

August 22, 2008

Honourable Gary Doer
Premier of Manitoba
204 Legislative Building
450 Broadway
Winnipeg, MB R3C 0V8
fax: 204-949-1484

Honourable Jim Rondeau
Minister of Science, Technology, Energy and Mines
333 Legislative Building
450 Broadway
Winnipeg, MB R3C 0V8
fax: 204-948-2692

Dear Premier Doer and Minister Rondeau;

Re: Climate Action Network Canada, the David Suzuki Foundation, Manitoba Wildlands, Pembina Institute and WWF-Canada Submission to the Western Climate Initiative – Draft Design Recommendations for a Cap-and-Trade Program

We are writing as representatives of Canada's environmental community to convey consensus recommendations from the David Suzuki Foundation, Pembina Institute, WWF Canada as well as Manitoba Wildlands regarding the Western Climate Initiative's (WCI) draft design recommendations for a cap-and-trade program.

Attached is a letter that is also being sent to the governments of British Columbia and Ontario. It outlines our recommendations concerning the WCI's draft design for a cap-and-trade system for its member provinces and states.

Primary concerns detailed in the attached letter include:

- lack of urgency of the cap-and-trade program implementation timeline
- lack of stringency of the initial cap on emissions
- inability of the program, as designed, to capture a sufficient percentage of emissions
- insufficiency of the commitment to auctioned allowances
- insufficiency of limits on the quantity of offsets

Manitoba Wildlands respectfully asks that you give these recommendations full consideration and distribute them as appropriate to Manitoba government officials, the WCI subcommittees and WCI

decision makers.

We also urge the Manitoba Government to take a leadership role amongst WCI members in addressing the above noted concerns. Manitoba's relatively low-carbon economy affords it the opportunity to do so in a number of ways. In particular, Manitoba should demonstrate leadership on the reduction of greenhouse gas emissions by:

- **putting a price on carbon** by bringing in a carbon tax that includes industrial process emissions, announcing the initiative in its 2009 budget and implementing the program by January 1, 2010
- operationalizing Section 3(2) of Manitoba's Climate Change and Emissions Reductions Act by issuing regulations that **set medium and long-term emissions reductions targets (i.e. for 2012, 2020, 2050)** that are aligned with the deep emissions cuts that climate scientists indicate are necessary
- **advocating within the WCI for 100% auctioning of auctioned allowances** – as a means of ensuring that the cap-and trade system follows a polluter-pay principle and protects consumers from unfair price increases

As an organization concerned about global warming, Manitoba Wildlands is pleased to be partnering with other Canadian NGOs to provide input into the WCI. Manitoba Wildlands is also a member of the Western Climate Advocates Network (WeCAN), whose members are actively involved in attending stakeholder meetings and providing input to strengthen the WCI. In support of WeCAN and the WCI, we are posting a variety of materials and information about the WCI and civil society groups' submissions and concerns. For more information, please visit our Climate Change pages – Manitoba Initiatives at: www.westernclimateinitiative.org

Please do not hesitate to contact our offices with any questions – 204.947.3400. We would also be pleased to meet with you or your staff to discuss the attached letter in more detail.

Yours truly,



Gaile Whelan Enns
Director, Manitoba Wildlands

Attachment:

- August 13, 2008 letter to the WCI from the David Suzuki Foundation, Manitoba Wildlands, Pembina Institute and WWF-Canada re: WCI Draft Design Recommendations for a Cap-and-Trade Program