Evolving with Complexity: A Perspective on Canadian Environmental Policy in 1991

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Since the publication of the Brundtland Report, *Our Common Future* (World Commission on Environment and Development, 1987), Canada has adopted the goal of **sustainable development** as a basis for policy in all areas that are affected by or impinge upon environment. It has been recognized that environmental concerns extend well beyond the mandate of Environment Canada (the Federal Environment Ministry) into practically all areas of policy at federal, provincial, and municipal levels of government, and also involve private sector decision-makers as well as the behavior and lifestyle of all members of the Canadian public. One of the first tangible signs this new realization was the publication of a short report *Into the Mainstream*, by the Minister at the time, the Honourable Tom McMillan (Environment Canada 1988). According to this report, “The fundamental challenge is to bring environmental concerns into the mainstream of our thinking and decision-making.” Just as war is too important a matter to be left to the Generals, so environment is too important a matter to be left to Ministries of Environment, although it is naturally towards such agencies that we have to look for the lead. Environment must henceforth be central to the thinking and planning of Ministries of Finance, Economics, Development, Trade, Industry, Science and Technology, Agriculture, Health, Forestry, Fisheries, Transport, Education and so on and on. One of the most important environmental policy statements is in the national budget of a country, because this expresses in the most tangible way what a nation is prepared to spend to protect its own environment and that of the planet. Environment is also of increasing importance in international relations, and Ministries of Foreign Affairs are now becoming heavily involved in international negotiations on environmental issues. In Canada the Department of External Affairs lead Canada’s active participation in the United Nations Conference on Environment and Development (UNCED) held in Rio de Janeiro in June 1992. With the strong support of Environment Canada, External Affairs also spearheaded Canada’s contribution to the negotiations on the Framework Convention on Climate Change.

These discussions, as well as others on forests and biodiversity, are part of major effort at redirection of development towards sustainability that are occurring in Canada and internationally. The efforts receive further impetus at the UNCED Conference for which the Canadian, Maurice Strong, served as Secretary-General.

These developments are a source of great hope for those concerned with the protection of the environment. Yet, as many have come to realize since 1987, the task embodied in the idea of sustainable development is complex and progress will not be easy. Even the most insightful and perspicacious cannot see clearly how we can bring about the great transformation that is required in science and technology, in patterns of human behaviour, in economic production and trade, and in people’s values and attitudes. Nor is it easy to see how the divergent views and interests of the nations are to be reconciled. These is no way - short of the total collapse of our world civilization - that we can retreat towards a more simple organization of human affairs. We are evolving towards a more complex, integrated, and highly structured civilization. The main theme of this paper is how Canada is now grappling with this task; and how it is manifested in Canada’s emerging environmental policies.

**Round Tables and the Green Plan**

An early response to the Brundtland Report and the challenge of sustainable development was the creation of a National Task Force on Environment and the Economy (Canadian Council of Resource and Environment Ministers 1987). Prominent among the Task Force recommendations was the proposal to create Round Tables in each province and territory and at the national level. Designed to be a new form of consultation in which senior decision-makers “can meet to candidly discuss environment-economy issues and make recommendations directly to the First Ministers of their respective jurisdictions,” these Round Tables have been established and are now at work. They are an innovative approach in the pattern of environmental decision-making, and are doing some
valuable work, although it is perhaps still too early to say how successful they may eventually prove to be. The Round Tables are helping to stimulate and lead discussion on sustainable development by involving the public, the private sector and environmental interest groups.

This activity was quickly followed by a federal government announcement that a new comprehensive strategy for the environment would be developed. Some of the proposed elements in this strategy were described in a document, “A Framework for Discussion on the Environment” (Environment Canada 1990a) which was widely distributed and which formed the basis for public consultations. In a two-step process, first some 41 information sessions were held from April to June 1990. These took place in cities and towns throughout the country and attracted over 6,000 Canadians. In the second phase 17 consultation sessions were held in major cities in May and June 1990 in which more than 3,500 Canadians participated. Some 500 proposals or suggestions for action emerged during this springtime of debate and more than 400 of them were subsequently included in one form or other in the resulting plan.

On December 11, 1990 the Federal Minister of the Environment, then the Honourable Robert R. de Cotret, released a comprehensive $3 billion, five-year environmental action plan for Canada, known as the Green Plan (Environment Canada, 1990b). The Green Plan is one of the most comprehensive and action-oriented responses to the challenge of sustainable development so far made by any government anywhere. It proposes many new initiatives in environmental protection in air, water, and land. It addresses the problems of toxic contamination, sustainable forest development, sustainability in agriculture and fisheries, and the need to protect unique ecological areas and Canadian wildlife. It describes action to deal with global warming, ozone layer depletion, acid rain, and the preservation of Canada’s historical heritage. A special section is devoted to the North and the development of an Arctic Environmental Strategy.

The main feature of the Green Plan, however, is not the specific initiatives it proposes, but rather its recognition that the process of decision-making itself has to be changed. If we change the way we make decisions we will change the decisions that we make is a leitmotif of the Green Plan document. The change that has to be made is towards sustainable development and this requires a vastly different approach than that of traditional political decision-making.

The plan, of course, has its critics, as is to be expected in a democratic society. Opposition parties and environmental groups have protested that Green Plan does not go far enough, that it lacks specifics, and that it will not achieve sustainable development. It is clear, however, from Table 1 that an additional $3 billion has been committed to environmental action programmes over a five-year period (later extended to six years).

<table>
<thead>
<tr>
<th>Table 1: GREEN PLAN RESOURCE (over five years)</th>
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<tr>
<td>1. Life’s Three Essentials: Clean Air, Water and Land</td>
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<tr>
<td>2. Sustaining Our Renewable Resources</td>
</tr>
<tr>
<td>3. Our Special Spaces and Species</td>
</tr>
<tr>
<td>IV. Canada’s Unique Stewardship: The Arctic</td>
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<tr>
<td>V. Global Environmental Security</td>
</tr>
<tr>
<td>VI. Environmentally Responsible Decision-Making</td>
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<tr>
<td>VII. Starting in our Own House</td>
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<tr>
<td>VIII. Emergency Preparedness</td>
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<tr>
<td>Total</td>
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The Green Plan is a practical plan of action, and will respond to changing circumstances. Each year, the Government of Canada will examine and adjust these allocations to ensure existing priorities are being met and to respond to new and emerging priorities.

Three Canadian Dimensions of Complexity

The task of developing policy for sustainable development in a modern industrial society is difficult everywhere. Each country has to develop its own approach and priorities congruent with its own unique and particular circumstances. In Canada, three dimensions of complexity are especially significant.

Geography

Canada is an extremely large country in territorial extent. Its area is nearly 10 million km², second only to the former Soviet Union. A population of 36.5 million occupies this territory at a density of about 2.7 people per km². Despite this overall low density, population and economic activity are heavily concentrated into a few regions in the extreme south of the country. Population density in and around a few major cities is not much different from similar areas in Europe. Further north, there are huge tracts of very sparsely populated lands. Environmental management
has to be sensitive to such great contrasts. Laws applicable to densely populated areas are often not appropriate in other regions.

There are great regional contrasts in Canada's economy, even in the more densely populated south. The traditional industrial heartland is in southern Ontario and Quebec along the shores of the Great Lakes and the St Lawrence River. Agriculture, especially wheat production, is a mainstay of the economies of the Prairie Provinces, together with oil in Alberta and coal, and potash, and other minerals in Saskatchewan and British Columbia. Forest products are a dominant element in the economy of British Columbia. Fishing is also important there as well as in the Maritime Provinces on the Atlantic coast. It is easy to realize, therefore, that almost any environmental policy will have different impacts and be very differently perceived in the varied regions of Canada.

Cultural Diversity

Added to geographical complexity is the fact of Canada's great cultural diversity. To the aboriginal population of Indians and Inuit (now totalling about one million) are added the major francophone and anglophone cultural groups which have dominated the modern history of Canada. There are now an increasingly large group of Canadians from other cultural and linguistic groups. Initially these came from other European countries, but now come more and more from all corners of the globe. There are now substantial numbers of Dutch, German, Ukrainian, Italian, and Chinese. Overseas immigrants now constitute some 41%, 39%, and 21% of the population of the cities of Toronto, Vancouver, and Montreal, respectively. All these groups have their own set of values in relation to the environment. Again this diversity creates complexity for legislators and environmental managers who wish to be responsive to local and regional needs and at the same time serve the national interest.

Constitution

Canada's response to the diversity of her geography and cultures has been to evolve a highly decentralised federal form of government. Many of the powers reserved to the central government in a unitary state are allocated to the provinces, under what was originally the British North America Act of 1867. In the case of natural resources and environment, the jurisdiction is shared and this makes an already complicated task still more complex. In broad terms, the provinces have responsibility for water resources, mines, forests, land, air quality, and waste disposal, especially where these are matters of local concern. Federal jurisdiction enters when larger scale questions arise. For example, the federal government has responsibility for fisheries and migratory birds (since they are mobile they do not stay in one provincial jurisdiction); all interprovincial matters involve the federal government, such as transboundary air and water pollution, as well as all matters concerning radioactive safety. In addition, the criminal code is a matter of federal jurisdiction and many environmental and related health issues are therefore federal concerns. The Canadian constitution also makes the federal government responsible in an overriding way for "peace, order and good government". Although this clause is invoked rarely its effect is to ensure that in the last resort the federal government is responsible. In daily practice, however, the boundary between federal and provincial responsibility is often not sharply drawn and a great deal of cooperation is required. A common expression in Canada is "the provincial government owns the water and the federal government owns the fish!" Recently the division of powers has been the subject of intense debate, which is still continuing as part of the constitutional negotiations.

The Federal Government as Janus and Shiva.

From the perspective of the federal government it seems as if one is balanced at the cusp between the growing need for international agreement and action in one direction, and similar pressures for local and regional agreement and action in the other. The chief function of the Roman god Janus was as a guardian deity of gates and doors. Janus was usually represented by two bearded heads placed back to back so that he might look in two directions at once. (see Figure 1) This posture serves as an appropriate symbol for the Canadian federal government. It guards the doors and
keeps the gates between the Provinces and watches over the diversity of the nation. It looks one way to the complex and evolving pattern of Canadian society divided by geography, culture and constitutional arrangements. It also looks another way to safeguard the collective Canadian interest in the tangled international scene of nation states, and the shifting pattern of regional groups and interests.

Given this complexity it is not surprising that Canadian environmental policy defies brief and elegant description. The epigrammatic title of this paper is designed to portray the spirit of that policy. Its richness can only be conveyed by some necessarily brief sketches of particular cases. From this perspective the Hindu deity Shiva might be a more appropriate symbol for Canadian environmental policy. The image of Shive-Nataraja is shown (Figure 2) as four-armed, bearing various emblems and dancing on one foot on a prostrate demon! Certainly there are many arms to Canadian environmental policy, so much so, that one hand cannot be expected to know always what another is doing.

The Great Whale Project

The Great Whale project, also known as James Bay II, is a major hydro-electric power development project in northern Quebec. It is proposed to dam and divert five rivers which drain into Hudson's Bay, flooding some 5,000 square kilometres of forests and wilderness in the process. The largest of these rivers is the Great Whale - hence the name of the project which has nothing to do with Whales. The purpose of the project, like James Bay I, is to develop hydro-electric power much of which it was planned to export to the United States. This plan is now in jeopardy as the potential markets in the United States are reconsidering their need for additional power, and, in some cases, have already taken action to postpone their contracts with Hydro-Quebec, the government-owned utility which is the proponent of the project. The project is opposed by the indigenous Indian and Inuit inhabitants of the region who argue that it will destroy their traditional way of life including hunting and fishing, and cause irreversible environmental damage. They point to the impacts of the first phase of the James Bay development - land lost to flooding, and extensive and persistent mercury poisoning of the fish and the consequent risk to the human population. The Provincial Government of Quebec and the Federal Government of Canada are engaged in a debate about the proper role of environmental impact assessment in this case. Both levels of government announced their intention to hold environmental reviews on different aspects of the project. The Quebec government planned a bifurcated review, looking only at the access infrastructure, roads, and airports required during construction, first. Once those are approved and underway, the Quebec government will look at the impacts of the dams, dikes and power houses themselves. The federal government will review the project's impacts on areas of federal jurisdiction, including native people, fish, migratory birds and the waters of Hudson's Bay, as well as any interprovincial impacts. Hydro-Quebec at one point announced its intention to boycott the federal process. Without the proponent's evidence it is doubtful that the federal process could properly assess the project. Meanwhile, the largest of the indigenous groups, the Cree of northern Quebec, have won a significant court victory which will require the federal government, with the contractual agreement of the Quebec government, to review the project in its entirety and, most significantly, to make a binding decision as to whether or not the project can proceed. The court based its rulings on commitments made by both levels of government to the Cree and the Inuit in the James Bay and Northern Quebec Agreement of 1973.

Indigenous Land Claims

When the territory of Canada was brought under the control by French and English explorers and settlers agreements and treaties were often signed with the local indigenous inhabitants, in the name of the British or French governments. In some cases, no treaty was signed, and where treaties do exist they are now being subject to legal challenge by the present day Indians and Inuit on the grounds that they have been violated by Canada, or were signed under duress and hence are invalid. The extent of these Indian land claims is extremely large in some regions of Canada and they include some land that is now highly valuable in urban
areas, as well as large areas of land rich in forests, fish and wildlife, and with great potential mineral wealth. Progress in settling these land claims has been extremely slow. The federal government developed a policy requiring comprehensive claims from Canada’s first nations. The Comprehensive Claims Policy then limited the number of claims under negotiation at any one time to six. As each claim takes years of negotiation, only a handful have been resolved, and most of these were claims in the far north where resource conflicts have been relatively less significant. Hundreds more claims are waiting in the queue. The sense of frustration among indigenous peoples has grown rapidly in recent years, leading in a number of cases to protests which have taken the form of blocking roads. Such action has resulted in confrontations with the police and, in the famous case of Oka in summer 1990, even the armed forces has become involved. Often, as in the case of Oka, the immediate controversy is over the protection of the natural environment. In Oka it was the local Mohawks’ determination to protect 22 hectares of pine forest from being converted to a golf course that led to the long and tragic siege. The protests have brought a great deal of sympathy to the Indian cause from the rest of the Canadian population, and the federal government has now announced the creation of a Royal Commission to enquire into all aspect of Indian affairs.

The Canadian Environmental Protection Act

The Canadian Environmental Protection Act (CEPA) of 1988 is an important advance in the federal management of toxic substances in the environment. It recognises that the regulation of toxic chemicals is an area of shared jurisdiction between the federal and provincial levels of government, as well as between a number of departments at the federal level, and it provides authority for the federal government to regulate where provincial regulations are absent or too weak. The Environmental Protection Act operates on a one at a time basis for the regulation of priority toxic substances. In that sense it continues the practice of its predecessor legislation, the Environmental Contaminants Act. When the Environmental Protection Act was proclaimed, the Contaminants Act was revoked and its regulations were continued under CEPA. As of August 1991, only one set of new regulations has been adopted by the Federal Government — namely for PCBs. This regulation was in fact stimulated by a large fire which took place in an unguarded PCB storage facility at St. Basil-le-Grand in Quebec. The Act provides that where regulation already exists in a province, that the provincial government may propose that its own regulations are “equivalent” to the federal regulations. Note that the provincial regulations do not have to be identical with the federal ones, but “equivalent”. The term “equivalent” has not been defined in the act so that it is not possible to state what it means until some experience has been built up and possibly tested in the courts. In the case of the PCB regulation, all ten provinces have argued that their own existing provincial regulations are in fact “equivalent” to the federal ones.

An important innovation in the Environmental Protection Act is the extension of concern for toxic contaminants through their life cycle, “from cradle to grave”, and not just the waste-disposal end.

National Action Strategy for Global Warming

Canada has participated actively in the many international symposia and conferences that have been held on global warming over the past several years. One of the largest of these was the international conference held in Toronto in June 1988 under the title “The Changing Atmosphere: Implications for Global Security”. It was at this conference that the goal of reducing carbon dioxide emissions by 20% by 2005 on the current base year of 1988 was first proposed and endorsed as a global target. The conference involved more than 300 scientists and decision-makers from many countries, it was addressed by two Prime Ministers (Brian Mulroney of Canada and Gro Harlem Brundtland of Norway), and was sponsored by Environment Canada and the World Meteorological Organization. It was not, however, an official inter-governmental conference, and the proposal for a 20% reduction of carbon dioxide emissions was no more (and no less) than a consensus agreement of the participants. Since that conference the international community of nations has been moving cautiously towards the negotiation of a framework convention on climate change, which was signed in Rio de Janeiro in June 1992. There is quite clearly a wide range of views between governments on the desirability of internationally agreed and binding targets. Canada has undertaken to stabilize carbon dioxide and other greenhouse gas emissions by the year 2000 to 1990 levels. In seeking to implement this undertaking Canada has developed a proposal for a National Action Strategy on Global Warming (Canadian Council of Ministers of the Environment, 1990). This consists of a
three prong approach, namely the limitation of emissions, anticipation and preparation for global warming, and research to improve understanding. From the Canadian perspective the limitation component should be comprehensive, linked to international agreements, flexible, and should recognize regional differences. It is proposed that Canada’s limitation strategy should be based upon broad consultations and involve specific targets and schedules, and that these should be phased in in a progressive and incremental fashion. The first step in this process proposed by the federal government is the stabilization of carbon dioxide and other greenhouse gases (not controlled by the Montreal Protocol) at 1990 levels by 2000.

The National Action Strategy also proposes as first steps measures that those actions which are economic in their own right should be taken first (e.g. some energy efficiency measures), as well as those steps that help achieve other objectives (e.g. sustainable agriculture and forestry), and that each agency should develop its own contribution in consultation with others. Beyond these first steps it is expected that policy will be developed on the basis of benefit-cost analyses of options, and that measures might include taxes, pricing and/or regulatory action, as well as innovations in urban planning, lifestyle changes and the like. Actions of these kinds in Canada will require Federal/Provincial agreements. These will also cover actions to adapt to climate change and to improve understanding through research and public information. It is proposed that the National Action Strategy will be regularly updated and made public.

**Canadian Environmental Assessment**

In the area of environmental assessment, the complexity of Canadian environmental policy is evident. At the moment, Canada lacks any legislation at the federal level in this vital aspect of public policy. Since 1984, Canada’s environmental assessment has been regulated by a Cabinet Order, known as “Order in Council”. It required environmental assessment wherever federal lands, money or areas of federal jurisdiction are affected by a project. Provincial governments have legislated environmental assessment in every province. Some, such as Ontario, have rigorous environmental assessment, complete with a standing administrative board to adjudicate the process.

The federal environmental review process has undergone significant changes in recent years. Initially, in 1987, the government launched public consultations with an eye to reforming what is known as the EARP - Environmental Assessment and Review Process. Major criticisms of the process were that by relying on the principle of self-assessment, there was an inevitable conflict of interest. Other criticisms pointed to the erratic application of the Guidelines Order. Some departments of government applied it faithfully. Others disregarded it. The federal government began the process of consultation leading to the eventual adoption of legislation to deal with criticisms. But in 1989, before legislation had been drafted, a major court decision led to a reinterpretation of the guidelines order. The Federal Court ruled that a licence granted by the Federal Minister of Environment to the province of Saskatchewan, permitting the building of two dams, was illegal as it had not been subjected to a federal environmental review. The court held that the guidelines order had the effect of law. Subsequent court hearings on other projects confirmed this interpretation and broadened it to hold that whenever areas of federal jurisdiction were affected, even if a provincial review had been held, the federal government had to conduct its own review by law. As we have already seen in the Great Whale case, this can lead to a number of simultaneous and non-cooperative hearings.

It remains to be seen if federal/provincial environmental reviews can work in practice, or whether the conflicts in the constitutional area will continue to spill over into environmental policy.

**The St. Pierre and Miquelon Fishing Waters Dispute**

St. Pierre and Miquelon are two small islands 20 km off the coast of Newfoundland. They were alternately claimed and occupied by the British and the French from 1534 until 1814 when France resumed permanent control under the Treaty of Ghent. The islands have long been a base for the French fishing fleet from St. Malo, and France takes a major catch of cod from the surrounding waters. A serious dispute has arisen between France and Canada since 1964 when Canada extended its exclusive fishing zone to 15 km, and then in 1977 to 220 km. France retaliated with a 220 km claim of its own. The extend of the two claims and their obvious conflict are shown in Figure. The dispute has now been referred to the International Court and both countries have agreed in advance to accept the ruling of the court.
An International Overview

This saga of Canada's evolving environmental policy reflects the complexity of the process. It might be concluded that Canada has more than its fair share of problems, and that the nation's environmental policy is not keeping pace with the current sense of urgency. That Canada shares the policy dilemmas of other leading industrial nations, and fares no worse than many and better than most is suggested by the most recent independent survey carried out by a consortium of non-governmental organizations. An environmental "report card" was prepared for the G-7 summit meeting held in London in July 1991 (Friends of the Earth, 1991). Table 2 shows the percentage score in nine areas of environmental policy as evaluated by national non-governmental organizations, and as coordinated by Friends of the Earth (U.K.). The average of the "grades" shows Canada somewhat surprisingly in second place behind the United States. A comparison between Canada and Japan shows that Canada scores higher in atmosphere, species and habitats, water and oceans, agriculture, global relations, and the public right to know. Japan scores higher in transport and waste treatment and disposal (Table 3).

<table>
<thead>
<tr>
<th>Table 2: 1991 Environmental Report Card</th>
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<tr>
<td>Average of &quot;Grades&quot; in 9 Categories</td>
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<tr>
<td>1. United States: 39.1%</td>
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<tr>
<td>2. Canada: 37.5%</td>
</tr>
<tr>
<td>3. France: 29.9%</td>
</tr>
<tr>
<td>4. United Kingdom: 28.9%</td>
</tr>
<tr>
<td>5. Japan: 28.7%</td>
</tr>
<tr>
<td>6. Italy: 27.6%</td>
</tr>
<tr>
<td>7. Germany: 24.9%</td>
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<td>Source: Friends of the Earth</td>
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KEY: CANADA-JAPAN REPORT CARD SCORES

1. Atmosphere and Energy: Canada 33% - Japan 31%
2. Species and Habitats: Canada 47% - Japan 15%
3. Water and Oceans: Canada 31% - Japan 48%
4. Transport: Canada 17% - Japan 34%
5. Agriculture: Canada 34% - Japan 21%
6. Waste: Canada 21% - Japan 46%
7. Global Relations: Canada 43% - Japan 25%
8. Public Right to Know: Canada 54% - Japan 23%
(Another category, Land Use, was applied to all G-7 countries except Canada - because land use is under provincial jurisdiction - and therefore is not included in the transparency graph or in Canada's average score)

These "grades" are the result of highly subjective judgements by groups whose self-appointed role is to serve as critics of national policy from an environmentalist point of view. They are not strictly comparable, but perhaps they do show that, despite the complexity of environmental policy-making in Canada, the nation's record is not significantly different from other G-7 nations. A similar "report card" for the 1990 G-7 Summit in Houston, Texas, had Canada in fifth place and tied with Japan. The authors of the 1990 report on Canada wrote:

"The reason for Canada's poor performance which contrasts with Canada's high international standing on environmental issues, is explained primarily by the fact that Canadian bureaucrats are actively involved in formulating and writing many international agreements and reports on the environment, but when it comes to translating high sounding principles into domestic policies, regulation, enforcement, and funding, the federal government really falls down. In other words, we Canadians are good at espousing important principles such as sustainable development, but we don't yet possess the national political will to translate such principles into effective domestic action."

To the extent that there is any truth in this assessment, it is perhaps less because of lack of national political will, and more because the accidents of Canada's geography, economy, cultural history, and constitutional arrangements have created a situation in which no matter how strong the political will the...
obstacles to implementation remain high.

Conclusions

Canadian environmental policy is in a period of rapid change and evolution. The changes are strongly driven by the concept of sustainable development, and by Canada’s commitment to the development of a system of global environmental security. The attainment of the policy goals is not easy, either within Canada or internationally. Indeed, the extent to which Canada can achieve sustainable development internally depends in part upon international progress towards the same end. And for Canada to play its full and proper part internationally depends upon much more than the Federal Government. Like Janus the Government of Canada has to keep guard in two directions at once, and the four arms of Shiva seem often to be not enough to handle all the necessary tasks simultaneously. Nevertheless, despite the complexity of the task, Canada is evolving its environmental policy in the right direction and is managing to play a leading role internationally, and to cope with remarkable success in its own internal situation. Given the geographical and economic variations in Canada, the cultural diversity, and the constitutional decentralization on environmental matters, the record seems very encouraging. In this regard Canada is something of a microcosm for the globe, where even greater extent, variety, diversity, and divergence forms the context in which humanity is running a race for survival. There are signs of hope in the experience of Canada, which can give us courage as we seek to create one human world to correspond with the one earth which we all must share.

(Ifias and Atmospheric Environment Service, Canada)

References


