CLEAN ENERGY CANADA

SUBMISSION

Date: March 6, 2026

B.C. Zero-Emission Vehicles Act and Regulation: 2026 Engagement Paper

Clean Energy Canada is pleased to submit these comments to the Ministry of Energy and Climate Solutions in response to the *B.C. Zero-Emission Vehicles Act and Regulation: 2026 Engagement Paper* (the "Engagement Paper").

The following is a summary of our recommendations:

- Preserve a strong *Zero Emission Vehicles Act* ("ZEV Act") and Regulation that builds on B.C.'s EV leadership to-date and complements, rather than mirrors, the federal government's new approach to EV regulations.
- Revise the 2030 Zero-Emission Vehicle (ZEV) sales targets from 90% to no less than 55%, and the 2035 ZEV sales target from 100% to 90%, respectively. These targets are based on various models' medium growth scenarios for B.C. and would ensure B.C. sets targets that are at least as ambitious as what the province expects Canada will achieve through vehicle emission regulations nationally.
- Remove the prohibition on non-ZEV sales in 2035.
- Reaffirm that conventional hybrids remain ineligible for credits under the ZEV Act and Regulation.

Preserve B.C.'s Zero Emission Vehicles Act and Regulation

The Government of B.C. should preserve a strong ZEV Act and Regulation that builds on B.C.'s EV leadership to-date and complements (versus mirrors) the federal government's new approach to EV regulations.

B.C. is a leader on electric vehicle uptake. It consistently ranks in the top five highest EV market shares among Canadian provinces and U.S. states. Supported by smart policies and programs such as the Go Electric rebate, there are now almost 200,000 EVs on B.C. roads and the province nearly reached its 2026 EV sales target of 26% in 2024, two years early. With nearly 8,000 public chargepoints already installed and B.C. leading Canada in fast charger installations in 2025 (see figure below), the province is poised to meet or even exceed its 2030 charging targets ahead of schedule as well.

Leaderboard: Top Provinces by Deployment #s
Based on New DCFC Ports Opened — 2025

Source: Paren

PROVINCES	2025	All Time	YoY Growth	% of 2025
British Columbia	614	2,493	32.7%	31.9%
Quebec	610	2,650	29.9%	31.7%
Ontario	484	2,406	25.2%	25.1%
Alberta	82	457	21.9%	4.3%
Nova Scotia	42	127	49.4%	2.2%
Manitoba	31	143	27.7%	1.6%
New Brunswick	29	235	14.1%	1.5%
Saskatchewan	27	202	15.4%	1.4%
Northwest Territories	3	9	50.0%	0.2%
Newfoundland & Labrador	2	36	5.9%	0.1%
Yukon	1	24	4.3%	0.1%
Prince Edward Island	0	22	0.0%	0.0%
Total	**1,925**	**8,804**	**28.0%**	**100%**

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The B.C. *Zero Emission Vehicles Act* and Regulation have already delivered—and will continue to deliver—a myriad of benefits to B.C. residents. These benefits include:

- **Driving affordability** by unlocking the fuel cost savings EVs provide, lowering the upfront price of EVs at no cost to the provincial government, and building a robust used EV market. From a total cost of ownership perspective, a typical EV driver can save approximately $2,600-3,400 per year in B.C. compared to a gas car driver, translating into savings of $26,000-$34,000 over 10 years of vehicle ownership, according to new analysis by Clean Energy Canada that will be published in the coming weeks. As a result of B.C.'s robust new EV market, you can now also purchase a used EV for between $10,000 and $20,000 in the province, opening up the electric car market to a whole new demographic of buyers. With some of the cheapest and cleanest electricity in the country—and with gas prices expected to rise as a result of recent global events—B.C. drivers stand to save more on fuel by going electric than drivers in other parts of the country.
- **Ensuring British Columbians continue to get access to the best supply of EV makes and models, including new affordable Chinese EVs**. The Fiat 500e, Jeep Wagoneer S, and even the Ontario-built electric Dodge Charger were made available for purchase exclusively in Quebec and B.C. (the only two provinces with ZEV sales regulations in place) before other provinces. Preserving B.C.'s ZEV Act will maintain B.C.'s preferential access to new makes and models, including the new Chinese EVs from brands such as Chery and BYD that are expected to enter the Canadian market in the coming months (as

Chinese carmakers will be incentivized to sell their vehicles in B.C. to earn credits under the ZEV Act).

- **Providing regulatory certainty for investments**. Keeping the ZEV Act in place is one of the best ways to support private sector investment in Canada's EV supply chain, as utilities are guided by EV targets to help project electricity demand, developers rely on them when deciding whether to include EV charging in new buildings, and charging station providers use them to determine whether the business case for charging investments in certain areas exists.
- **Reducing emissions in B.C.'s highest-polluting sector.** Transportation accounts for 42% of B.C.'s emissions, with passenger vehicles accounting for about one-third of that total. Zero-emission vehicles are one of the best solutions we have for cutting carbon pollution from passenger vehicles.
- **Improving air quality and saving lives.** According to a recent study by Health Canada, tailpipe pollution contributes to 160 premature deaths annually in B.C.. The monetized value of the total health impacts from on-road transportation in B.C. amounts to an estimated $1.3 billion per year. Zero-emission vehicles produce no tailpipe pollution, which means better air quality in our communities.
- **Supporting B.C.'s burgeoning ZEV industry**: B.C.'s ZEV sector delivers jobs and significant economic opportunities across the province with some 400 companies that directly provide over 8,000 full-time jobs and contribute more than $900 million to the provincial gross domestic product.

It would be a mistake for the B.C. government to repeal or significantly weaken a policy that's delivered cheaper EVs, better charging infrastructure, cleaner air and real consumer benefits over the last six years.

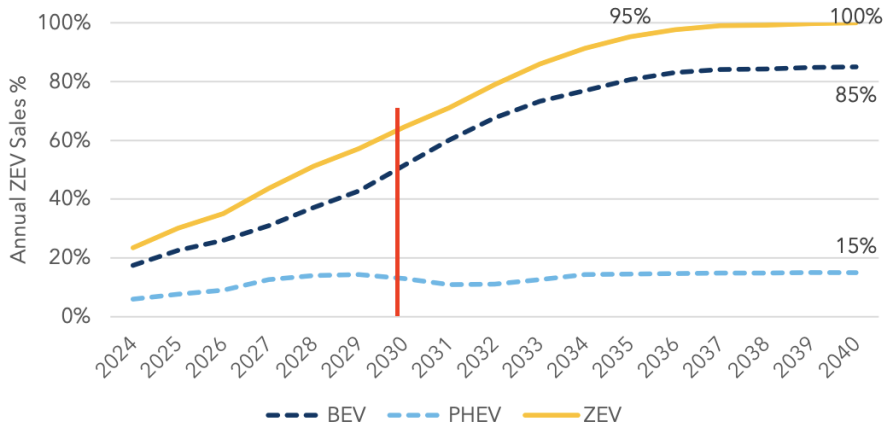
Revising Light-Duty ZEV targets

Clean Energy Canada recommends revising the ZEV Act targets from 90% down to no less than 55% for 2030, and from 100% down to 90% for 2035. Recent modelling and analyses from multiple credible organizations indicate that these targets are reasonable and achievable for B.C.:

- Modeling conducted by Dunsky Climate & Energy Advisors for Electric Mobility Canada projects that B.C. will reach **65% ZEV sales by 2030** and **95% by 2035** in a "medium growth" scenario. (see graphic below)
- BC Hydro's 2025 Integrated Resource Plan includes a medium or "reference scenario" that predicts B.C. achieves **60% ZEV sales by 2030** and **100% by 2035**.
- The B.C. Ministry of Energy and Climate Solutions projects that B.C. will achieve **55% ZEV sales by 2030**, according to the Engagement Paper.

Figure 17. Annual ZEV sales % by powertrain, medium growth, British Columbia

British Columbia will experience significant growth in ZEV uptake, reaching 100% by 2040.



Since the ZEV Act was put in place in 2019, zero-emission vehicle sales in the province have grown significantly, from 4% of new car sales in 2018 to 22% in 2024. While B.C.'s ZEV sales dipped in 2025 following the "pause" of the provincial and federal EV rebates and the uncertainty that pause created for buyers,[1] they recovered in Q4 2025 according to new data from S&P Global Mobility. Indeed, B.C. achieved 22.5% ZEV sales in Q4 2025—the highest sales share ever, save for one quarter in 2024 when it reached nearly 25% (see graphic below).

With the federal rebate now re-launched, lower tariffs on Chinese EVs (which will directly deliver more affordable vehicles by Chinese carmakers and stimulate competition in the domestic market, encouraging other non-Chinese carmakers to prioritize more affordable offerings) and forthcoming federal tailpipe emission standards coming into effect next year, B.C. is likely to see ZEV sales continue on an upward trajectory in 2026.

[1] A September 2025 poll conducted by Abacus Data on behalf of Clean Energy Canada found that the vast majority of those open to buying an EV said they would simply wait for an update (41%) rather than purchase an EV today (14%).

ZEV share

Province	2024 - Qtr1	2024 - Qtr2	2024 - Qtr3	2024 - Qtr4	2025 - Qtr1	2025 - Qtr2	2025 - Qtr3	2025 - Qtr4	Q4 25 vs Q3 25	Q4 25 vs Q4 24
Newfoundland	2.4%	2.6%	2.9%	3.1%	2.5%	2.0%	2.5%	2.6%	-22.8%	-22.8%
P.E.I.	7.2%	8.9%	9.6%	10.2%	8.0%	6.0%	6.4%	6.6%	-13.7%	-39.3%
Nova Scotia	4.2%	4.5%	5.6%	7.0%	5.2%	3.4%	4.4%	5.2%	4.7%	-23.3%
New Brunswick	6.0%	7.4%	7.5%	8.3%	7.4%	6.9%	4.2%	4.2%	-9.0%	-48.7%
Quebec	25.0%	28.4%	34.7%	42.0%	14.8%	17.3%	20.2%	21.3%	-8.0%	-55.5%
Ontario	7.0%	7.8%	9.0%	9.6%	7.3%	5.8%	6.6%	7.7%	4.6%	-22.7%
Manitoba	3.4%	5.1%	6.3%	7.1%	5.4%	4.7%	5.4%	5.6%	-6.4%	-26.3%
Saskatchewan	2.6%	2.8%	3.5%	3.6%	2.8%	2.5%	2.4%	2.5%	-12.0%	-32.2%
Alberta	4.2%	4.2%	5.6%	6.1%	4.7%	3.8%	3.7%	5.6%	29.1%	-14.8%
British Columbia	21.9%	21.8%	24.9%	22.5%	19.3%	15.6%	16.7%	22.5%	25.9%	-3.8%
Yukon	10.6%	12.3%	10.3%	14.5%	10.9%	4.7%	6.8%	9.4%	31.6%	-28.6%
Northwest	0.4%	2.3%	3.9%	1.7%	1.1%	1.3%	1.2%	0.9%	-50.0%	-40.0%
Nunavut	5.8%	0.0%	1.2%	5.9%	0.0%	1.3%	0.0%	8.0%	0.0%	100.0%
National	**12.5%**	**13.4%**	**16.5%**	**18.9%**	**9.7%**	**9.2%**	**10.4%**	**12.1%**	**2.4%**	**-40.0%**

Source: S&P Global Mobility

The fourth quarter sales share should serve as a clear sign of how healthy ZEV demand in B.C. continues to be. Indeed, Clean Energy Canada's polling consistently shows that British Columbians are more likely than all Canadians to say they intend to get an electric car next. And this is especially the case in the Lower Mainland, where seven in 10 Metro Vancouverites are inclined to get an EV as their next car.

The federal government's new auto strategy commits to developing and implementing federal vehicle emission standards that would deliver approximately 75% ZEV sales by 2035 and 90% by 2040. The Engagement Paper indicates that the B.C. government is inferring this regulation would also deliver about 55% ZEV sales nation-wide by 2030. With a significant head start—from more EVs on the road, to a better charging network, to higher public awareness of the benefits of EVs— B.C.'s ZEV Act and Regulations should set 2030 and 2035 ZEV sales targets that are *at least as high* as what Canada expects to achieve nationally, if not higher than the national average.

Removing the 2035 Prohibition on Non-ZEV Sales

Clean Energy Canada agrees with the CleanBC Review Panel's recommendation to remove the 2035 prohibition on internal combustion engine vehicle sales. Removing the 100% target could further enhance public support, improve policy durability and offer options for "hard-to-electrify" jurisdictions", while still achieving significant emission reductions and improving EV affordability and availability.

Conventional Hybrids

Clean Energy Canada recomends that the B.C. Government confirm that conventional hybrids continue to be ineligible for credit under the ZEV Act. Conventional hybrids are mildly more efficient than other internal combustion engine vehicles, but they still only run on fossil fuels, emit significant greenhouse gases, and don't offer the same cost-savings benefits as EVs. For instance, driving a Honda CR-V hybrid only reduces one's fuel consumption by 24% compared to a regular gas-powered Honda CR-V. In contrast, driving a fully electric vehicle eliminates fuel consumption entirely by swapping it out for electricity, saving drivers thousands of dollars in avoided fuel and maintenance costs every year. To include conventional hybrids is to lose the vast majority of emission reductions and affordability benefits that could be realized through electric vehicle adoption.

Including conventional hybrids would also undermine a number of the standard's objectives—improving EV availability and affordability, stimulating investment in transformative battery electric vehicle technology, and providing market certainty for charging station providers looking to build out Canada's charging network. As conventional hybrids only have a small battery and do not charge externally at all, they would not contribute to the evolution of Canada's battery sector and charging network buildout.

Last, conventional hybrids are already a widespread technology that have achieved unprecedented growth since the pandemic and do not need additional support via being incentivized under ZEV Act. Sales of conventional hybrids across Canada have risen from 38,600 vehicles sold in 2019 to 169,000 in 2024. Last year, hybrid sales reached a record high sales share of 17.2%, up from 13.3% in 2024 and 10.9% in 2023 and B.C. led the country in HEV sales share (see graphic below). Crediting conventional hybrids would lead to a massive oversupply of credits under the B.C. ZEV Act and Regulation, compromising the integrity of the credit market and the policy's effectiveness, and signfiicantly decreasing actual ZEV sales.

Province	ZEV share 2024	ZEV share 2025	Hybrid share 2024	Hybrid share 2025
Quebec	32.9%	18.5%	8.2%	13.4%
British Columbia	22.8%	18.3%	16.1%	20.9%
Ontario	8.3%	6.8%	16.2%	19.7%
PEI	9.1%	6.7%	12.2%	16.3%
New Brunswick	7.3%	5.7%	12.1%	14.0%
Manitoba	5.5%	5.2%	11.9%	15.1%
Alberta	5.0%	4.4%	13.6%	16.6%
Nova Scotia	5.3%	4.4%	12.0%	14.6%
Saskatchewan	3.1%	2.5%	10.7%	12.4%
Newfoundland	2.8%	2.3%	10.0%	12.3%

Source: S&P Global Mobility