

## **SUBMISSION TO THE ENVI COMMITTEE REGARDING BILL C-12**

By Kenneth Andrew Love, as an individual, on 17 May 2021

### **INTRODUCTION**

Bill C-12 contains serious flaws regarding the composition, mandate, and independence of the advisory body, and regarding the degree of deference that the government must pay to the advisory body's advice.

These flaws are as bad as the lack of a 2025 milestone year and the weakness of the Environment Commissioner's mandate and resources to evaluate progress reports and assessment reports. Since those issues, and particularly the 2025 milestone year issue, have received much more attention, this submission will focus on the issues related to the advisory body.

The advisory body should be a strong group of expert climate change scientists and climate change economists. It should function as a board of directors that oversees its own independent secretariat of full-time experts and technicians. It should have the explicit mandate of being Canada's primary source of advice on Canada's greenhouse gas ("**GHG**") reduction targets and on the plans to achieve those targets. It should report to Parliament and not to the Environment Minister (the "**Minister**"). Its research and analysis should be available to support opposition parties in the House of Commons. The Minister and the government should owe considerable deference to the advisory body's advice. In other words, it should be hard for the government not to follow the advisory body's advice.

In its present incarnation, the advisory body has none of these qualities and cannot have any of them.

The legislative scheme described above has been the law of the United Kingdom since it passed *The UK Climate Change Act, 2008*<sup>1</sup> (the "UK Act"). The system was fundamentally replicated by the New Zealand *Climate Change Response Act, 2002*, as amended in 2019<sup>2</sup> (the "**NZ Act**"), with those amendments. These countries did so because they have realized that this is the best way for democratically elected governments to reduce their countries' GHG emissions. The success of the British model has been tremendous.

### **DISCUSSION**

What Bill C-12 states about the composition, independence, and mandate of the advisory body is set out in ss. 20(1) and (2), and ss. 21(1) and (2):

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<sup>1</sup> *The UK Climate Change Act, 2008*, UK Public General Acts, 2008 c.27, accessed at <https://www.legislation.gov.uk/ukpga/2008/27/contents>, retrieved 11 May 2021.

<sup>2</sup> *New Zealand Climate Change Response Act, 2002*, As Amended 2029, accessed at <https://www.legislation.govt.nz/act/public/2002/0040/latest/DLM158584.html#DLM158590>, retrieved 14 May 2021.

### Establishment and mandate

20 (1) There is established an advisory body whose mandate is to provide the Minister with advice with respect to achieving net-zero emissions by 2050, including advice respecting measures and sectoral strategies that the Government of Canada could implement to achieve a greenhouse gas emissions target, and any matter referred to it by the Minister, and to conduct engagement activities related to achieving net-zero emissions.

### Terms of reference

(2) The Minister may determine and amend the terms of reference of the advisory body.

### Appointment and remuneration of members

21 (1) The Governor in Council appoints the members of the advisory body on the recommendation of the Minister and fixes their remuneration.

### Composition of body

(2) The advisory body is composed of no more than fifteen members, who are appointed on a part-time basis for a renewable term of up to three years.

## **Composition and Independence of the Advisory Body**

The power to appoint the members of the advisory body is thus concentrated in the Environment Minister – or, more realistically, in the Prime Minister and the Prime Minister’s Office.<sup>3</sup> In light of the fact that another party will, almost certainly, eventually form a subsequent government, and the fact that that government will then be the recipient of the advisory body’s advice, this is short-sighted and unwise.

No criteria are set out regarding the knowledge, skills, or experience for individual appointees, or for the advisory board as a collective whole.

During the last election, Prime Minister Trudeau promised Canadians an expert advisory body: “Here in Canada, we’ll appoint a group of experts to help us chart our path forward, and we’ll legislate 5-year targets along the way.”<sup>4</sup> Then-Environment Minister Catherine McKenna made the same promise: “I’ll be frank, it’s an ambitious target. That’s why we’re also pledging to appoint a group of experts to help us chart the

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<sup>3</sup> Donald J. Savoie, *Democracy in Canada* (Montreal and Kingston: McGill-Queen’s University Press, 2019), Ch. 10.

<sup>4</sup> Justin Trudeau speech in Burnaby, B.C., streamed live by Global News on 24 September 2019: <https://www.youtube.com/watch?v=bqjXWgAPx9U&t=1464s>, retrieved 11 May 2021.

path to a net-zero future.”<sup>5</sup> She elaborated: “I’m not going to stand here and say what our exact plan is to 2050 because we need to make that plan with experts.”<sup>6</sup>

Environment Minister Jonathan Wilkinson announced the members of the advisory body on or about 25 February 2021. Of the 14 members, only one can be described as an expert in climate change science or climate change economics: Simon Donner is a Professor at the University of British Columbia, “where he teaches and conducts research at the intersection of climate change science and policy”.<sup>7</sup> Among the others, one is the former CEO of Canada’s Oil Sands Innovation Alliance (the members of which are Canadian Natural, Cenovus Energy, ConocoPhillips Canada, Imperial, Suncor, Syncrude, and Teck),<sup>8</sup> one is the former CEO of NB Power (who holds a bachelor’s degree in electrical engineering),<sup>9</sup> and one is the President of the Canadian Labour Congress.<sup>10</sup>

It must be emphasized that none of the foregoing is in any way a personal criticism of the individuals who have been named to the advisory body. They all appear to be intelligent, personable, and accomplished individuals. The fact remains, though, that, except for Professor Donner, they are not climate change experts.

Environment Minister Jonathan Wilkinson acknowledged this, at least implicitly, during the Bill C-12 debate in the House of Commons on 27 April 2021:

“Madam Speaker, let us be serious here. The members of the group were selected to represent the diversity of the Canadian population. This included representation from all regions of the country as well as gender balance, Indigenous people and visible minorities. It included a range of perspectives...”<sup>11</sup>

The fact that this non-expert advisory body will have no independent staff is another, and related, crucial flaw in Bill C-12. The advisory body’s Terms of Reference, also released on or about 25 February 2021, state regarding the Secretariat:

*Environment and Climate Change Canada (ECCC) will provide logistical, administrative, and policy support to the advisory body.* The advisory body may request that ECCC and other government departments provide economic analysis and emissions modelling expertise. Relevant Government of Canada

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<sup>5</sup> Catherine McKenna speech on 24 September 2019, streamed by Global News: <https://www.youtube.com/watch?v=qpglorxfEM>, retrieved 11 May 2021.

<sup>6</sup> Catherine McKenna speaking to reporters, footage used in Global News Report on 24 September 2024: <https://www.youtube.com/watch?v=mr1VRZ8xTFA>, retrieved 11 May 2021.

<sup>7</sup> “Members – Current Net-Zero Advisory Body”, [https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/net-zero-emissions-2050/advisory-body.html#member\\_7](https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/net-zero-emissions-2050/advisory-body.html#member_7), retrieved 11 May 2021.

<sup>8</sup> <https://www.cosia.ca/about/members>, retrieved 11 May 2021.

<sup>9</sup> <https://www.mccarthy.ca/en/people/gaetan-thomas>, retrieved 11 May 2021.

<sup>10</sup> <https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/net-zero-emissions-2050/advisory-body.html>, retrieved 11 May 2021.

<sup>11</sup> Canada, Parliament, *Hansard*, 43<sup>rd</sup> Parliament, 2<sup>nd</sup> Session, Edited Hansard No. 089, Tuesday 27 April 2021, 1145: <https://www.ourcommons.ca/DocumentViewer/en/43-2/house/sitting-89/hansard>, retrieved 11 May 2021.

departments may be asked to assist the advisory body by providing briefings and analysis on federal policies and programs.”<sup>12</sup> [Emphasis added.]

Canada has never met a climate change goal or kept a climate change promise. In 2017, Environment and Climate Change Canada, under then-Environment Minister Catherine McKenna, published a report stating that, for 2020, “Canada’s national target is a 17% reduction from 2005 levels”. It also stated that the 2005 levels were 738 Mt. Thus, the target for 2020 was 613 Mt.<sup>13</sup> In April 2021, ECCC, under Environment Minister Jonathan Wilkinson, released Canada’s Submission to the United Nations Framework Convention on Climate Change. It stated that Canada’s GHG emissions for 2019 were 730 Mt, which it stated was “a net decrease of... 1.1% from 2005 emissions.”<sup>14</sup>

With one year to go, the Liberal Government, working with ECCC, is missing its own 2020 target by 117 Mt, or 16 % of the 17% that it targeted.

The time has come to consider whether the combination of the elected federal government (regardless of party) and ECCC is competent to reduce Canada’s GHG emissions. All evidence to date suggests it is not.

It is foolish to think that a “group...selected to represent the diversity of the Canadian population”, with no expertise of its own, no independence from the Environment Minister, and no independent staff but instead obliged to use the ECCC staff, will do any better.

### **Mandate of the Advisory Body**

Pursuant to s. 20(1) of Bill C-12, set out above, the advisory body’s only mandate is “to provide the Minister with advice with respect to achieving net-zero emissions by 2050, including advice respecting measures and sectoral strategies that the Government of Canada could implement to achieve a greenhouse gas emissions target, and any matter referred to it by the Minister, and to conduct engagement activities related to achieving net-zero emissions”.

Pursuant to s. 7(1) of Bill C-12, “The Minister must set a national greenhouse gas emissions target for each milestone year.”

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<sup>12</sup> <https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/net-zero-emissions-2050/advisory-body.html>, retrieved 12 May 2021.

<sup>13</sup> ECCC 2017-17 Departmental Results Report, p. 27. Accessed at <https://www.canada.ca/en/environment-climate-change/corporate/transparency/priorities-management/departamental-results-report/2016-2017.html>, retrieved 12 May 2021.

<sup>14</sup> ECCC National Inventory Report 1990-2019: Greenhouse Gas Sources and Sinks in Canada – Executive Summary, 2021 Edition, p. 1. Accessed at <https://www.canada.ca/en/environment-climate-change/corporate/transparency/priorities-management/departamental-results-report/2016-2017.html>, retrieved 12 May 2021.

The advisory body has been given no mandate to advise on the targets for the milestone years.

Pursuant to s. 9(1) of Bill C-12, “The Minister must establish a greenhouse gas emissions reduction plan for achieving the target[s].”

The advisory body has no explicit mandate to advise on plans, except for “advice respecting measures and sectoral strategies that the Government of Canada **could** implement.” [Emphasis added.]

### **The Degree of Deference Due from the Minister to the Advisory Body**

The deference, or lack thereof, that the Minister must give to the advisory body is set out in s. 22:

Report

22 (1) The advisory body must submit an annual report to the Minister with respect to its advice and activities.

Minister’s response

(2) The Minister must **publicly respond** to the advice that the advisory body includes in its annual report with respect measures and sectoral strategies that the Government of Canada **could** implement to achieve the greenhouse gas emissions target. [Emphasis added.]

Thus, it is open to the Minister to issue a press release thanking the advisory body for its work and thereafter to ignore it.

Beyond that, s. 13 of Bill C-12 states:

Public participation

13. When setting or amending a national greenhouse gas emissions target or establishing or amending an emissions reduction plan, the Minister must, in the manner the Minister considers it appropriate, provide the governments of the provinces, Indigenous peoples of Canada, the advisory body established under section 20 and interested persons, including any expert Minister considers appropriate to consult, with the opportunity to make submissions.”

The degree of deference that the Minister must give to any of these groups is significantly limited by the qualification that, in providing them the opportunity to make submissions, the Minister need only do so “in the manner the Minister considers it appropriate”.

Section 13 also implies that the advisory body’s submissions have no more significance than those of “the governments of the provinces, Indigenous peoples of Canada, ...and interested persons, including any expert Minister considers appropriate to consult.”

The reference to the advisory body should be deleted from s. 13 and the deference that the Minister owes to the advisory body's advice should be made explicit elsewhere in Bill C-12. This should include specific references in s. 7, regarding targets, and s. 9, regarding plans.

However, these amendments should only be made if the advisory body is transformed into a truly expert and independent body, with sufficient staff of its own to produce well-reasoned targets and comprehensive plans to achieve them. In its present incarnation, the advisory body is more akin to a somewhat enhanced citizen's assembly, or a stakeholders' group. It may be likened to the former National Round Table on the Environment and the Economy, but without experts or the staff.<sup>15</sup> If the advisory body is not transformed, then the deference that the Minister owes to it should be left unchanged, because the advisory body, and its advice, will not be worthy of any further deference.

### **Appointments of Climate Change Committee Members under the UK Act**

The UK Act is superior to Bill C-12 in almost every conceivable way. The UK Act combines the advisory mandate that Bill C-12 gives to the advisory body and the evaluation mandate that Bill C-12 gives to the Environment Commissioner into one body, called the UK Climate Change Committee (the "**Committee**"). The Chair of the Committee is chosen by the "national authorities",<sup>16</sup> who are the Secretary of State, the Scottish Ministers, the Welsh Ministers, and the relevant Northern Ireland department.<sup>17</sup>

Between five and eight more members are appointed to the Committee, and the national authorities must consult the Chair before appointing them.<sup>18</sup>

"In appointing a member, the national authorities must have regard to the desirability of securing that the Committee (taken as a whole) has experience in or knowledge of the following: (a) business competitiveness; (b) climate change policy at national and international level, and in particular the social impacts of such policy; (c) climate science, and other branches of environmental science; (d) differences in circumstances between England, Wales, Scotland and Northern Ireland and the capacity of national authorities to take action in relation to climate change; (e) economic analysis and forecasting; (f) emissions trading; (g) energy production and supply; (h) financial investment; (i) technology development and diffusion."<sup>19</sup>

The legislation itself prevents the appointment of people who are not highly qualified.

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<sup>15</sup> <http://nrt-trn.ca/>, retrieved 13 May 2021.

<sup>16</sup> s. 1(1) Sched. 1, UK Act

<sup>17</sup> s. 95(1) & (2) UK Act

<sup>18</sup> s. 1(2) Sched. 1, UK Act

<sup>19</sup> s. 1(3) Sched. 1, UK Act

The Committee is independent from the UK Environment Minister and the government. The national authorities can seek advice or give some directions, but this “does not include the power to direct the Committee as to the content of any advice or report.”<sup>20</sup>

The Committee is currently comprised of nine members. The Chair was formerly the UK’s longest-serving environment minister. The Chief Executive was previously the Director of Energy and Climate Change in the Scottish government. Of the remaining seven members, all but one hold a doctorate degree specializing in some form of climate change science or climate change economics. (The one without a doctorate is nevertheless a visiting professor of Economics, based on his MSc, at University College London.)<sup>21</sup> One member, Professor Corinne LeQuéré, is Canadian. She is Professor of Climate Change Science at the University of East Anglia and also the Chair of the French Haut Conseil pour le Climat.<sup>22</sup>

The UK Committee has its own independent full-time staff: “The Secretariat provides analytical and corporate support to the Committee and is made up of around 35 staff members, led by the Chief Executive.”<sup>23</sup>

### **Appointment of Climate Change Commission Members under the NZ Act**

The legislative scheme for selection of the advisory body under the New Zealand statute is even better and more applicable to Canada. New Zealand calls its advisory and evaluating body the “Commission”. The Minister must appoint an independent nominating committee to nominate members of the Commission.<sup>24</sup> The nominating committee must comprise five or more people who, in the opinion of the Minister, have the relevant skills or experience to identify suitably qualified candidates.<sup>25</sup> Once there is a chairperson for the Commission, he or she becomes a member of the nominating committee.<sup>26</sup>

Before recommending the appointment of someone proposed by the nominating committee, the Minister must consider a list of qualifications. They are similar to the UK’s list, but also include an understanding of New Zealand’s primary treaty with its First Nations peoples, as well as their traditional knowledge, custom, and protocol. The Minister must also consult representatives of all political parties in Parliament.<sup>27</sup> In recommending the appointment of an individual to the Commission, the Minister must recommend a term of office that ensures that no more than two members have their terms of office expire in any calendar year.<sup>28</sup>

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<sup>20</sup> s. 42(4) UK Act

<sup>21</sup> [https://en.wikipedia.org/wiki/Paul\\_Johnson\\_\(economist\)](https://en.wikipedia.org/wiki/Paul_Johnson_(economist)), retrieved 11 May 2021

<sup>22</sup> Except for the information from the immediately preceding footnote, all biographical information is from <https://www.theccc.org.uk/about/>, retrieved 11 May 2021.

<sup>23</sup> <https://www.theccc.org.uk/about/>, retrieved 14 May 2021.

<sup>24</sup> s. 5F(1) NZ Act

<sup>25</sup> s. 5F(3) NZ Act

<sup>26</sup> s. 5F(2) NZ Act

<sup>27</sup> s. 5E, 5H NZ Act

<sup>28</sup> s. 5I NZ Act

The NZ Act explicitly states that the commission must act independently of the government in performing its functions and duties and exercising its statutory powers.<sup>29</sup> The Commission's specific mandate is set out in a twelve-point list, each point of which is specified in further detail in a separate additional section.<sup>30</sup>

### **The Mandate, Independence, and Deference Owed to the UK Committee**

The UK Committee's mandate is clearly specified in the UK Act. It is the duty of the Committee to advise the UK's Environment Minister on the targets (using the Canadian terms) for each milestone year, how the targets should be met, and which sectors should make reductions. The Committee must also publish its advice.<sup>31</sup>

Before the UK Environment Minister sets the target, he or she must obtain and take into account the advice of the Committee.<sup>32</sup>

The deference that the UK Environment Minister must give to the advice of the Committee is explicitly set out in the statute: "If the [target] makes provision different from that recommended by the Committee, the [UK Environment Minister] must... publish a statement setting out the reasons for that decision."<sup>33</sup>

In 2018, the London School of Economics published a paper entitled "10 Years of the UK Climate Change Act". In one passage, it stated:

"Unlike the Monetary Policy Committee in the UK or the Federal Reserve in the United states, the CCC does not have formal decision-making powers. It is not a legal enforcer: it is an advisory body. However, the Climate Change Act makes it as difficult as possible for the government to deviate from the CCC's advice by requiring a formal explanation if the government should do so. As such, the CCC is an effective mechanism to protect climate policy against 'the weakness of politicians'.... Respondents from all backgrounds see it as 'an incredibly powerful voice'...and the ultimate provider of high quality information and analysis in the UK climate debate."<sup>34</sup>

In purely political terms, all Canadian members of parliament should welcome a strong advisory body that will provide solid comprehensive plans to reach significant reduction targets. No politicians want to make the cuts and sacrifices required to make significant GHG reductions in Canada. Quite obviously, no Canadian members of Parliament have been willing to do so to date. When deference to the advisory body's advice is

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<sup>29</sup> s. 50(1) NZ Act

<sup>30</sup> s. FJ NZ Act

<sup>31</sup> ss. 34(1) & (6) UK Act

<sup>32</sup> s. 7(1) UK Act

<sup>33</sup> s. 7(6) UK Act

<sup>34</sup> Frankhauser, Averchonkova, and Finnegan. "10 Years of the UK Climate Change Act", The London School of Economics and Political Science, Centre for Climate Change Economics and Policy, 2018, p.13. Accessed at: <https://www.lse.ac.uk/granthaminstitute/publication/10-years-climate-change-act/>, retrieved 16 May 2021.

enshrined in law, federal politicians of all stripes will have something of a political “out”. “It’s not my fault that we must make these changes,” the politician can say, “the advisory body says it is necessary.” Thus, reducing GHG emissions becomes significantly more non-partisan.

It is worthwhile to briefly consider the output of the UK Committee. In December 2020, the Committee published the **Sixth** UK Carbon Budget. It applies to the years 2033 to 2037. It is 448 pages long. A brief sample of the advice it provides is illustrative of the degree of detail it provides.

Regarding the heating of buildings, it states: “Boiler lifetimes of 15 years imply a phase-out date for the installation of fossil fuel boilers in advance of 2035, in order for update of low-carbon heat to be sufficient to decarbonize buildings by 2050. Our Balanced Pathway sees sales of oil boilers phased out by 2028, and gas boilers by 2033 in residential homes, with the exception of hydrogen-ready gas boilers in areas where the gas grid is set to convert to low-carbon hydrogen.”<sup>35</sup>

By way of another sample, consider this: “**Cars and vans.** A high take-up of electric vehicles (EVs), resulting in the end of sales of new conventional cars, vans and plug-in hybrids (PHEVs) by 2032 at the latest. From 2030, regulatory approval to drive fossil fuel cars, vans, and motorbikes should be limited to 2050 so that remaining fossil fuel vehicles are removed from the fleet at that point. High take-up of EVs will require significant roll-out of charge points...”<sup>36</sup>

At the same time that it published the Sixth UK Carbon Budget, the Committee also published “Policies for the Sixth Carbon Budget and Net Zero” (209 pages)<sup>37</sup> and “The Sixth Carbon Budget Methodology Report (340 pages).<sup>38</sup> Also in the same month, the Committee and Cambridge Econometrics published Economic Impact of the Sixth Carbon Budget (26 pages).<sup>39</sup>

It is inconceivable that the current Bill C-12 advisory body could do any of this.

An indication of the success of the UK Act can be found in the UK’s annual GHG emission statistics. In 2008, the year the UK passed the UK Act, the UK emitted 652 Mts of GHGs. In 2019, it emitted 455 Mts, a reduction of 43% from the 2008 amount.<sup>40</sup>

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<sup>35</sup> UK Committee on Climate Change, The Sixth Carbon Budget, December 2020, p. 71. Accessed at <http://www.theccc.org.uk/publications/>, retrieved 14 May 2021.

<sup>36</sup> *Ibid.*, p. 90.

<sup>37</sup> UK Committee on Climate Change, Policies for the Sixth Carbon Budget and Net Zero, December 2020. Accessed at <http://www.theccc.org.uk/publications/>, retrieved 14 May 2021.

<sup>38</sup> UK Committee on Climate Change, The Sixth Carbon Budget Methodology Report, December 2020. Accessed at <http://www.theccc.org.uk/publications/>, retrieved 14 May 2021.

<sup>39</sup> Cambridge Econometrics and The UK Committee on Climate Change, Economic Impact of the Sixth Carbon Budget, December 2020. Accessed at: <https://www.theccc.org.uk/publications/page/2/?topic&type=0-report>, retrieved 14 May 2021.

<sup>40</sup> UK Department for Business, Energy & Industrial Strategy, Provisional UK Greenhouse Gas Emissions National Statistics 2020. Published 25 March 2021. Accessed at <https://data.gov.uk/dataset/9a1e58e5->

In 2008, Canada emitted 723 Mts of GHGs.<sup>41</sup> In 2019, Canada emitted 730 Mts, an increase of approximately 1% over the 2008 amount.<sup>42</sup>

## **CONCLUSION**

The way to fix the flaws in Bill C-12 regarding the advisory body are clear:

- Set out the collective qualifications that the advisory body must have.
- Have Bill C-12 create a nominating committee to select members for the advisory body.
- Require the nominating committee or the Minister to consult all parties sitting in the House of Commons and all provincial and territorial premiers before making the appointments.
- Make the advisory body wholly independent of the government.
- Give the advisory body a large independent secretariat.
- Make it clear that the advisory body is the primary entity in Canada to set targets and create plans. Add to s. 7 that the Minister must obtain and consider the advice of the advisory body before setting targets. Add to s. 9 that the Minister must obtain and consider the advice of the advisory body before enacting legislation on a plan.
- Ensure in both sections that, if the government enacts policies that differ from the advisory body's advice, the Minister must table a report in Parliament explaining in detail the reasons for that decision. Remove reference to the advisory body in s. 13 to avoid any confusion about the pre-eminence of the advisory body's national role.

If the ENVI Committee is not willing to make these amendments, then Bill C-12 should be defeated in the House of Commons. A non-expert advisory body, operating under the direction of the Minister, would wrongly provide legitimacy to targets and plans not supported by expert analysis. Such an advisory body would obscure what needs to be done. It would also add delay and inefficiency to the overall process. As such, it would do more harm than good.

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[d1b6-457d-a414-335ca546d52c/provisional-uk-greenhouse-gas-emissions-national-statistics](https://www.canada.ca/en/environment-climate-change/services/environmental-indicators/progresstowards-canada-greenhouse-gas-emissions-reduction-target.html), retrieved 14 May 2021.

<sup>41</sup> Environment and Climate Change Canada (2020), *Canadian Environmental Sustainability Indicators: Progress towards Canada's greenhouse gas emissions reduction target*. p. 12. Accessed at [www.canada.ca/en/environment-climate-change/services/environmental-indicators/progresstowards-canada-greenhouse-gas-emissions-reduction-target.html](https://www.canada.ca/en/environment-climate-change/services/environmental-indicators/progresstowards-canada-greenhouse-gas-emissions-reduction-target.html), retrieved 14 May 2021.

<sup>42</sup> Environment and Climate Change Canada (2021), *National Inventory Report 1990-2019*. p. 1. Accessed at <https://www.canada.ca/en/environment-climate-change/services/climate-change/greenhouse-gas-emissions/inventory.html>, retrieved 14 May 2021.