



Initial Feedback on BC Regional Energy and Resource Table: Interim Workplan May 2023

Introduction

The BC Federation of Labour (BCFED) appreciates the opportunity to provide initial feedback on the government's interim workplan for the BC Regional Energy and Resource Table. The BCFED represents more than 500,000 members of our affiliated unions, from more than 1,100 locals, working in every aspect of the BC economy. The BCFED is recognized by the government as a significant advocate for workers in BC, and we are committed to ensuring that workers' rights are maintained and strengthened through the necessary economic transitions to a low carbon future.

Our work on climate justice and jobs is guided by three foundational principles, and we encourage you to bring these approaches to your work on clean energy as you plan for a net-zero emissions future:

- **Labour-led and worker-centred:** Taking a “nothing about us without us” approach, the experiences, stories and insights of workers should lead this work, in particular, those most impacted by climate change.
- **Equity:** The impacts of climate change are not fair. Indigenous, Black and racialized workers, women and gender-diverse workers, workers with accessibility barriers and other marginalized workers and their communities bear much of the weight of climate impacts: losing land, being displaced, facing health impacts and, at worst, dying. First Nations land and title is a primary factor here. These communities should be part of this work, and job creation must include these equity-deserving groups.
- **Evidence-based:** This work should be grounded in climate science and knowledge (including Indigenous and other culturally relevant knowledge) with support from academic and community-based researchers.

Context

Natural Resources Canada and the BC Ministry of Energy, Mines and Low Carbon Innovation have been co-developing an Interim Workplan for the BC Regional Energy and Resource Table (Regional Table) since June 2022. More recently, First Nations partners have been engaged, and the First Nations Leadership Council has assigned its First Nations Forestry Council and First Nations Energy and Mining Council to be formal participants.

The aim of the Regional Tables is “to identify and accelerate opportunities to transform Canada’s traditional resource industries and advance emerging ones. The Regional Tables will empower the provinces and territories to decide their economic priorities and work collaboratively with the federal government to achieve them as part of a net-zero economy. As these region-specific opportunities are agreed upon with each province and territory, individual action plans will be developed to align resources, timelines and regulatory approaches.”¹ This work is aligned with the federal government’s development of the Sustainable Jobs legislation to be enacted later this year.

In December 2022, the BC Federation of Labour was invited to a briefing on the priority areas developed by the government within the BC action plan and gave some initial feedback. Then, in April 2023, the BCFED was invited to a short briefing on the draft interim workplan but that initial feedback, such as focusing on impacted workers and more significant investment in public transit, had not been incorporated. Both times, the BCFED strongly recommended that the government reach out to individual impacted affiliates for more specific feedback. They also invited the government team to present to the BCFED Climate Justice and Jobs (CJJ) Standing Committee later in April. There, participants heard more about the Sustainable Jobs initiative and Regional Tables and had a short opportunity to provide initial feedback. Much of the feedback from affiliates was focused on the lack of labour engagement, in particular, with affiliates who represent impacted workers.

We are pleased to see the developing First Nations partnership, but we are concerned about the lack of meaningful labour engagement. To our knowledge, the two short briefings with the BCFED and the presentation to the CJJ committee, (as well as a presentation to the Vancouver Economic Commission’s Just Transition Coalition that involves a small labour contingent), were the only labour interactions on this initiative in BC up to April. At that time, the BCFED made the following recommendations to the Natural Resources Canada engagement staff, urging them to engage meaningfully in the following ways:

- One-on-one with impacted affiliates in resource industries (the BCFED has now made targeted e-introductions and these meetings have begun);
- Sector/issue-specific focus groups (not roundtables, but small groups with enough time to have meaningful discussion) on topics such as: critical mineral mining; buildings; transportation; training and education, etc.;
- Labour-specific roundtable; and
- Continuing engagement through a tripartite committee (government including First Nations, labour, employers) – this echoes the call of the Canadian Labour Congress at the national level.

¹ <https://natural-resources.canada.ca/climate-change/regional-energy-and-resource-tables/24356>

BCFED recommendations

Given the government's short timeline with the planned launch of this interim workplan in May/June, we offer some short, initial feedback at this time. The opportunities in climate jobs are huge – from building out service and infrastructure construction in better transit systems to providing critical minerals for electrification. We are a significant stakeholder in this ongoing dialogue, and we urge you to consider our recommendations and meaningfully engage with us as you move ahead with these plans.

General

The benefits from this level of public investment must be tied to benefits to communities in various ways. First, we must ensure that the climate jobs created are good, family-supporting, unionized jobs with wages, benefits and pensions that allow workers to thrive. The federal government is tying its clean energy tax credits to the provision of prevailing wages, but the BC government should go further to ensure that these are unionized jobs, especially because the majority of those in resource-intensive industries impacted by these transitions are already unionized.

At least, the Interim Workplan should include the definition of Sustainable Jobs from the federal government's plan. "In the context of this Sustainable Jobs Plan, the Government of Canada understands a 'sustainable job' to mean any job that is compatible with Canada's path to a net-zero emissions and climate resilient future. The term 'sustainable jobs' also reflects the concept of decent, well-paying, high-quality jobs that can support workers and their families over time and includes such elements as fair income, job security, social protection, and social dialogue."²

Clean energy skills training should be enhancing skilled trade certification, not replacing it with short-term, micro-credential courses that do not ensure the necessary quality. It remains to be seen how TradeUpBC, a continuing education hub announced in the recently launched *StrongerBC: Future Ready Action Plan*, will provide this quality approach. Equity-seeking groups should also be prioritized within this job creation, and targeted training and education should be provided. It is good to see this highlighted within the *Future Ready Action Plan*. However, to support these groups in the workplace, training to ensure inclusive workplaces is critical. We congratulate the government for its recent funding commitment to the BC Centre for Women in the Trades (BCCWITT), which does this important work, and we hope this funding continues over the long-term.

² <https://www.canada.ca/en/services/jobs/training/initiatives/sustainable-jobs/plan.html#s3>

Public ownership is another community benefit that should be foundational. In the oil and gas sector, the Government of Canada provided over \$20 billion in financial support last year³ while oil and gas companies recorded huge profits – globally, five oil and gas companies reported almost \$200 billion profits last year.⁴ We need to put the public back into our existing systems and explore public ownership of other clean energy solutions. Given the provincial government's commitments to Environmental, Social, Governance (ESG), public ownership and accountability ensures increased environmental and worker protections (and enforcement).

However, while there is an urgency to move fast to address increasing climate challenges, we caution the removal of regulatory and legislative accountability mechanisms that are in place to protect the environment. Already, these are not effective at holding corporations accountable and may need to be strengthened or rebalanced in relation to increasing industrial activity for electrification, critical mineral mining and other infrastructure development.

Accountability for this Regional Tables initiative itself needs to be embedded. Although related to the development of the federal Sustainable Jobs Act, the Regional Energy tables currently will not be defined in the legislation or held accountable to its guiding principles and goals. Without this alignment, there is a danger that the appropriate balance to these opportunity areas will not be applied. For instance, electrification requires growth of the critical mineral mining industry but not without bounds, which would be applied through the necessary targets and timelines for the reduction of greenhouse gas emissions. Thus, accountability measures for the Regional Tables (or whatever other implementation mechanism is coordinated as this work moves forward), including a continuing engagement mechanism such as a tripartite committee consisting of government including First Nations, labour, and employers need to be added to both the forthcoming legislation and this Interim Workplan.

This is also an opportunity for the provincial government to reaffirm its legislated mandate to fulfill the *Declaration on the Rights of Indigenous Peoples Act* (DRIPA) and it is good to see that prioritized in the vision of the Interim Workplan. This includes BC's commitment to free, prior and informed consent for all impacted Indigenous peoples with regard to any expansion of critical minerals mining and new energy infrastructure including, for example, new hydropower. This could include Indigenous governance and partnership, and First Nations benefit and revenue sharing.

We recommend that the Regional Energy initiative:

- Apply guiding principles, such as: worker-centred through labour partnerships; equity and inclusion; and evidence-based, including Indigenous and other culturally relevant knowledges;

³ <https://environmentaldefence.ca/2023/03/21/will-budget-2023-eliminate-fossil-fuel-subsidies/>

⁴ <https://foe.scot/press-release/offshore-workers-demands-take-on-government-inaction-and-industry-profiteering/>

- Ensure that the jobs created through these transitions are good, family-supporting, unionized jobs with priority for impacted workers within resource-intensive industries and equity-seeking groups;
- Ensure that the skills training for clean energy jobs provided through the recently announced StrongerBC: Future Ready Action Plan is focused on enhancing, not replacing, skilled trade certifications; and that the new future skills grant is available to those accessing training through union programs;
- In addition to the supports outlined in the provincial government's *Future Ready Action Plan*, invest further in targeted training and education pathways:
 - Ensure Indigenous peoples have access to quality high school education to support their ability to become tradespeople;
 - Standardize high school trades programs and elevate them to building trades entry requirements;
 - Create gap programming and subsequent instruction for entry into building trades unions that can assist those who don't have access or passed up the opportunity at the time to transition into a trade; and
 - Ensure that all apprentices are meaningfully supported for the full duration of their trade training, e.g., childcare, travel assistance, school support, etc.;
- Continue funding BCCWITT to build inclusive workplaces; and provide funding to other labour training and education initiatives to enhance inclusion in their existing programs;
- Ensure benefits from public investments flow to communities and First Nations, through putting the public back into our existing transportation systems and exploring public and First Nations ownership in other clean transportation and energy solutions;
- Add accountability measures for the Regional Tables to the forthcoming Sustainable Jobs Act and in the Interim Workplan, including: alignment with the guiding principles and goals of the legislation; and a continuing engagement mechanism such as a tripartite committee consisting of government including First Nations, labour and employers; and
- Reaffirm the BC government's legislated mandate to fulfill the DRIPA and its commitment to free, prior and informed consent for all impacted Indigenous peoples with regard to any expansion of critical minerals mining and new energy infrastructure.

Opportunity areas

The five opportunity areas have been identified as:

1. Critical minerals
2. Electrification
3. Clean fuels/Hydrogen
4. Forest sector
5. Carbon management technology and systems

There is no mention of transitioning from fossil fuel industries to renewable energy sources. Geothermal, small hydro, wind, tidal, solar and other clean energy sources have potential in BC, so we need to invest in, develop and build these sectors. These are lower cost projects utilizing existing technology rather than investing in new, untested, expensive pathways. The reduction of LNG extraction is also not mentioned, and the BC government has recently approved the Cedar LNG project – how does this commitment fit with this Regional Table initiative to transition to a low carbon future?

At the BCFED Convention in 2022, delegates passed resolution 2243 for a “controlled reduction in the production of fossil fuels in a swift transition to a renewable energy economy” while investing in “training and continued employment for workers exiting the fossil fuel industry.” This interim plan is missing this transition and investment in a renewable energy economy, and this is a huge gap. The BC Government’s own Climate Solutions Council has raised this concern, highlighting that current action “misses the opportunity to expand and strengthen BC’s existing expertise in renewable electricity and provide more economic development opportunities across the province and support reconciliation. BC Hydro, many First Nations and renewable energy companies would benefit from a greater emphasis on producing more clean electricity in BC, which includes a range of co-benefits. For example, small-scale hydro can produce co-benefits in the form of flood control.”⁵

Further, in relation to the stated goal of maximizing the creation of sustainable jobs in this Interim Workplan, additional opportunities exist in reclamation and adaptation. Many past and existing energy projects in British Columbia have left equipment and waste behind. Corporations have been fined but have little motivation to clean up after themselves. Public investment in providing good, unionized jobs in the reclamation of these industrial sites would provide a significant public benefit on the path to restoring these ecosystems. Adaptation is also critical in the face of increased extreme weather events due to climate change – whether it is building up dikes to respond to floods or forest management to reduce wildfires, there are multiple job opportunities. The BC Government has made recent commitments to prioritizing climate preparedness and adaptation that should be connected to this initiative on economic growth and job opportunities.

⁵ https://www2.gov.bc.ca/assets/gov/environment/climate-change/advisory-council/bc_climate_solutions_council_2022_annual_report.pdf

1. Critical minerals

A low-carbon economy depends on a critical mineral strategy to expand renewables and green energy alternatives. Globally, BC mines have lower emissions and better environmental and safety standards, and mining unions are committed to both protecting our environment and strengthening reconciliation with First Nations. BC's mines provide family-supporting jobs, and unions have been negotiating to ensure more diversity in hiring, while improving access for under-represented workers. At the 2022 BCFED Convention, delegates passed resolution 2235 from the United Steelworkers District 3 to:

- “promote BC as a global leader in the responsible development of minerals that a low-carbon future requires;
- press for governments to train workers and kickstart BC's critical mineral recycling industry, as they have in Ontario;
- protect Canada from the dumping of minerals and goods produced in jurisdictions with poor environmental laws and few worker rights; and
- encourage governments to collaborate on a comprehensive supply chain strategy that creates jobs using local products in domestic, value-added manufacturing.”

It is good to see these points prioritized in the Interim Workplan and we look forward to working with you on developing this area. We hope to see a significant investment in BC's critical mineral mining industry to support the necessary electrification and to ensure ethical and environmentally sound mining practices.

We also appreciate the focus on circular economy opportunities and encourage the government to make this an Opportunity Area of its own, and develop and invest in local recycling programs and second-life applications for heavy metals, i.e., cars, batteries, etc.; and make recycling mandatory for critical raw materials, such as those present in circuit boards, magnets used in disc drives and electric vehicles, batteries for electric vehicles and fluorescent lamps.

2. Electrification

In relation to improving energy efficiency of existing and new buildings, public buildings such as schools, libraries, community centres and government offices should be prioritized to increase public benefit. For residential units, our affiliate union, MoveUP, has a compelling proposal, *Efficiency BC: Better Homes, Better Buildings*, and we recommend that you invest in, develop and implement this concept. This will help meet the stated goal within the Interim Workplan to “reduce retrofit market confusion and maximize accessibility.”

“MoveUP proposes the creation of a new made-in-BC agency to coordinate building retrofits that will maximize the reduction of GHGs from buildings at the same time as maximizing the number of jobs that are created for each grant. The agency will be a people-centred program that provides one-stop-shopping for grants, applications and information and also reaches out

directly into the community. The agency will help to reduce the cost of materials for building retrofits for people, organizations and businesses through bulk purchasing of energy efficiency materials such as heat pumps, windows and doors. The goal is to support BC businesses to create and expand local manufacturing of these in-demand energy efficiency materials and decrease dependency on strained supply chains. The agency's goal will be to help increase equity in BC by reducing energy poverty in lower-income communities, support existing training and hiring programs that recruit new workers from equity-seeking groups, and ensure an increased pool of trained hammer-ready construction workers. Finally, the agency will serve as a centre for excellence to monitor new innovations in energy efficiency and supporting local businesses and communities to thrive.”⁶

An energy justice approach should be applied to all programs to improve energy efficiency in buildings. Targeted approaches for low-income people and renters should be included in the plan to increase the supply of heat pumps and other essential equipment for low-carbon buildings. The “right to cooling” in the home should be embedded, and access to cooling equipment should also be provided for these marginalized groups in recognition that they have less resources to respond to increased heat events due to climate change. After 619 people died during the heat dome in the summer of 2021, mostly low-income seniors, BC's Chief Coroner recommended the provision of passive and active cooling measures targeted to low-income people.⁷

In relation to clean transportation, there must be much more significant investment in public transit systems. We do not need more data, outlined as an early action in the Interim Workplan, to show that shifting drivers of gasoline vehicles to public transportation decreases greenhouse gas emissions. We have made multiple recommendations within our Clean Transportation submission,⁸ and urge you to consider those, including: putting the public back in public transit; developing a two-year implementation plan with the goal of shifting from the unsustainable fare revenue model to fare-free transit to encourage the necessary cultural shift; and investing significantly in increased transit infrastructure and service to ensure that transit is as efficient or more efficient than driving and ensures accessibility. We should also focus on public transportation fleets, such as emergency services and local government, as initial priority areas. Where electrification may be used for automation in the transportation sector, such as in ports, workers must be supported in transitioning to other unionized, good, family-supporting jobs.

3. Clean fuels/Hydrogen

It is unclear whether hydrogen production will be focused on “green” pathways or reliant on gas, and the lack of full transparency in this work plan implies the latter. Prioritizing fossil-

⁶ MoveUP proposal available on request.

⁷ https://www2.gov.bc.ca/assets/gov/birth-adoption-death-marriage-and-divorce/deaths/coroners-service/death-review-panel/extreme_heat_death_review_panel_report.pdf

⁸ <https://bcfed.ca/news/briefs/submission-bcs-government-clean-transportation-action-plan>

derived hydrogen continues to support the expansion of non-renewable energy sources at the expense of necessary investment in renewable energy. Further, the Auditor General of Canada found in 2022 that Natural Resources Canada “over-estimated hydrogen’s potential to reduce greenhouse gas emissions.”⁹

Funding for fossil-based hydrogen constitutes fossil fuel subsidies and undermines Canada’s and BC’s commitments to eliminate these subsidies. Investment in renewable energy sources for the production of electricity must be the priority, and hydrogen should only be supported in hard-to-reach sectors where direct electrification is not an option, such as the production of cement and steel, and heavy-duty transportation and shipping. In addition, this should only be hydrogen produced with additional renewable energy, not through the continuation of the fossil fuel industry resulting in stranded assets when we fully transition away from this sector.

4. Forest sector

Resolution 2239 at the BCFED’s Convention in 2022 urges the provincial government to make “a commitment ensuring a sustainable forest for future generations, while creating jobs for today,” and for the BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development to implement “a strategy that includes re-establishment of a social license that promotes greater domestic manufacturing, re-manufacturing and re-creating the Jobs Protection Commissioner.” So, we support the focus in the Interim Workplan on “growth in the production and export of high-value forest products.”

However, there is no mention of the importance of supporting existing workers within the forest sector in this section of the workplan. This is a glaring gap given the changes to the allowable timber cut and mill closures that have impacted workers over the last few years. For instance, the Isle Pierre sawmill in Prince George closed permanently in 2020, and more recent layoffs and closures have occurred in Chetwynd, Houston and Williams Lake. In fact, in the last two decades, over 40 wood manufacturing and processing mills have closed, and more than 40,000 direct jobs have been lost.¹⁰ Impacted workers must be prioritized in the reconfiguration of the forest sector to centre value-added approaches.

The Interim Workplan prioritizes “increased production and market uptake of bioproducts and wood construction materials as alternatives to traditional carbon-intensive products” and identifies an early action as supporting “market development for wood-based construction materials.” Clearly, this complements the BC Government’s actions within its Mass Timber Action Plan. However, it is unclear whether labour has been involved in the development of the Mass Timber Action Plan, so worker considerations are once again missing. So far, the manufacturing of mass timber is largely not a unionized sector, so previously unionized forestry

⁹ https://www.oag-bvg.gc.ca/internet/English/att_e_44028.html

¹⁰ <https://thetyee.ca/Analysis/2023/01/18/Running-Empty-BC-Forestry-Crash/>

workers may be transitioning into jobs with lower pay and less security. Any public investment into market development of this sector must be tied to public benefits, including ensuring good, unionized labour in this emerging sector.

The Interim Workplan also identifies an early action as launching a “collaborative mechanism to develop a roadmap/workplan for shared-decision making on forest landscape plans and increas[ing] Indigenous participation to incorporate traditional values & knowledge into sustainably managed forests.” We have recently been engaging in the development of a framework on biodiversity and ecosystem health led by the BC Ministry of Water, Land and Resource Stewardship. Once developed and implemented later this year, the goal is for this framework to be over-arching and to guide all provincial legislation, policy and practice. Will this serve the purpose of this action? How will the other identified opportunity areas align with the government priority of ecosystem health?

5. Carbon management technology and systems

The BC Government’s Climate Solutions Council, which has two labour representatives, cautions against relying too heavily on carbon offsetting¹¹ and carbon management technology and systems. While negative emissions technologies and systems may be useful in specific contexts (such as the production of cement and steel), the focus must be on government initiatives that encourage the reduction of greenhouse gas emissions.

We recommend:

- Adding Renewable Energy as an Opportunity Area to ensure that we invest in, develop and build these sectors;
- Investing in the creation of sustainable job opportunities in reclamation and adaptation;
- Investing significantly in BC’s critical mineral mining industry to support the necessary electrification and to ensure ethical and environmentally sound mining practices;
- Elevating Recycling to an Opportunity Area through extending the circular economy approach to develop and invest in local recycling programs and second-life applications for heavy metals, i.e., cars, batteries, etc.; and making recycling mandatory for critical raw materials, such as those present in circuit boards, magnets used in disc drives and electric vehicles, batteries for electric vehicles and fluorescent lamps;
- Prioritizing improving energy efficiency in public buildings such as schools, libraries, community centres and government offices, and public transportation fleets, such as emergency services and local government;
- Implementing MoveUP’s proposal to create a new made-in-BC agency that is a people-centred program that provides a one-stop shop to coordinate building retrofits that will


¹¹ https://www2.gov.bc.ca/assets/gov/environment/climate-change/advisory-council/bc_climate_solutions_council_2022_annual_report.pdf

maximize the reduction of GHGs from buildings at the same time as maximizing the number of jobs that are created for each grant;

- Applying an energy justice approach to all programs to improve energy efficiency in buildings. Targeted approaches for low-income people and renters should be included and access to cooling equipment should also be provided for these marginalized groups;
- Implementing the recommendations within the BCFED's Clean Transportation submission;¹²
- Prioritizing investment in renewable energy sources for the production of electricity, and only supporting hydrogen in hard-to-reach sectors where direct electrification is not an option. In addition, this should only be hydrogen produced with additional renewable energy, not through the continuation of the fossil fuel industry;
- Prioritizing impacted workers in the reconfiguring of the forest sector to centre value-added approaches. Any public investment into market development of this sector must be tied to public benefits, including ensuring good, unionized labour in this emerging sector; and
- Focusing government initiatives and investments on encouraging the reduction of greenhouse gas emissions, so applying carbon management technology and systems only to specific contexts, such as the production of cement and steel.

Conclusion

We look forward to seeing consideration of our recommendations included in the next iteration of the Interim Workplan for BC's Regional Energy and Resource Tables. We welcome further and continuing engagement with the BCFED and our affiliate unions to ensure the labour perspective and voices of workers are front and centre in the development of these initiatives.

1000_23sub_tg_initial_feedback_bc_regional_energy_resource_table.docx/km 

¹² <https://bcfed.ca/news/briefs/submission-bcs-government-clean-transportation-action-plan>