

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

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To: Alberta Municipal Council's

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

Executive Summary

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

Alberta is a net carbon sink, with its vast forests, wetlands, grasslands, and agricultural lands naturally absorbing more CO₂ than the province emits. This fact challenges the necessity and cost-effectiveness of adopting net-zero frameworks that may not align with Alberta's economic and environmental priorities. Given the province's unique resource-based economy and focus on energy security, it is essential that climate policies reflect local needs rather than international directives.

Furthermore, Alberta's municipalities are under no federal or provincial legal obligation to meet emissions targets set by international agreements such as the Paris Accord. Participation in the PCP program remains entirely voluntary, with no penalties for opting out. Municipal leaders should recognize that their primary responsibility is to prioritize local interests, such as economic diversification and community resilience, rather than conforming to externally driven climate agendas.

A significant concern is the financial and legal liability placed on municipalities in implementing PCP programs. ICLEI and its funding partners explicitly disclaim responsibility, leaving municipalities solely accountable for any failures or financial shortfalls. This shifts risks onto local governments and diverts valuable resources away from essential priorities such as infrastructure development, economic growth, and public safety.

Redirecting municipal resources from externally driven climate programs to local priorities—such as **housing, energy availability, water management, rural-urban

development, and economic diversification—**will better serve Alberta's communities and ensure long-term sustainability.

Key Recommendations:

1. **Pause and Reevaluate** participation in the PCP program and Climate Action Plans in the context of Alberta's economic and environmental priorities.
2. **Ensure Transparency** through financial audits and public consultation on climate program costs, risks, and benefits.
3. **Withdraw from the PCP Program** and redirect resources to initiatives that deliver tangible, community-specific benefits.
4. **Focus on Practical Environmental Stewardship** by investing in pollution control, water conservation, and responsible land management, rather than costly net-zero targets.
5. **Prioritize Immediate Municipal Needs**, including energy security, infrastructure maintenance, and public safety, to promote sustainable economic and social development.

By emphasizing practical, locally driven solutions, Alberta's municipalities can safeguard financial stability, support property rights, and foster growth without unnecessary external obligations.

The Alberta Municipal Government Act and Council Authority

Under the **Municipal Government Act (MGA), RSA 2000, c M-26**, Alberta municipal councils have the legal responsibility to govern in the **best interests of their municipalities**, which inherently includes serving the **people who live and work in those communities**.

Specifically:

- **Section 153** of the MGA mandates that councillors must "**consider the welfare and interests of the municipality as a whole and bring to council's attention anything that would promote the welfare or interests of the municipality.**" This responsibility extends beyond infrastructure and operations to include the well-being of **residents, businesses, and property owners**.
- **Section 201(1)** confirms that councils are responsible for "**developing and evaluating the policies and programs of the municipality**" and for "**ensuring that**

the powers, duties, and functions of the municipality are appropriately carried out."

- Councillors swear an **Oath of Office** to "**diligently, faithfully, and to the best of my ability, fulfill the duties of my office.**"

These provisions make it clear that **decision-making power rests solely with elected municipal councils**—not with external consultants, third-party organizations, or administrative staff. Councils must ensure that participation in programs like **ICLEI's Partners for Climate Protection (PCP)** aligns with the municipality's **financial capacity** and the **needs and priorities of its people**.

While staff and consultants may provide advice and recommendations, their role is strictly **advisory**. 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, councils must carefully evaluate whether these programs truly align with the **needs of their residents** or if they impose **unnecessary costs** and **external controls** that could undermine local priorities and autonomy.

Legal Context: International, Federal, and Provincial Requirements

1. The Paris Agreement

- The Paris Agreement is a **non-binding international treaty** that commits **federal governments**, not municipalities, to greenhouse gas (GHG) reduction targets.
- Alberta municipalities are under **no legal obligation** to align their policies with the Paris Agreement or participate in ICLEI programs.

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

- The **Canadian Net-Zero Emissions Accountability Act** requires the federal government to achieve net-zero emissions by 2050.
- This legislation **does not impose mandates** on municipal governments regarding emissions reduction policies.²

3. Alberta's Provincial Climate Policies

- Alberta's **Emissions Management and Climate Resilience Act (EMCRA)** focuses on regulating industrial emissions but **does not impose net-zero targets on municipalities**.³
- The **Technology Innovation and Emissions Reduction (TIER) Regulation** applies exclusively to large industrial emitters and does not mandate municipal participation in net-zero programs.⁴

Liability Waivers and What They Mean for Municipalities

ICLEI, the **Federation of Canadian Municipalities (FCM)**, and the **Government of Canada** offer support for the PCP program but explicitly **waive all liability** for any legal, financial, or operational consequences municipalities may face.

PCP Program Disclaimer:

*"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."*⁵

Implications for Alberta Municipalities:

1. **Voluntary Participation:** Municipalities can **opt in or out** of the PCP program without legal penalties.
2. **Full Liability:** Municipalities bear **all financial and legal risks** associated with PCP participation.
3. **Financial Burden:** Long-term costs for program implementation fall entirely on municipalities, with no guarantees of success or liability protection.

Practical Example: Cost and Risk Projections

Participation in the PCP program is often marketed as a low-cost initiative; however, significant hidden costs exist. 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+
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:** \$7.2 million
- **Comprehensive Implementation:** \$192 million⁶

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

Alberta's CO₂ Emissions and Carbon Sequestration Capacity

Provincial Emissions

Alberta has a population of approximately **4.8 million residents** as of 2024.⁷ Using Canada's average per capita emissions of **14.2 tonnes of CO₂ per year**, Alberta's gross emissions are calculated as follows:

- **4.8 million residents × 14.2 tonnes of CO₂ per resident per year = 68.16 million tonnes of CO₂ annually**

Thus, Alberta's gross annual CO₂ emissions for the population are approximately **68.16 million tonnes**.

The Government of Alberta states their current emissions are **269.9 million tonnes**, which would include their industrial and resource sector.

Alberta's Carbon Sequestration Capacity

Net-zero programs often overlook **natural carbon sinks**, failing to recognize the substantial role that Alberta's ecosystems play in absorbing carbon dioxide. These programs apply a one-size-fits-all approach, disregarding the unique contributions of forests, wetlands, peatlands, and agricultural lands in mitigating CO₂ emissions.

Alberta's ecosystems naturally absorb vast amounts of CO₂, far exceeding the province's annual emissions. The estimated carbon sequestration by ecosystem type is as follows:

- **Forests** – Alberta's boreal forests cover approximately **38 million hectares**, absorbing an estimated **10 tonnes of CO₂ per hectare annually**, totaling **380 million tonnes of CO₂** absorbed each year. ⁸
- **Wetlands** – Wetlands span about **14.36 million hectares**, sequestering roughly **1.8 tonnes of CO₂ per hectare annually**, totaling **25.8 million tonnes of CO₂** absorbed annually. ⁹
- **Peatlands** – Alberta's peatlands cover approximately **5.8 million hectares**, with long-term carbon storage through slow organic accumulation. These ecosystems are estimated to store **hundreds of millions of tonnes** of carbon over centuries. ¹⁰
- **Agricultural Lands and Grasslands** – Alberta's agricultural soils and grasslands cover approximately **20 million hectares**, contributing to carbon sequestration through soil health practices and vegetation cover, with an estimated **15 tonnes of CO₂ per hectare annually**, totaling **300 million tonnes of CO₂** absorbed annually. ¹¹

Net CO₂ Balance

- **68.16 or 269.9 million tonnes (emissions) – 705.8 million tonnes (sequestered) = –637.64 million tonnes annually**

Alberta is a **net carbon sink**, absorbing approximately **637.64 million tonnes more CO₂** than it emits each year. This substantial carbon sequestration capacity highlights the misalignment between costly net-zero policies and Alberta's existing environmental strengths.

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: Alberta

Given Alberta's vast natural carbon sinks and resource-based economy, continued participation in programs focused on net-zero targets diverts critical resources away from pressing local issues that fall under municipal jurisdiction. Alberta's municipalities must prioritize their unique local needs rather than aligning with externally driven climate initiatives that may not serve the best interests of their communities.

In Canada, municipalities operate under the authority of provincial and territorial governments, which delegate specific responsibilities. While responsibilities may vary slightly by province, the core municipal responsibilities in Alberta generally include:

- **Housing Availability:** Addressing rising costs and availability challenges to ensure safe, accessible housing for all residents. Municipalities must protect property rights and resist over-regulation of rural lands that displace people and limit economic opportunities in smaller communities. Alberta's municipalities should focus on policies that support affordable housing solutions tailored to local demographics and workforce needs.
- **Energy Security:** Ensuring affordable and reliable energy sources to support households, businesses, and critical infrastructure. Alberta, as a leader in energy production, must prioritize local energy security, including expanding natural gas infrastructure, supporting energy diversification, and resisting externally imposed energy restrictions that could hinder economic growth.

- **Land Use Planning and Development:** Ensuring balanced growth that supports both urban and rural communities while preserving Alberta's unique landscape and economy. Municipalities should resist centralized "sustainable development" policies that disproportionately favor urban centers at the expense of small towns, rural communities, and agricultural operations.
- **Infrastructure Maintenance and Expansion:** Investing in the upkeep and development of essential infrastructure such as roads, bridges, water, and wastewater systems to support economic growth and quality of life. Alberta's municipalities must prioritize practical, cost-effective solutions that meet the needs of their residents without unnecessary external constraints.
- **Transportation Networks:** Providing efficient and accessible transportation options that serve residents and businesses alike. Municipalities should avoid restrictive policies that discourage private vehicle use or impose costly public transit initiatives that do not align with Alberta's geographic realities and reliance on personal and commercial vehicles.
- **Emergency Services and Public Safety:** Supporting police, fire, and paramedic services to enhance community safety, emergency preparedness, and disaster response, including mental health support services and rural emergency response capabilities.
- **Waste Management:** Overseeing efficient waste collection, recycling, and disposal programs that promote environmental stewardship while being cost-effective and locally driven. Municipalities must resist externally driven mandates that add unnecessary costs or reduce local autonomy in waste management practices.
- **Parks and Recreation:** Maintaining and expanding green spaces, recreational facilities, and community programs to support active and healthy lifestyles, with an emphasis on local decision-making and sustainable land management practices that reflect Alberta's cultural values and lifestyle.
- **Economic Development:** Promoting job creation, investment, and industry growth to sustain vibrant and resilient communities. Local governments must prioritize organic growth, entrepreneurship, and support for small businesses rather than catering to global investors or large corporations that do not contribute to long-term community sustainability.
- **Public Health and Social Services:** Collaborating with health agencies and social service providers to address community well-being, ensuring access to healthcare,

mental health services, and social programs tailored to Alberta's diverse population.

- **Government Accountability:** Strengthening transparency, fiscal responsibility, and public trust by ensuring that financial resources are directed toward local priorities and essential services rather than costly international programs that fall outside municipal jurisdiction.

Alberta's municipal governments must focus on these core responsibilities to best serve their communities and avoid diverting funds toward global initiatives such as climate action programs that impose additional financial burdens and limit local autonomy. Redirecting resources toward these pressing local needs will ensure that municipalities remain resilient, self-sufficient, and responsive to the unique challenges and opportunities within Alberta's dynamic economic landscape.

This approach avoids imposing **costly net-zero policies** that are misaligned with Alberta's existing **natural carbon advantage** and the immediate concerns of its citizens.

Recommendations

1. **Pause and Reevaluate the PCP Program and Climate Action Plans:**

- Conduct a comprehensive review of the PCP program and climate action initiatives, including thorough public consultation, to ensure they align with Alberta's local economic priorities, environmental realities, and financial capacities.
- Assess the cost-effectiveness and feasibility of continuing with the milestone-based framework, considering Alberta's vast natural carbon sinks and energy sector contributions.

2. **Improve Transparency and Accountability:**

- Disclose all costs already incurred under the PCP program and climate action plans, including consultant fees, data collection expenses, and long-term financial obligations to taxpayers.
- Conduct a detailed financial audit of climate-related spending to evaluate its impact on municipal budgets and ensure responsible resource allocation.

- Engage residents, businesses, and stakeholders in meaningful public consultations to foster trust and ensure transparency in decision-making processes.

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 milestone-based frameworks to prevent the imposition of externally driven policies that do not reflect Alberta’s economic strengths and environmental realities.
- Cease further development and implementation of climate action plans to avoid additional financial commitments and regulatory burdens that may undermine Alberta’s economic resilience and energy independence.
- Redirect municipal resources to locally driven initiatives that provide tangible benefits to residents and businesses, fostering self-reliance and economic growth.

4. Prioritize Local Environmental Stewardship and Practical Solutions:

- Focus on protecting Alberta’s natural carbon sinks—forests, wetlands, grasslands, and agricultural lands—that contribute to the province’s environmental sustainability without the need for costly net-zero policies.
- Develop cost-effective, locally controlled programs to improve pollution prevention, water conservation, and responsible land management that align with Alberta’s industrial and agricultural landscape.
- Implement practical environmental initiatives that enhance carbon sequestration and environmental resilience without excessive reliance on data collection or costly “green” technologies that do not align with Alberta’s needs.
- Strengthen infrastructure resilience and emergency preparedness to mitigate risks from natural disasters and ensure community safety.

5. Address Immediate Municipal Priorities:

- **Housing:** Reduce unnecessary regulations and streamline approvals to increase access to affordable housing while protecting property rights and supporting balanced urban and rural development.

- **Energy Security:** Invest in affordable and reliable energy infrastructure, leveraging Alberta's abundant natural resources to support communities and businesses.
 - **Economic Development:** Encourage local job creation, small business growth, and support for Alberta's industries to sustain long-term prosperity and community resilience.
 - **Public Safety and Community Services:** Enhance emergency response capabilities, policing, and fire services to ensure the safety and well-being of all residents.
 - **Government Accountability:** Promote fiscal responsibility, transparency, and prudent financial management to uphold public confidence in municipal governance.
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Conclusion

Alberta's natural carbon sequestration capabilities, diverse economic base, and energy-rich landscape demonstrate that net-zero frameworks and climate action plans imposed by external entities are misaligned with the province's needs and priorities. We respectfully urge municipal councils to reevaluate these policies, prioritize transparency, and focus on sustainable, locally driven solutions that serve the best interests of Alberta's residents.

Sincerely,

Maggie Braun, KICLEI Canada

info@kiclei.ca

Concerned Residents and Stakeholders of Alberta Municipalities

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