

**From:** Adrienne Brown

**Sent:** Wednesday, May 12, 2021 4:31 PM

**To:** ~Environment & Sustainable Development/Environnement et développement durable  
<ENVI@parl.gc.ca>

**Subject:** Bill C-12

To the Clerk of the Standing Committee on Environment & Sustainable Development

I am writing to you because I am deeply concerned that Bill C-12, the Climate Accountability Act, is not strong enough to reduce Canada's levels of GHG emissions to a level that will prevent a climate disaster in the near future. Once we reach a tipping point, we cannot stop a global climate catastrophe. Canada has not met any of its climate targets to date. A national carbon tax & carbon drawdown will not be enough. We need serious ACTION now. Bill C-12 needs to be much stronger!

**Recommendations to strengthen C-12:**

- Bill C-12 must ensure that Canada maximizes ambition as soon as possible, including requiring the Minister to ensure accountability in the next five years and ensuring all targets are consistent with the best available science, international obligations, and equity principles.
- Bill C-12 must place greater emphasis on science and expertise and less emphasis on politics by strengthening the Advisory body's role in establishing targets, plans and reports, and ensure that the body is comprised of independent experts. The Advisory body should also prepare regular impact reports that assess the risks of current and predicted climate impacts in Canada, to inform adaptation planning.
- The Environment Commissioner needs to be an independent officer of Parliament reporting on whether our targets are in line with the best available science; whether the plan will get us to our targets; whether our progress reports & assessment reports are accurate & whether our proposed corrective actions are adequate for addressing the times that we are not on track.
- Bill C-12 must actually hold government to account by prescribing robust minimum standards for planning and reporting, and imposing a legal obligation to meet the established targets.
- Bill C-12 should ensure targets and plans are set further in advance, provide for earlier and more regular progress reporting, and place a low cap on the use of international offsets (or even restrict those offsets altogether, other than to exceed targets).
- Without undermining the need for the federal government to take a leadership role and be willing to backstop climate action where necessary, Bill C-12 should also incentivize and facilitate provincial ambition and recognize shared action. Bill C-12 must also require transparency about the status and direction of greenhouse gas emissions in sub-national jurisdictions.
- Bill C-12 must reflect Canada's commitment to enacting UNDRIP and must include means by which Indigenous peoples can be full participants in climate action.
- In amending Bill C-12, Parliamentarians must ensure a strong relationship between climate accountability and just and equitable workforce transition planning.

Please work together to make this bill a model for climate action that will not only reduce our GHG emissions to zero but also drawdown carbon from the atmosphere to a safer level of 350 ppm.

Thank you for the important work of your committee.

Adrienne Brown V0R 1K1