



David
Suzuki
Foundation

SOLUTIONS ARE IN OUR NATURE

GREENPEACE



January 12, 2005

The Right Honourable Paul Martin
Prime Minister of Canada
80 Wellington Street
Ottawa ON K1A 0A2

Re: Canada's Implementation of the Kyoto Protocol

Dear Prime Minister,

The Kyoto Protocol enters into force as international law on February 16, 2005. As representatives of major Canadian environmental organizations, we are writing to urge you to give the highest possible priority to the announcement and implementation of a credible package of effective Government of Canada initiatives ensuring that Canada complies with the Kyoto Protocol.

We were encouraged by your genuine commitment to the Protocol during the last election campaign. We have noted your February and October 2004 Throne Speech promises to “develop” and then “refine and implement” a Kyoto plan. We warmly welcome Minister Dion’s December 2004 statement in Buenos Aires that the government is “determined to meet our [Kyoto] commitment. Our efforts are devoted to attaining that goal and we are taking action with the greatest determination.”

Canadians overwhelmingly support our country’s participation in the Kyoto Protocol. There is abundant evidence that implementing an effective Kyoto plan will be good for innovation and will help to create the kind of twenty-first century economy that Canada needs.

In light of the Protocol’s imminent entry into force, your Government’s commitments noted above, and the fact that less than three years remain before Canada has to start meeting its Kyoto target, **it is essential that by February 16, the Government announce the full package of initiatives it intends to implement to comply with the Kyoto Protocol.**

A credible, effective Kyoto plan must meet the following criteria:

1. The plan must associate clear and credible amounts of greenhouse gas (GHG) emission reductions to a set of specific Government initiatives with clear implementation targets and timelines. The total emission reductions from these initiatives must be sufficient to meet Canada's Kyoto target over the period stipulated by the Protocol, 2008–12. While we also believe Canada should adopt longer-term national targets for the much larger reductions in GHG emissions needed to prevent dangerous climate change, longer-term targets can in no way replace Canada's obligation to meet its Kyoto target during 2008–12.
2. The plan must consist mainly of regulatory initiatives and financial incentives conditional on real emission reductions occurring during 2008–12. The evidence unequivocally shows that voluntary measures will not secure the emission reductions needed.
3. The plan must include a program of mandatory GHG emission targets and complementary initiatives for large industry (including the electricity sector), backed by legislation. Large industry accounts for approximately 50% of Canada's GHG emissions. The mandatory targets and complementary initiatives for large industry must add up to a total emission reduction that is in keeping with this 50% share of emissions.
4. The plan must not include payments into an R&D fund, or granting of R&D credits, as options for large industry to comply with its mandatory targets. These options would not generate significant amounts of emission reductions during 2008–12, and would therefore put the Government in the position of having to secure additional emission reductions elsewhere to comply with Canada's Kyoto target.
5. The plan must rely primarily on domestic emission reductions. We recognize, however, given the delays in domestic action, that Canada will also need to purchase international emissions units to meet its Kyoto target. These international units must correspond to emission reductions that go beyond business-as-usual and meet established sustainable development criteria.
6. The plan must not include targets for industry for the period post-2012. In other words, the Government must not tie its own hands by allocating portions of Canada's allowed emissions levels post-2012 before those levels have even been negotiated.
7. The mandatory targets for large industry must be set at a level that prevents any windfall allocations of emissions permits in excess of actual emissions levels to facilities in sectors such as gas-fired electricity or oil sands.

Prime Minister Martin, we are aware of discussions in the federal bureaucracy of plans to fall short of, or to delay compliance with the Kyoto Protocol. Delayed compliance is non-compliance. This is unacceptable. After many years of delay and ineffective voluntary measures, announcement of a revised climate change plan that fails to meet sufficiently the criteria we have

elaborated above will lead to the conclusion that Canada does not intend to adhere to its international obligation.

We look forward to your announcement of a credible, effective Kyoto plan by February 16, and then participating in full and meaningful consultations as the Government urgently completes the details of its implementation.

Sincerely,



Jim Fulton,
Executive Director, David Suzuki
Foundation



Marlo Reynolds,
Executive Director, Pembina Institute



Bruce Cox,
Executive Director, Greenpeace Canada



Ann Coxworth,
Program Coordinator, Saskatchewan
Environmental Society



Elizabeth May,
Executive Director, Sierra Club of Canada



David Coon,
Policy Director, Conservation Council of
New Brunswick

Cc: The Honourable Stéphane Dion, Minister of the Environment
The Honourable Ujjal Dosanjh, Minister of Health
The Honourable John Efford, Minister of Natural Resources
The Honourable David Emerson, Minister of Industry
The Honourable John Godfrey, Minister of State (Infrastructure and Communities)
The Honourable Geoff Regan, Minister of Fisheries and Oceans