

CleanBC Review Submission

Local Government Peer Networks

Introduction

The <u>Community Energy Association</u> (CEA) is pleased to contribute this submission to the CleanBC Review on behalf of our Local Government Peer Networks. CEA is a BC-based non-profit organization with over 30 years of experience supporting local governments and First Nations to advance climate and energy solutions. One of CEA's most impactful programs is delivering our interconnected <u>peer network ecosystem</u>, which enables collaboration, knowledge-sharing, and coordinated implementation of local climate solutions across British Columbia.

The Peer Network program is a cornerstone of climate collaboration infrastructure in British Columbia. CEA currently facilitates 16 regional and topical peer networks, supporting staff and elected officials from communities across BC and beyond. In fiscal year 2024–2025 alone, CEA delivered 69 peer network sessions, engaging 1,161 individuals from 124 local governments and 16 Indigenous communities. These networks support local government staff to navigate policy and implementation challenges by learning from peers, sharing tools, and advancing solutions collaboratively. By enabling communities to replicate successful approaches, adapt them to local contexts, and scale their impact, the networks play a vital role in delivering on CleanBC goals.

This submission represents the voices and insights of local government staff engaged through CEA's peer networks. On July 9, 2025, CEA hosted three targeted working group meetings with peer network members to inform this submission - focused on buildings (41 attendees), transportation (34 attendees), and overarching feedback (25 attendees). In total, the working groups included representation from 41 municipalities and regional districts. A summary of these working group discussions can be found here: https://docs.communityenergy.ca/wp-content/uploads/CleanBC LGPN response summary.pdf Recognizing that buildings and transportation are the two sectors where local governments have the most direct and significant impact on emissions reductions, this submission focuses on actionable recommendations in those areas. It is intended to complement two related submissions also coordinated by CEA:

- CEA's organizational submission, which presents systems-level recommendations based on delivery experience and engagement through the Climate Aligned Energy Framework
- The Northern BC Climate Action Network (NorthCAN) submission, which highlights the innovation, leadership, and regional realities of northern communities

By elevating the practical perspectives of local government staff, this submission aims to strengthen provincial-local alignment, build capacity, and sustain momentum for CleanBC implementation across British Columbia.

Key recommendations for Buildings

1. Re-affirm existing commitments to reduce emissions in new buildings.

There is widespread support for Energy Step Code and Zero Carbon Step Code. Clear timelines and policy direction are necessary for adequate planning and capacity-building, while enabling early adoption lets leading communities pilot solutions that benefit the whole province. Misinformation about Energy Step Code and Zero Carbon Step Code is widespread, with insufficient communication about the purpose and intent of the Codes leading to confusion and distrust. Backtracking policies risks adding to confusion and further undermines efforts. The province should send a clear message to communities and industry that the Step Codes are here to stay and re-affirm the commitment to mandate Emissions Level 2 or 3 by 2027, and Emissions Level 4 by 2030.

Local governments need support to reach these standards. Smaller, resource-constrained communities need funding to build staff capacity and offer incentives and training to support industry. More data-sharing would help local governments understand the state of building in their communities and inform their approach in transitioning to higher Steps and Emissions Levels. More clarity on the province's energy mix and the role of various energy sources in the low carbon transition would also support planning and implementation. Different regions have different needs and capacities and require different supports to effectively implement the Step Codes, whether providing additional funding or enabling alternative compliance pathways. Mandating higher levels of the Step Codes also ensures housing will keep occupants safer and more comfortable, even during extreme weather events, while also lowering utility bills. Aligning messaging with core priorities, like affordability, health and safety, and resilience can combat misinformation and advance adoption and implementation.

2. Introduce regulations to reduce emissions in existing buildings.

Local governments need regulatory tools to decarbonize existing buildings. Key actions the Province can take include:

- a. **Prioritize the inclusion of Alterations to Existing Buildings Code (AEBC) in BC Building Code.**AEBC, delayed since 2024, will give local governments the regulatory framework to reduce energy and emissions from existing buildings.
- b. Re-affirm commitment to implement Highest Efficiency Equipment Standards (HEES) by 2030 and enable early adoption. Ensuring all new space and water heating equipment is at least 100% efficient is an effective way to decarbonize buildings. Many communities, especially those in the lower mainland and southern Vancouver Island are well-positioned to adopt and implement HEES ahead of 2030.
- c. Enable mandatory energy and emissions disclosure. While the Home Energy Planner tool, now available across the province, is a helpful tool for educating homeowners on how their home uses energy, a mandatory home energy labelling program would increase energy literacy of homeowners and buyers. Similarly, mandatory energy and emissions reporting for large buildings would enable local governments and building owners to better understand how their existing buildings are performing. Increasing energy literacy and data availability would support integrating energy considerations into decisions about selling, purchasing, and renovating.
- d. **Develop and introduce building performance standards** to provide a framework for improving the energy performance and limiting the emissions of existing buildings.

Allowing early adoption by communities and regions that are ready to implement ahead of Provincial timelines supports market transformation by setting an example and providing tangible outcomes and lessons learned. Clear communication on how and when regulatory tools will be phased in is needed to provide certainty. Meaningful engagement across BC should inform the development of these regulations, with considerations to the implementation capacities and needs of different regions.

3. Expand retrofit financing opportunities.

While CleanBC Better Homes and Energy Savings Program rebates have helped homeowners access retrofits, a more comprehensive program is needed, including support for envelope upgrades and resiliency measures. Homeowners are motivated by co-benefits like improved comfort and energy cost savings, and expanding rebates to include complementary measures will help communities meet emissions reductions targets more effectively. However, rebates alone are not enough. Greater diversity in financing options, such as PACE, on-bill financing, and public-private financing opportunities, are also needed to support homeowners, building owners, and tenants to access retrofits.

Sharing data on rebate uptake by location would highlight successes and inform where more support is needed. Furthermore, while tying eligibility of rebates to Home Performance Contractor Network members is effective to build industry capacity and bolster quality assurance, rural areas face shortages of qualified contractors resulting in homeowners being unable to access much-needed rebates for energy retrofits. Allowing for regional flexibility would help ensure equitable access to programs.

4. Develop a complete approach to reduce embodied carbon in new buildings.

As operational emissions account for a small portion of lifetime emissions, local governments are keen to better understand how embodied carbon can be regulated in new construction. The Province can lead by sharing data on embodied carbon and developing a framework for setting targets for embodied carbon reduction. Similar to the Energy and Carbon Step Codes, the Province should develop an "Embodied Emissions Step Code" to phase in embodied emissions limits and ensure alignment across sectors.

5. Invest in workforce and industry development.

BC needs skilled workers to build and renovate at the scale required to meet housing and GHG targets. Investing in workforce development is essential. The province should lead, partner, and collaborate with secondary schools, post-secondary institutions, and industry associations to develop meaningful career pathways, offer courses, and update curricula to align with evolving Codes, ensuring the workforce is prepared.

Key recommendations for Transportation

1. Protect and strengthen the ZEV Act.

The Zero-Emission Vehicle (ZEV) Act, BC's legislative foundation for reducing transportation emissions, is facing industry pressure but must be maintained and strengthened. The Province should re-affirm its commitments in the ZEV Act and expand the Act to include medium- and heavy-duty vehicles – particularly where zero-emission options like electric school buses and refuse trucks

are already viable. Clear timelines and expectations enable local governments and industry to plan accordingly and make necessary adjustments. Additional supports are needed to ensure equitable adoption across BC, particularly in rural areas where communities may rely more on gasoline vehicles (also known as internal combustion engine vehicles or ICEVs), face limited access to electric vehicles (EVs), and often travel longer distances. Targeted actions will help these communities overcome barriers and benefit from EV cost savings and emissions reductions

2. Improve EV affordability.

While EV rebates encourage adoption, high costs remain a major barrier. The discontinuation of EV rebates tied to the elimination of the Carbon Tax may further hamper EV adoption. In addition to reinstating rebates for EVs, the Province must identify and implement additional measures to enable residents to participate in the clean transportation transition and affordably access EVs, including providing additional funding for local governments to provide incentives for EVs and EV chargers. However, increased funding is not a substitute for Provincial leadership. The Province must improve long-term affordability by reducing actual costs of EVs, such as by supporting battery manufacturing, improving supply chains, and partnering with manufacturers.

3. Address Gaps in EV Charging Infrastructure.

The Low Carbon Fuel Standard (LCFS) has been instrumental in supporting local governments to implement EV charging infrastructure. However, there are still significant gaps. Key actions the Province can implement to address these gaps include:

- a. Maintain and extend the Low Carbon Fuel Standard program. LCFS credits help offset the costs of providing, operating, and maintaining EV charging infrastructure. Ensuring this program is available supports the business case for local governments and other entities to continue implementing EV charging infrastructure. However, the system is challenging to navigate and may be a barrier to participation.
- b. Coordinate efforts and clarify roles and responsibilities for providing public EV charging infrastructure. The Province can facilitate more robust EV charging networks by clarifying the roles of the Provincial government, local governments, utilities, and the private sector in implementing, operating, and setting standards for reliability and accessibility of EV charging infrastructure. Sharing data on where existing and planned charging stations are located and their usage can shed light on current and future needs and ensure coordinated efforts for planning and building out EV charging infrastructure to address gaps and ensure equity in availability and accessibility of EV charging.
- c. Improve operational standards for EV charging infrastructure. Many local governments receive complaints of unavailable or non-operating public charging stations. Negative experiences with unreliable charging stations can hinder EV adoption. Clear reliability and service commitments should be required for operators, along with future-proofing design and energy management systems to allow multiple users so people can access charging when they need it.
- d. Mandate EV-ready requirements for all new residential and commercial developments. EV-ready buildings would help support long-term infrastructure goals and support the transition away from ICEVs by providing occupants access to charging.
- e. **Support existing multi-unit buildings to provide EV charging**. Existing multi-unit buildings are difficult and expensive to retrofit more support is needed to enable renters, condodwellers, and building owners to access and provide at-home and on-site EV charging. This would promote equitable EV access. Better integration of transportation, buildings, and

energy policies is needed to clarify how older buildings can be adequately retrofitted to support both decarbonization of buildings systems and EV charging. The Province should streamline and align incentives, reporting requirements, and technical guidance to alleviate confusion and remove barriers for stratas and building owners.

4. Enable alternative transportation options (ie. mode shift).

While fuel-switching is a crucial component in the clean energy transportation transition, energy efficiency is also an important driver. Personal vehicles, regardless of their emissions, are one of the least efficient forms of transportation. The Province must enable and support alternative transportation options by:

- a. Supporting active and assisted transportation (ie. micromobility). Communities are interested in micromobility (eg. E-scooters, e-bikes) options for the health, affordability, and climate resilience benefits. The Province should emphasize and proactively communicate these benefits and provide complementary programs, including incentives, to enable access and drive uptake. Local governments have noted that programs such as the Active Transportation Infrastructure Grants Program and Electric Kick Scooter Pilot Program have been helpful to enable residents to adopt micromobility, but the process to participate is burdensome. To help drive micromobility uptake, the Province needs to simplify the process for local governments to participate in micromobility programs, clarify its policies on micromobility, and enable local governments to regulate the use of micromobility in their communities.
- b. **Expanding transit access throughout BC.** Local governments across BC, particularly outside the Lower Mainland, are seeking improved public transit to address gaps where personal vehicles or micromobility are unavailable or impractical. Improved and better integrated transit services can help fill these gaps, but greater capital and operational funding is needed to expand services. The Province should explore opportunities for integration of services such as re-purposing school buses for public transit during off-school hours and addressing funding and capacity challenges to enable equitable transit access throughout the province.

5. Release the Clean Transportation Action Plan.

The Province must demonstrate leadership and release the Clean Transportation Action Plan, outlining concrete actions and clarifying roles in the transition to clean transportation. Local governments are seeking this guidance to inform their own community planning and next steps.

Conclusion

CleanBC policies and programs are essential to enabling climate action in communities across BC. Local governments are uniquely positioned to implement solutions in high-impact areas like buildings and transportation—but to do so effectively, they require stable policy direction, strong intergovernmental coordination, and sustained investment in capacity and collaboration.

Local government staff engaged through CEA's Peer Networks emphasized the importance of staying the course on provincial commitments while improving the clarity, predictability, and accessibility of tools needed for implementation. There is strong support for CleanBC's foundational regulatory tools, and communities emphasized the importance of stable timelines, cross-sector alignment, and collaboration between provincial and local governments. Across communities of all sizes and regions, momentum is

building. This is not the time to pause or pull back; it is the time to enable those who are ready to lead, and support those who need it.

To strengthen implementation and scale impact, this submission calls on the Province to:

- Provide Clear, Predictable Policy Roadmaps: Ensure timelines for Step Codes, HEES, and ZEV Act
 implementation are transparent and stable to support planning and investment. Connect these
 policies within a broader coordinated Provincial energy strategy.
- **Enable Local Government Leadership:** Continue funding for local capacity, including LGCAP, and consider delegating regulatory powers where appropriate to accelerate local action.
- **Invest in People and Capacity Building:** Support workforce development, fund local climate staff, and support incentives for industry training and contractor engagement.
- **Streamline Financing & Program Access**: Enable PACE, simplify rebate processes, and develop a centralized CleanBC program access hub.
- Lead Public Communication: Communicate clearly and consistently about CleanBC policies, framing climate action around tangible co-benefits such as affordability, health, and resilience, while actively countering misinformation.
- **Coordinate Across Systems**: Align transportation, buildings, energy, and land use policies in an integrated Provincial energy strategy that also embeds a climate resilience lens.
- **Respect Regional Diversity:** Offer tailored support to communities facing unique geographic, economic, or capacity challenges.

Meeting BC's climate goals will require continued provincial leadership alongside empowered, well-resourced local governments. Local governments are ready to lead; with the right tools, clarity, and collaboration, they can deliver lasting climate solutions for communities across British Columbia.