

18 July 2025

By email

Dear Clean BC Review Panel:

SCBC has stood up for nature protection and environmental stewardship for over 50 years. In recent decades our 30,000 supporters have joined us in urging the BC government to work with First Nations to reduce greenhouse gas emissions and implement strong climate mitigation and adaptation. We have supported the BC government's price on carbon including the OBPS and an oil and gas emissions cap, as well as successful regulations to reduce methane emissions from the gas industry. We have also used the courts to call for greater accountability, improved reporting of greenhouse gas emissions and quantified plans to meet BC's legislated emissions targets.

In this submittal, we discuss improvements to Clean BC policy goals and metrics, and to existing climate programs and policies; and propose new programs to mitigate global warming and improve climate resilience. SCBC is a member of Organizing for Change and incorporates by reference their submission to the CleanBC review into our comments.

I. Improvements to Clean BC policy goals and metrics

1. CleanBC targets

Legislated targets are the foundation of BC's climate mitigation plan. Intensity-based and per-capita reductions are good but do not necessarily result in overall emissions reductions. Targets should be strengthened by adopting a net-zero standard that requires "real" GHG reductions and removal of GHGs, rather than relying on carbon

offsets, as promised in the CleanBC Roadmap¹, to ensure lasting climate benefits². The Climate Solutions Council has also identified the use of offsets as a pitfall of BC climate policy.³

While GHG reduction targets are important they may not be impactful on the public understanding of progress on climate action. Adding new targets and metrics that are meaningful to the public would increase citizen support for climate programs. For example, the number of heat pumps installed and resulting emissions reductions, or number of households benefiting from energy efficiency incentives could be part of regular reporting.

SCBC recommends CleanBC keep existing legislated targets and add targets and metrics that are meaningful to the general public.

2. Accountability and Reporting

The CCAA requires the Minister to report on climate risks and progress to targets but does not include criteria for reporting. Detailed modeling should be released as part of regular climate reporting to show how BC expects to meet climate targets, and should include all GHG sources and emissions in the province including logging industry and wildfire emissions, which are currently not counted. Actual 2022 emissions were not within the range forecast in the 2021 modeling⁴, indicating inadequate modeling and the need to incorporate uncertainty/contingency analyses. An independent assessment of policy impacts on GHG emissions⁵ would increase public trust in the process.

The CCAA should establish accountability for the Minister to the Climate Solutions Council that advises the Minister, for example by requiring the Minister to report back to the Council on how their advice is considered, implemented and tracked.

¹ https://www2.gov.bc.ca/assets/gov/environment/climate-change/action/cleanbc/cleanbc_roadmap_2030.pdf on p. 10

² [SCBC Comments on BC Forest Carbon Offset Protocol, 2021](#)

³ 2022 Climate Solutions Council report at [bc_climate_solutions_council_2022_annual_report.pdf](#)

⁴ The CCAAR 2022 report projection for GHG 2022 emissions was 61.3 to 64.3, whereas the reported emissions for 2022 is above this range, 65.6 MtCO₂e. See https://www2.gov.bc.ca/assets/gov/environment/climate-change/action/cleanbc/2024_climate_change_accountability_report.pdf

⁵ Recommended in the 2022 Climate Solutions Council report at [bc_climate_solutions_council_2022_annual_report.pdf](#)

SCBC recommends:

- **Release detailed modeling data**
- **Add uncertainty/contingency analyses**
- **Provide independent review of policy impacts on emissions**
- **Legislate accountability of the Minister that requires the Minister to respond to the Climate Solutions Council on how advice is considered, implemented and tracked**

II. Effectiveness of existing CleanBC programs

1. Energy efficiency and clean energy incentive programs

Without data about uptake of existing programs we cannot comment on their effectiveness. We know from experience among our supporters that some requirements for solar, heat pump and energy efficiency upgrades are barriers to uptake:

- The income requirements prevent middle- and upper-income homeowners from benefiting from incentives.
- The time limit for accessing incentives is too short for busy working people who are also managing home upgrades to meet.
- The requirement for some upgrades to be performed by a licensed contractor rules out many do-it-yourself homeowners making energy efficiency upgrades on a small budget.
- Requirements that some upgrades be done by specially-certified contractors results in those contractors charging installation fees that exactly match the reimbursement amount, so the homeowners must go through the hoops of claiming the reimbursement but do not actually spend any less money in the end.

SCBC recommends eliminating income-based requirements, extending time limits, and eliminating the licensed contractor and certified contractor requirements in order to improve efficacy of the energy efficiency upgrade incentives.

2. Output based pricing system

The OBPS is the province's implementation of the industrial price on carbon. The OBPS should be improved by reducing the portions of emissions that are exempt from pricing sooner (i.e. Increase the tightening rate), and by continuing to increase the price annually. In addition, no industries or individual projects should be favoured with an early cap on the price per tonne of carbon: all carbon should be priced and accounted for in an OBPS that is fair and effective.

SCBC recommends tightening the OBPS and eliminating caps for individual projects.

3. Methane regulations

B.C. has successfully reduced methane emissions from the gas industry and should build on this success by ramping up reduction requirements. There are practical and cost-effective ways to achieve near-zero methane emissions by 2030, including monthly leak detection and repair, eliminating routine venting and flaring, switching to low and zero-emission technology, comprehensive monitoring and reporting, and upholding the polluter pay principle.⁶

SCBC recommends advancing the deadline for near-zero methane emissions to 2030.

III. New programs to achieve legislated targets

1. Transportation

Transportation is the largest source of GHGs in B.C. and emissions continue to rise despite various programs to address them. This section outlines new programs that would result in substantial emissions reductions from this sector.

⁶ [Report: Methane - LNG's dirty secret - Stand.earth](#) 2025

- a) Create a “lease-to-own” ZEV program.

B.C. is not on track to meet the legislated target of the Zero Emissions Vehicle Act⁷ and has recently terminated ZEV rebates. Research indicates that rebates are not the most efficient or equitable way to decrease transportation emissions, since they are used mostly by the wealthiest drivers and are not generally a deciding factor in ZEV purchases.⁸

A “lease-to-own” program could make ZEVs more widely affordable. The least expensive new ZEV in B.C. is about \$40,000. A lease-to-own program at \$333/month over 10 years is cheaper and more accessible to average households than a \$5000 rebate on the same vehicle purchased up-front or privately financed. Emissions reductions would be further increased if the lease-to-own program required an exchange of an internal combustion vehicle, incentivizing switching from fossil fuel to ZEV vehicles.

SCBC recommends creating a “lease-to-own” incentive program for ZEVs.

- b) Increase investment in and affordability of public transit

A switch from personal vehicles to public transit is one of the best ways to reduce emissions and overall energy demand. B.C. ridership could be much higher, but public transit is currently a major cost to households and in many cases is not cheaper than driving and parking a personal vehicle. For example, a one-way 3-zone fare in Vancouver is \$5.10 with a stored value card. A family of four would pay \$19.20. to attend a single event using BC Transit. A similar family would pay \$6368.40 annually for monthly transit passes.

Affordability would improve if public transit subsidies provided:

- Reduced adult fares, eg. \$2.00 for a 3-zone fare
- Free for children under 5 and students from kindergarten through post-secondary
- Free or steep concession fares for senior, disabled and low-income individuals
- Fare capping, eg. at \$5.00 per day, so that no single day of transit costs more than \$5.00 (replaces daily passes)

⁷ In 2024, 22.4% of new light-duty vehicles were zero-emission vehicles ([2024 zev annual report.pdf](#)). This is slightly down from 2023 (22.7%). First quarter of 2025, there was a 19 per cent in adoption rate and decreased to 15 per cent.

⁸ [A Review of Electric Vehicle Consumer Subsidies in Canada](#), 2023

B.C. spends substantially more on highways than on public transit⁹. Since most highway funding comes from general taxes (not fuel surcharges)¹⁰, a shift from highways to public transportation is a more equitable use of public funds and would vastly reduce transportation costs for many households. BC and the federal government committed to reallocating funding from highway expansion to low-carbon transportation in the 2016 Pan Canadian Framework on Clean Growth and Climate Change.¹¹

SCBC recommends reducing/eliminating fares for public transportation by shifting public funds from highways to public transit investments.

c) Focused Electrified Public Transportation

Within the transportation sector, a switch to all-electric public transit for education and health-care facilities would significantly impact emissions. The cost of driving and parking for health-care services is prohibitive for some and burdensome for many¹² in both rural and urban settings. Transit programs designed to get people to and from health-care and schools using electric vans and buses and at no cost to the user would reduce transportation emissions and make those services more accessible. This would also contribute to the CleanBC goal of achieving carbon-neutral government by reducing emissions from the health care sector.

SCBC recommends providing all-electric free transportation to health-care and education facilities across B.C.

2. Buildings

a) Rooftop solar and heat pumps for all new buildings

The 2024 Accountability report notes that building sector GHGs increased by 1% in residential buildings and 10% in commercial buildings¹³, taking us further from meeting B.C.'s targets. Key to decreasing building emissions is accelerating the BC

⁹ [Transportation Expenditures Compared](#), 2024

¹⁰ *Ibid.*

¹¹ [Pan-Canadian Framework on Clean Growth and Climate Change - Canada.ca](#), 2016

¹² For example: [Vancouver Coastal Health - Public Parking Rates 2024](#)

¹³ See p. 11 of the report.

Zero Carbon Step Code which presently requires only measuring, not reducing, emissions from new buildings by 2025¹⁴.

B.C. could vastly accelerate GHG emissions from new buildings by requiring all new residential buildings be equipped with solar panels, heat pumps and a battery for short term energy storage, starting in 2026. This requirement could be tailored for different regions in the province if necessary, and could be phased over three years, starting in urban areas where access to the power grid is standard.

This program leverages government housing mandates that require massive new construction across B.C. and ensures cleaner, more affordable homes since heat pumps and solar panels reduce energy costs for consumers. B.C. could increase solar panel production domestically, providing guaranteed contracts to manufacturers. B.C. could also take advantage of the reduction in solar panel purchasing by the United States due to their reduced incentives, by buying solar panels from other trading partners. Both options are net positives for the B.C. economy.

The requirement to provide power generation via rooftop solar on every new building would augment the recent BC Hydro Call for Power¹⁵, and reduce the need to import electricity, some or all of which is fossil-generated,¹⁶ during dry years. These are multiple benefits of a mandatory rooftop solar program.

SCBC recommends requiring solar panels, batteries and heat pumps for all new buildings in a phased program starting in 2026.

b) Solar panels and batteries for commercial buildings and shopping centres

Many communities across B.C. are far from municipal buildings but have small to medium sized commercial/shopping centres, sometimes in the form of a plaza, business park or strip mall. These should be electrified with solar panels and battery storage to reduce their emissions, and to support communities through warming/cooling centres in case of local power shortages caused by fires, floods, storms, etc. This provides emergency preparedness for rural/remote communities and improves community resilience to climate disasters, without the use of diesel

¹⁴ [Zero Carbon Step Code - Province of British Columbia](#)

¹⁵ BC Hydro [2025 Call for Power](#)

¹⁶ See <https://wernerantweiler.ca/blog.php?item=2024-05-12>

generators. An interest free loan program assisting commercial property owners to install solar panels and batteries would save those businesses energy costs and would come with a requirement that they serve the community in times of need.

SCBC recommends government interest-free loans for commercial centres to install solar panels and battery storage so they may support community resilience while reducing GHG emissions.

3. Carbon neutral government: BC Health

CleanBC goals include a carbon neutral government sector. CCAA must be updated from carbon neutral to net-zero legislation (see Section I), which would align with of net-zero policy goal. Carbon-neutrality is currently achieved in part through carbon offsets rather than real reductions in GHG emissions. The health sector is B.C.'s largest public sector source of GHGs, making up about 30% of reportable B.C. public sector emissions in 2022,¹⁷ and nearly 5% total B.C. emissions. The health sector has not appreciably reduced GHGs.

While we lack complete analyses for B.C. we can look at the UK analyses for the National Health System which shows that scope 3 emissions (medicines, medical equipment and other supply chain) make up the majority at 62% and patient, staff and visitor travel makes up another 10%.¹⁸ B.C. could make significant reductions in real emissions by requiring low-carbon supply chains and creating new trade across Canada and EU in health sector goods; and by providing electrified, free transportation to and from health services (see Transportation, above).

SCBC recommends a legislated plan to achieve a net-zero health care sector.

¹⁷ https://www2.gov.bc.ca/assets/gov/environment/climate-change/cng/yir/2022_cng_year_in_review_summary.pdf

¹⁸ [https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(20\)30271-0/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(20)30271-0/fulltext)

4. An end to fossil fuel subsidies and tax breaks

In aggregate fossil fuel projects have received enormous subsidies from provincial and federal governments in the form of grants, tax breaks, tariff exemptions on imported supplies such as steel, and exemptions from the OBPS. Local governments also contribute in the form of upgraded roads, bridges and other infrastructure. For example, the LNG Canada project received an estimated benefit of over \$1 billion through measures such as these.¹⁹

Eliminating these expensive gifts to the oil and gas industries would mean more funds in government coffers that could be directed to the programs described above and many other climate mitigation and resilience efforts.

SCBC recommends eliminating favourable fiscal treatment for fossil fuel projects in B.C. and using the funds saved/collected in this way to support programs that reduce emissions and improve climate resilience.

Conclusion

Improving climate action in B.C. is critical for our well-being and for a prosperous future. Thank you for the opportunity to share these analyses and suggestions. We look forward to working with the CleanBC review panel and B.C. government to achieve climate goals and secure a brighter future.

Sincerely,



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¹⁹ [Billions In Subsidies Flow To LNG Canada As Kitimat Terminal Nears Launch - CleanTechnica](#)