

March 28, 2024

The Honourable Steven Guilbeault, MP  
Minister, Department of Environment and Climate Change  
Government of Canada  
200 Sacré-Coeur Blvd.  
Gatineau QC K1A 0H3

Via email: [ministre-minister@ec.gc.ca](mailto:ministre-minister@ec.gc.ca)

Re: WaterPower Canada comments on Environment and Climate Change Canada's Consultation on setting Canada's 2035 Greenhouse Gas (GHG) Emissions Targets

Dear Minister Guilbeault:

WaterPower Canada is Canada's national association representing the hydropower industry. We represent utilities, equipment manufacturers, constructors, consultants, and associated industry partners.

We are writing this letter to you to offer our comments in relation to Environment and Climate Change Canada's engagement on its 2035 emissions reduction target. We have reviewed the survey issued by Environment and Climate Change Canada on its website, but we would like to take this opportunity to provide more specific information in letter form.

Amongst the various Canadian economic sectors, the electricity sector has delivered the most significant emissions reductions since 2005<sup>1</sup>. This was the result of the retirement of coal fired generation and greater use of renewables like hydropower and wind. The electricity sector reduced emissions by 56% (66 Mt CO<sub>2</sub>e) between 2005 and 2021, while it increased electricity production by approximately 4% over the same period<sup>2</sup>.

Sector	GHG Emissions (Mt CO <sub>2</sub> e)		
	2005	2021	Difference
Oil/Gas	168	189	21
Electricity	118	52	-66
Transportation	157	150	-7
Heavy Industry	89	77	-12
Buildings	85	87	2
Agriculture	64	69	5
Waste/Others	52	47	-5
<b>Total</b>	<b>733</b>	<b>671</b>	<b>-62</b>

<sup>1</sup><https://www.canada.ca/en/environment-climate-change/services/environmental-indicators/greenhouse-gas-emissions.html>

<sup>2</sup><https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=2510002101&pickMembers%5B0%5D=1.1&cubeTimeFrame.startYear=2005&cubeTimeFrame.endYear=2021&referencePeriods=20050101%2C20210101>

Given the significant reductions already achieved by the Canadian electricity sector, it currently only represented about 8% of Canadian GHG emissions in 2021. While further reductions are expected through the planned Clean Electricity Regulation, much greater progress will have to be made in other sectors of our economy to achieve our current reduction targets. Specific initiatives to substitute fossil fuel use with non-emitting electricity will be needed to advance progress. These initiatives will need to happen across our economy, from industrial to residential consumers of energy. If end-users do not decide to use substitute electricity for fossil fuel, our targets simply will not be achieved.

Programs to encourage fuel substitution are needed immediately.

Residential consumers ‘lock-in’ energy choices when they make purchases – for vehicles, HVAC systems, and appliances. Once these are made, their choice of fuel is set for several years until equipment is purchased again. The same principle applies for institutional and industrial customers unless governments are prepared to provide substantial subsidies to encourage early replacement of fossil-fuel fired equipment.

While Canada has the potential to have a clean, modern net-zero economy, it is incumbent on the Government of Canada to communicate the trade-offs to be made to achieve our net-zero aspirations. Achievement of this goal will come at a cost – in terms of energy rates, equipment investment, and energy development.

Given the short time between now and 2035, and the uncertainty about achieving the current targets, further reductions to Canada’s emissions targets without presenting concrete plans are likely to undermine the credibility of a new target.

We recognize the urgency of the need to address climate change. We also appreciate the utility of establishing stretch goals to drive important initiatives. However, we are concerned with the lack of specific actions to achieve these goals in the next six years for our 2030 goals and in the next decade to 2035. While we do not object to the establishment of a new target, we believe building confidence in our ability to meet current targets should be the current priority.

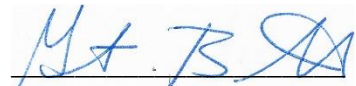
Setting new targets will not necessarily help us overcome the many technical, economic, and political constraints towards achieving our aspirations.

We are concerned that further reducing targets without a clear and credible plan that includes timely progress reporting and specific initiatives that demonstrate GHG reductions will not lead to the progress we need.

We are anxious to cooperate with the Government of Canada in the development of such plans and actions that will help achieve a net-zero future for Canada.

We are available to discuss these points at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Bennett', is written over a light blue horizontal line.

**Gilbert Bennett, P. Eng., FCAE**  
President

cc. The Honourable Jonathan Wilkinson, MP, Minister of Energy and Natural Resources