

October 5, 2022

To: Yukon Government

Re: Comments on intensity-based emission targets for mining

The Yukon Chapter of the Canadian Parks and Wilderness Society (CPAWS Yukon) advocates for the territory's most valuable and priceless resource: our abundant wilderness. Our mission is to conserve the land, water and wildlife of the Yukon for current and future generations. As a conservation organization, we carry a responsibility to ground our actions within a commitment to reconciliation, and we recognize that the lands and waters we advocate for are also the Traditional Territories of Yukon First Nations, the Inuvialuit, and transboundary First Nations in British Columbia, the Northwest Territories, and Alaska.

Thank you for the meeting on September 13, 2022 to discuss options for setting a greenhouse gas intensity target for mining in the Yukon. Our comments are generally organized according to the questions in the discussion document, although we have skipped some questions.

Proposed Approach

Yukon Government is “proposing a target for mines in production where greenhouse gas emissions are based against a unit of a mineral produced”, with an aim to reduce greenhouse gas (GHG) emissions by 45% per unit of production by 2035.

While CPAWS Yukon believes that establishing energy intensity targets can be an important component of a greenhouse gas reduction plan for mining, Yukon Government's suggested approach has not tied these intensity targets to projected activity levels or set an absolute emissions cap. This is in stark contrast to science-based approaches that establish sector-specific carbon budgets, aligned with the Paris Agreement and meant to keep warming below 1.5°C to 2°C. These types of science-based approaches then set absolute targets and/or intensity targets tied to activity levels to ensure emissions stay within established carbon budgets¹. As currently designed, Yukon's Government's proposed approach does not appear to be science-based, linked to a carbon budget, or aligned with the territory's responsibilities under the Paris Agreement.

¹ UN Global Compact Germany. (2022). *Science-based climate targets as the basis for a corporate climate strategy: Discussion paper*.
https://www.globalcompact.de/fileadmin/user_upload/Dokumente_PDFs/DGCN-DiskPpr-EN-fin-screen__1_.pdf

Q1: What do you think is achievable now with respect to reducing mining emissions? What can we expect over the next 15 years? What supports would be needed to make the transition away from fossil fuels?

Because Yukon Government has shied away from setting absolute reductions targets for the mining industry, all reductions must come through the intensity target. Yukon Government has not provided evidence that 45% intensity reductions are remotely achievable for mining operations. This sets the mining industry and this approach up for failure.

For example, the intensity target exceeds that set by one of the world's largest mining corporations, which has set targets to reduce their Scope 1 and 2 emissions, and their related intensity, by 32 percent (from a 2018 base year) by 2030². The company's target is more ambitious than that of most other mining companies, suggesting that 45% intensity reductions are perhaps far fetched (as opposed to 45% absolute reductions, which could be achieved by not approving carbon intensive mines). This company has pledged to support their targets with a \$500 million dollar investment in climate change initiatives, resources that far exceed those available to most mining operations in the Yukon. Placer operators in particular are unlikely to have the resources and capacity to put towards the necessary strategic planning and equipment investments, even with government supports.

On top of that, the company mentioned above has operations across the globe and will be able to meet their company-wide target by shifting more of their projects to those where it's possible to generate power through renewable sources and to switch their diesel fleets to electric. These options are not available to many operations in the Yukon, which are off-grid and rely on diesel generators and equipment. Even in areas of the Yukon where transitioning away from diesel equipment becomes possible, this transition is expected to be slow as existing equipment represents investments of tens and hundreds of thousands of dollars.

We suggest that Yukon Government translate the 45% intensity target to an approach that utilizes a feasible intensity target, and to introduce an overall emissions cap that is aligned with a carbon budget aimed at keeping warming within 1.5°C to 2°C. Having a cap would ensure the mining sector stays within their carbon budget, while having a feasible intensity target would still spur individual operations to improve their emissions efficiency, and allow more operations to fit within the cap than if there was no intensity target.

Q2: Should exploration be part of the mining intensity target, or under the economy-wide absolute target? If exploration were part of the mining intensity target, what would work as a baseline?

We are uncertain how exploration could be linked to a production intensity target when individual exploration efforts generally result in little to no production, unless exploration as a whole was linked to Yukon-wide production. Lumping too many activities from unrelated

² Newmont Corporation. (2021). *2021 Climate Report*.
https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2021-report/2021-Climate-Report.pdf

operators under one target has a high chance of reducing individual feelings of responsibility to meeting the target. CPAWS Yukon believes an absolute target is much more likely to result in reductions to greenhouse gas emissions.

Q3: Should reclamation be part of the mining intensity target, or under the economy-wide absolute target? If reclamation were part of the mining intensity target, what would work as a baseline?

If reclamation were part of the mining intensity target, the result could be highly influenced by operations that close much sooner than anticipated, and thus have a low ratio of production to emissions from reclamation. We suspect this would have a larger effect on quartz than placer, given the scale of emissions related to quartz mining reclamation. This would dilute the effectiveness of the mining intensity target as a tool to measure progress, and another reason CPAWS Yukon recommends introducing an absolute target alongside intensity targets for all mining emissions.

Q10: With respect to the three options outlined above for establishing baselines, which option do you prefer and why?

Thinking through the pros and cons of each option presented is enormously complex, and highlights the arbitrary nature of developing a baseline for intensity-based targets at the scale of individual mining projects, each with very different characteristics. A target that is out of reach for underground, low-grade or off-grid mines may be insubstantial for open pit, high grade or grid-connected mines. We aren't suggesting that more carbon intensive mines be given an easier target, but rather that trying to accommodate carbon intensive mines risks watering down the targets that could be achieved were the Yukon to favour less carbon intensive projects. This is another reason we suggest the Yukon implement an absolute carbon target for mining.

Communicating Progress

It would be helpful for communications to disaggregate the intensity target data, so that it's possible to understand the proportion of quartz and placer mines that are well above, above, and near the targets.

Q12: What do you think are the best solutions for reducing mine emissions, and what supports would help?

Without a price on carbon or an emissions cap that can be enforced through regulatory mechanisms or project assessment, mining companies have a weak business case for reducing emissions and it is unlikely that even incredibly generous supports from Yukon Government could fully combat this inertia.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Newton".

Randi Newton
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