



March 15, 2024

The Honourable Steven Guilbeault  
Minister of Environment and Climate Change  
Place Vincent Massey Building  
351 Saint-Joseph Boulevard  
Gatineau QC K1A 0H3  
ecd-dec@ec.gc.ca

Re: Feedback on the final Clean Electricity Regulations – Recommendations from the  
Conservation Council of New Brunswick

Dear Minister Guilbeault:

On behalf of the Conservation Council of New Brunswick (CCNB), please accept the attached submission as part of the Federal Government's consultations on the Clean Electricity Regulations (CER). We commend the effort put into the updated release of the CER and appreciate the closure of certain loopholes. However, we remain concerned about the potential weakening of regulatory standards.

Our primary concern lies in maintaining a stringent performance standard within the proposed transition to an emissions limit approach. While we recognize the practicality of this shift, we emphasize the importance of setting the emissions limit between 30-40 tonnes of CO<sub>2</sub> per GWh to ensure meaningful progress towards our climate goals.

We also urge careful consideration regarding the integration of offsets within the CER framework to prevent undermining existing carbon pricing mechanisms. Additionally, we believe that extending the "end of prescribed life" provision beyond 20 years would delay progress toward achieving a net-zero economy by 2050.

We ask policymakers to finalize the regulations by fall 2024 to ensure timely implementation and maximize their meaningful impact on emissions reduction efforts. Thank you for considering our feedback, and we look forward to continued collaboration towards achieving our shared environmental objectives.

Please get in touch with me if you would like to discuss our submission in detail.

Sincerely,

A handwritten signature in cursive script, reading "Beverly Gingras".

Beverly (Bev) Gingras  
Executive Director  
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Enclosure: CCNB Recommendations for the updated Clean Electricity Regulations – March 2024

CC: Moe Qureshi, Director of Climate Research and Policy  
Corey Robichaud, Director of Communications