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Ministry of Environment  
Victoria, BC

\*\*\* VIA EMAIL AT  
**CLIMATELEADERSHIPPLAN@GOV.BC.CA** \*\*\*

Dear Sirs/Mesdames:

**Re: Climate Leadership Team Report consultations**

Climate leadership requires the “leader” to set ambitious greenhouse gas reduction targets but also to develop and implement plans to achieve those targets. BC’s legislated greenhouse gas reduction targets are possibly the most stringent in the country, but the fact that we have no chance of achieving our 2020 goal of a 33% reduction relative to 2007 levels demonstrates that we have not followed through on our promise of climate leadership.

By this measure, the establishment of a Climate Leadership Team (CLT) to advise on how to achieve BC’s climate targets was long overdue, and very welcome. It is shocking, and embarrassing that BC has been claiming to be leaders on climate change without considering whether it would achieve the 2020 targets.

The CLT has identified a series of measured initiatives that together form a package that will enable us to achieve a new 2030 target, and set us on a path towards achieving our 2050 target. Dropping any of the recommendations will, absent additional actions to replace those dropped, reduce the likelihood that BC will meet the 2030 or 2050 targets. In 2016 we know enough about effective climate action to understand that there is no “silver bullet”, but the members of the Climate Leadership Team have drawn on their own and others’ expertise to develop a coherent set of recommendations that will tackle all of our largest domestic GHG emission sources, and bring us in, on budget, for our climate targets.

We are very concerned that the BC Government may not feel it is necessary to adopt all of the CLT’s recommendations, but will instead pick and choose between them, claiming leadership on the basis of a few new initiatives, while again setting us on a path to fail to achieve our targets. True leadership, and prudent management, requires that the Province accept and implement **all** of the CLT’s recommendations – or else that it develop its own, equally thorough and credible, plan of how BC’s targets can be achieved.

Indeed, the very question offered in the government’s consultation guide invites the respondent to pick a few “most important actions we can take to lower our greenhouse gas emissions,” rather than asking them to comment on the CLT’s suite of recommendations as a whole or how BC can best achieve its greenhouse gas reduction targets.

Please read the **Consultation Guide** and tell us your thoughts on the most important actions we can take to lower our greenhouse gas emissions and take advantage of the low carbon economy of the future.<sup>1</sup>

Questions more to the point might have been, “is this the right mix of policies” or “is anything missing from these actions?”

Climate leadership requires that the planned actions be directly correlated with the goals/targets we are attempting to achieve. It is not a question of whether there are a few “important actions” that can reduce greenhouse gas emissions, but how the total range of actions do or do not achieve our promised targets. Results matter.

### **Importance of ongoing planning and adaptive management**

As noted above, BC failed to meet its greenhouse gas reduction targets for 2020 in large measure because it failed to plan and strategize, in an ongoing and transparent manner, how it would achieve that target, and halted those actions that were in place (notably increases in the carbon tax). While we endorse all of the CLT recommendations, in this context we would highlight the importance of Recommendation #32:

Government should undertake a review of its Climate Leadership Plan and policies at least every five years supported by a Climate Leadership Team.

Indeed, we would recommend the establishment of a permanent advisory body to play this role, to measure BC’s progress towards its climate targets, and to learn from the actions we take.

This body could be created at the provincial or (with cooperation among the provinces) national level. We refer you to our report, *A Carbon Budget for Canada*,<sup>2</sup> which recommends the creation of a national climate science committee to advise all the provinces on their share in achieving national greenhouse gas reduction targets, and which discusses the track record, and advantages, of such an approach.

### **Adaptation: Recommendation 24- Support for climate resilient communities**

BC communities and local governments are on the frontlines in dealing with climate change impacts, and they are themselves showing leadership, but targeted provincial support is essential. We support the actions set out in Recommendation 24, noting that the following specific measures would fall within the scope of those actions:

- Providing assistance to communities with funding and analysis of impacts and vulnerabilities;
- Investing in weather monitoring and emergency response systems;
- Coastal communities, in particular, need funding and technical assistance to refine local sea level rise projections;
- Developing provincial guidelines and policies about coastal flood management to guide local action, and ensuring that provincial and federal requirements for infrastructure funding reflect climate change adaptation and coastal flood risks;
- Providing provincial guidance and support, technical and financial, for ecosystem-based adaptation, including coastal green infrastructure and other approaches. BC already has

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<sup>1</sup> <https://interceptum.com/s/en/ClimateActionLeadership-Winter2015-16>.

<sup>2</sup> [http://wcel.org/sites/default/files/publications/CarbonBudget%20%28Web%29\\_o.pdf](http://wcel.org/sites/default/files/publications/CarbonBudget%20%28Web%29_o.pdf).

experience with implementing green infrastructure approaches for rainwater management, and can build on this experience to implement ecosystem-based adaptation measures that will have multiple benefits for BC communities, including contributions to greenhouse gas reductions through carbon sequestration;

- Providing provincial support for regional and sub-regional climate change adaptation planning and implementation to help ensure effective use of resources, generally, and in particular to support ecosystem-based adaptation which may be most effective at regional scales;
- Increasing public communications at the provincial level about climate change impacts and responses to help support and legitimize local actions.

### **One reservation**

Implementation of the CLT's recommendations is crucial to achieve BC's 2050 legislative greenhouse gas reduction target. However, that target focuses exclusively on emissions occurring in BC, and does not consider emissions resulting from fossil fuels extracted in BC, or transported through BC. The CLT's mandate did not include such emissions, but clearly leadership on climate change cannot allow us to turn a blind eye to emissions that we are enabling through fossil fuel extraction and export (coal, LNG, conventional and unconventional oil, etc).

### **Conclusion**

It has become fashionable to talk about a "science-based" approach to addressing climate change. Science-based, if it means anything, means an approach which will achieve the types of reductions that scientists tell us we need to achieve, consistent with the global carbon budget.

The CLT's recommendations are collectively consistent with a science-based approach. Picking and choosing between those recommendations on the basis of political expediency is not.

Sincerely,



Andrew Gage,  
Staff Counsel