructure out of service and commence repairs. We understand BC Hydro subsequently started an investigation into the possibility that this damage was directly contributable to the extreme heat in late June.

This is one real example of how infrastructure can be impacted by climate change and underscores why hardening our infrastructure is an important part of our climate adaptation strategy.

We therefore recommend:

- All critical infrastructure be identified and assessed for climate resilience in the strategy, with special attention paid to our electrical grid, but also specifically including fuel, natural gas, water, wastewater, energy companies and private energy infrastructure, and roads and transportation networks
- The task force also recommends that comprehensive risk assessments are undertaken and incentivized for all utilities and infrastructure at local and regional levels of government

## **2. Climate Adaptation and Preparedness for Buildings and Construction**

As noted in our previous submission of January 10, 2020 during the initial development of this strategy, climate change has the potential to significantly impact the construction and building sector as building codes change how we construct our built environment.

The development sector has taken significant steps towards building in a climate-resilient and low way, and the strategy should look to support further collaboration and knowledge-sharing within this sector, and between this sector and government.

Collaboration between government and business groups such as trade associations and chambers of commerce should be identified in the Strategy specifically to help break knowledge barriers and enable sharing of best practices across the public and private sectors. Furthering connectivity between the business sector, development community and government will also help to identify areas where improvements could be made that would drive greater efficiencies and sustainability, for example, finding ways of streamlining processes and language for developers on building codes.

Therefore, we recommend the Strategy:

- Foster greater collaboration in the development sector and between the sector and government on sector-specific climate change risks, adaptations and innovations to encourage uptake
- Increase incentives or develop other cost-recovery mechanisms to assist businesses with the adoption and implementation of low carbon assets and practices. Currently, cost recovery of climate resilient

building is achieved through higher prices for the end consumer, worsening housing affordability and putting sustainable builders at a cost-disadvantage

- Seek to understand and socialize nature-based solutions to climate change impacts in our built environment such as the addition of green roofs, adding trees and vegetation to buildings and sites, and hardening buildings via natural solutions that create symbiotic relationship with nature and build climate resilience

### **3. Creating a Regulatory Environment that Incentivizes Sustainability**

Creating a regulatory environment that incentivizes both adoption of climate mitigation efforts and uptake of low carbon processes by our business community is critical to the success of British Columbia's adaptation and preparedness strategy. For example, while both BC and California have implemented low carbon fuel standards, California provides a superior incentive structure to encourage faster and broader implementation.

In the spirit of creating regulations that drive broad and successful uptake of sustainable practices in our economy, we recommend the Strategy:

- Support more general incentives that will help drive adoption in the business community of both low carbon and climate resiliency efforts, recognizing that such investments can be challenging for small businesses to afford but are nevertheless critical to the long-term viability of those businesses
- As part of Pathway 4 in the Strategy, support more incentives specifically related to the BC low carbon fuel standard which will encourage further low-carbon fuel production and availability in the province
- Provide for knowledge-sharing and support for businesses to help them understand business case for action, the financial cost inaction, and the cost-benefit analysis of implementing sustainable and climate change-mitigating practices
- Support sector-based and cohort-based risk assessments and solution building to help identify and prioritize low carbon and resiliency solutions
- Support public/private collaboration to identify best practice resources and provide a "go to" knowledge base to be adopted broadly
- Seek to work collaboratively and knowledge-share with global leaders in implementing leading-edge low carbon and resiliency strategies in BC

### **4. Results of Survey "Climate Impacts on Burnaby based businesses"**

The Burnaby Board of Trade surveyed its members to better understand how and if climate change was impacting their business, particularly in light of the recent extreme heat event in late June. A brief summary of this data is provided below to provide further understanding of the impacts of climate change as they are being experienced by local businesses today. The BBOT acknowledges that our survey focused on business impacts explicitly, and did not explore the lives which were lost due to the heat or other human impacts.

Of the survey respondents:

- 52% indicated they were impacted by the recent heat wave
- 25% reported that they experienced equipment failure
- 25% indicated staff and employees were impacted
- 58% indicated they have taken action to be more prepared in the future

From the individual responses, common themes emerged of businesses needing more information on what they can or should do to prepare for climate change, businesses wanting financial help to implement upgrades to equipment or buildings to better prepare for extreme weather, and the need for hardening public services and infrastructure so they remain viable during extreme weather and other climate impacts.

In conclusion, our task force focused on the need for the strategy to have language and best practices on the importance of behaviour change and both risk and emissions reduction as a core strategy of adaptation and preparedness; that there needed to be more inclusion and detail on existing best practices and strategies to support all business and sectors from assessing climate risk, to creating meaningful incentives to accelerate low carbon approaches and pathways.

On behalf of our business community, thank you again for the opportunity to comment on this matter, and we look forward to collaborating with the provincial government in the future on the Climate Preparedness and Adaptation Strategy.

Sincerely,



Paul Holden  
President & CEO  
Burnaby Board of Trade