

**Submission by JustEarth**

**To the**  
**Standing Committee on Environment and**  
**Sustainable Development**  
**May 17, 2021**  
**On Bill C-12**  
**The Canadian Net-Zero Emissions**  
**Accountability Act**



**Introduction:** The Canadian Net-Zero Emissions Accountability Act should hold this and future federal governments to account for its commitments to achieve needed climate targets so that Canada is doing its fair share in the global effort to reduce GHG emissions to net zero by 2050.

Given that the window to prevent the worst effects of climate change is rapidly closing, a post COVID economic recovery must build on a foundation of environmentally sustainable growth. More than a decade ago the United Kingdom created a climate accountability framework under its Climate Change Act (2008). The UK CCA was the first of its kind, and remains highly regarded. It has served as a model for legislation in other jurisdictions, including Sweden, Denmark, France, Germany, Spain and New Zealand.

JustEarth strongly recommends the improvements outlined below to strengthen Bill C-12.

### **Recommendations to Improve Bill C-12**

**Targets:** Net zero emissions by 2050 is critical to avoid catastrophic climate change, but the next 10 years are crucial. **Bill C-12 must provide meaningful accountability “checkpoints” over the next ten years. A 2025 target must be put in place.** Also, Bill C-12 does not require the Minister to transparently consider independent expert advice when setting the emission reduction targets. (The UK accountability includes this requirement.) Because Canada is a wealthy country with high emissions per capita, the Climate Action Network (CAN) wants to see more ambitious targets than those set by the IPCC of 45% global GHG reductions by 2030 and net-zero by 2050. CAN calls for domestic GHGs to be reduced by 60% by 2030.

**Advisory/accountability group:** Bill C-12 creates an “Advisory Body” to make policy recommendations on how to achieve the targets. Reports are prepared by the Commissioner for Environment and Sustainable Development (CESD) on the implementation of measures every five years. The Net Zero Emissions Body has now been established, consisting of 15 experts. They are now advocating for strengthening the bill to provide them with the mandate and capacity to do their job. We expect them to be **sufficiently well resourced** to conduct the detailed analysis necessary to advise on targets and plans, monitor progress and prepare regular impact/risk reports.

**Accountability:** Bill C-12's obligations on government are weak and difficult to enforce. Also, the Bill gives government wiggle room to set weak targets and to table plans with inadequate details. To incentivize real action, the Bill needs to require the Minister to meet or exceed minimum standards. Also, the advisory body has no clear role in progress reporting, which means that the government determines whether it is on track to meeting the targets. (See the previous recommendation to place reporting in the hands of the advisory body.)

**Solutions re accountability:** JustEarth offers suggestions from the UK and New Zealand: the UK act contains a requirement that the Minister listen to its advisory body, the Committee on Climate Change, and states that purchase of offsets can be used as a global contribution and a financial inducement to meet targets. One suggestion: Finance Canada could book the 2030 Nationally Determined Contributions as a "fiscal contingent liability." So if we fail to meet our target through domestic reductions, we will be forced by our own legislation to purchase credits internationally. The larger our failure to meet targets, the larger the financial cost. Another idea is to add a section to the Bill that places a "mandatory duty" on the Minister to meet the target, theoretically creating the opportunity for citizen enforcement by way of administrative law.

**Limit the purchase of international offsets as an incentive to meet targets.** Sweden limits these to 15% of its 2050 goal. Even better, use them to exceed targets.

**Sharing the effort domestically:** Bill C-12 must also require transparency about the status and direction of greenhouse gas emissions in sub-national jurisdictions (provincial, territorial, municipal and Indigenous). The climate crisis could be taken as an opportunity to further cooperative federalism by ensure that the task of reduction is shared fairly.

### **In addition to our comments on C-12**

**Sharing the effort internationally:** Canada's fair share also means helping developing countries to reduce GHGs. Canada fair share is at least \$4bn USD annually by 2020. A 60% by 2030 target for domestic emissions reductions plus assistance of \$4 B per year for the Global Green Fund to enable other countries to reduce their emissions by transitioning to renewables instead of reliance on fossil fuels for development.

**Chief Climate Scientist:** We recommend a Chief Climate Scientist to play a similar role as Teresa Tam for Health.

**National Roundtable on Economy and the Environment:** We feel there is a role to be played by this body. It could represent various sectors in developing the economic transition plans required to meet the targets set by the scientific advisory body.

**Who we are:**

Just Earth is a group of citizens concerned about the climate change. Our focus is to contact MPs to promote the best Canadian policy to achieve Canada's fair share in GHG emissions reductions.