

British Columbia Municipalities: Re-evaluation of Climate Action Plans and FCM-ICLEI Partners for Climate Protection Program Participation

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To: British Columbia Municipal Councils

Subject: Concerns Regarding Climate Action Plans and the FCM-ICLEI's Partners for Climate Protection Program Framework

Executive Summary

This report advises British Columbia's municipalities to critically reevaluate participation in the FCM-ICLEI Partners for Climate Protection (PCP) Program and the implementation of Climate Action Plans. While marketed as progressive climate initiatives, these programs often impose significant financial and administrative burdens on municipalities without yielding proportional benefits.

British Columbia is a **net carbon sink**, with its extensive forests, wetlands, and agricultural lands naturally absorbing more CO₂ than the province emits. This reality challenges the necessity and cost-effectiveness of adopting net-zero frameworks that may not align with local priorities.

Importantly, British Columbia's municipalities are **not legally required** to achieve net-zero emissions under provincial or federal law. While the province has established long-term climate goals through the **CleanBC Roadmap to 2030**, including a target of net-zero emissions by 2050, these remain broad provincial objectives rather than mandatory municipal obligations. Participation in programs such as the PCP is entirely voluntary, and there are no penalties for opting out.

Furthermore, municipalities bear **full financial and legal liability** for any failures in implementing PCP programs, while ICLEI and its funding partners explicitly disclaim responsibility. This places undue risk on local governments, diverting critical resources from essential municipal priorities.

Redirecting municipal resources from externally driven climate programs to locally prioritized issues—such as **housing affordability, energy security, wildfire resilience, adaptive infrastructure, and public safety**—will better serve residents and ensure long-term resilience.

Key Recommendations:

1. **Pause and Reevaluate** PCP participation and Climate Action Plans, ensuring they align with local needs and fiscal realities.
2. **Ensure Transparency** through financial audits and public consultation regarding climate program costs and impacts.
3. **Withdraw from the PCP Program** and redirect funds to local initiatives that provide tangible community benefits.
4. **Prioritize Practical Environmental Stewardship** over costly net-zero targets, focusing on wildfire management, water conservation, and pollution prevention.
5. **Address Immediate Municipal Needs**, including housing affordability, infrastructure resilience, and economic development, to enhance community well-being.

By focusing on **practical, locally driven solutions**, municipalities can protect their financial stability, uphold property rights, and support community growth without unnecessary external obligations.

Responsibilities of Council Members

Under **Section 115** of the **Community Charter**, every council member has the following responsibilities:

- **To consider the well-being and interests of the municipality and its community.**
- **To contribute to the development and evaluation of the policies and programs of the municipality respecting its services and other activities.**
- **To participate in council meetings, committee meetings, and meetings of other bodies to which the member is appointed.**
- **To carry out other duties assigned by the council.**
- **To carry out other duties assigned under this or any other Act.**

These provisions confirm that decision-making authority rests solely with the council, not with staff or consultants.

Oath of Office:

According to **Section 120** of the **Community Charter**, a person elected or appointed to office on a municipal council must make an oath or solemn affirmation of office within the

prescribed time limits. The specific wording of the oath is provided in the **Local Government Oath of Office Regulation (B.C. Reg. 137/2022)**. The oath includes a commitment to:

- **"Truly, faithfully, and impartially execute the office to the best of my knowledge, skills, and ability."**

This sworn commitment obligates councillors to uphold the law, act in the best interests of residents, and make independent, informed decisions.

While staff and consultants may advise, their role is not to decide. The council alone holds the final authority to approve, modify, or reject programs like the ICLEI Partners for Climate Protection (PCP) and associated Climate Action Plans.

Given this mandate, council must carefully evaluate whether such programs align with local priorities or impose unnecessary costs and external controls.

Legal Context: International, Federal, and Provincial Requirements

Municipalities in British Columbia must navigate various climate policies within international, federal, and provincial frameworks. While agreements like the **Paris Agreement** set national targets, they **do not legally bind municipalities**. Federal and provincial policies provide guidance but allow local governments to set their own priorities and determine the most effective approaches to environmental stewardship.

1. The Paris Agreement

- The **Paris Agreement** is an international treaty that commits **countries, not municipalities**, to Nationally Determined Contributions (NDCs) for greenhouse gas reductions.
- Participation in programs like ICLEI's Partners for Climate Protection (PCP) is **voluntary**, and British Columbia municipalities are under **no legal obligation** to implement net-zero policies aligned with the agreement.

2. Federal Legislation—The Canadian Net-Zero Emissions Accountability Act

- The **Canadian Net-Zero Emissions Accountability Act** commits Canada to achieving net-zero GHG emissions by 2050 but imposes **no mandatory requirements on municipalities**.
- Municipalities remain free to determine their own environmental priorities and strategies without federal enforcement under this act.

3. British Columbia's Climate Policy and Legislative Framework

- British Columbia has implemented climate-related policies, such as the **CleanBC Roadmap to 2030**, which outlines provincial emission reduction targets and strategies. However, these policies do **not impose legally binding net-zero obligations on municipalities**.
- The **BC Energy Step Code**, a voluntary compliance pathway, allows municipalities to adopt higher building efficiency standards at their discretion but does **not mandate net-zero adoption**.
- Municipalities have the authority to decide whether to integrate provincial climate initiatives into their local planning based on community needs and financial capacity.

British Columbia municipalities are **not legally required** to adopt net-zero policies or participate in programs like ICLEI's PCP. Local governments maintain full autonomy to develop policies that reflect the unique needs, priorities, and financial considerations of their communities, ensuring a balanced and practical approach to environmental stewardship.

Liability Waivers and What They Mean for Municipalities in British Columbia

Although ICLEI, the Federation of Canadian Municipalities (FCM), and the Government of Canada fund and administer programs such as the Partners for Climate Protection (PCP) program, these organizations have **explicitly disclaimed liability** for the outcomes or impacts of municipal participation.

Key Disclaimer (PCP Webpage):

- *“This project was carried out with assistance from the Green Municipal Fund, a Fund financed by the Government of Canada and administered by the Federation of Canadian Municipalities, and from ICLEI – Local Governments for Sustainability (Management) Inc. Notwithstanding this support, the views expressed are the personal views of the authors, and ICLEI Canada, the Federation of Canadian Municipalities, and the Government of Canada accept no responsibility for them.”*

What Does This Mean for British Columbia Municipalities?

1. Voluntary Adoption:

- Programs modeled after PCP milestones are **voluntary**, and municipalities are under **no legal obligation** to participate. Local governments can choose to withdraw from these programs at any time without facing legal penalties.

2. No External Accountability:

- ICLEI, FCM, and the Government of Canada have **waived responsibility** for any financial losses, policy failures, or legal disputes arising from municipal participation. The burden of risk falls solely on the participating municipality.

3. Local Risk Exposure:

- Municipalities bear **full legal and financial accountability** for any cost overruns, compliance challenges, or policy impacts associated with their climate plans. This includes potential liabilities related to infrastructure changes, regulatory compliance, and taxpayer-funded expenditures.

4. Financial Uncertainty:

- While programs may offer **initial grant funding**, municipalities must cover the long-term costs of implementation, monitoring, and reporting. These expenses can amount to **millions of dollars** over time, without guarantees of success or financial protection from the funding organizations.

Given these liability disclaimers, municipalities in British Columbia should exercise caution when considering participation in externally driven climate programs, ensuring that any commitments align with local priorities, financial capacity, and risk tolerance.

Data Collection Concerns

The Climate Action Plan requires extensive data collection at both the corporate (municipal operations) and community levels. These data collection requirements, outlined in the PCP Milestone One Protocol Handbook [8], are repeated **annually or biannually** and include:

Corporate Data Collection Requirements:

- Tracking **energy consumption** from all sources, including non-CO₂-emitting sources.

- Recording **electricity usage** for all municipal lighting annually.
- Monitoring energy consumption for **water and wastewater facilities**.
- Reporting fuel sources and emissions from all **municipal buildings and facilities**.
- Conducting **waste audits** to categorize and measure all waste materials, from food waste to electronics.
- Calculating the **methane potential** of landfill waste and assessing decay rates annually.
- Collecting data on fuel usage for all **municipal fleet vehicles**, including public transit and staff commuting patterns.

Community-Wide Data Collection Requirements:

- Emissions from residential, commercial, and industrial buildings, including **fuel and electricity consumption**.
- Fuel sales data and kilometers traveled by all vehicle types, public transit, and private transportation within the county.
- Monitoring emissions from **industrial processes and wastewater treatment**.
- Detailed solid waste data, including livestock counts and methane potential.

These requirements represent a **significant administrative burden** and raise serious **ethical and privacy concerns**, such as:

- **Infringement on privacy:** Residents and businesses may not be aware that their energy and waste habits are being tracked, leading to potential distrust in local government.
- **Data security risks:** Sensitive information is often managed by third-party organizations such as ICLEI, raising concerns about data breaches and potential misuse.
- **Profit-driven motives:** Data collected is often used to market "green energy" products, benefiting corporate interests rather than prioritizing genuine environmental stewardship.

This level of surveillance and data harvesting could be seen as disproportionate where local environmental initiatives can be achieved without such invasive measures.

PCP Cost Projections

Participation in the PCP program is often marketed as a low-cost initiative; however, significant hidden costs exist [7]. These financial demands disproportionately burden rural and smaller municipalities with recurring expenses tied to externally driven objectives.

Estimated Costs for PCP Participation and Implementation

Milestone/Initiative	Estimated Cost Range*
Baseline Emissions Inventory	\$10,000–\$50,000
Emissions Reduction Targets	\$5,000–\$25,000
Local Action Plan Development	\$20,000–100,000
Implement Action Plan	\$50,000–1,000,000+
Monitor and Report Results	\$10,000–50,000 annually
Municipal Fleet Upgrades	\$500,000–5,000,000+
EV Charging Stations	\$100,000–1,000,000+
Municipal Building Upgrades	\$1,000,000–10,000,000+
Smart City Technology	\$500,000–5,000,000+
Circular Economy Initiatives	\$1,000,000–10,000,000+
15-Minute City Model	\$5,000,000–50,000,000+
Active Transportation Networks	\$1,000,000–20,000,000+
Urban Densification	\$5,000,000–100,000,000+

Total Cost Range:

- **Modest Implementation:** \$8.2 million
- **Comprehensive Implementation:** \$212 million+

These conservative estimates underscore the financial burden imposed by PCP participation and Climate Action Plan implementation. A thorough cost analysis of the program expenditures to date and anticipated future costs is essential.

British Columbia's CO₂ Emissions and Carbon Sequestration Capacity

Provincial Emissions

British Columbia (BC) has a population of approximately **5.2 million residents**. Using Canada's national average per capita emissions of **14.2 tonnes of CO₂ per year**, BC's estimated gross emissions are calculated as follows:

- **5.2 million residents × 14.2 tonnes CO₂ per resident per year = 73.84 million tonnes CO₂ annually.** [(1)]

Thus, British Columbia's gross annual CO₂ emissions are estimated at **73.84 million tonnes**.

British Columbia's Carbon Sequestration Capacity

BC's vast and diverse ecosystems serve as powerful carbon sinks, absorbing substantial amounts of CO₂ annually. Below is an overview of BC's major ecosystems, their estimated areas, and their carbon sequestration capacities.

1. Forests

- **Area:** Approximately **55 million hectares**, covering **58%** of the province's land area. [(2)]
- **Sequestration Rate:** An estimated **7.7 tonnes of CO₂ per hectare per year**. [(3)]
- **Total Sequestration:**
 - **55 million hectares × 7.7 tonnes CO₂/hectare/year = 423.5 million tonnes of CO₂ absorbed annually.**

2. Alpine Tundra, Icefields, and Glaciers

- **Area:** Approximately **33 million hectares**, covering about **35%** of the province. [(2)]
- **Sequestration Contribution:** Minimal, as icefields and glaciers do not actively sequester carbon, but they play a role in climate regulation and water storage.

3. Freshwater Ecosystems (Lakes, Rivers, and Wetlands)

- **Area:** Approximately **2.5 million hectares**. [(4)]
- **Sequestration Rate:** An estimated **1.85 tonnes of CO₂ per hectare per year**. [(5)]
- **Total Sequestration:**

- $2.5 \text{ million hectares} \times 1.85 \text{ tonnes CO}_2/\text{hectare/year} = \mathbf{4.63 \text{ million tonnes of CO}_2 \text{ absorbed annually.}}$

4. Grasslands

- **Area:** Approximately **1 million hectares**, found in regions such as the Okanagan, Similkameen, and Kettle Valleys. [(6)]
- **Sequestration Rate:** An estimated **2.5 tonnes of CO₂ per hectare per year**. [(6)]
- **Total Sequestration:**
 - $1 \text{ million hectares} \times 2.5 \text{ tonnes CO}_2/\text{hectare/year} = \mathbf{2.5 \text{ million tonnes of CO}_2 \text{ absorbed annually.}}$

5. Agricultural Lands

- **Area:** Approximately **4.6 million hectares**, within BC's Agricultural Land Reserve (ALR). [(7)]
- **Sequestration Rate:** An estimated **0.5 tonnes of CO₂ per hectare per year**, based on conservative soil management practices. [(8)]
- **Total Sequestration:**
 - $4.6 \text{ million hectares} \times 0.5 \text{ tonnes CO}_2/\text{hectare/year} = \mathbf{2.3 \text{ million tonnes of CO}_2 \text{ absorbed annually.}}$

6. Marine Ecosystems (Coastal Areas, Fjords, and Kelp Forests)

- **Area:** Data not fully quantified.
- **Sequestration Contribution:** Marine vegetation, such as kelp forests, has high sequestration potential, but reliable estimates are not yet available. [(9)]

Net CO₂ Balance Calculation

Total Estimated Annual Carbon Sequestration:

- **Forests:** 423.5 million tonnes CO₂ [(3)]
- **Freshwater Ecosystems:** 4.63 million tonnes CO₂ [(5)]
- **Grasslands:** 2.5 million tonnes CO₂ [(6)]
- **Agricultural Lands:** 2.3 million tonnes CO₂ [(8)]

- **Total Sequestration: 432.93 million tonnes CO₂ annually**

Net Calculation:

- **Total Emissions:** 73.84 million tonnes CO₂ [(1)]
- **Total Sequestration:** 432.93 million tonnes CO₂
- **Net Balance:** -359.09 million tonnes CO₂ annually

Conclusion:

British Columbia is a **significant net carbon sink**, absorbing approximately **359.09 million tonnes more CO₂** than it emits annually.

Ecosystems Not Yet Fully Included in the Calculation

Several ecosystems contribute to carbon sequestration but have yet to be fully quantified, including:

- **Urban Green Spaces:** Parks, green roofs, and urban forests. [(9)]
- **Riparian Zones:** Vegetated areas along rivers and lakes that provide additional sequestration potential. [(9)]
- **Aquatic Vegetation:** Underwater ecosystems, such as kelp forests, which sequester carbon at high rates. [(9)]

Note: The sequestration rates and areas are estimates based on available data and may vary with different management practices and environmental conditions. KICLEI Canada is available to collaborate with provincial and municipal GIS departments to refine these calculations using exact data for ecosystem coverage.

Redirecting Resources to Local Priorities

Given British Columbia's significant carbon-absorbing landscapes—forests, wetlands, and agricultural lands—continued participation in programs focused on net-zero targets diverts critical resources away from pressing local issues that fall under municipal jurisdiction.

In Canada, municipalities operate under the authority of provincial governments, which delegate specific responsibilities. While responsibilities may vary slightly across provinces, the core municipal duties in British Columbia generally include:

- **Housing Availability:** Addressing rising housing costs and availability challenges to ensure safe, accessible housing for all residents. Municipal policies must protect **property rights** and prevent overregulation that restricts rural development, such as excessive zoning restrictions that limit housing expansion in small communities.
- **Energy Security:** Ensuring **affordable and reliable energy** to support households, businesses, and community infrastructure. Expanding access to energy sources, including natural gas and alternative energy options, is crucial for supporting economic development, especially in rural and remote areas where energy options are limited.
- **Land Use Planning and Development:** Promoting balanced growth through **zoning policies** that support both urban and rural communities. Municipalities should resist centralized “sustainable development” frameworks that impose rigid growth restrictions and disproportionately favor urban centers at the expense of rural livelihoods.
- **Infrastructure Maintenance and Expansion:** Ensuring the upkeep and improvement of critical infrastructure such as **roads, bridges, water, and wastewater systems** to support growing communities and economic activity.
- **Transportation Planning:** Providing **accessible, efficient, and affordable transportation options** while avoiding policies that discourage private vehicle use, impose mobility restrictions, or limit parking near local businesses in favor of restrictive urban development strategies.
- **Emergency Services and Public Safety:** Supporting **police, fire, and paramedic services** to enhance community safety, including wildfire preparedness, rural emergency response capabilities, and mental health support initiatives.

- **Waste Management:** Overseeing **efficient waste collection, recycling, and disposal services** that align with environmental stewardship goals without imposing costly regulatory burdens on residents and businesses.
- **Parks and Recreation:** Maintaining and expanding **green spaces, recreational facilities, and community programs** that enhance quality of life, encouraging responsible land stewardship without excessive restrictions.
- **Economic Development:** Promoting **job creation and local industry growth** to sustain vibrant, self-reliant communities. Municipal policies should prioritize the needs of **small businesses, agriculture, and local entrepreneurship** rather than relying on foreign investment and corporate chains that can undermine the local economy.
- **Public Health and Social Services:** Collaborating with health authorities to address community well-being, including mental health resources, addiction services, and homelessness prevention, with a focus on **locally driven solutions**.
- **Government Accountability:** Strengthening **transparency and fiscal responsibility** to restore public trust and ensure that taxpayer funds are used efficiently and effectively.

Municipal governments in British Columbia must focus on core responsibilities that **directly impact residents** and avoid diverting resources toward global climate initiatives that fall outside their jurisdiction.

Redirecting funds and efforts toward these **critical community needs** better serves residents and ensures that municipal governments remain focused on local priorities. This approach prevents the imposition of costly net-zero policies that do not align with British Columbia's natural environmental advantages or the immediate concerns of its citizens.

Recommendations for British Columbia Municipalities

1. **Pause and Reevaluate the PCP Program and Climate Action Plans:**
 - Conduct a **comprehensive review** of the PCP program and climate action plans, including public consultation, to ensure they align with **local priorities, economic realities, and financial capacities**.
 - Assess the **cost-effectiveness and feasibility** of continuing with the data-driven milestone-based framework promoted by ICLEI and the FCM.

2. Improve Transparency and Accountability:

- Disclose **all costs already incurred** under the PCP program and Climate Action Plans, including consultation fees, data collection expenses, and projected liabilities to taxpayers.
- Conduct an **independent financial audit** of climate-related spending to determine the long-term fiscal impact on municipal budgets and ensure prudent use of public funds.
- Engage residents and stakeholders in **public consultations** to restore trust, foster transparency, and allow for informed decision-making.

3. Withdraw from the PCP Program and Halt Climate Action Plan Implementation:

- Immediately **withdraw from the ICLEI Partners for Climate Protection (PCP) program** or similar externally driven milestone frameworks that may not reflect British Columbia's natural carbon sink advantages or local priorities.
- Cease the development and implementation of climate action plans that impose **unnecessary financial and administrative burdens** tied to net-zero targets.
- Redirect municipal resources toward **practical, community-driven initiatives** that provide measurable local benefits without undue regulatory constraints.

4. Prioritize Local Environmental Stewardship and Practical Solutions:

- Focus on protecting and enhancing **natural carbon sinks**—forests, wetlands, and agricultural lands—that already absorb significant amounts of CO₂, reinforcing BC's environmental strengths.
- Develop cost-effective programs to address **pollution prevention, water quality, and waste management** that align with local needs and economic sustainability.
- Support practical, **locally driven environmental programs** that enhance carbon sequestration through responsible land management rather than relying on expensive “green” technologies and data-driven monitoring.
- Invest in **infrastructure resilience and emergency preparedness** to safeguard communities from wildfires, flooding, and other natural disasters.

5. Address Immediate Municipal Priorities:

- **Housing:** Reduce regulatory barriers and “green tape” to expand housing options, promote affordability, and support responsible development that meets local needs.
- **Energy Security:** Invest in reliable and affordable energy solutions, ensuring access to energy resources, particularly in rural and remote areas, to support economic growth.
- **Economic Development:** Focus on local job creation and business development by supporting small businesses, agriculture, and resource industries that are vital to community well-being.
- **Public Safety and Community Programs:** Strengthen emergency response services, including wildfire management, policing, and mental health supports to enhance community safety.
- **Government Accountability:** Maintain transparency and fiscal responsibility by ensuring all major policy decisions are made in the best interests of residents, with full disclosure of financial commitments.

Conclusion

British Columbia’s vast natural landscape provides significant carbon sequestration benefits, making net-zero frameworks and externally driven climate action plans **misaligned with the province’s environmental strengths and immediate municipal responsibilities.**

We respectfully urge British Columbia’s municipal councils to **reevaluate climate policies, prioritize transparency, and focus on practical, community-driven solutions** that reflect the unique needs and financial realities of their communities.

Sincerely,

Maggie Braun, KICLEI Canada, info@kiclei.ca

Concerned Residents and Stakeholders of British Columbia Municipalities

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