

October 22, 2009

The Honourable Dr Margaret MacDiarmid, MLA
Minister of Education
PO Box 9045 Stn Prov Govt
Victoria BC V8W 9E2

Dear Minister MacDiarmid:

SUBJECT: SMARTTool Agreement for Service

At our Public Board Meeting on October 13th, 2009 the Board unanimously passed the following motion:

that the Board supports the staff recommendation to not sign the "Agreement for the Use of SMARTTool and Related Services" and that the Board writes to the Minister of Education informing her of the Board's decision and rationale.

Further to this motion, I am writing to you on behalf of the North Vancouver Board of Education to express our concerns with respect to the requirement for school districts to sign the Agreement for Service that commits school districts to track carbon emissions using SMARTTool.

We wish to be very clear that we support the broad goals of the Province's Climate Action strategy and understand that *The Greenhouse Gas Reduction Targets Act*, requires all government ministries, colleges, universities, hospitals and school districts to begin reporting greenhouse gas emissions commencing in January 2010. However, we feel it is important to draw your attention to the administrative burden created by the requirement to use SMARTTool to achieve this objective.

For almost a decade, the North Vancouver School District has been a leader among school districts in the pursuit of resource conservation. In 2003, the School District won a BC Hydro Power Smart Partner Excellence Award in recognition of our highly successful eco-efficiency project that addressed lighting upgrades, installation of automated building systems and upgrades to school mechanical systems. Completed in 2005, the eco-efficiency project reduced water consumption by 70%, electricity consumption by 30% and resulted in a significant reduction in gas consumption. In 2009, a School District "Green Team" was established to develop directions for school and district-based best practices. Staff has recently commenced discussions with BC Hydro to obtain funding support for an energy manager position to further support our efforts to reduce greenhouse gas emissions and conserve resources.

We would also like to draw your attention to the fact that North Vancouver Outdoor School is celebrating 40 years of educating students throughout the Lower Mainland in environmental sustainability and our plans to build an Environmental Learning Centre at the Outdoor School. I have attached a copy of the letter sent to the Honourable Shirley Bond outlining our plans for the Outdoor School and a request for funding. We understand this request could not be approved due to the government's financial constraints however we wish to pursue funding from the Pacific Carbon Trust.

North Vancouver School District staff estimates that as much as one half of a full time equivalent staff person will be required to gather and input the amount of information that is expected by the SMARTTool. This administrative cost must be absorbed within our existing staff complement and is in addition to the annual cost of \$.82 per student charged by the Ministry of Citizen's Services

to recover their administrative costs. This is yet another administrative expectation on top of the recently imposed monthly financial reporting requirements.

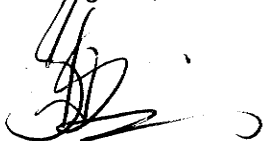
As you know, all school districts were directed to reduce administrative costs in their 2009/10 budgets by 3% which is about \$12 million or face having their grant reduced. It is my understanding that school districts rose to the challenge and achieved approximately \$27 million in administrative cost savings in their 2009/10 budget plans. These savings risk being jeopardized by administrative reporting requirements imposed on school districts by different government ministries, of which the Ministry of Environment's SMARTTool reporting expectations are only the latest demand.

Our Secretary Treasurer advises that as a consequence of recent consultation between representatives of the Association of School District Business Officials, the Ministry of Education, the Climate Action Secretariat and the Ministry of Citizens Services that the requirement to sign the SMARTTool Agreement for Service has been waived at this time but that the use of SMARTTool is mandated to enable accurate and consistent reporting throughout government.

We believe that the government's requirement to track greenhouse gas emissions could be met by using other simpler methods at a minimal cost. Our staff has been tracking greenhouse gas emissions for many years using these simpler methods and we would like your support to delay the requirement for school districts to use SMARTTool until the appropriate officials have had an opportunity to meet again to consider these other reporting methods. Until the Annual Facilities Grant is reinstated, school districts will only be able to achieve minimal reductions in greenhouse gas emissions that are possible through behaviour changes, as the Annual Facilities Grant was our only means to fund the necessary building upgrades required to further reduce greenhouse gas emissions. This calls into question the need for accurate detailed reporting expected through SMARTTool at this time.

In closing, I would urge you to support our request to delay the implementation of SMARTTool to allow an opportunity for the Ministry of Education, school districts and the Ministry of Citizen's Services to find the simplest way to meet the government's objectives that minimize the administrative reporting burden not only on school districts but on all public sector agencies. Thank you for your consideration of this request.

Best regards,



Susan Skinner
Chairperson
Board of Education

SHS/mg

Attachment: Letter to Honourable Shirley Bond re North Vancouver Outdoor School – Infrastructure Funding and Designation as a Centre of Excellence for Environmental Education

cc: Ralph Sultan, MLA, West Vancouver-Capilano
Honourable Naomi Yamamoto, Minister of State for Intergovernmental Relations
Jane Thornthwaite, MLA, North Vancouver-Seymour
North Vancouver Board of Education
John Lewis, Superintendent of Schools
BCSTA for distribution