



Submission on Bill C-12: An Act respecting transparency and accountability in Canada's efforts to achieve net-zero greenhouse gas emissions by the year 2050

To: The House Standing Committee on Environment and Sustainable Development
Francis Scarpaleggia (Chair) Dan Albas, Monique Pauzé (Co-Chairs) Members: Yvan Baker, Laurel Collins, Joël Godin, Matt Jeneroux, Lloyd Longfield, Yasmin Ratansi, Brad Redekopp, Raj Saini, Peter Schiefke

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We are writing to you as parents and caregivers who are deeply concerned about the accelerating climate crisis and what it means for our children's future. As the world's leading climate scientists have warned us, the climate crisis poses a severe threat to humanity and all life on earth.^[1] If we are to have a chance of securing a safe and liveable future for our children and all children, it is imperative that we act now to stabilize the earth's climate system by drastically reducing the greenhouse gas emissions that are causing global warming.

In recognition of the gravity of the threat posed by climate change, governments around the world, including Canada, signed the international Paris Agreement in 2015 committing themselves to limiting global warming to 2C while pursuing the means to limit the increase to 1.5C above pre-industrial levels. In addition, numerous governments have enacted climate accountability laws that establish national emission reduction targets and legally require governments to meet those targets in order to meet the 1.5C goal.^[2]

With the introduction of Bill C-12, Canada has the opportunity to join the ranks of nations who have passed climate accountability legislation. As parents, we welcome this development as a sign of our government's recognition of its responsibility to protect Canada's children. However, we are concerned that the Bill, in its current form, does not contain the provisions necessary to fulfil this responsibility. In particular, we are concerned that its emission reduction targets are not in line with what scientists tell us is necessary to limit global warming to 1.5C and its accountability mechanisms are weak.

In considering Bill C-12 it is the responsibility of Members of the Committee to assess its targets and plans based upon the best available science. The world's leading climate

scientists have made it clear that to limit warming to 1.5C and avert catastrophic climate change, action to reduce emissions this decade is critical. However, in the current draft of the Bill this fact is obscured. In the preamble to Bill C-12 it is acknowledged that “the Paris Agreement seeks to strengthen the global response to climate change and reaffirms the goal of limiting global temperature increase to well below 2°C above pre-industrial levels, while pursuing efforts to limit that increase to 1.5°C”. It is then stated that “the Intergovernmental Panel on Climate Change concluded that achieving net-zero greenhouse gas emissions by 2050 is key to keeping the rise in the global-mean temperature to 1.5°C above pre-industrial levels and minimizing climate-change related risks.”^[3]

These two statements, taken together, imply that reaching net-zero by 2050 will enable us to keep the global-mean temperature rise to 1.5C. But this is not, in fact, the case. The preamble to the Bill omits the crucial component of the IPCC’s 2018 report which states that “in model pathways with no or limited overshoot of 1.5°C, global net anthropogenic CO₂ emissions decline by about 45% from 2010 levels by 2030 (40–60% interquartile range), reaching net zero around 2050 (2045–2055 interquartile range).”^[4] In other words, if the world fails to cut emissions by at least 45% by 2030, we will not have a chance of keeping warming to 1.5C - even if we reach net-zero by 2050. Indeed, we could reach net-zero by 2050 but still be on course for catastrophic and irreversible warming of 3C or even 4C by 2100.

It is hard to overstate how catastrophic warming of 3 or 4C would be. At 4C of warming, scientists warn that most coastal cities would be inundated, unprecedented heat waves would render equatorial regions almost uninhabitable, entire ecosystems would be destroyed, and reduced food production capacity would result in higher rates of malnutrition globally.^[5] It is therefore absolutely imperative that we avoid warming of this magnitude and do our utmost to limit warming to 1.5C. IPCC climate scientists have made it clear that even the differences between warming to 1.5C and warming to 2C are profound. These differences are outlined in the 2018 IPCC report. They include the fact that under 1.5C of warming almost 14% of the world’s population would be exposed to severe heat waves at least once every five years whereas under 2C this number rises to 37%. And the fact that under 1.5C of warming 70 to 90% of the world’s coral reefs would die off but under 2C warming almost 100% of coral reefs would die, thereby devastating the fish populations which provide the protein source for over 4 million people.^[6] Limiting warming to 1.5C would save hundreds of thousands of lives and ensure a more safe and sustainable world for all future generations.

The important goal for climate accountability legislation must therefore be ensuring Canada achieves the emissions reductions required to limit warming to 1.5C. This is the only responsible and moral course of action. For Members of the Committee this means strengthening this Bill so that it will require Canada to reduce emissions in accordance with this goal and advance the transition to a more just and sustainable future for the sake of all children both in Canada and around the world.

Recommendations for amendments:

1. A target for 2025 and a more ambitious target of at least 50% by 2030.

We need ambitious climate action this decade in order to prevent catastrophic climate change and ensure that we limit global warming to 1.5C. Therefore, in order to ensure that Bill C-12 aligns with the science - and given Canada's high historic per capita and national emissions - we recommend that the Bill be amended to include:

- a milestone target for 2025.
- a more ambitious emissions reduction target of at least 50% by 2030.

2. Five year milestones should be measured as carbon budgets rather than emission reduction targets.

Bill C-12 requires the Minister of the Environment to establish national emissions reduction targets every five years. In other jurisdictions such as the United Kingdom, the milestone targets are measured in terms of carbon budgets rather than emission reduction targets. Carbon budgets establish a fixed amount of carbon that can be emitted over a given time period and are internationally recognized as a better measurement for ensuring emission reductions.⁷⁷

In order to ensure that Canada follows international best practices, we recommend that Bill C-12 should be amended to measure the 5 year milestone targets as carbon budgets rather than emission reduction targets. In the interests of long-term planning the budgets should also be set at least ten years in advance, rather than the current five years.

3. Accountability: Bill C-12 must impose a clear legal duty on the government to meet the targets.

In its current draft, Bill C-12 only requires the government to set targets, not meet them. If the government fails to meet one of its targets, the Minister is only required to explain why and describe the actions the government is taking or will take to meet it. This is not true accountability.

In order to ensure that the Bill enshrines true accountability the Bill needs to be amended to include a clear legal obligation upon the Minister to meet the targets.

4. Strengthen the role and independence of the Advisory Body.

Bill C-12 establishes an Advisory Body to simply advise the Minister for the Environment but it does not specify the qualifications of members or the duties of the Body.

The Bill needs to be amended to strengthen the role and independence of the Advisory Body by specifying the qualifications of appointees. The qualifications of appointees must include a demonstrated understanding of climate change, its impacts, and

Canada's treaty responsibilities. Further, the role of the Advisory Body should be expanded to include both advising on interim targets and reporting on progress toward meeting those targets. In its current draft, the responsibility of reporting on progress toward meeting targets is assigned to the Commissioner of the Environment and Sustainable Development. In order to strengthen transparency and accountability, this responsibility should be assigned to the more independent Advisory Body. Further, in order to increase public knowledge of the government's work, progress reports should be required on an annual basis.

5. Requirements to report on climate change impacts and make plans for adaptation.

In its current form Bill C-12 does not address climate change impacts nor does it require the government to make plans for adapting to climate change.

In order to assess and manage the impacts of climate change on all Canadians, particularly the most vulnerable and ensure a just transition for workers, the Bill should be amended to include requirements for regular annual reporting on climate change impacts, plans for adaptation, and progress toward implementing those plans.

6. Establish a framework for national and subnational intergovernmental cooperation.

In the Canadian federal system, it is clear that an intergovernmental approach to emission reductions is crucial if Canada is to meet its targets.

Bill C-12 should be amended to include an institutional framework for cooperation, consultation, and negotiation between the provinces, territories, and Indigenous governments so that planning for carbon budget and emission reductions targets is fairly shared across regions and sectors in this crucial national undertaking.

For Our Kids Toronto is a chapter of For Our Kids, a nation-wide network of parents, grandparents and caregivers who are advocating for climate action in order to create a sustainable, equitable and just world for all children.

^[1] Intergovernmental Panel on Climate Change (IPCC), 2018: *Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty* [Masson-Delmotte, V., P. Zhai, H.-O. Pörtner, D. Roberts, J. Skea, P.R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J.B.R. Matthews, Y. Chen, X. Zhou, M.I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, and T. Waterfield (eds.)].

^[2] Nations who have passed climate accountability legislation include: the United Kingdom *Climate Change Act* (2008); Mexico, General Law on Climate Change (2012); Finland, Climate Change Act, (2015); Sweden, Climate Act, (2018); New Zealand, Climate Change Response (Zero Carbon) Amendment Bill (2019); Germany, Climate Action Law (2019); The Netherlands, Climate Act (2019); Mexico. For a full list as of May 2020 see: <https://www.ecojustice.ca/wp-content/uploads/2020/05/6-Mini-Briefing-on-international-climate-change-laws-abbreviated-March-2020.pdf>

^[3] Bill C-12, An Act respecting transparency and accountability in Canada's efforts to achieve net-zero greenhouse gas emissions by the year 2050. <https://www.parl.ca/DocumentViewer/en/43-2/bill/C-12/first-reading>

^[4] IPCC, 2018: Summary for Policymakers. In: *Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty* [Masson-Delmotte, V., P. Zhai, H.-O. Pörtner, D. Roberts, J. Skea, P.R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J.B.R. Matthews, Y. Chen, X. Zhou, M.I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, and T. Waterfield (eds.)]. In Press.: p. 12 <https://www.ipcc.ch/sr15/chapter/spm/>

^[5] "World Bank. 2012. *Turn Down the Heat: Why a 4°C Warmer World Must Be Avoided*. Washington, DC. © World Bank. <https://openknowledge.worldbank.org/handle/10986/11860> License: CC BY-NC-ND 3.0 IGO."

^[6] Intergovernmental Panel on Climate Change (IPCC), 2018: *Global Warming of 1.5°C. An IPCC Special Report*. See also Ove Hoegh-Buldbert, Linwood Pendelton, Anne Kaup "People and the changing nature of coral reefs", *Regional Studies in Marine Science* Volume 30, July 2019: 1-20.

^[7] Beugin, D., J. Dion, A. Kanduth, C. Lee, D. Sawyer, and J. Arnold. 2020. *Marking the Way: How legislating climate milestones clarifies pathways to long-term goals*. Canadian Institute for Climate Choices <https://climatechoices.ca/wp-content/uploads/2020/06/CICC-climate-accountability-framework-FINAL.pdf>