

## Submission to the Standing Committee on Environment and Sustainable Development

Eliminating Fossil Fuel Subsidies

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# Recommendations for the Government of Canada on the elimination of fossil fuel subsidies and public financing

- Go beyond the commitments made to date and eliminate all subsidies, public financing and other forms of financial support from the Government of Canada and federal crown corporations directed to the oil and gas sector by the end of 2022. Shift this spending power towards climate solutions.
- 2. Adopt a definition of "fossil fuel subsidy" in line with international best practices (WTO, OECD) and drop 'inefficient' from the commitment.
- 3. Ensure the commitment to ending fossil fuel subsidies and public financing from federal crown corporations is binding by cementing it into legislation.
- 4. Ensure all definitions and policies exclude loopholes that would allow continued subsidies, public finance or support for gas or false solutions, including carbon capture, utilization and storage (CCUS) and fossil blue hydrogen. This includes canceling the CCUS tax credit.
- 5. Uphold the Polluter Pays Principle, which ensures that oil and gas companies do not pass on the costs of reducing emissions or environmental clean-up onto the public.
- 6. Align all government spending with Canada's obligations under the Paris Agreement to do our fair share to limit global temperature increase to 1.5 °C. This includes attaching strict conditions to government programs (including the Net Zero Accelerator, Canada Growth Fun, Clean Fuel Fund, etc.).
- 7. Develop concrete mechanisms to increase Canada's international finance in support of a just energy transition to at least \$4 billion a year in line with our fair share of limiting global warming to 1.5°C.<sup>1</sup>
- 8. Close carbon pricing loopholes.
- Ensure all energy projects, including those benefiting from government and crown corporation support, uphold Indigenous rights and are fully aligned with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and its principle of free, prior and informed consent.

Ending all subsidies, public financing and financial supports before end of 2022 and shifting support towards a clean energy economy

Environmental Defence produces a yearly tally of how much financial support has been provided to fossil fuels by the federal government. In 2020, the number was \$18 billion.<sup>2</sup> In

<sup>\*\*</sup> These recommendations were sent to the cabinet Ministers on May 3, 2022 in a letter signed by over 100 civil society organizations.

<sup>&</sup>lt;sup>1</sup> Holz, C. (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. Climate Action Network. Available: https://climateactionnetwork.ca/2019/12/02/canadas-fair-share-towards-limiting-global-warming-to-1-5c/

2021, the figure was \$8.6 billion.<sup>3</sup> A report from Bloomberg New Energy Finance found that from 2015–2019 the Government of Canada provided \$100 billion to the fossil fuel sector and raised its level of support to fossil fuels by 40% over those years — the second–largest increase among G20 countries.<sup>4</sup> Globally, Canada provides more public financing to oil and gas than any of the other G20 OECD countries.<sup>5</sup>

We welcome the commitments made by the Government of Canada to end subsidies and public financing for the fossil fuel sector. This includes both the promises made during the election, to accelerate the timeline to eliminate fossil fuels subsidies by 2023 and to develop a plan to phase out public financing to fossil fuels in alignment with Canada's net-zero target, as well as the historic Statement on International Public Support for the Clean Energy Transition at COP26 in Glasgow, a joint commitment to end international public finance for oil, gas and coal by the end of 2022.

However, these commitments do not yet amount to the federal government ending its fossil fuel support in line with what is needed for Canada to meet its climate targets. Furthermore, we are concerned by comments from members of Cabinet<sup>6</sup> suggesting a longer timeline for phasing out Export Development Canada's finance for projects within Canada. This would be misaligned with the International Energy Agency (IEA) and Intergovernmental Panel on Climate Change (IPCC) who have been clear that there should be no further investments in any kind of fossil fuel supply and that we need a rapid phase out of fossil fuels globally to stay within a safe 1.5°C emissions trajectory.<sup>7</sup>

Meanwhile, real climate solutions have received limited government support. In order for Canada to do its fair share under the Paris Agreement and limit global temperature increase to 1.5 °C, economy-wide rapid decarbonization is necessary. The key elements of this transition include scaling up renewable energy and storage options to ensure our economy is powered by non-polluting energy, massive electrification including transportation, homes and industry and significant improvements in energy efficiency. Effective solutions to achieve deep emission

IPCC (2021) AR6 Climate Change 2021 Summary for Policymakers. Available: https://www.ipcc.ch/report/ar6/wg1/

<sup>&</sup>lt;sup>2</sup> Levin, J. (2021) Paying Polluters: Federal Financial Support to Oil and Gas in 2020. Environmental Defence Canada. Available: <a href="https://environmentaldefence.ca/wp-content/uploads/2021/04/Federal-FossilFuelSubsidies-April-2021.pdf">https://environmentaldefence.ca/wp-content/uploads/2021/04/Federal-FossilFuelSubsidies-April-2021.pdf</a>

<sup>&</sup>lt;sup>3</sup> Levin, J. (2022) Buyer Beware: Fossil Fuels Subsidies and Carbon Capture Fairy Tales in Canada. Environmental Defence Canada. Available: https://environmentaldefence.ca/wp-content/uploads/2022/03/Buyer-Beware-FFS-in-2021-March-2022.pdf

<sup>&</sup>lt;sup>4</sup> BloombergNEF (2021) Climate Policy Factbook. Available: https://assets.bbhub.io/professional/sites/24/BNEFClimate-Policy-Factbook\_FINAL.pdf

<sup>&</sup>lt;sup>5</sup> Geddes, A. *et al.* (2020) Doubling Back and Doubling Down: G20 scorecard on fossil fuel funding. International Institute for Sustainable Development. Available https://www.iisd.org/publications/g20-scorecard

<sup>&</sup>lt;sup>6</sup> See: Governments are choking funding for new overseas oil and gas projects. Will the strategy work? | Financial Post

<sup>&</sup>lt;sup>7</sup> IEA (20210) Net Zero by 2050: A Roadmap for the Global Energy Sector. Available: https://www.iea.org/reports/net-zero-by-2050;

reductions in the next decade along a pathway to zero emissions are already at hand. Moreover, their costs are falling dramatically: the cost of renewable energies have plummeted to the point that they are cheaper than fossil fuels. However, fossil fuels retain an incumbent advantage in Canada – for example, because the infrastructure is already in place. Fossil fuel subsidies maintain that advantage and divert resources from these proven, more cost effective solutions that are available on the timeframes required to mitigate climate change.

For example, in order to ramp up solar and wind production sufficiently to decarbonize electricity production, the necessary investment has been estimated at \$8 billion a year until 2050. In contrast, in 2021, the federal government announced \$960 million for renewable energy and grid modernization projects – but over four years. Budget 2022 included a further \$600 million for this program - spread out over 7 years. This is a fraction of the government support that is made available to oil and gas companies and projects every year. Similarly, in order to tackle the emissions that come from residential and commercial buildings, the federal government, in partnership with the provinces, should be investing \$10–15 billion per year for ten years. Though the federal government has made significant investments in retrofits, the tally falls far short of what is needed at approximately \$9 billion over seven years, much of which is in the form of loans. Between 2018 and 2020, on average G20 countries provided two and a half times more public finance to fossil fuels than they did for renewable energy. During those same years, Canada provided 14 times more fossil fuel finance than support for renewables.

The scale of spending needed to tackle the climate crisis is significant. Given that governments don't have infinite spending capacity, they must be strategic. Oil and gas companies have profited immensely for decades from public resources. Instead of continuing to subsidize the sector, the government must implement strong regulatory frameworks that ensure oil and gas companies are doing their fair share, while investing in the activities that put us on a climate–aligned pathway.

We urge the government to demonstrate true leadership by going beyond the commitments made to date and eliminate *all* subsidies, public financing and other forms of financial support

<sup>&</sup>lt;sup>8</sup> Lazard (2020) Levelized Cost of Energy Analysis—Version 13.0. Available: https://www.lazard.com/media/451419/lazards-levelized-cost-of-energy-version-140.pdf

<sup>&</sup>lt;sup>9</sup> CanREA (2021) Powering Canada's journey to net-zero. Available:

https://renewablesassociation.ca/wpcontent/uploads/2021/11/CanREAs2050Vision\_Nov2021\_web.pdf <sup>10</sup> Government of Canada (2021) Canada Invests Over \$960-Million in Renewable Energy and Grid Modernization Projects. Available: https://www.canada.ca/en/natural-resources-canada/news/2021/06/canada-invests-over-960-million-in-renewable-energy-and-grid-modernization-projects.html

<sup>&</sup>lt;sup>11</sup> Government of Canada (2022) Budget 2022: A Plan to Grow Our Economy and Make Life More Affordable. Chapter 3: Clean Air and a Strong Economy. Available: https://budget.gc.ca/2022/report-rapport/chap3-en.html

<sup>&</sup>lt;sup>12</sup> Green Budget Coalition (2021) Canada's renovation wave: a plan for jobs and climate. Available: https:// greenbudget.ca/canadas-renovation-wave/

<sup>&</sup>lt;sup>13</sup> Tucker, B. & DeAngelis, K. (2021) Past last call: G20 public finance institutions are still bankrolling fossil fuels. Oil Change International, Friends of the Earth US. Available: http://priceofoil.org/content/uploads/2021/10/ Past-Last-Call-G20-Public-Finance-Report.pdf

from the Government of Canada and federal crown corporations directed to the oil and gas sector by the end of 2022 and shifting this spending power towards climate solutions.

#### Align with international definitions; Drop 'Inefficient' From Commitments

Canada must align with international definitions and best practice of what constitutes a fossil fuel subsidy – specifically by adopting the World Trade Organization (WTO) definition. <sup>14</sup> Though the Government of Canada has chosen to distinguish between subsidies and public financing, public financing should be considered a fossil fuel subsidy', based on the 'complementarity provision' (§10, 1.02) of the Export Development Act and the definition of subsidy by the WTO. <sup>15</sup> This is especially important given Export Development Canada's ongoing public financing of the fossil fuel sector. Public finance is often given at concessional (below-market) rates via longer rates of return, lower interest rates, and grant components. This means that public finance for energy acts as a subsidy that tips the scales in favour of the projects it supports. Even where public finance is not concessional, the high credit ratings of public finance institutions act to reduce the risk for other entities as this finance is ultimately government-backed. <sup>16</sup> This public support means more oil and gas projects go forward than would otherwise be possible, at a time when we need to be using public finance to catalyze a just transition that protects workers and communities.

Environmental Defence was encouraged to see the Government of Canada drop the word 'inefficient' from the commitment made to voters during the election campaign. In the past, the government has used this loophole to excuse continued subsidies by deeming some spending programs or tax breaks are "efficient". For example, in 2019 ECCC published their draft approach on non-tax subsidies. ECCC used unclear definitions to justify their conclusion that only four of the government programs that the department reviewed qualify as subsidies, and that none of them are considered to be inefficient. A country should not use definitions of subsidies or inefficient as a way to skirt the review and phase-out of particular subsidies.<sup>17</sup>

#### A Binding Commitment and Increased Accountability

Canada has a poor track record when it comes to fossil fuel subsidies and supports. Since the Government of Canada initially committed to ending fossil fuels subsidies in 2009, Canada's level of subsidies and support for the fossil fuel industry has only increased. While other

<sup>&</sup>lt;sup>14</sup> WTO. Agreement on Subsidies and Countervailing Measures ("SCM Agreement"). Available: https://www.wto.org/english/tratop\_e/scm\_e/subs\_e.htm

<sup>&</sup>lt;sup>15</sup> Censkowsky, P. et al. (2022) Paris Alignment of Export Credit Agencies: Case Study #4: Canada. Perspectives Climate Research. Available:

https://www.perspectives.cc/public/fileadmin/user\_upload/ECA\_Canada.pdf

<sup>&</sup>lt;sup>16</sup> Tucker, B. & DeAngelis, K. (2020) Still Digging: G20 governments continue to finance the climate crisis. Oil Change International & Friends of the Earth United States.

Available:https://priceofoil.org/content/uploads/2020/05/G20-Still-Digging.pdf

<sup>&</sup>lt;sup>17</sup> Levin, J. (2019) Comments on Canada's approach on non-tax inefficient fossil fuel subsidies. Available: https://environmentaldefence.ca/report/nontaxfossilfuelsubsidies-2019/

countries have completed their G20 peer reviews in 12-18 months, it has been four years since Canada committed to a peer review process with Argentina, with very little progress to show.

In order to ensure accountability, the government must bind their commitment to end oil and gas subsidies and public financing in legislation, with clear timelines.

#### **Uphold the Polluter Pays Principles**

Oil and gas companies have profited immensely for decades from activities that are fueling the climate crisis and polluting our land and water. The costs resulting from the production and consumption of fossil fuels are enormous and are being downloaded onto governments. A 2015 report by the International Monetary Fund found that, when externalities are included, Canada provided \$63 billion to the oil and gas sector that year. According to the Canadian Medical Association, the burning of fossil fuels is responsible for \$53.5 billion in health—related costs each year in Canada. Cleaning up Alberta's oil patch—including the 90,000 inactive oil wells, toxic tailing ponds and ageing pipelines—could cost up to \$260 billion. Without changes to existing regulations, there is a risk that these cleanup costs will be left to taxpayers, as has happened in the past.

Over the past two years, many new funding programs have been created under the guise of environmental outcomes and job creation, such as the \$750 billion Emissions Reduction Fund or the \$1.7 billion provided to oil and gas companies to remediate inactive and orphan oil and gas wells. Ministers have said these programs are not fossil fuel subsidies. However, according to the internationally recognized WTO definition, these programs are fossil fuel subsidies. They lower the cost of production and doing businesses for oil and gas companies, resulting in increased profitability. They distort the market; even further benefiting fossils over less polluting solutions like renewables and the electrification of transport. These programs socialize the environmental cost of fossil fuel production, while allowing oil and gas companies to reap enormous benefits from public resources.

Furthermore, none of these programs did what policymakers claimed they wanted to achieve in terms of emissions reduction, environmental clean-up or job creation or retention. For example, an audit conducted of the Emissions Reduction Fund by the Commissioner of the Environment and Sustainable Development found the program was poorly designed, that there was no evidence that the funds were ensuring credible and sustainable emissions reductions and that there was no requirement that companies use these funds to support worker retention, despite

liabilities-are-hundreds

<sup>&</sup>lt;sup>18</sup> MF (2019) Global fossil fuel subsidies remain large: an update based on country-level estimates. Available:https://www.imf.org/en/Publications/WP/Issues/2019/05/02/Global-Fossil-Fuel-Subsidies-Remain-LargeAnUpdate-Based-on-Country-Level-Estimates-46509

<sup>&</sup>lt;sup>19</sup> Buchman, S. (2019) Climate change is more than just economics. Available: https://ipolitics.ca/2019/09/25/ climate-change-is-more-than-just-economics/

<sup>&</sup>lt;sup>20</sup> De Souza, M. et al. (2018) Alberta regulator privately estimates oilpatch's financial liabilities are hundreds of billions more than what it told the public. Available: https://www.nationalobserver.com/2018/11/01/news/alberta-regulator-privately-estimates-oilpatchs-financial-

this having been a key claim for the initial creation of the program. The commissioner concluded that the Emissions Reduction Fund is an inefficient use of taxpayer dollars.<sup>21</sup>

By putting taxpayers on the hook to clean up industry's mess, these programs violate the polluter pays principle enshrined in Canadian law.<sup>22</sup> These same outcomes could be reached – with no public cost – by putting regulations in place to require companies to invest their own funds into solutions. It is critical that governments use this period of high oil prices to ensure companies deal with their ongoing liabilities, including ageing infrastructure, and pay for their own emissions reductions.

#### **Ending Subsidies for CCUS and Fossil Hydrogen**

The commitments made by the Government of Canada are at risk of being undermined by weak implementation and new subsidies and public financing being made available to false solutions, including carbon capture, utilization and storage (CCUS), gas, and fossil-based hydrogen, such as the new CCUS investment tax credit. The tax credit was implemented against the recommendations from over 400 of Canada's leading academics and energy transition experts.<sup>23</sup>

Continued government support for gas, CCUS and fossil-based hydrogen contribute to expanded or prolonged fossil fuel production instead of the just energy transition needed to stay within 1.5°C limits.<sup>24</sup> This support would also be economically risky, ignoring the fact that renewable energy costs are dropping rapidly and are already vastly cheaper than most unabated fossil fuel use, let alone fossil fuels paired with CCUS.<sup>25</sup> These kinds of emissions reductions are incredibly expensive and not aligned with net-zero by 2050 goals because even perfectly functioning CCS (which does not yet exist) leaves behind 70-80% of life-cycle emissions of Canadian oil and gas.

Since 2000, governments in Canada have spent \$5.8 billion subsidizing CCUS. The Government of Canada provided \$2 billion of that. These enormous subsidies have resulted in a

<sup>&</sup>lt;sup>21</sup> Commissioner of the Environment and Sustainable Development (2021) Report 4—Emissions Reduction Fund—Natural Resources Canada. Office of the Auditor General of Canada. Available: https://www.oag-bvg. gc.ca/internet/English/parl\_cesd\_202111\_04\_e\_43912.html

<sup>&</sup>lt;sup>22</sup> Smith, R. & Hauptman, G. (2020) The Polluter-Pays-Principle in Canadian Legislation. Our Living Waters. Available: https://www.ourlivingwaters.ca/legislating\_restoration

<sup>&</sup>lt;sup>23</sup> Letter to Minister Freeland from +400 scientists, academics, and energy system modellers in January 2022. Available: https://cehoicka.lab.yorku.ca/files/2022/01/Letter-from-Academics-re-CCUS-tax-investment-credit\_January-2022-4.pdf?x98920

<sup>&</sup>lt;sup>24</sup> Center for International Environmental Law (2021) Confronting the Myth of Carbon-Free Fossil Fuels: Why Carbon Capture Is Not a Climate Solution. Available: https://www.ciel.org/reports/carbon-capture-is-not-a-climate-solution/

<sup>&</sup>lt;sup>25</sup> Sgouridis et al.(2019) Comparative net energy analysis of renewable electricity and carbon capture and storage. Nature. Available: <a href="https://www.nature.com/articles/s41560-019-0365-7">https://www.nature.com/articles/s41560-019-0365-7</a>; Muttitt, G. et al. (2021) Step Off the Gas: International public finance, natural gas and clean alternatives in the Global South. International Institute for Sustainable Development. Available: <a href="https://www.iisd.org/publications/natural-gas-finance-clean-alternatives-global-south">https://www.iisd.org/publications/natural-gas-finance-clean-alternatives-global-south</a>

yearly capture rate of less than 4 MT (representing 0.05% of Canada's emissions), most of which is used for enhanced oil production. Higher oil and gas prices made 2021 a windfall year for oil and gas companies, and are expected to make even more money this year. However, instead of using their own funds to pay for CCUS and emissions reductions, these companies are pushing for even more government subsidies.

It is conceivable that CCS might play a modest role in sectors that are extremely difficult to decarbonize, such as cement, once all real decarbonization options are exhausted. But the limited potential benefits of doing so would need to be weighed against the enormous costs and massive impacts of building carbon capture and transport infrastructure required to do so. Moreover, most sectors have alternatives, such as direct electrification. The Canadian Climate Institute has warned that if Canada relies too heavily on engineered forms of negative emissions technology that fail to prove viable, it could significantly increase the costs of reaching our climate commitments, or cause us to miss these targets altogether.<sup>27</sup>

### **Climate Strings on All Federal Spending**

When it comes to aligning government spending priorities with the climate crisis, the question cannot be whether an initiative is incrementally better than an alternative. The question must be whether the project is consistent with a commitment to limit warming to 1.5 degrees. Support must only be given to sectors that can achieve zero emissions.

The federal government of Canada has developed several new funding programs designed to facilitate rapid decarbonization and accelerate industrial transformation, including the new \$15 billion Canada Growth Fund, the \$8 billion Net Zero Accelerator and the \$1.5 billion Low-Carbon Fuels fund, as well as several smaller programs run through Natural Resources Canada and Innovation, Science and Economy Development Canada.

Unfortunately, none of these funding programs have been designed with climate conditions to ensure that they are compatible with achieving Canada's fair share efforts to limiting warming to 1.5 degrees.

This failure to design spending programs with robust conditions regarding climate pollution is concerning. Currently there is no mechanism or standard to ensure that these programs actually reduce carbon pollution – without that, it is possible that these programs will result in significant fossil fuel subsidies without any environmental benefit.<sup>28</sup> Furthermore, the strategic value of these funding programs is severely limited given that the Government of Canada has not developed industrial policy frameworks and roadmaps and sectoral carbon budgets to guide the

<sup>27</sup> Canadian Institute for Climate Choices (2021) Canada's Net Zero Future: Finding Our Way in the Global Transition. Available: https://climatechoices.ca/reports/canadas-net-zero-future/

<sup>&</sup>lt;sup>26</sup> Levin, J. (2022) Buyer Beware: Fossil Fuels Subsidies and Carbon Capture Fairy Tales in Canada. Environmental Defence Canada. Available: https://environmentaldefence.ca/wp-content/uploads/2022/03/Buyer-Beware-FFS-in-2021-March-2022.pdf

<sup>&</sup>lt;sup>28</sup> Levin, J. (2021) Climate Conditions on Government Spending Programs. Environmental Defence. Available: https://environmentaldefence.ca/report/climate-govt-spending/

decarbonization efforts of key sectors which have a role to play in a climate-safe future. That includes sectors such as steel, cement and agriculture, but not the oil and gas sector. The IEA's net zero roadmap found there is no room for new oil or gas fields to be developed after 2021, oil and gas production must decline by about 3-4% per year.<sup>29</sup> This is a global average; Canada should be going much more quickly if it is doing its fair share. Canada must leave 84%% of its remaining oil and 56% of its remaining fossil gas in the ground if the world is to have even a 50% chance of holding average global warming to 1.5°C.<sup>30</sup> New research from the International Institute for Sustainable Development finds that Canada and other wealthy, major fossil fuel producing nations must cut oil and gas production by 74% by 2030, with complete phase out by 2034, in order to ensure a 50% chance of not exceeding 1.5°C.<sup>31</sup>

#### **Close Carbon Pricing Loopholes**

Oil and gas producers pay among the lowest average carbon costs of any sector. Canada's approach to carbon pricing allows provinces to design their own systems for charging industrial emitters. Provinces like Alberta grant generous exemptions to oil and gas companies. These systems let oil and gas companies off the hook: around 80–90% of emissions from the oil and gas sector are exempt.<sup>32</sup>

These exemptions constitute an enormous fossil fuel subsidy. However, given that the approach varies widely by province, the exact amount is difficult to quantify. The significance of this subsidy can be better understood through a case study of Suncor– the oil and gas sector's largest emitter. In 2020, Suncor's emissions were 27.7 million tonnes (MT) of greenhouse gas pollution. <sup>33</sup> If it had paid the full carbon price in 2020 – that which Canadians are paying – of \$30 per tonne, that would have cost Suncor \$830 million. Instead, Suncor only paid \$59 million in 2020. <sup>34</sup> That difference – \$771 million – is an enormous yearly subsidy. Yet this subsidy doesn't even include all of the emissions generated by the oil and gas that Suncor produces. If the emissions that are created when the oil and gas is burned were also included, the pollution caused by Suncor is around 92 MT. That brings the costs of the company's carbon pollution to \$2.8 billion.

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<sup>&</sup>lt;sup>29</sup> IEA (20210) Net Zero by 2050: A Roadmap for the Global Energy Sector. Available: <a href="https://www.iea.org/reports/net-zero-by-2050">https://www.iea.org/reports/net-zero-by-2050</a>;

<sup>&</sup>lt;sup>30</sup> Welsby, D., Price, J., Pye, S. et al. (2021) Unextractable fossil fuels in a 1.5 °C world. Nature 597, 230–234. Available: https://doi.org/10.1038/s41586-021-03821-8

<sup>&</sup>lt;sup>31</sup> Calverley, D., & Anderson, K. (2022). Phaseout Pathways for Fossil Fuel Production Within Pariscompliant Carbon Budgets. Tyndall Centre, University of Manchester. Available: https://www.iisd.org/publications/report/phaseout-pathways-fossil-fuel-production-within-paris-compliant-carbon-budgets

<sup>32</sup> Environmental Defence (2018) Canada's oil & gas challenge. Available:

<sup>&</sup>lt;sup>32</sup> Environmental Defence (2018) Canada's oil & gas challenge. Available: https://environmentaldefence.ca/ report/canadas-oil-and-gas-challenge/

<sup>&</sup>lt;sup>33</sup> Suncor (2021) Climate report 2021. Available: https://sustainability.suncor.com/-/media/project/ros/shared/ documents/climate-reports/2021-climate-report-en.pdf

<sup>&</sup>lt;sup>34</sup> Rack, Y. (2022) Canada's biggest emitters are paying the lowest carbon tax rate. Corporate Knights. Available:https://www.corporateknights.com/climate-and-carbon/canadas-biggest-emitters-are-paying-the-lowestcarbon-tax-rate/

The Canadian Climate Institute found that the average cost signal in Canada is exceptionally low for large emitter programs, ranging from \$1.80 to \$25.60 per tonne, with an average price per tonne of \$4.96. Their conclusion was that with such low average prices, firms are unlikely to deploy the bulky investments in new technologies that Canada's climate commitments require. Closing the loopholes in Canada's carbon pricing framework will ensure oil and gas companies and other large emitters to invest their own funds in emissions reduction activities, negating the need for public spending.

#### **International Leadership**

We encourage the Government of Canada to play a leadership role in advocating for the quick and fair elimination of all forms of fossil fuel production subsidies and public financing in international policy processes including in the G7, G20, the WTO and the OECD. Given Germany's G7 leadership this year, there is a real window of opportunity for fossil fuel reform. However, we were disappointed that the Government of Canada has still not endorsed a WTO ministerial statement put forward by New Zealand and the European Union, and cosponsored by 45 members, urging the WTO to prioritize fossil fuel subsidy reform. The importance of the WTO as a multilateral body and using trade as a mechanism to further climate ambition is evident.

The window of opportunity to make a 1.5°C future possible is rapidly closing. The federal government shifting its fossil fuel support to instead build just, rights-upholding and clean energy systems in Canada and abroad is a critical and transformative step to set us on this trajectory. Delayed action will only bring more violent and devastating impacts to the climate crisis and to workers and communities that are currently economically reliant on oil and gas production.

<sup>&</sup>lt;sup>35</sup> Canadian Institute for Climate Choices (2021) 2020 expert assessment of carbon pricing systems. Available: https://publications.gc.ca/site/eng/9.900084/publication.html

<sup>&</sup>lt;sup>36</sup> MTEG Launch of the Fossil Fuel Subsidy Reform Ministerial Statement.. Available: https://www.wto.org/english/tratop\_e/tessd\_e/newzealand\_statement\_e.pdf