



January 25, 2021

Neil Dobson

Executive Director, CleanBC Implementation

Climate Action Secretariat

Ministry of Environment and Climate Change Strategy

(via CleanBC@gov.bc.ca)

Dear Mr. Dobson:

Re: Setting Sectoral Targets for Emissions Reductions

As members of the Catalyst Business Alliance steering committee, we support the creation of greenhouse gas (GHG) emissions targets for sectors as required by the Climate Change Accountability Act. We offer the following comments in response to the government's *Setting Sectoral Targets for Emissions Reductions* discussion paper.

Key considerations in defining sectors and their targets should include:

- Maintaining the transparency and credibility of action to meet B.C.'s climate targets
- Considering long-term climate-related costs – such as the impacts of wildfires, flooding, and drought, and on health – to families, property owners, communities
- Ensuring flexibility by focusing primarily on performance-based outcomes, rather than being overly prescriptive on how emissions reductions are met, and by describing narrow target ranges to acknowledge that targets are based on modelled projections and forecasts, which by nature are imprecise
- Recognizing that overall, economy-wide emissions reductions and meeting B.C.'s targets for 2025, 2030, and beyond are non-negotiable imperatives

In defining the sectors and their targets, it is important to:

- Provide clear, consistent, and long-term signals to sectors, which will in turn inform and encourage investment in clean businesses and jobs

- Draw upon data that is currently being collected by government, relatively easy to monitor and verify, and can be communicated easily
- Represent sectoral targets in terms of a percentage reduction from a known baseline and tonnes of carbon dioxide equivalent – to provide clarity and consistency with how emissions targets are set out in other jurisdictions
- Mandate all utilities to include sectoral targets in their planning processes and decisions, including demand forecasts, to ensure adequate planning takes place and the requisite investments are made to enable sectoral targets to be met

In the spirit of transparency and credibility, we support defining sectors beyond buildings, transportation, and industry, in order to identify key emissions reduction opportunities and which sectors may require more targeted support. Regardless of what sectors are defined in this process, we support reporting out on provincial emissions in an easy and accessible manner (e.g. similar to the example provided in the discussion paper that shows subsectors and GHG categories as to whether emissions are rising or falling with respect to the target).

To build confidence within the business community and industrial sectors, we suggest the government provide case studies from B.C. and abroad showing success in reducing emissions at the scale of effort required to meet the targets.

Sincerely,

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Karen Tam Wu (co-chair)
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