

October 25, 2018

Bobbi Plecas  
Deputy Minister, Climate Change  
Ministry of Environment and Climate Change Strategy  
PO Box 9339, Stn Prov Govt  
Victoria, BC V8W 9M1

Dear Deputy Minister Plecas:

**Re: A climate accountability framework for B.C.**

The forthcoming clean growth strategy will include welcome policies intended to significantly reduce B.C.'s greenhouse gas emissions. As part of the regulatory regime supporting this anticipated climate strategy, we also expect an accountability framework to be established following its release. We recommend that this framework be science-based, transparent, enforceable, and rooted in international best practices for regulating greenhouse gas emissions. A framework that includes rigorous planning requirements is a key opportunity for the government to deliver on the transparency and accountability that the public expects.

The following three components should constitute the core of a strong accountability framework:

1. **Carbon budgets and sectoral targets:** Interim "carbon budgets" capping the total greenhouse gas emissions that are available to "spend" over a shorter period (five years or less). The government's commitment to introduce "sectoral targets" could be accommodated in a carbon budget framework through sectoral sub-budgets.
2. **Planning mechanisms:** Carbon budgets must be integral to government decision-making. Government should prepare detailed and transparent plans showing how it expects to meet the carbon budget, with clear responsibilities assigned to particular government ministers and corrective planning mechanisms to enact when the province is not on track to meet targets.
3. **Advisory body:** An advisory body should be made responsible for preparing an annual, science-based, transparent review of government progress towards achieving both short-term carbon budgets and long-term targets.

Please find attached our detailed recommendations for how each of these components could be integrated into a robust accountability framework that will help us track progress towards our

climate promises and ensure measures in the clean growth strategy are successful, transparent, and enduring.

A strong commitment from government to hold itself, and the private sector, accountable to the targets set for reducing our greenhouse gas emissions will establish the credibility necessary to help British Columbians commit to the short and long-term changes we all need to make to tackle climate change. In so doing, B.C. will help demonstrate to the world that it is possible to meet ambitious targets with smart policy, transparency, and accountability.

We look forward to the forthcoming climate strategy and continuing to work with you to establish a strong accountability framework to support it.

Sincerely,

Alan Andrews

**Ecojustice**

Andrew Gage

**West Coast Environmental Law Association**

Karen Tam Wu

**Pembina Institute**

Christianne Wilhelmson

**Georgia Strait Alliance**

Lisa Matthaus

**Organizing for Change**

CC:

Tim Lesiuk, Executive Director, Clean Growth Strategy

Merran Smith, Co-Chair, Climate Solutions and Clean Growth Advisory Council

Marcia Smith, Co-Chair, Climate Solutions and Clean Growth Advisory Council

Enclosures (3)

# Annex I: Detailed recommendations for an accountability framework for B.C.

	Currently in place	Gaps	Recommendations
<b>Carbon budgets</b>	<p>Established 10-year greenhouse gas reduction targets in legislation.</p> <p>Committed to establishing sectoral targets.</p>	<p>Timeframe for emissions targets is too long.</p> <p>Emissions targets could be communicated in clearer way.</p> <p>Sectoral targets not legislated.</p> <p>No clear allocation of responsibility for ensuring targets are achieved.</p>	<p>Establish 5-year economy wide targets through legislation.</p> <p>Require 5-year sectoral targets to be included in carbon budget planning.</p> <p>Express 5-year targets as a carbon budget in megatonnes (Mt) CO<sub>2</sub>e to aid in planning and improve transparency.</p> <p>Clarify that ministers are responsible for achieving targets and budgets, as well as preparing and implementing plans to achieve them.</p>
<b>Planning mechanisms</b>	<p>Legal requirements for the Minister of Environment and Climate Strategy to report to the legislature on progress towards achieving emissions targets every two years.</p> <p>Work on a new climate strategy that will include modelling to show how it will help achieve B.C.'s climate targets.</p> <p>Commitment to include a</p>	<p>Minimal cross-ministerial responsibility for planning for and achieving climate targets.</p> <p>Minimal planning mechanisms for corrective action when progress reports indicate the Province is not on track to achieve targets.</p> <p>No statutory requirement to consider carbon budgets in Environmental Assessment Act and Environmental</p>	<p>Through the Climate Change Accountability Act, introduce the following mechanisms:</p> <ul style="list-style-type: none"> <li>● The Minister of Environment and Climate Change Strategy, in consultation with other ministries, prepares detailed 5-year plans to ensure emissions stay within the carbon budget and achieve targets, including, for each measure: <ul style="list-style-type: none"> <li>○ Timetable for implementation.</li> <li>○ Estimated emissions reductions.</li> <li>○ Responsible ministry or level of government.</li> </ul> </li> <li>● 5-year plans are subject to public consultation, Indigenous consultation,</li> </ul>

	<p>climate test in environmental assessment laws.</p>	<p>Management Act.</p>	<p>and review by CSCGAC.</p> <ul style="list-style-type: none"> <li>● The Minister of Environment and Minister of Finance, in consultation with other ministries, develops a 3-year fiscal implementation plan, tabled with the Budget and included in the service plans of responsible ministries (for example, but not limited to, Ministry of Transportation and Infrastructure; Energy, Mines and Petroleum Resources; Agriculture; Municipal Affairs and Housing; Environment and Climate Change Strategy; and Forests, Lands, Natural Resource Operations and Rural Development).</li> <li>● All ministries directly responsible for programs or policies that may contribute to, or impinge on, meeting climate targets address their particular role and responsibilities in their minister’s mandate letter.</li> <li>● All requests for legislation, Treasury Board submissions, and other similar proposals demonstrate alignment with B.C.’s climate targets, budgets, and plans.</li> <li>● Where any progress report indicates that the Province is not on track to achieving a carbon budget or target: <ul style="list-style-type: none"> <li>○ The Minister of Environment and Climate Change develops, within 12 months and in consultation with ministries responsible for the sectors not in line with the carbon budget or target, a corrective action plan setting out the additional measures that will be taken to meet the budget or target.</li> <li>○ The Minister of Finance identifies the budget required, allocates funding, and revises the 3-year fiscal implementation plan accordingly in order to incorporate corrective measures.</li> <li>○ Responsible ministries revise 3-year service plans accordingly to get back on track to achieving carbon budgets and targets.</li> </ul> </li> <li>● Financial incentives or disincentives for ministers with regard to achieving or missing sectoral targets.</li> <li>● Statutory requirements to consider carbon budgets in planning and environmental legislation, including the Environmental Assessment Act and the Environmental Management Act.</li> </ul>
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<p><b>Advisory body</b></p>	<p>Climate Solutions and Clean Growth Advisory Council (CSCGAC) convened and tasked with providing advice to government and regular public reports about government progress on reducing greenhouse gas emissions.</p>	<p>CSCGAC not currently enshrined in legislation.</p> <p>Extent of role, responsibility, and duration of CSCGAC is currently unclear.</p>	<p>Through the Climate Change Accountability Act, enshrine CSCGAC in legislation with the following duties:</p> <ul style="list-style-type: none"> <li>● Be an expert body that includes climate scientists, policy experts, and those with other relevant technical expertise.</li> <li>● Report to the legislature and the public.</li> </ul> <p>Legislation specifies the mandate and composition of CSCGAC, and the terms of office of council members.</p> <p>CSCGAC are provided with the necessary resources and capacity, including staffing and budget, to undertake the following mandates:</p> <ul style="list-style-type: none"> <li>● Prepare an annual science-based, transparent review of government progress towards achieving both carbon budgets and long-term targets.</li> <li>● Evaluate the Minister of Environment’s 5-year plan and provide advice on policy solutions to ensure the plan meets the carbon budget.</li> <li>● Make annual budget recommendations to government.</li> <li>● Assess B.C.’s climate targets in light of the latest science and Canada’s international commitments by 2020.</li> <li>● Undertake public outreach related to CSCGAC materials including progress reports.</li> <li>● Provide advice to government on educating and informing the public on climate science and policy to raise awareness and foster greater understanding of climate issues.</li> <li>● Provide objective analysis on climate-related issues at the request of the legislature or government.</li> </ul>
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## Annex II: Carbon budget example for B.C.

	Carbon budgets (Mt CO <sub>2</sub> e)		Targets (Mt CO <sub>2</sub> e)	
	2018–2022	2023–2027	2030	Reduction from 2007 levels (by 2030)
<b>Total economy</b>	296	245	38.8	40%
Industrial sector	112	84	11.1	30%
Building sector	50	43	7.4	55%
Transportation sector	121	105	17.8	30%

*Note: Budget timeline and values are for illustrative purposes only, based on the current 2030 climate target and sectoral targets recommended by the Climate Solutions and Clean Growth Advisory Council.*

# Annex III. Planning and reporting timeline example for B.C.

	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
<b>5-year carbon budget</b>			2020-2025 carbon budget					2025 - 2030 carbon budget					
<b>Minister of Environment's 5-year plan</b>			2020-2025 MoE plan					2025-2030 MoE plan					
<b>Minister of Finance's 3-year fiscal plan &amp; Ministry service plans</b>	2018 Plan Projects to 2021	2019 Plan Projects to 2022	2020 Plan Projects to 2023	2021 Plan Projects to 2024	2022 Plan Projects to 2025	2023 Plan Projects to 2026	2024 Plan Projects to 2027	2025 Plan Projects to 2028	2026 Plan Projects to 2029	2027 Plan Projects to 2030	2028 Plan Projects to 2031	2029 Plan Projects to 2032	2030 Plan Projects to 2033
<b>Provincial inventory &amp; CSCGAC Progress to Targets report</b>	2018 Report	2019 Report	2020 Report	2021 Report	2022 Report	2023 Report	2024 Report	2025 Report	2026 Report	2027 Report	2028 Report	2029 Report	2030 Report
<b>Minister of Environment's corrective action plan</b>			(if progress report shows province is not on track to achieve the carbon budget)										

30.80 Mt CO<sub>2</sub>e

*Note: Timeline dates are for illustrative purposes only.*