

Assessment by Canadian Environmental Leaders of the Government's Kyoto Implementation Plan

Canada has an obligation, under international law, to reduce its emissions of greenhouse gases to 6% below the 1990 level during 2008-12. This target, specified in the Kyoto Protocol, is a reduction of approximately 270-300 megatonnes (Mt) from projected "business-as-usual" levels. Canadian emissions have risen steadily since the Kyoto Protocol was negotiated in 1997. As a result urgent action is required to address climate change by reducing emissions in Canada.

We are pleased that the federal government has finally released its revised Kyoto implementation plan. We support the use of the Canadian Environmental Protection Act (CEPA) as an appropriate regulatory authority to ensure that industry makes an adequate contribution to emission reduction in the Kyoto period. However, the plan as released today is inadequate to achieve Canada's Kyoto emission reduction target within the timeframe required by the Protocol. The key gaps in the plan include:

- The lack of detail in the largest sections of the plan to explain how targets will be met;
- The lack of timelines and associated milestones for implementation;
- The amount of mandatory reductions by industrial Large Final Emitters (LFEs) – which produce approximately 50% of Canada's greenhouse gas pollution – are so limited that it places what is likely to be an impossibly large burden on the rest of the plan;
- The absence of accountability mechanisms or instruments for measuring success;
- The expectation that at least 74% of the targets will be achieved through the individual actions of Canadians or the use of tax dollars, yet individuals are responsible for only 23% of Canada's emissions.

For Canada's Kyoto plan to be credible to ordinary Canadians and to other signatories of the Kyoto Protocol, the government must immediately:

- Establish timelines and interim targets for each section of the plan;
- Take major implementation steps in all sections of the plan (including the Climate Fund, the Partnership Fund, the "Programs" elements and the LFE system) during 2005;
- Strengthen the LFE system by establishing stronger but feasible targets for the 2008-12 period that are consistent with industrial contributions to Canada's greenhouse gas emissions;
- Eliminate the inappropriate use of the Technology Investment Fund as a loophole for LFEs to escape doing their fair share to reduce emissions by 2012;
- Ensure that a mechanism is established to prevent any double counting of emission reductions as the plan is implemented;
- Make better use of regulations and fiscal measures including the initiation of regulatory requirements for LFEs and automobile manufacturers;
- Establish accountability mechanisms that ensure progress within elements of the plan can be continuously evaluated, emission reductions can be verified and measured, and a feedback system exists to make adjustments if Canada is falling short of its Kyoto target.

These changes are necessary for Canada's Kyoto implementation plan to achieve its stated goals. Time is short. Urgent action is required. We are ready to work with governments, industry and other stakeholders to ensure the plan's success.

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