

B.C. Climate Solutions Council

David Black, President, MoveUP
Toni Boot, Mayor,
District of Summerland

Ian Bruce,
Acting Executive Director,
David Suzuki Foundation

Colleen Giroux-Schmidt, Vice
President, Corporate Relations,
Innergex Renewable Energy

Matt Horne, Climate Policy
Manager, City of Vancouver

Lydia Hwitsum, First Nations
Summit Political Executive

Mark Jaccard, School of Resource
and Environmental Management
Director, Simon Fraser University

Khelsilem, Councillor,
Squamish Nation Council

Adriana Laurent, Co-Founder and
Project Administrator,
UBC Climate Hub

Scott Maloney, Vice President,
Environment, Teck Resources Ltd.

Skye McConnell, Manager of
Policy and Advocacy, Shell Canada

Kurt Niquidet, Vice President,
Council of Forest Industries

Nancy Olewiler, School of
Public Policy Director,
Simon Fraser University

Danielle (DJ) Pohl, President,
Fraser Valley Labour Council

Arjun Singh, Councillor,
City of Kamloops

Merran Smith, Executive Director,
Clean Energy Canada

Karen Tam Wu, Regional Director
for British Columbia,
Pembina Institute

Jill Tipping, President & Chief
Executive Officer,
BC Tech Association

Joie Warnock, Assistant to the
President, Unifor

To: Minister George Heyman, Environment and Climate Change
Strategy

Cc: Jeremy Hewitt; Kevin Jardine

September 23, 2021

Dear Minister Heyman,

The Climate Solutions Council (CSC) has been briefed on the draft Roadmap to 2030. Overall, we feel your government has made significant progress on the draft Roadmap and we thank you for your efforts to move this important work forward.

While the draft Roadmap was well received by the CSC, we are providing the following additional advice to improve and increase stakeholder and all CSC member support for the Roadmap. The advice below contains no new policies, but advice on how to better communicate and implement the Roadmap.

1. 2030 is only eight years away and, if B.C. is to meet its climate targets and follow the science-based advice of the IEA, IPCC and others to transition away from fossil fuels, it must implement the Roadmap with urgency. Without clarity, there is a significant risk of implementation happening too slowly. **The implementation timelines, including new legislation and accompanying regulations, must be clearly communicated in the Roadmap. We recommend that legislative and regulatory changes for the Low Carbon Fuel Standard, Clean Portfolio Standard, and Zero Emissions Vehicles Standard be completed and in force as soon as possible and no later than the end of 2022. Other legislative and regulatory changes should be completed by the end of the mandate (2024), even if those regulations don't come into force until 2025 or 2030.**

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2. The language that accompanied the 2030 targets for the Clean Portfolio Standard and Low Carbon Fuel Standard is concerning. Instead of open-ended ‘subject to consultation’ language, the CSC points to past advice recommending that **engagement must be clearly bound by B.C.’s targets.**
3. The CSC emphasizes that the oil and gas sector must make a significant contribution to the 2030 targets by **ensuring emissions don’t increase from current levels and are reduced, and that those outcomes are backed by policy commitments in the roadmap such as a declining cap on emissions..**
4. The B.C. government has committed to pursue true and meaningful reconciliation through recognition, in partnership with Indigenous peoples. However, significant institutional and financial barriers remain that limit the scope of Indigenous participation in this work and in turn will limit the success of efforts to address climate change. **To this end, we recommend that the government put in place funding mechanisms that are dedicated to supporting Indigenous capacity to engage on climate policy and plans in B.C., and develop a communications plan to share these resources with Indigenous communities.**

The council also identified a number of other significant issues for your consideration when finalizing the roadmap:

- Building on the CSC’s April 13, 2021 letter to you on the value of a ‘whole of government’ approach to climate action, we recommend that the government consolidate key climate programs under a single authority to ensure an efficient and coordinated approach to Roadmap implementation.
- Those that develop and operate energy-economy models are quick to point out that forecasting future macroeconomic impacts of climate policy is an inexact science. We recommend that B.C. avoid over-attributing or overstating the macroeconomic outcomes linked to climate policy that are derived through the use of a single model. While there are costs to transition to a net zero economy, government has a range of policy tools to mitigate those impacts where needed (e.g. increasing the low income climate action tax credit).
- Moving toward a net zero economy will impact B.C.’s workforce and communities. We urge the government to complete its workforce readiness plan and initiate labour market and community planning to ensure a just transition for workers and their communities.

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- The draft Roadmap presented to the CSC was largely silent on Emissions Intensive Trade Exposed (EITE) issues. We urge your government to implement best practices for emissions reductions in EITE industries through consultation with EITE industries and civil society.
- BC Hydro recently released its draft Integrated Resource Plan, which excluded B.C.'s legal climate targets in its Reference Load Forecast. We believe that the Roadmap needs to contain clear policy commitments that align with B.C.'s targets, and if necessary, direction to B.C.'s utilities, including BC Hydro, FortisBC, and the BC Utilities Commission such that the long-term plans are consistent with B.C. achieving its climate targets. Furthermore, B.C.'s climate targets should be communicated to all Crown agencies, educational institutions and health authorities through the government's annual mandate letters to these bodies.
- The B.C. government needs to enable and deploy its full set of emission reduction tools to get to Net Zero, including carbon pricing, regulations, standards, electrification, carbon capture, utilization and storage, and more.
- We would like the Roadmap to include assurances that its implementation will receive the necessary multi-year funding in Budget 2022.

Thank you for your time and we would be happy to work with the Climate Action Secretariat on the above advice to ensure it can be integrated into the Roadmap.

Regards,



Merran Smith
Executive Director
Clean Energy Canada
Co-Chair, B.C. Climate Solutions Council



Colleen Giroux-Schmidt
Vice President, Corporate Relations
Innergex Renewable Energy
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