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.

<table>
<thead>
<tr>
<th>Currently in place</th>
<th>Gaps</th>
<th>Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Carbon budgets</strong></td>
<td>Establish 10-year greenhouse gas reduction targets in legislation.</td>
<td>Timeframe for emissions targets is too long.</td>
</tr>
<tr>
<td></td>
<td>Committed to establishing sectoral targets.</td>
<td>Emissions targets could be communicated in clearer way.</td>
</tr>
<tr>
<td></td>
<td>Timeframe for emissions targets is too long.</td>
<td>Sectoral targets not legislated.</td>
</tr>
<tr>
<td></td>
<td>No clear allocation of responsibility for ensuring targets are achieved.</td>
<td>No clear allocation of responsibility for ensuring targets are achieved.</td>
</tr>
</tbody>
</table>

| **Planning mechanisms** | Legal requirements for the Minister of Environment and Climate Strategy to report to the legislature on progress towards achieving emissions targets every two years. | Minimal cross-ministerial responsibility for planning for and achieving climate targets. | Through the Climate Change Accountability Act, introduce the following mechanisms: |
| | Work on a new climate strategy that will include modelling to show how it will help achieve B.C.’s climate targets. | Minimal planning mechanisms for corrective action when progress reports indicate the Province is not on track to achieve targets. | ● 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: |
| | Commitment to include a | No statutory requirement to consider carbon budgets in Environmental Assessment Act and Environmental | ○ Timetable for implementation. |
| | | | ○ Estimated emissions reductions. |
| | | | ○ Responsible ministry or level of government. |
| | | | ● 5-year plans are subject to public consultation, Indigenous consultation,
<table>
<thead>
<tr>
<th>Climate test in environmental assessment laws.</th>
<th>Management Act.</th>
<th>and review by CSCGAC.</th>
</tr>
</thead>
<tbody>
<tr>
<td>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).</td>
<td>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.</td>
<td>All requests for legislation, Treasury Board submissions, and other similar proposals demonstrate alignment with B.C.’s climate targets, budgets, and plans.</td>
</tr>
<tr>
<td>Where any progress report indicates that the Province is not on track to achieving a carbon budget or target:</td>
<td>○ 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.</td>
<td>○ 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.</td>
</tr>
<tr>
<td>○ Responsible ministries revise 3-year service plans accordingly to get back on track to achieving carbon budgets and targets.</td>
<td>Financial incentives or disincentives for ministers with regard to achieving or missing sectoral targets.</td>
<td>Statutory requirements to consider carbon budgets in planning and environmental legislation, including the Environmental Assessment Act and the Environmental Management Act.</td>
</tr>
</tbody>
</table>
| **Advisory body** | 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. | CSCGAC not currently enshrined in legislation. Extent of role, responsibility, and duration of CSCGAC is currently unclear. | Through the Climate Change Accountability Act, enshrine CSCGAC in legislation with the following duties:

- Be an expert body that includes climate scientists, policy experts, and those with other relevant technical expertise.
- Report to the legislature and the public.

Legislation specifies the mandate and composition of CSCGAC, and the terms of office of council members.

CSCGAC are provided with the necessary resources and capacity, including staffing and budget, to undertake the following mandates:

- Prepare an annual science-based, transparent review of government progress towards achieving both carbon budgets and long-term targets.
- Evaluate the Minister of Environment’s 5-year plan and provide advice on policy solutions to ensure the plan meets the carbon budget.
- Make annual budget recommendations to government.
- Assess B.C.’s climate targets in light of the latest science and Canada’s international commitments by 2020.
- Undertake public outreach related to CSCGAC materials including progress reports.
- 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.
- Provide objective analysis on climate-related issues at the request of the legislature or government. |
## Annex II: Carbon budget example for B.C.

<table>
<thead>
<tr>
<th></th>
<th>Carbon budgets (Mt CO₂e)</th>
<th></th>
<th>Targets (Mt CO₂e)</th>
<th>Reduction from 2007 levels (by 2030)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2018–2022</td>
<td>2023–2027</td>
<td>2030</td>
<td></td>
</tr>
<tr>
<td><strong>Total economy</strong></td>
<td>296</td>
<td>245</td>
<td>38.8</td>
<td>40%</td>
</tr>
<tr>
<td><strong>Industrial sector</strong></td>
<td>112</td>
<td>84</td>
<td>11.1</td>
<td>30%</td>
</tr>
<tr>
<td><strong>Building sector</strong></td>
<td>50</td>
<td>43</td>
<td>7.4</td>
<td>55%</td>
</tr>
<tr>
<td><strong>Transportation sector</strong></td>
<td>121</td>
<td>105</td>
<td>17.8</td>
<td>30%</td>
</tr>
</tbody>
</table>

*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.

### 5-year carbon budget
- **Minister of Environment’s 5-year plan**
  - 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

### Minister of Finance’s 3-year fiscal plan & Ministry service plans
- 2019 Plan: Projects to 2021
- 2020 Plan: Projects to 2022
- 2021 Plan: Projects to 2023
- 2022 Plan: Projects to 2024
- 2023 Plan: Projects to 2025
- 2024 Plan: Projects to 2026
- 2025 Plan: Projects to 2027
- 2026 Plan: Projects to 2028
- 2027 Plan: Projects to 2029
- 2028 Plan: Projects to 2030
- 2029 Plan: Projects to 2031
- 2030 Plan: Projects to 2032

### Provincial inventory & CSGAC Progress to Targets report
- 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

*(If progress report shows province is not on track to achieve the carbon budget)*

Note: Timeline dates are for illustrative purposes only.