

## LETTER TO THE HONOURABLE JONATHAN WILKINSON

November 30, 2021

The Honourable Jonathan Wilkinson  
Member of Parliament for North Vancouver  
310 Esplanade E, Suite # 201  
North Vancouver B.C. V7L 1A4

Dear Mr. Wilkinson,

### **Re: awaiting your response to our letter to you dated May 12, 2021**

We write further to our letter dated May 12, 2021, requesting that you answer questions we presented to you concerning the incompatibility between the Federal Government's climate goals announced during the past year, since November 2020, and the planned ongoing expansion of Canada's oil production to 2045.

I, Roz Isaac, reside in the constituency of North Vancouver and I am writing to you in your capacity as my Member of Parliament and as Minister of Natural Resources. We, Jennifer Nathan and David Gooderham, reside in the constituencies of New Westminster and Vancouver Quadra respectively, and we are writing to you in your capacity as Minister.

You indicated that you had forwarded our questions to Environment Ministry staff. The Federal election subsequently intervened. However, our questions remain unanswered.

### **The background to our questions**

During the time since we delivered our original letter to you six months ago, a series of new reports and analyses have been published which sharpen the urgency of the issues that underlie our original questions. These include the International Energy Agency's (IEA) *Net-Zero by 2030: a Roadmap for the Global Energy Sector* addressing the massive reductions in global oil consumption required by 2040 (May 18, 2021); the IEA's *World Energy Outlook 2021* report (October 12, 2021); the new *UN Production Gap Report* (October 20, 2021); and the *UN Emissions Gap Report 2021* (October 26, 2021).

Four years ago, the *UN Emissions Gap Report 2017* warned that even if all the countries in the world (including Canada) fully implement all the commitments they made under the Paris Agreement in 2015 to reduce their national emissions by 2030, the surface of the earth by 2030 would still be irrevocably committed to warming that will far exceed the promised 2°C threshold, let alone the more ambitious 1.5°C limit:

*Looking beyond 2030, it is clear that if the emissions gap is not closed by 2030, it is extremely unlikely that the goal of keeping warming to well below 2°C can still be reached. Even if the current NDCs are fully implemented, the carbon budget for limiting global warming to below 2°C will be about 80% depleted by 2030. Given currently available carbon budget estimates, the available carbon budget for 1.5°C warming will already be well depleted by 2030.*

It was therefore clear even by late 2017 that full implementation of all the then promised Nationally Determined Commitments (NDCs) — including meeting Canada’s 30% reduction commitment made in Paris in December 2015— would not be remotely adequate.

Global emissions have continued to rise. In 2019 they reached 51.5 GtCO<sub>2</sub>eq (not including land use emissions). They have risen at an average rate of 1.3% since 2010.

The most recent *Emissions Gap Report* published on October 26, 2021, confirms that the emissions gap is still as large as it was four years ago. The “gap” between the currently expected level of global emissions in 2030 (projected to reach 52 GtCO<sub>2</sub>eq by 2030 assuming all promised NDCs are fully implemented) and the much lower level of total annual emissions we need to achieve by 2030 to give us any realistic chance of keeping warming within the 2 °C limit (an annual level of 39 GtCO<sub>2</sub>eq) is 13 GtCO<sub>2</sub>eq.

The challenge is even more forbidding if we aim to limit warming to 1.5°C. The new *UN Emissions Gap 2021* report concludes that global emissions must be reduced to an annual level of 25 GtCO<sub>2</sub>eq by 2030 to give us a 66 % probability of limiting warming to 1.5°C. That represents an emissions gap of 28 GtCO<sub>2</sub>eq. Closing that gap will require a 50% cut of global emissions below the 2019 level.

Achieving a substantial reduction of global oil production by 2030 is one of the essential requirements to close the emissions gap. Yet, according to the Canada Energy Regulator’s most recent report published on November 24, 2020, Canada’s oil production is projected to continue expanding to 2045.

To give you a more detailed context for our questions and provide you with the particulars of the updated sources we refer to below, we enclose a paper *Nine Questions for All Members of Parliament: the Incompatibility Between Canada’s New “Net-Zero by 2050” Climate Plan and the Continued Expansion of Oil Sands Production to 2045*.

## **Canada plans to continue expanding oil production for 25 more years**

The new *Canada’s Energy Future 2020* (the “CER 2020” report) provides a detailed projection (called the “Reference Scenario”) showing that Canada’s overall oil production (including both oil sands and conventional oil) is expected to continue increasing until 2045, when it will “peak” at 7.1 million bpd, more than 2.2 million bpd above the 2019 level. Expanding oil sands production drives that growth. The CER 2020 report also published an alternative scenario called the “Evolving Scenario” which projects that the expansion of Canada’s oil production will

continue to increase to 2039 when it will peak at 5.8 million bpd, still 900,000 bpd above the 2019 level.

In direct contradiction to Canada's plans, during the past six months multiple reports have confirmed in unqualified terms that to have any realistic chance of stay within the promised 1.5°C warming threshold, oil producing countries must immediately halt any further expansion of global oil production and we must achieve deep reductions in global oil consumption by 2030. The IEA's study *Net-Zero by 2050: A Roadmap for the Global Energy Sector*, released on May 18, 2021, concludes that to have even a 50-50 chance of staying within the 1.5°C limit, global oil consumption must decline 50% below the 2019 level by 2040. That would require cutting oil use worldwide from 98 million bpd (the 2019 level) down to 44 million bpd within the next 20 years. To stay within the 1.5°C temperature threshold, oil consumption must further decline to 24 million bpd by 2050. In a dramatic departure from its past approach, the new IEA study calls for *an immediate halt to any further expansion of global oil production*.

In its October 12, 2021, *World Energy Outlook 2021* report, the IEA re-affirmed its May assessment and warned that global oil production must decline to 72 million bpd by 2030 (down from 97.9 million bpd in 2019) to meet that goal.

Similarly, the *UN Production Gap Report* published on October 20, 2021, has concluded that currently planned oil production growth by the world's 15 major producing countries (Canada is the world's 4<sup>th</sup> largest oil producer and 3<sup>rd</sup> largest oil exporter) far exceeds the safe levels consistent with limiting global heating to 1.5°C or 2°C. This is the third annual report in the UN's *Production Gap* series, first published in 2019, prepared by the UN Environmental Programme and several other research institutes. The stated purpose of the report is "to quantify the discrepancy between the global levels of fossil fuel production implied by governments' plans and projections and the levels consistent with the Paris Agreement goals (namely limiting warming to well below 2°C and pursuing efforts to limit the temperature increase to 1.5°C)." The discrepancy is referred to as the "production gap".

The *Production Gap Report* examines coal, oil, and natural gas production plans in 15 major producer countries, which account for 75% of all global fossil fuel extraction (including the U.S., Saudi Arabia, UAE, Canada, Brazil, Norway, UK, and Russia). It is based on a compilation of each government's published projections for fossil fuel production, as well as publicly available national energy outlooks and targets as of August 2021. In the case of Canada, it specifically cites and relies on the *Canada's Energy Outlook 2020* report released November 24, 2020, which is the same document (the "CER 2020 report") we refer to in this letter. The report's overall conclusion is that "the world's governments plan to produce more than twice the amount of fossil fuels in 2030 than would be consistent with limiting warming to 1.5°C". In the specific case of oil production, it states:

*Nations are, in aggregate, planning on producing around 40 million barrels per day (Mb/d) more oil than would be consistent with the median 1.5°C pathway in 2030 (with a range of 26-56 Mb/d). This excess is roughly equivalent to half of current global oil production.*

— *Production Gap Report*, October 20, 2021, p. 15-16

Oil accounts for 35% of all global CO<sub>2</sub> emissions from burning fossil fuels. The staggering task of achieving a 50% cut of total CO<sub>2</sub> emissions by 2030 below the 2019 level cannot be done without a substantial decline of oil production on a worldwide scale.

Neither the *Canada's Energy Future 2020* report nor the *Healthy Environment and a Healthy Economy* document address the incompatibility between the continued growth of Canada's oil sands production for another 20 to 25 years and the overwhelming scientific evidence that confirms the need for deep cuts in global oil production by 2030.

As you are aware, the *CER 2020* report includes a new scenario called the "Evolving Scenario," which outlines an alternative path for crude oil production in Canada involving a *slightly reduced rate of growth* over the next twenty years. The Evolving Scenario is just a theoretical projection. The report did not indicate any pending change in Canada's policy or plan to curb the presently expected rate of expansion, which continues to be the higher rate shown in the Reference Case. Yet, a brief statement toward the end of the document concedes that even the reduced production level shown in the Evolving Scenario would not be sufficient to meet Canada's recently announced "net-zero by 2050" goal:

*It is also clear that Canada's more ambitious goals, such as achieving net-zero by 2050, will require faster transition than we have witnessed historically and faster than is shown in the Evolving Scenario. Recognizing this fact, we have introduced a "Towards Net-zero" section in EF2020.*

— *Canada's Energy Future 2020*, page 62 (emphasis added)

But the CER 2020 report failed to offer any assessment of how much lower Canada's oil production would need to be in order to be consistent with the "more ambitious goals" promised by the government. The report is silent on that question, which is fundamental to assessing what changes in Canada's energy policy are required. On that grave question, you (in your former capacity as Minister of Environment and in your ongoing role as a Member of Parliament) have remained silent for the past 12 months since the CER 2020 report was released on November 24, 2020. You have offered no comment on how Canada's current plans to continue oil sands expansion can possibly be reconciled with your "net-zero by 2050" goal.

Indeed, when you were asked during a Zoom online election candidates panel on September 8, 2021, to explain how Canada's new "Net-zero emissions by 2050" climate plan can be squared with continued oil sands expansion, you answered only that there will be "no significant further *expansion* of oil production in this country".

You have refused to acknowledge that a *reduction* of oil production in Canada is essential to give us a chance to achieve a safe climate outcome. Your successor as Minister of Environment is following your lead. October 27, 2021, the day after he was appointed to your former position, Environment Minister Guilbeault was asked the same question. He answered: "*We are not trying to cap production*. We will be capping the amount of pollution that comes from those sectors."

## OUR QUESTIONS:

- 1.1 **Do you agree that all further *expansion* of oil sands production should end now, and that Canada must establish a plan that provides for a gradual reduction of Canada's total crude oil production to 2030 and a deeper reduction to 2050, a plan aligned with the reduced levels of global oil output that over the next three decades will be essential to meet the net-zero emissions goal by 2050 and limit warming to 1.5°C?**
- 1.2 **Will you as Member of Parliament for North Vancouver and in your capacity as Minister of Natural Resources publicly acknowledge that the "Reference Case" scenario presented in the Canada Energy Regulator's report of November 24, 2020, is not an acceptable or safe basis for developing Canada's energy policy?**

## 2. TMX pipeline expansion not required

The *CER 2020* report acknowledges that if Canada's oil production is even modestly reduced over the coming decades in line with the Evolving Scenario, the proposed new pipeline capacity provided by both the Keystone XL and by the TMX project *would not be required* (see the graph on page 44 of the report, reproduced as Figure D on page 10 of our enclosed *Nine Questions* paper). Under the Reference Case Scenario, all the currently planned new pipelines will be needed. But the CER 2020 report concedes that under the Evolving Scenario, depicted by the lower red dotted line on the graph at page 44 of the report which more slowly curves up to about 5 million bpd of available supply in 2035-2040, the TMX pipeline is not required.

## OUR QUESTIONS:

- 2.1 **Do you agree that under the Evolving Scenario the Trans Mountain Pipeline Expansion is not required?**
- 2.2 **Do you agree the project should be cancelled?**

## 3. The net zero target: an empty promise

The *Canada's Energy Future 2020* document tells us that "*reaching net-zero emissions does not necessarily require eliminating all emissions*" by 2050. It promises that by 2050 the ongoing level of Canada's annual emissions (referred to as our "remaining emissions") will be offset ("balanced") by future technologies that it claims will have the capability to remove massive amounts of CO<sub>2</sub> from the atmosphere ("emissions removals").

Unfortunately, the government's new promise is nothing more than an unsubstantiated and unverifiable claim that by 2050 "remaining emissions" will be equalized by "emissions removals." The government does not disclose any numerical target for what Canada's "remaining emissions" will be by 2050. The "net-zero by 2050" plan does not tell us what, under this plan, Canada's annual level of "remaining emissions" will be in 2050. This plan provides

nothing more than an empty promise that by 2050 Canada’s annual level of emissions (the so-called “remaining emissions”) will be fully offset by CDR technologies.

The feasibility of future “emissions removals”, especially on any large scale, is based on a conjecture about the availability of these envisioned future technologies. Direct air removal technologies do not yet exist, save for in very small-scale experimental forms. The IPCC *Special Report* in 2018 warned that CDR deployment of several hundreds of Gt CO<sub>2</sub>eq is “*subject to multiple feasibility and sustainability constraints*”. The IPCC acknowledged that one of the most prominent proposed CDR solutions (BECCS) due to its massive need for crop lands and water resources poses serious environmental risks and could compromise the world’s food security.

On June 30, 2021, Parliament passed into law the *Canadian Net-Zero Emissions Accountability Act* (Bill C-12). Section 7 of the new law sets certain deadlines for when the Minister of Environment and Climate Change must set a national greenhouse gas emissions target for each “milestone year”. Here is the specific provision that stipulates when the targets for the years after 2030 will be revealed:

*7 (4) The Minister must set the national greenhouse gas target*  
*for the 2035 milestone year, no later than December 1, 2024;*  
*for the 2040 milestone year, no later than December 1, 2029;*  
*for the 2045 milestone year, no later than December 1, 2034*

Accordingly, the new law does not legally require that the government establish or disclose to Canadians any long-term target for the reduction of Canada’s emissions until December 1, 2034 – thirteen years from now. The government is free to delay telling us anything about the 2040 target until December 1, 2029. We will not get any information about the 2035 target until the end of 2024.

The law enables the government to withhold from the public for many more years the long-term emissions implications of Canada’s plans to continue expanding oil and gas production to 2045.

Therefore, the government’s announcement of the “net-zero emissions by 2050” goal on November 19, 2020, does not provide a new climate plan for Canada. The *Canadian Net-Zero Emissions Accountability Act* (passed into law with the full collaboration of NDP MPs) allows the Government of Canada more time to delay the day of candour – to delay a truthful accounting of the contradiction between Canada’s existing energy policies, which continue to facilitate the ongoing expansion of the oil and gas sector and delay the kind of action required within the next nine years to give us a realistic chance of avoiding a catastrophic outcome.

This plan, as it stands, gives the government a free licence to continue the currently planned expansion of Canada’s oil sands production, and other carbon-intensive industries (including LNG in B.C.) for another twenty-five years. Oil and gas sector emissions are the dominant source of our country’s emissions growth. The higher they go (and the longer we delay reversing this trend) the higher our “remaining emissions” will be in 2050 – and the higher the annual level of “emissions removals” would have to be after 2050 to meet “net-zero”. Under this scheme, the risk and loss and suffering will be shifted to the world’s children, in exchange for our own immediate financial gain.

## QUESTIONS:

- 3.1 **What is the government’s number or measure that tells us what the estimated level of Canada’s “remaining emissions” will be in 2050? No such number has been provided to Canadians. Alternatively, what is the government’s currently available estimate of the annual level of “emissions removals” that will be feasible by 2050?**
- 3.2 **Do you know if the government has in fact developed any numbers or estimates?**
- 3.3 **Even if the government has no available data of that kind, do you as Minister of Natural Resources or as a Member of Parliament have any idea what the level of “remaining emissions” under Canada’s new plan is expected to be by 2050?**

## 4. The Canadian Energy Regulator has failed to model oil production scenarios for Canada that are consistent with a 1.5°C future

A deeply disturbing feature of the recent CER 2020 report is that it failed to provide your constituents (and citizens all across Canada) with any analysis or findings that would inform us of the projected future (lower) levels of oil sands output that will be consistent with a 1.5°C world. A study of that kind would examine the future limits on global oil consumption that will be essential to meet future global warming limits. In the case of Canada, energy economists can readily determine what levels of future oil sands production in Canada will be economically viable at the lower future crude oil prices that will prevail as global oil consumption declines to levels consistent with a 1.5°C world.

A study of that kind addressing Canada’s specific situation would provide us with an honest assessment of what future oil sands production levels will be safe in a world committed to stay within the 1.5°C warming threshold. The need for that information about Canada’s future oil production is especially important in view of the IEA’s new “*Net-Zero by 2050 Scenario*”. We now know that a responsible and safe pathway for worldwide oil production requires a 50% reduction by 2040. What production pathway does the government plan for Canada?

It is inexplicable that the CER, or Environment Canada, or some other arm of the Government of Canada, has not already developed and publicly released its own analysis of that kind. We are the world’s 3<sup>rd</sup> largest oil exporter. Over 80% of our production is consumed in foreign markets. Yet our national government has failed to conduct a study that would realistically inform Canadians of what the impact on the oil sands production will be, say by 2040, if the world’s main industrial economies adopt strong climate policies to limit emissions. An alternative explanation is that Environment Canada (or the Department of Natural Resources and Canada’s Energy Regulator) already possess analyses of that kind but refuse to disclose them publicly.

As we noted above, the CER 2020 report states merely that future production will have to be *some unspecified amount less than* the “Evolving Scenario”:

*It is also clear that Canada’s more ambitious goals, such as achieving net-zero by 2050, will require faster transition than we have witnessed historically and faster than is shown*

*in the Evolving Scenario. Recognizing this fact, we have introduced a “Towards Net-zero” section in EF2020.*

— CER 2020 Report, page 62 (emphasis added)

The report tells us only that the needed reductions must be “faster” than the trajectory shown in the Evolving Scenario. It refuses to tell us *how much faster* our oil production must decline. The question is very clear: what is the lower level for oil production in Canada required to be consistent with the “net-zero emissions by 2050” goal?

Without an answer to that question, Canadian citizens are denied any “accountability” (promised by the *Canadian Net-Zero Emissions Accountability Act* passed on June 30, 2021) on this most important issue. The choices we make about the future pathway of Canada’s oil production to 2045 will be crucial in determining our country’s ability to help keep the further heating of the earth to less than 1.5°C threshold, or within 1.8°C or 2°C limits.

On July 8, 2021, twenty-one energy economists and climate scientists, all deeply experienced and informed about Canada’s oil production projections and the emissions implications of continued expansion, sent a letter to the Prime Minister citing the findings of the IEA’s “*Net-Zero by 2050 Scenario*”. They sent copies to Canada’s Minister of Environment and Climate Change, to the Minister of Natural Resources, and to the Chair and CEO of the Canada Energy Regulator: <https://www.linkedin.com/pulse/canadas-energy-regulator-should-develop-net-zero-letter-mark-winfield>

In this unusual and important letter, these twenty-one leading experts, including Simon Donner who is a member of the Net-Zero Advisory Body, make a demand that is explicit and clear. They acknowledge the importance of the IEA’s recent *Net Zero by 2050 Scenario* which they describe as “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”.

The July 8, 2021 letter also specifically directs attention to the fact that Canada’s own energy agency (the CER) “does not currently model scenarios showing where Canada’s energy sector aligns with the government’s net-zero goal”. We note that the twenty-one experts conveyed this request directly to you as Environment Minister (the position you held then): “*Specifically, we urge you to mandate that the Canadian Energy Regulator model scenarios consistent with the IEA’s Net Zero by 2050 report.*” In plain English, that means the government should immediately direct or instruct the CER to develop a scenario that will inform Canadians with complete honesty and candour what production levels for Canada’s oil production over the next 20 to 30 years would be safely aligned with an effective global effort to stay within the 1.5°C warming threshold. That would provide Canadians with a first step towards real accountability.

## OUR QUESTIONS:

- 4.1 Has the Government of Canada developed any scenarios or studies or modelling that shows the impact on Canada’s oil sands production of a future reduction in global oil demand consistent with meeting a target of net-zero emissions by 2050 and limiting warming to 1.5°C?**

- 4.2 Are you aware of any scenario for Canada’s crude oil production that would be consistent with such a “faster transition” to achieve Canada’s “more ambitious goals”? Do you personally, as Member of Parliament for North Vancouver and Minister of Natural Resources, have any idea of what that would be?**
- 4.3 Would you be prepared as Minister of Natural Resources to instruct that a study of that kind be initiated without delay and that the results be shared with Canadians?**

## **5. Carbon capture and storage technology**

We will not repeat here the concerns we identified in our letter of May 13, 2021, relating to the government’s plans to rely on large-scale deployment of CCUS technology as a promised means to address the existential threat posed by the planned ongoing increase of our oil production.

A fundamental point is that even if it could be rapidly deployed on a massive scale, CCUS will only capture a portion of the *upstream emissions* associated with the extraction and processing of oil sands bitumen within Canada. Upstream emissions account for less than 15% of the overall emissions released into the atmosphere by Canada’s oil production. More than 85% of the life-cycle emissions associated with our oil production occur after our oil is exported. Publicly subsidized CCUS is not a substitute for policy decisions that candidly acknowledge Canada’s responsibility to achieve substantial absolute reductions in oil production by 2030 and 2040.

### **OUR QUESTIONS:**

- 5.1 Do you agree that there should be no subsidies or funding or tax incentives from the Federal Government to support the deployment of CCUS in the oil sands industry?**
- 5.2 Will you as the Member of Parliament for North Vancouver and Minister of Natural Resources publicly acknowledge that the recent proposal that CCUS technology be adopted on a large scale in the oil sands industry is not an acceptable or safe basis for developing Canada’s energy policy.**
- 5.3 Would you support the creation of an independent public inquiry to examine the implications of large-scale deployment of CCUS in the oil sands industry? It would examine and inform Canadians of the implications of this scheme including the safety and integrity of the required underground sequestration of CO<sub>2</sub> which will have to be maintained securely for hundreds of years and will be a burden on our children.**

## **6. Unsubstantiated claim: oil and gas emissions to be cut by 56 Mt by 2030**

On December 11, 2020, Environment Canada released new projections telling us that emissions in the oil and gas sector will by 2030 be reduced to 138 Mt, which is 55 Mt below the actual level recorded in 2018 (193 Mt) and 75 Mt below the “current measures” forecast published in the *Fourth Biennial Report* on January 2, 2020. It is 56 Mt below the government’s most recent Reference Case projection published on December 11.

This extraordinary claim by the Ministry of Environment on December 11, 2020, that oil and gas sector emissions will be cut to 138 Mt by 2030 has not been substantiated by any analysis of data disclosed to the public.

The promise made on December 11, 2020, that Canada's total emissions will be reduced to 503 Mt by 2030 is premised on this unsubstantiated claim that oil and gas sector emissions will be cut by 56 Mt below the most recent Reference Case projections. The claim is unsupported by evidence disclosed to Canadians and it misleads your constituents and all Canadians because it offers a level of assurance that is unfounded.

A 9-page "Annex" appended to the *Healthy Economy* document gives us the same 56 Mt number, again with no accounting of how it will be achieved. Table 1 in the Annex gives 194 Mt as the projected level of total oil and gas sector emissions by 2030 based on current policies (described as the "Reference Case"). Table 3 in the Annex says that total oil and gas emissions will be reduced to 138 Mt by 2030 by relying on promised new "initiatives" announced in the *Healthy Economy* document.

During the past five years, reports by the government have consistently shown that the adoption of new technologies in the oil sands industry will not be able to sufficiently reduce carbon-intensity per barrel by 2030 to achieve any significant reduction in oil sands emissions by that date, assuming we maintain existing plans to continue to expand production to 2030. There is no reason to believe that innovations in the oil sands industry between now and 2030 can account for a 56 Mt cut in oil and gas sector emissions. The promise that oil and gas sector emissions can be reduced to 138 Mt by 2030 is unprecedented. It is unbelievable.

The CER 2020 report, the *Healthy Economy* document, and the Annex document contain multiple references extolling the future potential of CCUS technology. But the three documents offer no data or estimate of the share of the promised 56 Mt reduction that might be achieved by means of CCUS before 2030, or what share might be accounted for by other means.

## OUR QUESTION:

- 6. How do you, as our Minister of Natural Resources, account for the promised reduction in Canada's oil and gas sector emissions to 138 Mt by 2030, a cut of 56 Mt below the "Reference Case" level given in the December 11, 2020 Annex?**

## 7. New April 2021 promise to reduce our emissions 40% to 45% by 2030

On April 22, 2021, the Liberal Government announced that Canada by 2030 will reduce its emissions 40% to 45% below the 2005 level. But the government has not revealed to Canadians any plan or analysis to explain how these massive additional cuts might be achieved. It merely announced a new number. A 45% reduction will mean that Canada's total emissions must decline to 401 Mt by 2030. The annual level was 730 Mt in 2019. The April announcement unfortunately sharpens the fundamental contradiction between Canada's avowed climate policy, which promises deep emissions cuts by 2030, and Canada's plans to continue to expand oil production to 2045.

Just four months earlier, on December 11, 2020, the government released a report with detailed projections showing that Canada would reduce its total emissions to 503 Mt by 2030 (representing about a 31% cut below the 2005 level). As we noted above, one disturbing feature of the promised reductions published in the December 11, 2020 Annex document was that the largest reduction of all, a massive 56 Mt cut of oil and gas emissions, was unsupported by any analysis or data to explain how that unprecedented large reduction could actually be achieved. Without achieving the that 56 Mt cut in oil and gas emissions by 2030, the government's entire scheme announced in December to lower Canada's total emissions to 503 Mt is untenable.

Now, given the April announcement, achieving the far deeper 401Mt target will require obtaining an additional 102 Mt of emissions reductions from among our seven economic sectors, beyond the reductions already promised in December 2020 to meet the 503 Mt target.

Yet our government has offered no explanation identifying which of Canada's sectors have the capacity to contribute any significant part of this additional 102 Mt cut.

Following upon the April announcement that Canada's emissions reduction target for 2030 has now been lowered to 401 Mt, an additional cut of 102 Mt must somehow be obtained from among the country's seven economic sectors. The question arises, is it feasible that any share of that additional 102 Mt reduction can be obtained from the emissions-intensive oil and gas sector? Any share of that from the oil and gas sector (for example a 20 Mt or 30 Mt share of the needed 102 Mt) would mean that oil and gas sector emissions will have to be reduced by as much as 76 Mt or 86 Mt by 2030 (well above the unprecedented 56 Mt reduction already promised by the government last December).

The Government of Canada has provided citizens of this country with no plan, no analysis, no evidence, and no reasoned explanation to show that anything remotely like a 56 Mt or an 86 Mt reduction of oil and gas sector emissions can be achieved between now and 2030. Nothing indicates that emissions reductions on that scale are achievable in that sector if Canada continues to expand oil and gas production to 2030 and beyond, as it currently plans to do. The government's April promise that Canada's emissions can be reduced to 401 Mt by 2030 was made without foundation or substance.

## **OUR QUESTIONS:**

- 7.1 Has the Government, or any department or agency of the government, developed any projections, studies, or data that identify and quantify how the additional 102 Mt of emissions reductions is allocated between Canada's seven economic sectors (or among the eight sectors including LULUCF)? What is the projected amount of the additional reductions that is expected to be obtained from each sector?**
- 7.2 Is any share of the proposed additional 102 Mt of emissions reductions to 2030 expected to be obtained from the oil and gas sector? What is the amount of the needed additional 102 Mt reduction that is attributed to the oil and gas sector, and what additional measures or technological measures are expected to achieve those additional reductions from the oil and gas sector?**

## 8. Emissions from Canada's Forest Lands: "wildfires"

The Liberal Government's most recent report detailing how it plans to reduce Canada's total emissions to 503 Mt by 2030 (see Figure F in Question 6 of the enclosed *Nine Questions* document) claims that based on promised "new initiatives" a reduction of 27 million tonnes (Mt) of CO<sub>2</sub> will be achieved in the "LULUCF" sector.

The LULUCF sector ('land use and land use changes and forestry') calculates the extent to which Canada's Forest Land operates as a "carbon sink" that absorbs CO<sub>2</sub> from the atmosphere and therefore offsets a substantial portion of our industrial emissions. Historically, British Columbia's richly endowed growing forests absorbed CO<sub>2</sub> from the atmosphere, making our forests carbon "sinks" that have accounted for vast "removals" of carbon.

As you well know, the protection long afforded to us by our forests as a carbon sink began to vanish in early July 2017. Fires exploded in the interior of B.C. By the summer's end they had released 163 Mt of CO<sub>2</sub> and other GHGs into the atmosphere – almost three times the total annual emissions from all other economic sectors in B.C. (the province's total emissions in 2019 were 68.6 Mt). In 2018, the wildfires occurred again, releasing another 195 Mt. Terrible wildfires came to B.C. again in the summer of 2021.

Yet, both the B.C. Government and Canada exclude wildfire emissions from our emissions accounting – and therefore entirely delete wildfire emissions from the "net removals" calculation for the LULUCF sector. Sadly, the projected 27 Mt emissions "reduction" attributed to the LULUCF sector in 2030 is a fantasy, a bookkeeping entry that does not reflect our new reality.

The increasing frequency, size, and distribution of wildfires is being driven by rising surface temperatures and decreased precipitation, caused by our cumulative emissions. This is a classic and tragic case of a *feedback loop*. These fires themselves are now releasing vast amounts of additional emissions, which in turn will drive a whole new cycle of escalated warming, causing more fires and destruction of our natural systems. By choosing to exclude wildfire emissions in B.C. from our official emissions inventory, the government is hiding the gravity of our situation.

### QUESTION:

- 8. Do you agree that the Government of Canada should cease its current practice of excluding wildfire emissions from its calculations of LULUCF emissions which, at present, claim that Canada's Forest Lands by 2030 will contribute a net reduction of 27 Mt to Canada's total projected emissions?**

## 9. Continued expansion of oil production incompatible with global 1.5°C goal

The *UN Emissions Gap Report 2021* published on October 25, 2021, on the eve of the Climate Conference in Glasgow, confronts us with the reality that with only nine years remaining, the world's largest emitting countries are not remotely on track to achieve the very deep emissions reductions that are required by 2030 to avoid the gravest impacts of climate breakdown.

The *atmospheric carbon concentration level* is the metric that explains why the timeline to arrest the further expansion of oil production – and to achieve deep cuts in our consumption of oil, coal, and natural gas – is brief and unforgiving. Comprehensive studies reviewed in the IPCC 2014 report, seven years ago, concluded that if we did not act quickly to curb the rise in global emissions the combined atmospheric concentration level of greenhouse gases would exceed 450 ppm CO<sub>2</sub>eq by 2030:

*Baseline scenarios (scenarios without explicit additional efforts to constrain emissions) exceed 450 parts per million (ppm) CO<sub>2</sub>eq by 2030 and reach CO<sub>2</sub>eq concentrations between 750 and more than 1300 ppm CO<sub>2</sub>eq in 2100.*

— IPCC, 2014, Summary for Policymakers, SPM 3, p. 8 (emphasis added)

The scientific evidence shows that to stay within the 2°C warming threshold, the atmospheric carbon concentration level must be kept below 450 ppm. To stay within the 1.5°C warming threshold would require that we meet an even lower concentration level. We are now on a path to exceed 450 ppm CO<sub>2</sub>eq by 2030. In 2020, the atmospheric carbon concentration level reached 413.2 ppm CO<sub>2</sub>. It is now rising at an average rate of 2.5 ppm every year. Even in 2020, a year when the extraordinary economic impact of COVID-19 temporarily reduced the annual level of emissions by about 5% to 6% worldwide, the concentration level still increased by 2.3 ppm.

#### QUESTION:

- 9. The UN’s most recent climate reports released on September 17, 2021, and on October 28, 2021, confirm that the projected annual level of global greenhouse gas emissions to 2030 is not expected to show any reduction below the 2019 level, even after accounting for all recent NDCs. Do you agree that this new information justifies an immediate reconsideration by Parliament of the government’s current plans and policies that support the continued expansion of Canada’s oil production?**

We will look forward to your answers.

Yours truly,

Roz Isaac

Jennifer Nathan

David Gooderham

Encl. *Nine Questions for All Members of Parliament*, October 31, 2021  
(also available online at <https://gooderhamnathan.com/nine-questions/>)