



Surrey for Future
Surrey, BC
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May 16, 2021

Dear Minister Wilkinson and Bill C-12 Subcommittee,

Surrey for Future is a community organization based in Surrey, British Columbia. In 2019, we successfully campaigned for the City of Surrey to declare a climate emergency and adopt greenhouse gas emissions targets consistent with the Intergovernmental Panel on Climate Change (IPCC) Special Report on Global Warming of 1.5°C.

Our group includes members living in 7 Metro Vancouver federal ridings, and is made up of people of all ages, from a variety of ethnic, cultural and professional backgrounds.

We are thrilled to see the development of Bill C-12, *Canadian Net-Zero Emissions Accountability Act*, and the commitment to legislate Canada's net zero commitment.

However, in its current form the bill has significant weaknesses. We recommend the following to strengthen Bill C-12:

- **Impose a legal obligation to meet the established targets**

Bill C-12 currently only requires that the government 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.

C-12 should be amended to include language similar to the UK's *Climate Change Act*, Section 4, which notes that it is the "duty of the Secretary of State" to "ensure that the net UK carbon account for a budgetary period does not exceed the carbon budget."¹ Canada's legislation should have direct language requiring the government meet its targets in addition to the existing language requiring that reporting on missed targets should include the reasons for failure and new actions to address the failure and meet the target.

C-12 should also be amended to ensure that future governments stay committed to strong GHG emissions reductions and eliminate the possibility of backsliding on targets, as Denmark's

¹ <https://www.legislation.gov.uk/ukpga/2008/27/section/4>

Climate Act does.² We ask that you include a requirement in Bill C-12 that any new climate target must not be less ambitious than the most recent previously set target.

Another feature of the Danish law that should be implemented is a robust *annual* cycle of assessment, planning, and reporting to ensure accountability.³ An additional annual accountability feature of the Danish act is the requirement to have an annual majority parliamentary approval on climate strategies.⁴

- **Include a limit on the amount of carbon offsets that can be used to meet Canada's emissions targets.**

Canada's plan to reach net zero GHG emissions must not rely heavily on offsets. It is our responsibility, as one of the largest per-capita GHG emitters in the world, to commit to actual reductions in our own emissions. Offsetting schemes are unreliable and may cause further damage to ecosystems.

Bill C-12 should limit the amount of carbon offsets that can be used to achieve Canada's emissions targets. An example of this is seen in Sweden's *Climate Act*, which calls for an 85% reduction in emissions without the use of offsets.⁵ Only 15% of Sweden's total emissions reductions can come from offsets.

- **Include a 2030 emissions target of at least a 50% reduction in GHG emissions from 2005 levels, in line with the USA's target.**

Bill C-12 does not include a 2030 emissions target. It directs the Minister to establish a target six months after the Act comes into effect.

On April 22, 2021, Prime Minister Trudeau announced that Canada will increase its GHG emissions reduction target under the Paris Agreement to 40-45% below 2005 levels by 2030. This is not ambitious enough.

As other countries ramp up their ambitions to reduce emissions, Canada is falling further and further behind. The UK, which implemented its climate accountability legislation in 2008, has

² https://stateofgreen.com/en/uploads/2020/09/Climate-Act_Denmark-WEBTILG%C3%86NGELIG-A.pdf

³

<https://gorrissenfederspiel.com/en/knowledge/news/denmarks-climate-law-is-a-reality-what-are-the-implications>

⁴ <https://www.bbc.com/future/article/20200706-the-law-that-could-make-climate-change-illegal>

<https://gorrissenfederspiel.com/en/knowledge/news/denmarks-climate-law-is-a-reality-what-are-the-implications>

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<http://www.swedishepa.se/Environmental-objectives-and-cooperation/Swedish-environmental-work/Work-areas/Climate/Climate-Act-and-Climate-policy-framework/>

now agreed to reach 68% below its 1990 levels in 2030⁶ and 78% by 2035.⁷ The US Biden-Harris administration has also committed to a 50-52% reduction from 2005 levels by 2030.⁸

We urge Canada to commit to *at minimum* a 50% reduction in GHG emissions by 2030, and include this target in Bill C-12. This should be done now, not in six months' time, and 40-45% is not enough.

Summary of Recommendations:

- **Impose a legal obligation to meet the established targets**
- **Include a limit on the amount of carbon offsets that can be used to meet Canada's emissions targets.**
- **Include a 2030 emissions target of at least a 50% reduction in GHG emissions from 2005 levels, in line with the USA's target.**

We are hopeful that you will include these recommendations in Bill C-12, making it truly effective and establishing a clear path to a net zero future.

Thank you for your work on helping Canada achieve net zero greenhouse gas emissions.

Yours sincerely,

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⁶ <https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit>

⁷ <https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035>

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<https://www.whitehouse.gov/briefing-room/statements-releases/2021/04/22/fact-sheet-president-biden-sets-2030-greenhouse-gas-pollution-reduction-target-aimed-at-creating-good-paying-union-jobs-and-securing-u-s-leadership-on-clean-energy-technologies/#>