

## **AN ACCOUNTABLE & AMBITIOUS PLAN TO MEET CANADA'S 2030 CLIMATE TARGET**

*This briefing note was sent to Environment and Climate Change Minister Steven Guilbeault in December 2021, on behalf of Climate Action Network - Réseau action climat Canada, the Conservation Council of New Brunswick, the David Suzuki Foundation, the Ecology Action Centre, Ecojustice, Équiterre, and West Coast Environmental Law.*

### **Overview:**

The 2022 Emissions Reduction Plan (ERP) will be the third climate plan issued by the Liberal Government of Canada since being elected in 2015. Previous climate plans failed to provide Canadians with the information required to understand and assess the efficacy of policy commitments. The 2022 ERP, as the first of its kind delivered under the *Net Zero Emissions Accountability Act* (NZEAA), must demonstrate this government's commitment to accountability and transparency. Business as usual planning is unacceptable as the key decade for climate action unfolds and extreme weather events wreak havoc across the country.

### **Context:**

The very formats of previous Canadian climate plans seemed designed to obscure accountability, as they lacked clear, actionable, and measurable policies, as well as timelines or clearly identified responsible actors. They also demonstrated a lack of modelling transparency, including modelling functionality, assumptions, and data inputs. As a result it has been difficult for Canadians to trust that the measures in the climate plans would put the country on track to achieve their goals when the foundation and building blocks used to create and track these measures are obscured.

Previous plans also failed to explain to Canadians how the climate policies specifically, and government policies in general, are supporting the transition away from a fossil fuel based economy and toward a society based on principles of social and environmental justice, fueled by non-polluting energy. Indicators, and the data required to apply them, must be developed using a whole of government approach that enables the government to communicate and Canadians to understand how we are progressing in the transition to a climate safe future. Indicators must be defined and trackable over time.

Fundamentally, the ERP must contain and explain all of the measures which will achieve the 2030 target. This is a mandate under NZEAA but is also an opportunity: to give Canadians the *whole* picture of the active climate measures in this country which together will get us to the milestone targets, and from there, to net-zero.

### **Modelling**

Modelling is central to the exercise of reaching our climate targets, and the assumptions and inputs to this modelling will have a large impact on policy decisions. And because these models are often used by other levels of government and the private sector to inform decisions as well, the futures they define contribute to shaping outcomes. The better the modelling, the better our climate measures.

Recommendations:

- 1) **The Climate Plan 2022 should be based on a robust modelling showing a scenario where global warming is limited to 1.5 degree Celsius.** To ensure timely and high-quality analysis, the scenario should be updated annually and subject to peer-review by independent experts. Federal government models should be harmonized across agencies to ensure a common basis for climate and energy-related decision-making.<sup>1</sup>
- 2) **Modelling results, inputs, and assumptions should be transparent and publicly accessible.** This is a pre-requisite for accountability, public engagement and the credibility of Canadian climate planning.<sup>2,3</sup> Detailed documentation of the modelling results, data sources, and key assumptions should accompany the publication of the climate plan. This will help ensure that the analysis underpinning the climate plan can be verified, assessed against comparable models, and situated in dynamics of the real world. The annexes accompanying the UK climate plan provide an example/best practice to be emulated.

### ***Structure and format of the plan***

The Act set the 2050 target and committed that the government would be accountable for reaching it and the milestone targets along the way. Accountability must be built into every element of this framework, down to the structure and format of the Climate Plan 2022 itself.

- 3) **Formatting and plan categories must be clear and consistent allowing measures to be easily tracked over time.** The measures must be clearly set out so that anyone can pick a measure from this climate plan and assess its status by looking at the first progress report, and onwards. Consistent categories or headers tied to the UNFCCC and the Pan-Canadian Framework (PCF) process are one requirement.<sup>4</sup> The measures

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<sup>1</sup> The CER and ECCC are now also trailing international best practice. In May 2021, the International Energy Agency (IEA) released its “Net Zero by 2050” report, charting a path for the global energy sector to be in line with meeting the Paris Agreement’s ambition of limiting global temperature rise to 1.5 C above pre-industrial levels.

<sup>2</sup> The 2019 FSDA amendments included, among other changes that underscored the importance of transparency to achieving goals and targets, the principle of openness and transparency, which is the principle that the release of information should be encouraged to support accountability and public engagement.

<sup>3</sup> See Rhodes, E et al, (2021): Improving Climate Policy Projections – A Pan-Canadian Review of Energy-Economy Models, University of Victoria, at pp. 36-7, which states: “Finally, the observed lack of transparency in model data and assumptions/equations is a significant concern, and one that deserves the attention of academics and policy-makers. Non-transparent models can raise questions around credibility, especially if their results are used to inform public policy decisions.”

<sup>4</sup> We do not understand the basis for the recent shift away from the PCF categories (which largely track UNFCCC categories) in the most recent climate plan, A Healthy Environment and a Healthy Economy (HEHE).

should also be clearly grouped and numbered.<sup>5</sup>

**4) The Climate Plan 2022 must break measures down into SMART objectives<sup>6</sup> that are:**

- Specific: Describes a specific action, behaviour or outcome that is observable.
- Measurable: Quantifiable and has associated indicators so it can be measured.
- Audience-specific: Appropriate and relevant to your target audience.
- Realistic: Achievable with the available resources.
- Time-Bound: States timeframe for implementation of objective(s) and achievement of objective(s)' emissions reductions.

The plan must also include the expected annual range of emissions reductions of the measures and strategies described according to sector, as well as their associated funding, and should identify responsible Minister(s) and departments.<sup>7</sup> These requirements apply to emissions reduction measures, relevant sectoral strategies (the plan must clearly show sectoral pathways), strategies for federal government operations, and the key cooperative measures or agreements with provinces and other governments in Canada.<sup>8</sup>

***Data collection, analysis and synthesis***

The problem of climate change is complicated, detailed and crosses every discipline: physical sciences, energy systems, economics, social sciences, political science. The way we collect, analyze and synthesize the data that is relevant to climate measures must reflect that reality.

Recommendations:

**5) The Climate Plan 2022 should assess where existing data gaps will make progress reporting on the plan measures difficult or impossible and include a plan to fill them.** Further, given the extremely long time-horizon for the climate plan (8 years to the 2030 milestone year), the climate plan should provide for reassessment of its measures as data gaps are filled. Measures may need to be added and changed, and these amendments should be formalized in the climate plan itself.

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<sup>5</sup> HEHE, for example, references sixty-four “strengthened and new federal policies, programs and investments” but there is no way to determine which items in the body of that report are the sixty-four policies, programs and investments.

<sup>6</sup> The Government of Canada recognizes this framework in *Writing SMART objectives* (2017) available at: <https://www.canada.ca/en/environment-climate-change/services/environmental-funding/tools-for-applying/writing-smart-objectives.html> and the Federal Sustainable Development Act SC 2008, c 33 which was amended in 2019 to reflect this commitment to accountability. For example, two principles were added: the principle of openness and transparency, which is the principle that the release of information should be encouraged to support accountability and public engagement, and the principle that a results and delivery approach — that allows for developing objectives, developing strategies for meeting those objectives, using indicators for reporting on progress towards meeting those objectives and establishing accountability — is key to meeting measurable targets.

<sup>7</sup> For a good example, see Annex C to UK's Carbon Plan dated December 2011, starting at p. 208.

<sup>8</sup> Sections 10(b), 10(c), 10(d) and 10(g) of the Act.

- 6) **The Climate Plan 2022 should establish the use of indicators that capture and communicate the complexity of the measures in the plan and for the government as a whole.** These indicators will challenge our tendency to silo policy development into narrow categories,<sup>9</sup> drive more creative policy design by granting new angles on old problems and help communicate policy progress to Canadians as well as support the identification of the data gaps in recommendation 3. The shift away from a fossil-based economy and toward a society based on social and environmental justice, and fuelled by non-polluting energy needs to be clearly communicated to Canadians; this requires a whole of government approach that is clearly anchored in the Climate Plan 2022.

### ***Early and ambitious action***

Canada's goal of net-zero GHG emissions by 2050 is fundamentally tied to staying below 1.5°C and a climate-safe future. The Act, and our international obligations through the Paris Agreement, recognize that limiting climate change to 1.5°C requires immediate and ambitious action.

Canada's current nationally determined contribution (NDC) range target of 40 to 45 percent below 2005 levels is inadequate: analysis by the Climate Action Network Canada shows that, in order for Canada to do its fair share of the global effort to limit warming to 1.5°C, emissions must be reduced by 60% below 2005 levels by 2030,<sup>10</sup> and the Glasgow Climate Pact requests for parties to revisit and strengthen the 2030 targets in their NDCs to align with Paris targets by the end of 2022.

Canada must urgently continue to pursue ambitious action which will allow it to increase the 2030 target and associated actions in a manner that is consistent with Canada's obligations to keep climate change within 1.5°C.

Recommendations:

- 7) **The 2030 target set out in the Climate Plan 2022 should accordingly be at least a 45 percent reduction below 2005 levels with a commitment to increasing ambition in the near term.** Canada should be aiming for this upper range of its current NDC in recognition of the Glasgow Climate Pact's acknowledgement that all nations need to do more to limit warming to 1.5°C.

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<sup>9</sup> German Environment Agency, Data on the Environment: Environmental Monitor 2020, Accessed December 1, 2021:  
[https://www.umweltbundesamt.de/sites/default/files/medien/376/publikationen/data-on-the-environment\\_environmental-monitor-2020.pdf](https://www.umweltbundesamt.de/sites/default/files/medien/376/publikationen/data-on-the-environment_environmental-monitor-2020.pdf)

<sup>10</sup> Holz, Christian (2019). Deriving a Canadian Greenhouse Gas reduction target in line with the Paris Agreement's 1.5°C goal and the findings of the IPCC Special Report on 1.5°C, Accessed December 1 2021:  
<https://climateactionnetwork.ca/wp-content/uploads/2019/12/CAN-Rac-Fair-Share-%E2%80%94-Methodology-Backgrounder.pdf>

- 8) **The 2026 objective must chart an ambitious and equitable pathway to the 2030 target.** Given the need to work to exceed the 2030 target, we need to set an ambitious 2026 objective that reflects Canada's historical responsibility and capacity. The Climate Plan 2022 must clearly indicate which of the measures and strategies are designed to meet this objective.
  
- 9) **The Climate Plan 2022 must explain in detail how its measures will contribute to Canada achieving net-zero by 2050.** Using 1.5-aligned scenarios and pathways the plan must explain how the 2030 target and its key measures and strategies will contribute to Canada achieving net-zero emissions by 2050 per section 10(2) of the Act. The climate plan should explain in detail anywhere there might be scope for increased ambition and set out a resourced plan to pursue those possibilities.