Clean BC Review
Comments from ELECTRIC MOBILITY CANADA
July 18, 2025

ABOUT EMC

Electric Mobility Canada (EMC) is the Canadian EV Industry association and the unifying and authoritative voice for the transition to electric transportation across Canada.

EMC has 180+ member organizations, including electricity suppliers; manufacturers of light, medium, heavy, and off-road vehicles; infrastructure providers; technology companies; mining companies; research centres; government departments and agencies; cities; universities; fleet managers; unions; environmental NGOs; and EV owner groups.

Members of EMC collaborate under different working groups to identify barriers and solutions specific to different industry segments: Batteries (life cycle), Charging infrastructure (accelerating deployment), Utilities (best practices and grid planning), MHDVs (Fleet electrification), and Research, Education and Training (preparing Canada's workforce).

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CLEAN BC REVIEW - EMC COMMENTS

1. ***With respect to CleanBC's policies—inclusive of legislation, regulation and government direction—that directly reduces or enables emission reductions:***

   a. *What is working well?*

   - **ZEV Standard – Stay the course**. Consistently overachieved with the exception of near-term disruptions in the market for which there are ample existing compliance flexibilities.

     Actual emissions reductions and a decoupling of emissions from population and GDP growth. Considering initial efforts go back to 2008, when Carbon Fees were announced, and that BC's population rose over 20% and earned a 46% higher GDP with emissions held to a near standstill as a result of good public policy regarding how power is produced, homes are heated/cooled and EVs brought into the market (that result in today's EV fleet NOT emitting the 660,000 tonnes of the ICE vehicles they replaced).

   - **ZEV Standard – CREDITS ONLY FOR PLUG-INs -** It is essential that the only vehicles for which ZEV sales credits can be issued remain plug-in models (BEVs and PHEVs). Conventional hybrids (HEVs) operate solely on gasoline and do not require charging infrastructure. PHEVs and BEVs, on the other hand, rely on a charging network and drive demand for upstream inventment in grid modernization, site upgrades and charging infrastructure industries.

     For example, after approximately 40,000 km (the time to absorb GHG emissions from battery manufacturing) GHG emissions of a Honda Civic hybrid will be approximately **90 times higher per kilometer driven** than those of a comparable battery electric car and this will hold for approximately 85% of the vehicle lifespan.

   b. *What are the challenges and/or areas for improvement?*

   - **ZEV Standard – Initiative Agreements** – Do not increase % of credits that can be generated from iniative agreements. Such an increase would lower the effective compliance ratios below 24%, which was achieved two years ago. Maintain iniative agreements at 5% of total compliance to maintain ongoing supply growth in the EV market.

- If the government was to lower (between 2026 and 2030) short term EV sales targets, EMC could support… only if no other flexibilities are added. That being said, we must keep in mind that the slower we transition to electric cars, *the more deaths will happen from air pollution.*

- According to Health Canada "Traffic Related Air Pollution (TRAP) was associated with over 1,200 premature deaths in Canada in 2015. Non-fatal health outcomes included 2.7 million acute respiratory symptom days, 1.1 million restricted activity days and 210,000 asthma symptom days per year.

- The total annual monetary value of the health burden was estimated at $9.5 billion (CAD 2015), with $9 billion being associated with premature deaths. Analysis also found that light-duty vehicles (e.g., passenger vehicles) contributed to approximately 37% of premature deaths, while heavy-duty vehicles (e.g., commercial trucks and buses) contributed to approximately 63% of premature deaths.

- In terms of the geographic distribution of the air pollution burden, the results indicated greater adverse health impacts in more populous provinces and census divisions (CDs): **170 premature deaths were estimated in British Columbia with 110 in Vancouver."**
  https://www.canada.ca/content/dam/hc-sc/documents/services/publications/healthy-living/health-impacts-traffic-related-air-pollution/health-impacts-traffic-related-air-pollution.pdf

  That's why EMC recommends to aim for at least 70% ZEV sales by 2030.

- **Regulatory PREDICABILITY -** Programs, policies and regulations must be predictable to ensure maximum effectiveness for the EV Ecosystem. **The ZEV Standard provides market predictability to the industry and makes BC a more attractive market for innovative companies.** Knowing in advance where the market will be through 2035 makes BC a more secure investment destination. This stimulates short-, medium-, and long-term investments in this emerging industry, securing high-paying sustainable jobs for decades to come. But instability or uncertainty are very damaging to the industry. The same applies to vehicle purchase incentives and funding programs for infrastructure. Clear phase-out information and end dates are essential.

c. *What gaps exist, and how could they best be filled?*

The BC government must support EV awareness initiatives so more BC citizens understand the critical role that EVs play in both health, environment AND **economic** points of view.

For instance, according to our calculations, the import of gas and diesel costs approximately **$200 millions to $250 million a month** to the province *before tax.*

According to the Canada Energy Regulator,

- In 2023, British Columbia (B.C.) produced 113.3 thousand barrels per day (Mb/d) of crude oil (including condensate and pentanes plus). This represented 3.7% of total Canadian production.
- All production is conventional light oil, condensate, and pentanes plus and is from the northeast portion of the province.
- B.C.'s remaining resource of crude oil was estimated to be 524 million barrels

According to Statistics Canada, net sales of gasoline had decreased by 5% in 2023 compared to 2017, while net sales of diesel oil had increased by more than 14% during the same period. (The number of liters sold shown here is X 1000)

Geography	British Columbia[3] (map)						
Type of fuel sales	2017	2018	2019	2020	2021	2022	2023
	Litres						
Net sales of gasoline[4]	4,935,834	4,789,165	4,822,252	4,344,971	4,699,080	4,717,767	4,684,934
Gross sales of gasoline[5]	5,182,517	5,024,318	5,060,063	4,571,720	4,928,709	4,964,404	4,917,831
Net sales of diesel oil[4]	1,910,156	1,963,507	1,819,262	1,850,987	2,086,759	2,325,127	2,179,136
Net sales of liquefied petroleum gas[4]	85,669	208,883	270,958	240,036	329,821	253,893	255,010

According to the US Energy Information Administration[3], Petroleum refineries in the United States produce about 19 to 20 gallons of motor gasoline and 11 to 12 gallons of ultra-low sulfur distillate fuel oil (most of which is sold as diesel fuel and in several states as heating oil) from one 42-gallon barrel of crude oil.

One US gallon = 3,8 liter

With a barrel of oil, you can therefore produce approximately 74 liter of gas and 43 liters of diesel.

113,298 barrel per day = 8 384 052 liters of gas + 4 871 814 liters of diesel
8 384 052 liters of gas X 365 days = 3 060 178 980 liters of gas per year
4 871 814 liters of diesel X 365 days = 1 778 212 110 liters of diesel per year

This means that approximately:
- 1 624 755 020 liters of gas were imported from outside the province in 2023
- 400 923 890 liters of diesel were imported from outside the province in 2023

Cost for BC to import gasoline

According to the BC government[4], the motor fuel tax rate per liter on gasoline ranges between 27 and 14.50 cents now that the carbon tax has been abolished.

Motor fuel and carbon tax rates on clear gasoline

Where in B.C.	Motor fuel tax rate per litre on gasoline	Carbon tax rate per litre on gasoline	Total tax rate per litre on gasoline
Vancouver Area	27.00¢ (includes 1.75¢ general revenue, 6.75¢ BCTFA, 18.50¢ TransLink)	17.61¢	**44.61¢**
Victoria Area	20.00¢ (includes 7.75¢ general revenue, 6.75¢ BCTFA, 5.50¢ BC Transit - Victoria)	17.61¢	**37.61¢**
Rest of B.C.	14.50¢ (includes 7.75¢ general revenue, 6.75¢ BCTFA)	17.61¢	**32.11¢**

If we use 20 cents per liter average and subtract from the price of gas in BC[5] as of April 20, 2025, we end up with an average of $1.15 / liter of gas.

If we multiply 1 624 755 020 liters of gas by $1.15, the result is:
$1 868 468 273 a year to import gasoline

Cost for BC to import diesel

According to the BC government[4], the motor fuel tax rate per liter on diesel ranges between 15 and 27.50 cents now that the carbon tax has been abolished.

If we use 20 cents per liter average and subtract from the price of diesel in BC[6] as of April 20, 2025, we end up with an average of $1.35 / liter of diesel.
If we multiply 400 923 890 liters of diesel by $1.35, the result is:
$541 247 251 a year to import diesel

This means that BC consumers pay $2 409 715 525 a year before tax to import gas and diesel.
That's more than **$200 million a month**

BUT, as of June 2025, the price of gas increased to **$165.6/liter**, which means that the amount is closer to **$250 million a month fleeing the province.**

2. ***With respect to CleanBC's programs and other government spending that directly reduces or enables emission reductions:***

   a. *What is working well?*

   - **Clean BC GO Electric EV incentive (LDVs)** was working well but the MSRP cap was lowered to levels below the average purchase price of a new vehicle in Canada, reducing demand for the program and slowing EV adoption. Restore the program with the original MSRP threshold but reduce the purchase incentive benefit.

   - The **CleanBC EV ready** rebates (planning, infrastructure, chargers) have worked exceptionally well and will continue to be required to finalize MURB retrofits. Even where buildings have taken advantage of the program, there are significant expansion opportunities that will be expedited with this program's support.

   b. *What are the challenges and/or areas for improvement?*

   - **Clean BC GO Electric EV incentive** : Consider announcing phase out plan, annually reducing the incentives to 0$ by 2030.
   - **Clean BC GO Electric EV incentive** - Also consider encouraging **ENERGY EFFICIENCY**: Reduce incentives for less efficient EVs (>24 kWh/100 km) while maintaining maximum incentives for more efficient models (<25 kWh/100 km).

   c. *What gaps exist, and how could they best be filled?*

   What needs to be improved is for the public to learn about:

- The health impacts of gas and diesel cars and trucks and how EVs make a positive difference.
- The many successes to date that help build towards the 2035 goal of zero ICE sales (for Health, Environmental, Climate and Citizen Finance reasons).
- The fact that if some legacy OEMs do not want to comply with the EV standards, it's time to let affordable electric cars from other countries and regions such as Europe come to Canada if they are CETA compliant. Right now, some carmakers are blocking access for these cars to come to Canada, claiming that Canadian automotive jobs are on the line. The truth is that NO affordable electric car is built in Canada and the only affordable gas car currently built in Canada is the Honda Civic. As of now, Canadians already have to look to cars built in Mexico, South Korea, Europe South America and even China (there are no tariffs on Chinese gas cars coming to Canada).

3. Are there different ways to fund CleanBC programs beyond government grants, rebates, and incentives? Are there examples from other jurisdictions that could be applied in B.C.?

- We recommend introducing a fee-bate program inspired by the one that the 2007 federal Conservative government did where the fees for gaz guzzlers would pay for the rebates for EVs, making it a fiscally neutral program. Regular BC consumers buying regular cars wouldn't have any fee to pay. Only those who purchase a more expensive gaz guzzler would have to pay a fee to help accelerating the transition to cleaner cars such as EVs and PHEVs.

Table 3.2
Vehicle Efficiency Incentive (VEI) Structure

	New Rebate		New Green Levy
Fuel Efficiency[1]	Cars	Minivans SUVs and Light Trucks	Passenger Vehicles (Other Than Trucks)
(L/100 km)		(dollars)	
5.5 or less	2,000	2,000	
5.6 – 6.0	1,500	2,000	
6.1 – 6.5	1,000	2,000	
6.6 – 7.3		2,000	
7.4 – 7.8		1,500	
7.9 – 8.3		1,000	
8.4 – 12.9			
13.0 – 13.9			1,000
14.0 – 14.9			2,000
15.0 – 15.9			3,000
16.0 or more			4,000

[1] Vehicle fuel efficiency is based on combined 55 per cent city/45 per cent highway fuel consumption ratings.

(2007 chart for fees and rebates that we could update)
https://www.budget.canada.ca/2007/pdf/bp2007e.pdf

- WCI Cap and Trade program rather than the old carbon tax could bring with funds directly supporting clean energy programs.

4. ***With respect to the role of B.C.'s electricity and gas utilities in CleanBC and the B.C. Utilities Commission as their regulator:***

   a. *What is working well?*

      - Those who are aware of the BCUC feel they are an impartial arbiter in energy cost considerations, unless Government takes decisions out of their purview (Site C) which undermines the authority, and support for this arms-length panel. BC Hydro has been instrumental in getting the non-Tesla DCFC charging infrastructure set up on every major highway in BC- that should be acknowledged and celebrated.

   b. *What are the challenges and/or areas for improvement?*

      - BC Hydro should be given a greater role in bringing forward our electrified future by expanding their mandate to include only renewables in power generation. For instance, if half of single-family homes in BC (~450,000) were provided a 50% grant towards hosting an 8 Kwh solar array they would produce enough energy over half the year to essentially retain the water that would have been released to power those homes for the rest of the year.

      - DC Fast Charging projects in BC are generally more costly and often require ownership of private substations. This reduces investment.

   c. *What gaps exist, and how could they best be filled?*

      - Lack of transmission or energy storage capacity in remote highway corridors limits the expansion of the charging network. It was advised in 2018 and again in 2023 by EMC members that BC should immediatley begin considering these challenging remote corridors. To date we don't believe this has taken place.

5. ***Are there enabling conditions (e.g. workforce, supply chains, permitting, capital, cost effectiveness/affordability) that are currently insufficient to support the adoption of emissions-reducing technologies and services encouraged or required by CleanBC? If so, please describe the challenge and provide suggestions for how it can be addressed.***

- Training and retraining programs need to be accelerated so current and future workers can embrace the transition to the EV industry from the high school to college to university levels.

6. ***Are there other barriers that have hindered the effectiveness of CleanBC policies and programs?***

7. ***How could CleanBC's policies and programs be better aligned or integrated with other provincial priorities, including (but not limited to) improving affordability, enhancing economic competitiveness, protecting health, and ensuring energy security?***

   - Consider a feebate program to fund purchase incentives.
   - WCI Cap and Trade to price carbon and generate revenue for a green fund while actually reducing emissions with certainty (unlike the carbon tax)

8. ***Are there other innovative and effective approaches—including those that account for or align/integrate with other priorities—from other jurisdictions that B.C. should consider adopting?***

   - WCI Cap and Trade to price carbon and generate revenue for a green fund.

9. ***With regards to B.C.'s approach to establishing targets (2025, 2030, 2040 and 2050; and sectoral targets), public reporting and accountability:***

   a. *What is working well?*

      - EV adoption rates are working well – if you take your foot off the accelerator on this now you'll have to find deeper reductions in resources and industry investment at a time when that is more necessary than ever.

   b. *What are the challenges and/or areas for improvement?*

      - The public is less interested in climate policy at present as demonstrated by the BC government's recent actions to reduce access to sustainable energy solutions.

   c. *What gaps exist, and how could they best be filled?*

- Ongoing lack of solutions for green energy generation sufficient to power an electric-transport network for cars and trucks into the BC interior and north.

10. Are there other potential indicators of progress (e.g. investment, behavioural change, energy production and use, deployment of key technologies etc.) that should be considered for tracking and reporting?

Sources:

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