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October 18, 2023

Rt. Hon. Justin Trudeau  
Prime Minister of Canada  
Office of the Prime Minister  
80 Wellington Street  
Ottawa, ON  
K1A 0A2

**Re: Capping and cutting GHG emissions from the oil and gas sector**

Dear Prime Minister Trudeau:

As the leaders of organizations committed to ensuring thriving nature and a viable climate, we welcomed the commitments you made in your recent address to the UN General Assembly to increase climate ambition and introduce a framework for capping emissions from the oil and gas sector. **We urge you to move forward with a strong and effective emissions cap regulation by the end of this year.**

It has now been two years since your government pledged to “cap and cut” emissions from oil and gas. Consultations on potential regulatory options concluded last September. We are gravely concerned that further delay in the publication of the regulation will miss the window for bending the emissions curve from Canada’s oil and gas sector in this crucial decade.

**Canadian Environmental Law Association**

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As UN Under-secretary General Melissa Fleming rightly pointed out in introducing you at the General Assembly, “Canada was one of the largest expanders of fossil fuels last year.” The oil and gas sector accounts for the largest share of Canada’s GHG emissions and these continue to increase. Canada has little chance of achieving its global climate commitments – much less the more ambitious emission reductions needed – without a hard cap on emissions from oil and gas.

We know you share our deep concern about the intensifying impacts of climate change. The catastrophic wildfires that engulfed Canada this past summer were a harsh reminder of the urgency of the situation. These wildfires are made more likely by the emissions associated with producing and burning fossil coal, gas and oil.

The International Energy Agency's (IEA) 2023 pathways report to net zero emissions by 2050 underscores that fossil fuel consumption is approaching a critical inflection point. Thanks to the rapid deployment of renewables, combined with investments in electrification such as EVs, and heat pumps, demand will soon peak. Indeed, since Russia’s invasion of Ukraine, the IEA notes how investments in renewables have soared and “extraordinary advances in clean energy technology supply chains have kept the door to net zero emissions open.” To keep the goal of limiting global warming to 1.5°C within reach, the IEA calls on governments to ramp up climate action. Canada has a pivotal role to play in these global efforts, not only for its domestic emissions but also as one of the world's major fossil fuel exporters. Bold, science-based measures, such as a rigorous emissions cap for the oil and gas sector, are crucial steps to align our nation with the global imperative to tackle climate change head-on.

We acknowledge that Canada has made progress in addressing emissions from various sectors and that efforts are underway to reduce fossil fuel consumption and emissions, from pricing pollution, to forthcoming Clean Electricity Regulations and a Zero Emissions Vehicle standard. Substantial progress on methane emissions from the oil and gas industry has been made thanks to federal and provincial regulations targeting 45 per cent methane mitigation by 2025 and revised methane regulations to achieve the 2030 target are in the works. The oil and gas industry, as seen by this example, will reinvest profits in mitigating emissions when effective regulations are put in place.

Moving forward with a rigorous emissions cap is an essential complement to these other measures. It is a targeted and effective way to hold the industry accountable and to drive investments in emissions reduction. Since energy prices are set in global markets, it will not impact domestic prices for gasoline or affordability. It will provide predictability for communities and workers while creating new jobs in emissions reduction.

**A robust oil and gas emissions cap should, at a minimum:**

- **enforce sectoral reductions in line with Canada’s 2030 climate target which would be 40 to 45% for oil and gas;**
- **be an enforceable, hard cap that declines over time; cover all oil and gas facilities, including LNG export terminals;**
- **uphold Indigenous rights and United Nations Declaration on the Rights of Indigenous Peoples;**
- **and, in conjunction with other government efforts, promote environmental justice.**

The world is looking to fossil fuel exporters, like Canada, to take the bold action needed to curb emissions and transition to a low-carbon economy. With COP28 coming in weeks, and Minister Guilbeault serving as co-facilitator, **Canada needs to lead by example and follow through with publication of the draft oil and gas emissions cap regulation by the end of the year.**

Thank you for your attention to this critical matter.

Sincerely,

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Pembina Institute

cc. Hon. Chrystia Freeland, Deputy Prime Minister and Minister of Finance  
Hon. Steven Guilbeault, Minister of Environment and Climate Change  
Hon. Jonathan Wilkinson, Minister of Energy and Natural Resources