

## Comparing CAPP and CPC Climate Plans

On June 19, the Conservative Party of Canada released [A Real Plan to Protect the Environment](#). While there are a lot of pages, there isn't a lot of details:

- No cost figures for most of the measures.
- No calculations of greenhouse gas (GHG) reductions for any of the measures.
- No commitment to achieve Canada's Paris climate agreement target.
- The centre-piece of the plan (establishing emissions standards where companies exceeding undefined thresholds pay an undefined amount for some kind of (undefined) technology credits) is an extremely complicated, bureaucratic and likely-expensive way to implement a form of carbon pricing without calling it that. Or it could just as easily provide cover for business as usual.
- There is a highly-questionable claim that increasing GHGs in Canada (by increasing oil and gas production) will somehow help solve the global climate crisis.

For (non-Greenpeace) overviews from academic experts and consultants who have studied and worked on GHG reduction plans like [Nic Rivers](#) (University of Ottawa), [Mark Jaccard](#) (Simon Fraser University), [Andrew Leach](#) (University of Alberta) and [Dave Sawyer](#) (Enviroeconomics).

Below is a comparison of the proposed climate measures in the 2019 federal Conservative Party environment plan and what was proposed by the Canadian Association of Petroleum Producers in the [Energy Platform](#) that they put forward for the 2019 federal election. This comparison shows that CAPP's key policy demands have been met by the Conservative Party's Environment Plan.

This is a work in progress, so please contact Keith Stewart [kstewart@greenpeace.org](mailto:kstewart@greenpeace.org) with comments.

CPC Plan	<a href="#">CAPP 2019 Election Platform</a>	Notes
<p>Set emissions standards for major emitters that will lower greenhouse gases and drive Canadian businesses to the highest standards of green technology.</p> <p>Develop a Green Investment Standards Certification program that outlines eligible investments.</p> <p>Require all companies with facilities falling under this regulation to report on their emissions. We will establish an auditing function to ensure that emitters are complying with regulations and that investments are incremental.</p>	<p>The Government of Canada must develop climate policies that:</p> <p>Include a large-emitter framework that prioritizes investment in technology and emissions reduction and achieves results in a cost-effective manner that protects competitiveness.</p> <p>Prioritize investment in emissions reduction technology in the oil and natural gas sector.</p>	<p>This would appear to be the principal domestic tool to reduce GHGs, yet there is no clear explanation of how it would work, which provinces it would apply to (do Alberta and Ontario get exempted because they have their own plans?), what the standards might be, or how much it would reduce emissions.</p> <p>All large industrial emitters spend millions on existing environmental and R&amp;D spending and many are diversifying into clean tech as a hedge against strong climate policy.</p> <p>Just like carbon offset programs, it is virtually impossible to determine what is "incremental" (i.e. would not have happened without the government program) so companies may claim credit for business-as-usual actions.</p>

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		The best way to ensure Research, Development and Deployment of low-carbon tech is to put a meaningful price on carbon pollution.
<p>Canadian energy products can be used to replace dirtier foreign energy sources.</p> <p>The export of Canadian Clean products can displace higher emissions products.</p> <p>Technology developed in Canada to reduce emissions can be exported to the world.</p>	<p>With respect to Article 6 of the Paris Agreement (which will define a system for international emissions credits),</p> <p>Canada should take a position that allows Canada's oil and natural gas resources to play an international role in generating net emissions reductions and obtain offset credits for Canada.</p> <p>+ Assert the value of using Canadian oil and natural gas, which have substantive emissions savings over other energy sources, to develop international recognition of Canada's contribution to net global emissions reduction.</p> <p>+ Acknowledge that Canada's only credible path to meeting its Paris commitments is through increased exports of Canadian natural gas that is enabled by a well-defined Article 6.</p>	<p>This is not the way global GHG accounting system works (good explanation from Ecofiscal Commission <a href="#">here</a>), and even if it were we then have to take a debit for bitumen exports because they are high-carbon oil.</p> <p>LNG has lower emissions than coal at point of combustion, but the upstream emissions from extracting it (particularly when fracked) and liquefying reduces or even eliminates this benefit. It is also difficult to know if LNG displaces coal, or new renewable energy so there may in fact be a negative impact on global GHGs.</p> <p>Exporting green tech is a good idea, but the best way to encourage Research, Development and Deployment of low-carbon tech is to put a meaningful price on carbon pollution.</p>
<p>Work with provinces, territories and stakeholders to increase the availability and use of renewable fuels and to decrease the carbon intensity of Canada's fuel mix.</p>	<p>Withdraw the proposed Clean Fuel Standard (CFS) in its entirety, as it will increase costs to both industry and Canadians. If the CFS proceeds, it should provide EITE protection to the oil and natural gas sector, allow GHG reductions to earn CFS credits, and provide sufficient compliance flexibility for obligated parties</p>	<p>By taking this back to the drawing board, the CPC plan grants CAPP's request.</p>
<p>&lt;silence on federal regulation of methane emissions from the oil and gas sector&gt;</p>	<p>Remove federal duplication of existing provincial methane reduction policies.</p>	<p>The silence on methane regulations – one of the most significant measures in the Pan-Canadian Framework – suggests that the CPC plan grants CAPP's request.</p>

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Provide targeted accelerated capital cost allowances to industries that can be shown to reduce emissions in other countries, and to producers who can be shown to be among the least carbon-intensive in the world in their industry.	Comprehensive tax and fiscal reform is needed to create a fiscal framework that enables Canada to compete globally for markets and investment.  • Establish 100-per-cent immediate capital expenditure deductibility, equivalent to similar deductibility that applies to other industries.	This is another subsidy to oil and gas.
Expand Export Development Canada (EDC) programs to issue more green bonds that provide financing for the development of emissions-reducing technologies.	In consultation with the sector and the investment community, develop innovative approaches to access capital for small-to medium-sized oil and natural gas companies.	Depending on what qualifies for green bonds (the oil industry has lobbied to be included within green bond criteria), this could be another subsidy to oil and gas.
Launch the ‘Canadian Clean’ brand for Canadian products that are the cleanest in the world. The Canadian Clean brand will allow buyers in Canada and around the world to have confidence that they are getting a high-quality product that is making a difference for our environment.	Become a domestic and international champion of Canada’s oil and natural gas, and ensure no government policies or decisions restrict access to global markets.	A public relations campaign won’t change the fact that Canadian oil has the <a href="#">4<sup>th</sup> highest GHG intensity</a> amongst 50 nations studied.
Develop a Green Investment Standards Certification program that outlines eligible investments.  Require all companies with facilities falling under this regulation to report on their emissions. We will establish an auditing function to ensure that emitters are complying with regulations and that investments are incremental.		This is a long-standing program. These kinds of incentives are useful and popular with higher-income families, but a stronger building code would be a much more effective tool and benefit renters and low-income households as well.  In some cases, such as Ontario, the CPC program would replace the provincial program cancelled by the Ford government.
Leverage up to \$1 billion in private investment in new venture capital for Canadian green technology companies.		This sounds like re-branding the Liberal Infrastructure Bank.
Establish a Green Patent Credit that will reduce the tax rate to 5% on income that is generated from green technology developed and patented in Canada.		At \$20M – \$80M /year, this is not a serious investment from the federal government.  The best way to incent low-carbon technology RD&D is through a meaningful price on carbon.

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Create a single online hub for green technology innovators that will help them identify where they can find talent, information, and resources from the private and public sectors.		Building another website is not a plan.
Section on Greening the Grid		This is provincial jurisdiction and in many cases is already happening so it's not clear how this would assist / accelerate those efforts.
Section on Community Resilience and Wildfires		Already happening, but needs to be scaled up – no \$ commitment makes this look like a gesture without content.
Section on Indigenous Communities		No mention of reconciliation or Section 35 rights make this a hollow statement.