

December 9, 2020

The Hon. Jonathan Wilkinson, P.C., MP  
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Dear Minister Wilkinson, Mr. Albas, Ms. Collins, Madame Michaud, Mr. Zurawski,

**Re: Recommendations to strengthen the *Canadian Net-Zero Emissions Accountability Act*, Bill C-12**

I am writing on behalf of the David Suzuki Foundation to share our initial recommendations for strengthening the *Canadian Net-Zero Emissions Accountability Act*, Bill C-12.

We are at a pivotal moment for climate action in Canada. If we are to rise to the challenge of addressing the climate emergency, strengthening Bill C-12 will be paramount to our success as a country and responsible global partner.

Today, the UN released its 2020 emissions gaps report showing that, despite a temporary drop in GHG emissions driven by the coronavirus pandemic, emissions are expected to rebound and we are headed for a global temperature increase of 3.2 C by the end of the century. For the Paris Agreement goal to stay within reach, it is imperative for governments to dramatically strengthen their emission targets (NDC ambitions) in 2020, and to ensure that corresponding short-term policies and green recovery measures are aligned with net-zero goals.

As you know, youth and Indigenous leaders have rallied millions of people throughout our country to call for climate action. They've been some of the largest political demonstrations in Canada's history. Hundreds of cities and communities across Canada declared a climate emergency. Throughout Canada,

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we are already feeling the impacts of the climate emergency, including intensified, dangerous extreme weather events.

Yet Canada has not met one of its international emissions reduction targets (even though these targets have been weak relative to what the science calls for and what other nations are showing is possible).

We have not yet seen the type of strong and unified political leadership needed to tackle this crisis in a meaningful way. Now is our chance to change that by accelerating the kind of action and accountability that the climate emergency, and Canadians, are demanding.

As climate accountability legislation will lay the foundation for Canada's action on climate change now and into the future, it is crucially important to get it right. We believe key provisions in Bill C-12 must be strengthened to improve planning, participation and accountability. Most importantly, **Canada's climate accountability legislation must ensure that future emissions reduction targets and plans align with IPCC science and recommendations to limit global warming to 1.5 C.** This is what the climate emergency requires.

We therefore recommend the following amendments to strengthen Bill C-12:

1. Establish 2025 as the first milestone year. At a minimum, require the minister to prepare and table in 2025 interim progress and assessment reports in relation to the 2030 target.
2. Incorporate Canada's NDC set under the UNFCCC within the legal text as the minimum target for 2030.
3. In setting targets, require alignment with IPCC science and recommendations. Moreover, the minister's power to amend targets should be constrained to prevent backsliding.
4. Enable longer-term planning in setting targets and plans to ensure time for implementation, improve investment certainty and enhance transparency.
5. Impose a duty on the Government of Canada to ensure that the net emissions for each milestone year do not exceed the established target for that year, and exclude reductions attributable to international offsets except as a last resort.
6. Require that emissions reduction plans include scientifically determined estimates of emission reductions expected from each element of the plan.
7. Establish a stronger, central role – and ensure functional capacity – for an independent, expert body to advise on targets and emissions reduction plans, assess progress and recommend course correction.
8. Specify that when appointing members to the advisory body, the minister must take into account the need for the membership to include relevant technical and scientific expertise as well as the desirability of representation from civil society and Indigenous nations.
9. Establish a clearer framework for public participation/consultation.

Noting also Bill C-215 (the *Climate Change Accountability Act*) and Bill C-232 (the *Climate Emergency Action Act*) currently before the House, we are encouraged by the broad multi-party support for climate accountability legislation and look forward to Canada joining the growing number of countries that have enacted national laws on climate change as vehicles to achieving the objectives agreed upon under the Paris Agreement. Climate accountability legislation in Canada could be a game-changer, and these amendments would help ensure Bill C-12 delivers on that full potential.

For the health of our communities and the well-being of our children and grandchildren, we need stronger climate action – including real emissions reduction accountability – and we need it now. We urge all parties to support C-12 at second reading, work together to strengthen it at committee and ensure timely passage in the House. As the climate crisis affects us all, we must all be part of the solution.

Sabaa Khan, the Foundation's director general for Quebec, and I would be pleased to meet with you to discuss these recommendations. The David Suzuki Foundation would also welcome the opportunity to share our perspectives with the committee that will study Bill C-12.

Sincerely,



Ian Bruce  
Acting Executive Director  
David Suzuki Foundation

