



Government of Yukon
Clean Energy Act
Sent via email to: cleanenergyact@yukon.ca

January 7th, 2022

RE: Public Discussion Comments for Government of Yukon's "Creating a Clean Energy Act for the Yukon"

Dear Government of Yukon,

Thank you for the opportunity to submit comments on the Creating a Clean Energy Act for the Yukon discussion paper. We are submitting these remarks in our capacity as conservation scientists on behalf of Wildlife Conservation Society (WCS) Canada. WCS Canada is a national non-government organization of scientists conducting research on species and ecosystems to inform conservation decisions. Our role is to provide long-term, site-based, research and syntheses of science that inform policy and practice and that support the implementation of effective conservation measures. We do this by providing technical advice and by engaging relevant decision-makers at all levels, from local to federal. WCS Canada scientists have been working in Yukon since 2004 on land use and protected areas planning, land and water management, wildlife conservation research, and policy applications for conservation science.

Purpose

The Government of Yukon is committed to reducing the Yukon's greenhouse gas (GHG) emissions, with the exception of mining emissions, by 45 per cent by 2030, reaching net-zero emissions across the Yukon's entire economy by 2050.

This target should be commended as it is on par with the Federal Government's ambitious commitment to reducing GHG emissions by 40-45% below 2005 levels by 2030. However, why is the mining industry exempted from this reduction? This is a major flaw and is unfair as mining emissions continue to go up in the Yukon while other sectors of the economy and society will have to work

WILDLIFE CONSERVATION SOCIETY CANADA
169 TITANIUM WAY
WHITEHORSE, YUKON, Y1A 0E9, CANADA
WWW.WCSCANADA.ORG

Chrystal Mantyka-Pringle
CMANTYKAPRINGLE@WCS.ORG
PHONE: (CAN) 867 393 2447

hard to reduce emissions. Ultimately it is also counterproductive as it will undermine the attainment of targets^{1,2}. The mining sector should be forced to be self-sufficient in their energy production rather than relying on the public electricity grid. Not only does the mining sector have to be treated as every other sector with a goal of reducing targets by 45% by 2030, this revised target needs to be supported by more intensive investment by Government in developing sources of renewable electricity (e.g., wind, solar, micro-hydro) across all sectors to make it work.

Vehicle Sales Targets

The following zero emissions vehicle sales targets are proposed for inclusion in the Yukon's clean energy legislation: 10 per cent of light duty vehicles sold in the Yukon will be zero-emission vehicles by 2025; and 30 per cent of light duty vehicles sold in the Yukon will be zero-emission vehicles by 2030.

Our concern with this target is that sales targets versus actual use are two separate things that need to be reported with the use of research surveys. Such an ambitious target is commendable, but just because we sell 10% more electric cars, are they solely being used with electricity year-round? What the government (Energy Solutions Centre) could do is provide substantially more information to prospective Electric Vehicle owners on the ever-changing types and capacities of these vehicles. For instance, see the report prepared by ICF International³. However, the technology is changing fast and consumers need readily available information to make good choices about purchasing in the future.

There is a huge opportunity to increase Electric Vehicle use by commuters in the Whitehorse area, but this will require re-charging options in town (at the workplace specifically, but also more widely). Government can facilitate charging options of various types, beyond just the Level 2 charging stations currently subsidized. For example, it could subsidize businesses to install more of the regular 120V charging stations (Level 1), which are the same as block-heater plug-ins, so that EV users can recharge vehicles while at work. Plug-in hybrids using Level 1 chargers are still the most useful and resilient option for Yukon EV users now.

Given the large proportional consumption of fossil fuels by commuting, government subsidies of electrified public transit with better scheduling, plus densification of the city, will also make a difference.

¹ D. Reid & H. Cooke. Comments by WCS Canada on Yukon Territorial Government's Documents "Our Clean Future: A Yukon Strategy for Climate Change, Energy and a Green Economy". 2021. Available here: <https://www.wcscanada.org/Policy-Comments/Climate-Change.aspx>

² L. Rifkind. Commentary: "Mining will bury us all". 2021. Yukon News. Available here: <https://www.yukon-news.com/opinion/commentary-mining-will-bury-us-all/>

³ ICF International. Electric Vehicle Investigation. 2016. Available here: https://yukonenergy.ca/media/site_documents/Yukon_EV_Investigation_Report.pdf

Voluntary versus Regulatory Approaches

The question was asked as to which approach would we prefer for reaching the Yukon's zero-emission vehicle sales target: a voluntary approach or a regulatory approach?

We recommend that a mix of voluntary and regulatory approaches is required. Within a voluntary approach, the incentive to purchase electric vehicles is enhanced with subsidies (as are presently available), although that these are partly inequitable because the purchaser has to have substantial capital up front to take advantage of the subsidy. But subsidies will still need to be a prominent piece until the market price for an electric vehicle gets down to, or below, a regular fossil fuel vehicle. If a regulatory approach means pushing the vehicle sales industry to submit to future deadlines and incentives for ending sales of fossil fuel vehicles (as in the proposed targets for legislation), then we argue that this should also be part of the mix of approaches. A big problem in the north is the long-distances and the need for back-country vehicles (not ATVs but just bad roads). The electric vehicle industry has not produced vehicles to deal with these issues yet and so implementing a mixed carrot (i.e. voluntary) and stick (i.e. regulatory) policy agenda is needed.

Heating with Biomass

Transitioning our heating sources more to the burning of biomass (harvested wood) is problematic and counterproductive as such burning will add to Yukon's GHG emissions. Right now the Government does not have to report these additional GHG emissions because of a quirk of accounting built into the United Nations Framework Convention on Climate Change (UNFCCC) whereby burning wood is lumped with wind, solar, and other renewable energy sources in one category that is deemed carbon neutral. This is a logical fallacy that has been repeatedly challenged in the scientific literature and policy discussions^{4, 5}. Yukon Government is mistaken by claiming that biomass burning is low carbon when it is actually adding to our emissions annually. As outlined in our original comments to the Yukon Government's "Our Clean Future"⁶, more reliance on biomass energy will produce a net annual increase in our carbon emissions from the heating sector, whether or not they are reported. Government needs to move to truly low carbon sources of renewable energy (e.g., solar, wind and geothermal) in its choice of sectors to subsidize and invest in.

⁴ Norton, M. 2019. Serious mismatches continue between science and policy in forest bioenergy. *Global Change Biology Bioenergy*. DOI: 10.1111/gcbb.12643

⁵ Schlesinger, W.H. 2018. Are wood pellets a green fuel? *Science* 359 (6382): 1328-1329. DOI: 10.1126/science.aat2305

⁶ D. Reid and H. Cooke 2021 op. cit.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, reading "CMPringle".

Dr. Chrystal Mantyka-Pringle

Conservation Planning Biologist

A handwritten signature in black ink, reading "Donald G Reid".

Dr. Donald Reid

Conservation Scientist