An Analysis of B.C.’s Light-Duty Fleet Transformation

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Who We Are

EcoForward Sustainable Solutions Society is uniquely qualified to analyze British Columbia's light-duty vehicle transformation due to its decades long leadership in delivering a number of the province's most impactful clean transportation programs. Formerly known as SCRAP-IT, Canada's first voluntary vehicle retirement and emissions reduction initiative, EcoForward has supported BC's transition away from high polluting internal combustion vehicles since the 1990s, operating programs designed to reduce emissions, retire older vehicles, and expand access to cleaner transportation alternatives.

EcoForward's leadership in the past 10 years includes supporting ZEV adoption and deployment of EV charging infrastructure. The organization has administered over $49 million in EV rebates through the Electric Vehicle Rebate Program, $2.8 million in rebates for EV home chargers, $2.3 million in rebates for EV fleet charging, $1.3 million for rebates for B.C. residents who surrendered a vehicle for other transportation options such as transit passes, carshare, and e-bikes, and over $10 million in rebates for electric bikes.

The programs delivered by the Society have supported provincial GHG reductions under the Climate Change Accountability Act.

With years of operational experience, direct involvement in numerous major clean transportation program in BC, and a robust track record of measurable emissions reduction outcomes, EcoForward is exceptionally well positioned to produce this comprehensive, evidence-based analysis of BC's transition to cleaner forms of transportation.

Purpose of this Report

This report analyzes why transportation-sector emissions in B.C. are not declining despite ZEV mandates, LCFS requirements, and federal emissions standards. It identifies the key factors driving continued emissions from the province's light-duty fleet and discusses why current policies may not achieve their intended outcomes without addressing the new and used ICE vehicle population.

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Executive Summary

British Columbia's transportation sector continues to be the province's largest source of greenhouse gas (GHG) emissions, despite more than a decade of clean-transportation initiatives, record ZEV adoption rates, and the implementation of both the Low Carbon Fuel Standard (LCFS) and the *Zero-Emission Vehicle Act*.

B.C.'s light-duty fleet remains 96% gasoline or diesel powered, and the age, longevity, and continued growth of this fleet is eroding and will continue to erode any gains ZEV adoption and the LCFS carbon-intensity reduction targets achieve.

This analysis identifies three major factors, largely outside direct policy control, that are preventing B.C. from meeting transportation-sector emission targets.

A Large, Long-Lived ICE Fleet

Over 3.28 million light-duty internal combustion engine (ICE) vehicles remain on the road, with 53% being model year 2014 or older. These older vehicles each emit between 3.9 and 4.5 tonnes of GHGs annually and are expected to remain in operation for a total of approximately 20 years. These vehicles are contributing to a large and persistent baseline of emissions.

ICE Vehicle Turnover is Not Declining

Despite ZEV mandates, new ICE vehicles continue to enter the market in large numbers, and almost all will eventually become used vehicles. With no provincial restrictions on importing or reselling used ICE vehicles, the total number of fossil fuel vehicles in circulation remains largely unchanged.

ZEV Adoption Rates and ZEV Availability Alone are Not the Limiting Factors

ZEV adoption rates, while historically strong, softened temporarily in 2024 and 2025 mainly due to the permanent cancellation of B.C.'s provincial ZEV rebate program. Even though sales increased late in 2025 with the Federal rebates reinstated, ZEVs still only account for only 4–5% of the fleet (depending on dataset and timing) of B.C.'s registered light-duty fleet and many ZEVs originally sold in B.C. are later exported, written off, or deregistered thereby reducing their long-term provincial impact.

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Emissions Outlook

By the end of 2024, B.C.'s light-duty fleet had already produced over 200 million tonnes of GHG emissions. Even if the carbon-intensity targets under the LCFS are met every year through to 2030, the remaining lifetime emissions of the existing fleet will exceed 547 million tonnes, bringing the total projected emissions liability to more than 747 million tonnes (excluding future additions to the fleet e.g., imported used or newly sold ICE vehicles).

With the above numbers "in hand" it is mathematically difficult to conclude that the province's existing regulatory framework (ZEV Act and LCFS combined with federal emissions standards) will meaningfully decrease the emissions produced by light-duty ICE vehicles in the province without a mechanism that accelerates replacement.

Why Current Policies Will Not Close the Gap

This report identifies several systemic challenges:

- Long-life ICE vehicles remain in circulation for decades, especially in B.C.'s mild climate.
- ZEV mandates apply to manufacturers, not consumers, and do not reduce emissions from new or existing (used) ICE vehicles.
- Federal emissions standards have (to-date) plateaued, and new ICE vehicles still emit roughly 3.7 tonnes of GHGs annually.
- Used ICE vehicle imports and sales counteract ZEV sales, creating "fleet inertia."
- The current 3.2 million ICE vehicles in B.C. plus those new/used, sold or imported through to 2027 (when federal emissions standards aim to improve fuel economy of ICEs), are largely reliant on reductions in fuel carbon intensity (LCFS), rather than reductions in supply or turnover.
- Population growth will maintain high overall vehicle demand through 2030.
- Affordability issues will continue to make used ICE vehicle prices attractive.

Together, these factors explain why transportation-sector emissions have risen since 2007 and why sectoral targets continue to be missed.

Conclusion

B.C. may not meet its transportation-sector emission goals without reducing the size and

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age of its existing ICE fleet. ZEV mandates, LCFS requirements, and federal emissions standards combined are unlikely to meaningfully decrease emissions at the scale required to offset the impact of millions of new and used ICE vehicles that will continue operating for decades.

Definitions

The following definitions are relied upon in this document.

“Appendix A”	means the MS Excel document titled “Supporting Data for Light-Duty Fleet Transformation in B.C.”
“CI”	means carbon-intensity, as it related to the carbon-intensity of fuel in accordance with B.C.’s Low Carbon Fuel Standard (LCFS).
“Continued GHG emissions” or “Continued emissions”	means the current, plus future emissions that will be produced between today and the anticipated ICE vehicle’s end-of-life, or those that are avoided in the future by purchasing a ZEV.
“Credits” and “Debits”	mainly refers to the positive and negative number of compliance units under the LCFS which can be sold or traded through credit markets (they each represent one tonne of GHG emissions). The ZEV Act also has a credit/debit system however they differ from LCFS compliance credits as there is no marketplace for them beyond manufacturers.
“Current” or “Currently”	means as of December 31, 2024, unless otherwise noted.
“Federal Emission Standards”	refers to the On-Road Vehicle and Engine Emission Regulations, under the *Canadian Environmental Protection Act,* 1999 (CEPA).
“Fleet”	means all light-duty gasoline and/or diesel fueled ICE and/or ZEV vehicles combined and currently registered to operate in B.C. as noted in the Assumptions/Data section.
“Fuel(s)”	means gasoline, diesel or both gasoline and diesel fuels burned by ICE vehicles.
"Fuel Supplier" (or "Supplier")	refers to a person responsible for the supply or marketing of fuel in British Columbia, as defined under Section 6 of the *Low Carbon Fuels Act*.
“GHGs and/or CO2 emissions”	It is understood that burning gasoline or diesel fuel produces greenhouse gases. Those gases include CO2, N2O and CH4. CO2 is the principle GHG. The use of the terms, GHGs and/or CO2 emissions

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	include all the GHGs that are emitted through the burning of gasoline or diesel fuels.
“ICE vehicle(s)”	means internal combustion engine light-duty vehicles that burn either gasoline or diesel fuel.
“NRCan”	means the department of the Government of Canada know as Natural Resources Canada.
“Over 3.2 million”	ICE vehicles on the road today refers to the 3,284,138 gasoline or diesel fueled Light-Duty ICE vehicles registered in B.C. as of December 31, 2024, according to publicly available ICBC records.
“Vehicles”	means the combination of light-duty gasoline and/or diesel fueled vehicles (only).
“ZEV vehicles”	means battery electric (BEV), plug-in hybrid electric (PHEV) and hybrid electric (HE) vehicles.

Assumptions and Data

- The assumption for distance driven is 14,000 kms per year up to 10 years of age, then 9,000 kms per year for year 11 and beyond.[1]
- Based on the available data, ICE vehicles remain in operation on the roads in B.C. for an average of 20 years or 230,000 kms.[2]
- All NRCan fuel consumption data used (where indicated) is based on the published combined city/highway (l/100km) fuel consumption ratings.[3]
- The 3,284,138 registered light-duty ICE vehicles currently on the road in B.C. by model year as of December 31, 2024, is based on data published by ICBC.[4] This number increased to 3,439,728 as of December 31, 2025.
- The 4% registered ZEV vehicles currently (as of December 31, 2024) on the road in B.C. is based on data published by ICBC.[5]

Referenced Acts & Regulations

- *Low Carbon Fuel Act,* SB.C. 2022 (LCFA)
- Low Carbon Fuel Standard (LCFS)

[1] Appendix A – Definitions & Sources (TAB 1)
[2] Appendix A – Tab 6-Life Expectancy BC Fleet
[3] Government of Canada. (n.d.). **Fuel consumption ratings**. Open Government Portal. https://open.canada.ca/data/en/dataset/98f1a129-f628-4ce4-b24d-6f16bf24dd64
[4] Appendix A – Tab 3-Current Fleet YE 2024
[5] Appendix A – Tab 3-Current Fleet YE 2024

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- *Zero Emission Vehicle Act,* SB 2019 (ZEV Act)
- On-Road Vehicle and Engine Emission Regulations, under the *Canadian Environmental Protection Act,* 1999 (CEPA).

B.C.'s Transportation Sector Transformation Goals

CleanBC and the 2025 Climate Change Accountability Report

The 2025 Climate Change Accountability Report confirms, *"The transportation sector continued to account for the largest share of B.C.'s emissions (41%). This includes emissions from trucks and mobile equipment used on-site at industrial operations*."[6]

It also notes that although *"transportation emissions fell 4% (2022 to 2023) mainly due to renewable fuels, they are still 7% higher than 2007 levels."*[7]

The report also confirmed that the *"transportation sector continues to be the largest contributor of greenhouse gas emissions than any of the other sectors."*[8]

"Transportation emissions were 4% lower in 2023 than in 2022. Light-duty vehicle emissions declined by 2%. This is in large part due to significant increases in the use of renewable fuels."[9]

Further, it was reported that as of June 2025 B.C.'s light-duty ZEV fleet reached 210,000. *"In 2024, B.C. had the second-highest uptake of zero-emission vehicles (ZEVs) in Canada. As of the end of June 2025, over 210,000 light-duty ZEVs are now registered in B.C., compared to just over 3,000 in 2015."*[10]

Progress Towards Sectoral Targets

The province's progress towards sectoral targets, however, are not being met. In fact, transportation sector emissions, as confirmed below, have increased between 2007 and 2023, despite the number of ZEVs on the road, and the incorporation of renewable fuels as required under the LCFS.[11]

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[6]Province of British Columbia. (2025). *Climate Change Accountability Report 2025 (pp. 6, 11, 16)*. https://www2.gov.bc.ca/assets/gov/environment/climate-change/action/CleanBC/2025_climate_change_accountability_report.pdf
[7] Ibid.
[8] Ibid.
[9] Province of British Columbia. (2025). *Climate Change Accountability Report 2025* (p. 11). https://www2.gov.bc.ca/assets/gov/environment/climate-change/action/CleanBC/2025_climate_change_accountability_report.pdf
[10] Ibid, p. 6.
[11] Ibid, p. 16.

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Sector	2023 emissions change relative to 2007	2030 Target relative to 2007
Transportation	+7%	-27% to -32%
Buildings and Communities	-11%	-59% to -64%
Other Industry	-7%	-38% to -43%
Oil and Gas	-22%	-33% to -38%

Source: Ministry of Energy & Climate Solutions, CleanBC Climate Change Accountability Report, November 2025

"Total transportation emissions have risen since 2007, and the modeled transportation emissions observed in 2030 and later are contingent on the continued blending of biofuels in diesel and gasoline and the deployment of zero-emission vehicles."[12]

The B.C. Low Carbon Fuel Standard

Brief Overview

The B.C. LCFS is a regulatory framework that requires fuel suppliers to reduce the lifecycle carbon-intensity of the transportation fuels they supply. Its primary goal is to achieve a 30% reduction in carbon-intensity by 2030 in comparison to 2010 levels.

Suppliers meet this target through fuel blending, switching to low-carbon alternatives (such as electricity, hydrogen, and RNG), and participation in a credit-based trading system.

These efforts are further supported by Initiative Agreements, which currently incentivize large-scale investments in the province's clean energy infrastructure.[13]

These agreements provide targeted support to projects that can reduce emissions. In return, project developers must meet specific performance targets and report on their results. This helps accelerate the rollout of new low-carbon technologies across B.C.

[12] Ibid, p. 16.
[13] Province of British Columbia. "Renewable & Low Carbon Fuel Requirements Regulation," Ministry of Energy, Mines and Low Carbon Innovation. https://www2.gov.bc.ca/gov/content/industry/electricity-alternative-energy/ transportation-energies/renewable-low-carbon-fuels

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Exemptions

Some fuel supplied in B.C. is exempt from the regulatory requirement. This exemption is not based on carbon-intensity it is based on annual supply volumes. Starting in 2022, the exemption applies to organizations who supply less than 200,000L annually.[14]

"As of 2022, less than one percent of gasoline and diesel fuel supplied in B.C. is exempt. Read RLCF-007 Requirements regulation summary for annual volumes of exempt fuel. The exemption limit for diesel and gasoline is 200,000L combined."[15]

According to the Low Carbon Fuel Standard Requirements website, as of 2022, less than one percent of gasoline and diesel fuel supplied in B.C. is exempt.[16] As the overall approach to the analysis is conservative, we did not adjust the carbon-intensity of fuels to address exemptions, however, as noted below we don't consider the number to be inconsequential.

It should be noted that the exemption carries forward year over year.

Regulated Fuel Volumes Supplied to B.C.

In 2024, 4,369,300,000 total litres of gasoline and 2,586,600,000 total litres of diesel, equalling 6,955,900,000 litres of fuel was supplied to B.C.[17] All of this fuel was subject to the low carbon fuel requirement except for the 1,100,000 litres that were exempt and did not have to meet carbon-intensity targets.

Gas 900,000 litres
Diesel 200,000 litres
Total 1,100,000 litres

[14] Ministry of Energy and Climate Solutions. (2025, August). *Information Bulletin RLCF-007-2024* (Revised). https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/renewable-low-carbon-fuels/final_rlcf007-2023_-_summary_2010-2024.pdf

[15] Ministry of Energy and Climate Solutions. (2025, February). *Information Bulletin RLCF-005* (Revised). https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/renewable-low-carbon-fuels/rlcf-005_exemption_reports_12feb2025.pdf

[16] Ministry of Energy and Climate Solutions. (2025, August 12). *Low Carbon Fuel Standard requirements: Exemptions section*. https://www2.gov.bc.ca/gov/content/industry/electricity-alternative-energy/transportation-energies/renewable-low-carbon-fuels/requirements

[17] Ministry of Energy and Climate Solutions. (2025, August). *Information Bulletin RLCF-007-2024*. https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/renewable-low-carbon-fuels/final_rlcf007-2023_-_summary_2010-2024.pdf

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GHG emissions generated by 1.1 million litres of exempt fuel
Total Emissions = V x ED x CI/1,000,000
Total Emissions = 1,100,000 x 34.69 x 93.67/1,000,000
3,574 tonnes

Baseline Carbon-intensity & Reductions

The following are the 2010 baseline carbon intensities for gasoline and diesel fuels. The annual targets for decrease in intensity are calculated as percentages of reductions from this baseline[18]. The baseline is also key to calculations for carbon-intensity reductions for credit purposes.

Gasoline — Carbon-intensity 93.67g CO2e/MJ
Energy Density 34.69

Diesel — Carbon-intensity 94.38g CO_2e/MJ
Energy Density[19]

Since the CI of diesel fuel is greater than the CI of gasoline, and in order to project GHG emissions conservatively we will use the gasoline CI for all vehicles in the B.C. fleet as of December 30, 2024, that are not ZEV.

Carbon-intensity Reduction Targets

Starting in 2024, fuel suppliers in B.C. were required under the LCFS to reduce the carbon-intensity of fuel through the blending of biofuels and/or other low-carbon options. This requirement carries through to 2030.

The reduction percentage per year is measured from the baseline.

Example for 2024:

(Baseline) 93.67 – (Target) 78.68 = (Factor) 14.99

If you subtract (Factor) 14.99 from (Baseline) 93.67 = (Target) 78.68

[18] Province of British Columbia. (n.d.). *Baseline carbon intensities*. https://www2.gov.bc.ca/gov/content/industry/electricity-alternative-energy/transportation-energies/renewable-low-carbon-fuels/requirements
[19] Province of British Columbia. (n.d.) *Carbon intensities*. https://www2.gov.bc.ca/gov/content/industry/electricity-alternative-energy/transportation-energies/renewable-low-carbon-fuels/carbon-intensities

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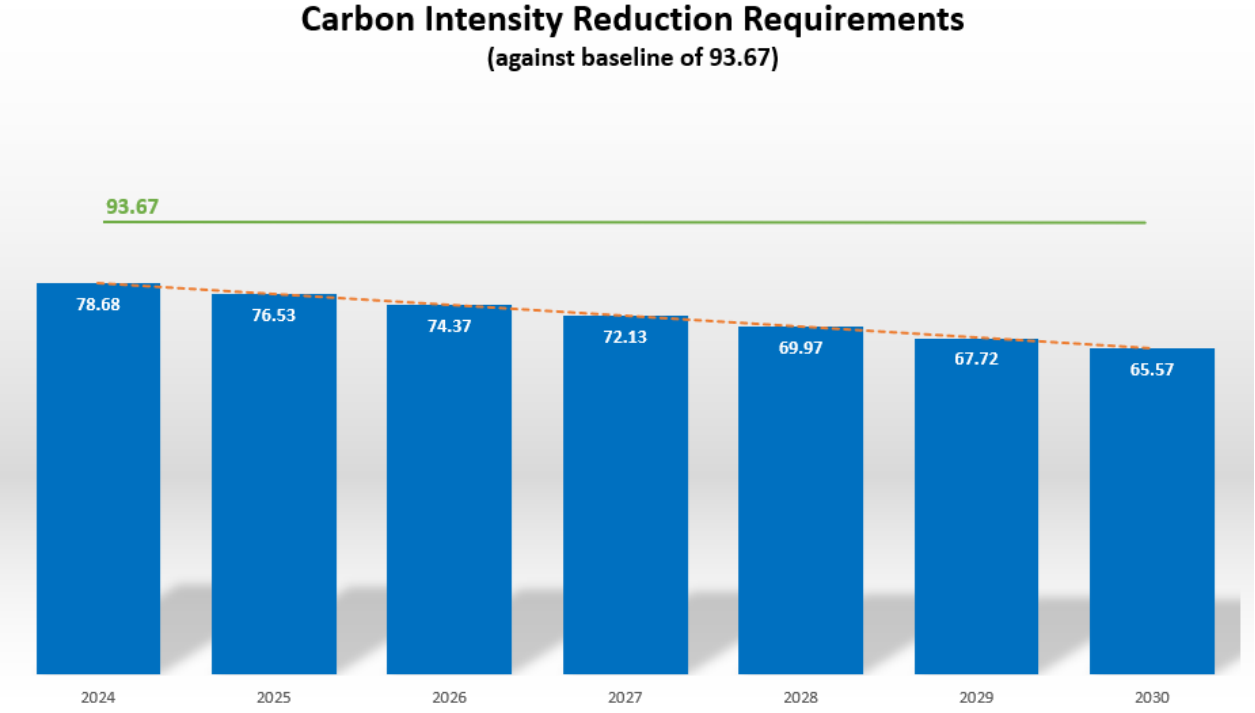
Each year is reported and reconciled in the following year. For example, when submitting compliance reports, fuel suppliers must report fuel supplied in 2024 on or before March 31, 2025.

The measurement for performance and compliance is based on the provincial "pool" of both gasoline and diesel fuels supplied vs. each individual litre of fuel.[20]

Suppliers who do not meet the small volume exemption, and do not meet the targets for either gasoline or diesel have two compliance options:

- Credit Acquisition (purchase compliance credits)
- Financial Settlement (pay the administrative penalty)
    - As of 2023, $600/per compliance unit
    - From 2019 to 2022, $200/per compliance unit



[20] Government of British Columbia. (2024). Information Bulletin RLCF-003: Compliance reporting requirements (Revised May 2024). Ministry of Energy, Mines and Low Carbon Innovation. https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/renewable-low-carbon-fuels/rlcf-003_compliance_reporting_requirements.pdf

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Compliance Credits

According to the BC LCFS Credit Market Data Report[21], in 2025, 115 transfers of 1,730,041 credits at an average price of $259.50 and a total dollar value of $448.9 million confirms that some fuel suppliers are not meeting the regulated target carbon intensities but rather, relying on the credit market. In other words, paying for other projects that will "decarbonize" for them vs. reducing the CI of fuel. This activity is completely acceptable under the Regulation as the funds support projects that decarbonize in other ways.

Purchasing credits reduces the penalty for fuel suppliers who do not or cannot achieve compliance. Credits typically trade for significantly less than the penalty and would therefore be a desirable option.

NOTE: Under the LCFS 1 compliance credit represents 1 tonne of GHGs.

Any credits created by independent projects must be related to transportation fuels. Examples: bio-fuel production, EV charging, hydrogen station supply, and so forth.[22]

The projects that create approved (and therefore saleable) credits could be seen as equivalent to the carbon reductions that would have been achieve through the lowering of the carbon-intensity of fuel.

Administrative Penalties

In November of 2025, the Ministry of Energy and Climate Solutions published i*nformation Bulletin RLCF-021: Administrative Monetary Penalties*[23]. Within that bulletin, Table 1 lists the compliance actions from 2019 to 2023 that resulted in administrative monetary penalties.

The reverse math on the penalties paid for each reporting year shows that 247,332.20 tonnes of GHG emissions may not have been avoided through the reduction of the carbon-intensity of fuel or through Initiative Agreement credits.[24]

The results for 2024 are not yet published as the compliance reporting for 2025 is not due until March 31, 2026.

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[21] Province of British Columbia. (2026, March 4). *Low Carbon Fuel Standard credit market: Credit market data*. https://www2.gov.bc.ca/gov/content/industry/electricity-alternative-energy/transportation-energies/renewable-low-carbon-fuels/credit-market#data

[22] Province of British Columbia. (n.d.). *Initiative Agreements*. https://www2.gov.bc.ca/gov/content/industry/electricity-alternative-energy/transportation-energies/renewable-low-carbon-fuels/initiative-agreements

[23] Province of British Columbia. (2024, August). *RLCF021: Administrative monetary penalties*. https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/renewable-low-carbon-fuels/rlcf021_administrative_monetary_penalties_202408.pdf

[24] Appendix A – Tab 18-Compliance Penalties

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Summary of LCFS Compliance

BC's Renewable and Low Carbon Fuel Requirements Summary (2010–2024)[25] shows that fuel suppliers exceeded renewable content requirements in 2024 with gasoline renewable content reaching 11.4% and diesel strongly over-performing with 31.3% renewable content.

However, Information Bulletin RLCF-021 [26]shows that administrative monetary penalties continue to be issued where blending or CI reduction targets are not met. Although paying a penalty is an accepted compliance pathway under the regulation, it indicates that some suppliers are not fully achieving the program's intended outcomes through renewable blending or CI reductions alone.

The following is a summary of the key points from *"Designing a low carbon fuel standard to achieve deep GHG reduction targets: Insights from an energy-economy simulation model of British Columbia."*

- *The effectiveness of the LCFS is highly dependent on ZEV adoption levels.*
- *If ZEV uptake is weaker than modeled, the LCFS must compensate.*
- *Lower-than-expected ZEV adoption increases compliance pressure on fuel suppliers.*
- *This outcome implies a need for expanded compliance pathways.*
- *Ensuring system stability requires pre-emptive expansion of LCFS credit flexibility to safeguard against slower-than-assumed ZEV market growth, thereby maintaining the achievability of carbon-intensity targets under multiple adoption trajectories.*[27]

> "*Effective Jan. 1, 2026, the minimum 5% renewable-fuel requirement for gasoline must be met with eligible renewable fuels produced in Canada. The renewable-fuel requirement for diesel is 4% and will immediately be increased to 8%. Beginning April 1, 2025, the renewable content of diesel fuel must be produced in Canada."*[28]

Reports suggest that meeting future compliance targets cannot rely solely on fuel blending due to engine limits (referred to as the "blend wall").[29] However, Initiative

[25] Province of British Columbia. (2025, August). *RLCF-007-2024: Summary for 2010 - 2024*. https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/renewable-low-carbon-fuels/final_rlcf007-2023_-_summary_2010-2024.pdf

[26] Province of British Columbia. (2024, August). *RLCF021: Administrative monetary penalties*. https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/renewable-low-carbon-fuels/rlcf021_administrative_monetary_penalties_202408.pdf

[27] Lepitzki, J. (2017). Designing a low carbon fuel standard to achieve deep GHG reduction targets: Insights from an energy economy simulation model of British Columbia (Report No. 663). Simon Fraser University.

[28] Province of British Columbia, Ministry of Energy and Climate Solutions. (2025, February 27). *B.C. will strengthen biofuel industry with Canadian-content requirements* [Press release]. https://news.gov.bc.ca/releases/2025ECS0008-000147

[29] Lepitzki, J. (2017). *Designing a low carbon fuel standard to achieve deep GHG reduction targets: Insights from an energy-economy simulation model of British Columbia* (Master's project, Simon Fraser University). Report No. 663.

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Agreements currently support (a) refinery co-processing, (b) carbon capture, and (c) charging infrastructure (or "EV adoption").[30]

As it pertains to (c) above, conceptually, oil companies would build their own EV charging networks to "self-generate" credits. This option, however, relies on high growth/sales of EVs.

The *Zero Emission Vehicle Act*

Brief Overview

This Act mandates automakers to sell an escalating percentage of zero-emission vehicles. The goal is to phase out the sale of new internal combustion engine (ICE) light-duty vehicles.[31]

On November 19, 2025, the B.C. Provincial government announced, "*British Columbia has abandoned a rebate program for electric vehicles that it paused six months ago and is scrapping a mandate that every new vehicle sold in the province must be zero-emission by 2035"* adding *"the 90% target and 100% goal were no longer realistic" and "the rebates were never meant to be permanent."*[32]

It has been acknowledged by the Ministry of Energy and Climate Solutions that this timeline will not be met.[33]

The timeline for 100% of new light-duty ZEV sales was 2035.

"Prime Minister Mark Carney announced the end of the Electric Vehicle Availability Standard, stating the government would replace the EVAS with a reduced goal of 75 per cent EV sales by 2035 and 90 per cent EV sales by 2040."*[34]*

[30] Province of British Columbia. (n.d.). *Initiative Agreements*. https://www2.gov.bc.ca/gov/content/industry/electricity-alternative-energy/transportation-energies/renewable-low-carbon-fuels/initiative-agreements
[31] Province of British Columbia, Ministry of Energy and Climate Solutions. (n.d.). *Zero-Emission Vehicle Act*. https://www2.gov.bc.ca/gov/content/industry/electricity-alternative-energy/transportation-energies/clean-transportation-policies-programs/zero-emission-vehicles-act
[32] Depner, W. (2025, November 18). *B.C. redrawing EV sales mandate, scraps goal of 100% by 2035, leaves rebates to feds*. CBC News. https://www.cbc.ca/news/canada/british-columbia/bc-electric-vehicle-rebates-sales-mandates-9.6984032
[33] Province of British Columbia, Ministry of Energy and Climate Solutions. (2025, November 18). *B.C. brings in measures to support EV adoption, auto sector, while awaiting federal decision* [News release]. https://news.gov.bc.ca/releases/2025ECS0045-001133
[34] Vorano, N. (2026, February 5). *Canada Repeals EV Availability Standard restores $5,000 vehicle incentives with new automotive policy*. Electric Autonomy. https://electricautonomy.ca/policy-regulations/2026-02-05/canada-repeals-ev-availability-standard-restores-5000-vehicle-incentives-with-new-automotive-policy/

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In April 2026, B.C. formally introduced amendments to its Zero-Emission Vehicles (ZEV) Act to better align with the federal direction. Key changes include:

- Reducing the 2035 target from 100% to 75% ZEV sales.
- Removing the outright ban on internal combustion vehicle sales by 2035.
- Shifting some targets into regulations for more flexibility.

Detailed post-2027 targets (2028–2030) are not yet finalized and are being held back pending federal decisions on fleet emission standards.

Relationship to the B.C. LCFS

The B.C. LCFS targets the fuel supplied for use in vehicles. The ZEV Act targets the vehicles themselves to ensure cleaner vehicles are available for British Columbians to purchase. These are two different Acts, that regulate two different bodies. They target different stages of the lifecycle, and credits are issued for different compliance purposes. ZEV credits measure progress toward a vehicle supply mandate, while LCFR credits measure actual emissions reductions from fuel use.

ZEV Act Compliance Credits

Automakers have sales targets and earn credits for every ZEV they sell. If they sell more than the target, each sale earns a credit and those can be banked or sold to other manufactures. If automakers fail to meet targets, and do not have enough credits to cover shortfalls, they have options, through Initiative Agreements, for example, investment into charging infrastructure. If approved, some may be allowed to carry temporary debits into future years.

These credits differ from LCFS compliance credits, they are not inter-changeable and there is no marketplace for them beyond manufacturers.

Automotive industry representatives have stated that the mandated targets of the Act are not achievable without consumer demand.[35]

[35] Gruske, C. (2025, September 6). *Canada pauses EV sales mandate for 2026*. Electric Autonomy. https://electricautonomy.ca/policy-regulations/2025-09-06/canada-ev-sales-mandate-2026-pause/

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Since consumer demand is linked to affordability and affordability is often linked to rebates, what will automakers do if they do face penalties for not meeting the ZEV sales targets? (even when the targets have been lowered).

It's reasonable to expect that any additional compliance cost incurred by the manufacturers may be offset in some way. This could potentially include pricing strategies such as discounting ZEVs or increasing the price of new and used ICE vehicles. While there is no direct evidence that manufactures will implement such pricing strategies, costs are likely to be passed on to consumers in some form. This is sometimes described as a "hidden tax."

"The average price of a used car here in B.C. is $37,700, nearly $4,000 more than the average price in the rest of Canada. Compared to last year's prices in B.C., there has been a significant 4.95 per cent increase, and compared to the previous month, it marks a modest 1.14 per cent increase."[36]

"British Columbia: $37,147 (+1.38% MoM, +1.13% YoY) — highest average price in the country, and one of the few that rose to close the year."[37]

What is Currently Regulated

The ZEV Act initially regulated new, light-duty vehicles with a gross vehicle weight rating (GVWR) of 3,856 kg or less.

Included: Most light-duty vehicles: from two-seater to full-size cars, station wagons (small & mid-size), pickup trucks, SUVs (small and standard), mini vans, cargo vans (non-passenger) and any special purpose vehicle under that weight.

Beginning October 1, 2024, the ZEV Act and Regulation also began regulating new Class 2B vehicles. This captures vehicles with a gross vehicle weight rating of 4,536 kg or less.

Included: Class 2B vehicles in Canada include full-size pickup trucks, large SUVs, utility or step vans. These vehicles fall within the Gross Vehicle Weight Rating (GVWR) range of 3,856 kg to 4,536 kg (8,501–10,000 lbs).

[36] Ali, A. (2025, September 11). *B.C. has the highest average used car prices in the country*. Daily Hive. https://dailyhive.com/vancouver/bc-used-car-prices-canada
[37] Clutch. (2026, January 14). *Clutch used car pricing report (December 2025)*. https://www.clutch.ca/blog/posts/clutch-used-car-pricing-report-december-2025

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The CleanBC Go Electric Rebate Program

Costs & Rebates

The CleanBC Go Electric Passenger Vehicle Rebate Program provided incentives at the point-of-sale to consumers who purchased zero-emission vehicles. The Ministry of Energy and Climate Solutions, BC Hydro and the New Car Dealers Association of B.C. worked together to deliver the program.

"Between March 2015 and May 2023, the Ministry provided a total budget of $234.7 million to the Program. In May 2023, the BC Hydro and Power Authority (BC Hydro) was committed to administer the Program, in collaboration with the Ministry and the NCDA, and fund the Program through the sale of Low Carbon Fuel Standard credits.[38]

CleanBC Go Electric Passenger Vehicle Rebate Program		**Reported # of ZEV passenger vehicle rebates issued**	**Average rebate cost per vehicle**
Total Provincial funding provided (Mar 2015 to May 2023)	$234,700,000		
Total BC Hydro provided (Dec 2023) funds from carbon credit sales	$100,000,000		
Total Received	$334,700,000		
Total Expended on Rebates as at Dec 2023	$274,400,000	84,276	$3,256

Since the February 2026 announcement by Prime Minister Mark Carney regarding new sales targets for ZEVs, B.C.'s Minister of Energy and Climate Solutions has reiterated that B.C. has permanently ended provincial funding for this program.

NRCan Fuel Consumption Ratings

[38] Internal Audit and Advisory Services, Ministry of Finance. (2024, May). *Internal audit of the CleanBC Go Electric Passenger Vehicle Rebate Program*. https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/services-policies-for-government/internal-corporate-services/internal-audits/passenger-vehicle-rebate-program.pdf

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Modest Fuel Consumption Improvements

NOTE: *The analysis below is based on the average of all NRCan published fuel consumption ratings for 55,052 makes/models of vehicles (1980 through 2024).*[39]
How much has the average fuel consumption of vehicles with model years between 1980 and 2024 improved in 44 years?

- Between 1980 and 2015 there was a slight decrease of 1.8 L/100 km
- Between 2015 and 2024 there was a slight increase of +0.1 L/100 km
- The overall average for all 44 years is 12.25 L/100 km

NOTE: Based on the available NRCan data and the analysis provided in this report the 2018 average fuel consumption rating of 9.0 L/100 km was not sustained. The decrease was supported by technological advancements such as hybrid and electric vehicles, but consumer preference led a rise in the purchase of larger SUVs and pickup trucks.

For the reasons noted above, the 2018 fuel consumption rating has not been included in average calculations for all years.

Increased Vehicle Weights

"…the shift in new vehicle sales towards more polluting SUVs and trucks has cancelled out more than 80 per cent of the reduction in average fuel consumption that has been achieved by more fuel-efficient engines over the period of 2010-2022 in Canada.[40]**"**

Further, regulations allowed for lower emissions standards for larger vehicles. *"Canada adopts its vehicle fuel efficiency regulations from the American Environmental Protection Agency (EPA), and these rules currently allow automakers to get away with selling more polluting vehicles if they are larger in size or weigh more. These loopholes have encouraged automakers to make bigger and heavier vehicles while shifting car sales to SUVs to 'game' the system.*[41]**"**

The average light-duty vehicle in Canada now weighs roughly twice as much as it did 50 years ago, reflecting the addition of safety systems, comfort features, and larger vehicle designs. Consumer demand for improved performance has driven a doubling of average engine horsepower since the early 1980s. Improvements in engine and vehicle efficiency

[39] Appendix A, Supporting Data for Light-Duty Vehicle Transformation in B.C., Tab 1-Original Data Summary Chart, Column C, based on actual SCRAP-IT data for model years 1980 to 1994. NRCan data for model years 1995 to 2024. Includes all makes/models sold in Canada, for # makes/models included in averages see Appendix A, Tab 4-Avg Fuel Econ in 44 Yrs.
[40] Environmental Defence. (2024, November 13). New study: Rise of bigger vehicles has cancelled out 80% of improvements in Canadian fuel economy. https://environmentaldefence.ca/2024/11/13/bigger-car-truck-loophole-emissions-standard-study/
[41] Environmental Defence. (2024, November 13). New study: Rise of bigger vehicles has cancelled out 80% of improvements in Canadian fuel economy. https://environmentaldefence.ca/2024/11/13/bigger-car-truck-loophole-emissions-standard-study/

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technologies have enabled higher horsepower without proportional increases in fuel consumption.

"Average vehicle weight in North America (including Canada) has roughly doubled since the early 1970s, with trends in Canada closely tracking U.S. production figures used by NRCan for fleet analysis."[42]

Larger and heavier vehicles also put more load on the roads, and result in more frequent road maintenance. *"Overweight and heavy vehicles accelerate pavement deterioration, decreasing roadway performance life and increasing maintenance and rehabilitation costs for Canadian road agencies."*[43]

Since the average fuel consumption has not decreased but has maintained an average of 11.1 L/100 km level since 2013 it can be assumed that new ICE vehicles coming into the market meet this standard.

Example:

Between 2013 and 2024 the best-selling SUV in Canada was the Toyota RAV4. For direct comparisons purposes, we are referencing the RAV4 AWD model.

- Toyota Rav4 AWD - 2013 combined fuel consumption = 8.1 L/100 kms
- Toyota Rav4 AWD - 2024 combined fuel consumption = 8.5 L/100 kms[44]

Light-duty ICE vehicles are each still (on average) emitting approximately 3.7 tonnes of emissions annually.

Because ICE efficiency has plateaued, the CI reduction calculation for the 20-year lifecycle is stable. If fuel consumption data projected ICE engines getting cleaner every year (in tandem with the CI reductions) the continued emissions would drop considerably. *Reference Appendix A – Tab 4-Avg Fuel Consump in 44 Yrs*. Since they are not, the 547 million tonne future liability is determined to be a conservative and realistic estimate.

[42] Natural Resources Canada. *Learn the facts: Weight affects fuel consumption*. https://natural-resources.canada.ca/sites/www.nrcan.gc.ca/files/oee/pdf/transportation/fuel-efficient-technologies/autosmart_factsheet_16_e.pdf

[43] Transportation Association of Canada. (n.d.). Quantifying incremental pavement damage caused by overweight trucks.https://www.tac-atc.ca/en/knowledge-centre/technical-resources-search/conference-papers/quantifying-incremental-pavement-damage-caused-by-overweight-trucks/

[44] Natural Resources Canada. (2013). *Fuel consumption guide 2013*. https://publications.gc.ca/collections/collection_2013/rncan-nrcan/M141-5-2013-eng.pdf

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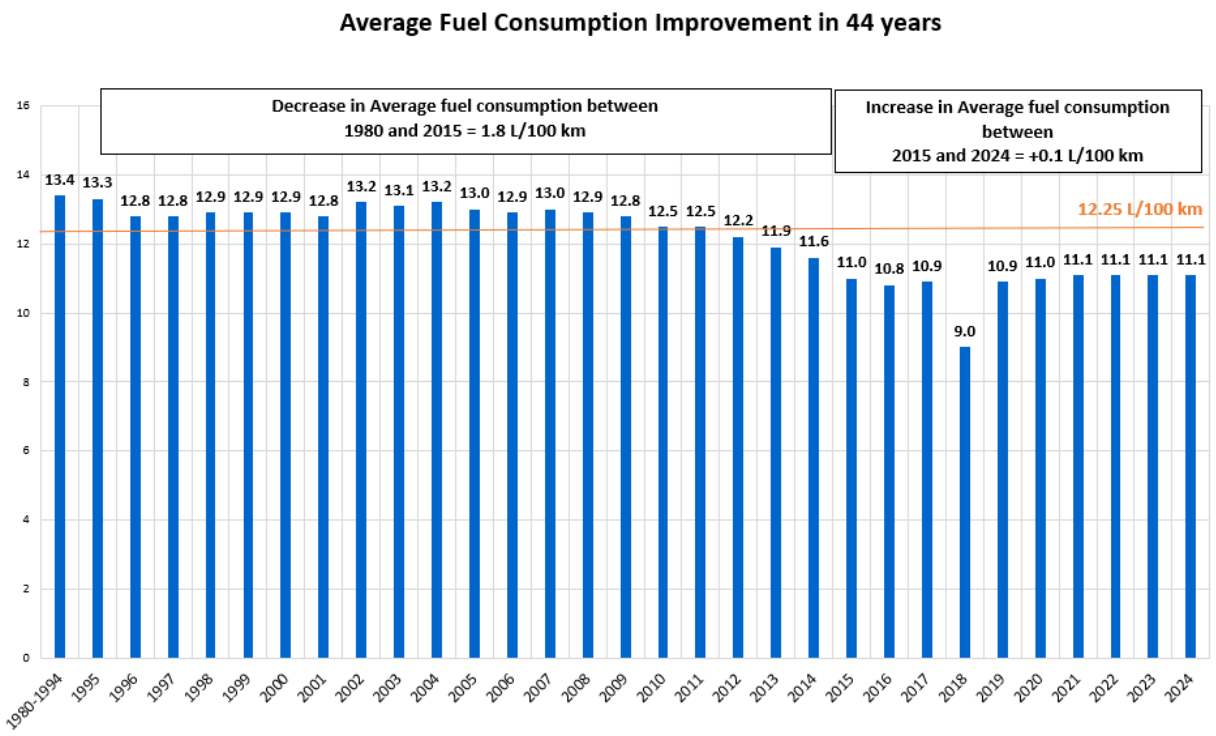

The fact that fuel consumption has not consistently reached an average below 11.1 L/100 km in the last 6 years, or below 12.25 L/100 km over a 44-year period suggests that vehicle fuel efficiency and current technologies may already be at their best considering the increases in vehicle weights.

2026 Federal Emissions Standards

The recent (February 2026) announcement by Prime Minister Mark Carney, was not the classic NRCan, fuel consumption, tier-styled, controlled laboratory testing (5-cycle test) regulatory mechanism. It's a fleet-wide emissions cap system that uses those underlying measurements for compliance.

"The federal policy intends to replace the sales-mandate approach with a performance-based emissions standard, meaning automakers are no longer required to meet fixed ZEV sales quotas but must instead ensure their fleets meet increasingly stringent greenhouse-gas limits.

Under the new framework, emissions standards for vehicles sold between 2027 and 2032 will be tightened significantly and are designed to drive average tailpipe emissions down to roughly 74 grams per mile by 2032, representing about a 57% reduction in vehicle emissions intensity over time.

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This shifts compliance to a system where manufacturers can meet targets through a mix of technologies (ZEVs, hybrids, or more efficient ICEs)."[45]

This concept, if achievable by manufacturers, could have a significant impact on reducing future emissions. However, it does not address emissions from the existing ICE fleet, nor the long-term emissions commitment associated with continued ICE vehicle imports/sales. Each new ICE vehicle sold represents approximately a 20-year emissions trajectory that will persist while the transition to lower-emission technologies, including more efficient ICEs, gradually unfolds.

B.C. may need to consider how to "bridge the gap" between the current light-duty ICE vehicle fleet, and the new (model year 2027 and beyond) fleet, as envisioned in the Federal framework.

B.C.'s Current Fleet

NOTE: The total B.C. fleet number changes on a regular basis as new/used ICEs and ZEVs are imported/sold into the marketplace. ICBC data for 2025 suggests a slight change in percentage of ZEVs from 4 to 5% of the fleet, however, this change is not significant enough to alter the findings or conclusions in this report.

96% are ICE Vehicles

As of December 31, 2024, 96% of B.C.'s registered light-duty vehicles were gasoline and/or diesel fueled and 4% were ZEV.[46]

1.7 Million (53%) are Over 10 Years Old

Emissions standards have become increasingly more stringent over time, but even though these standards, between 1980 and 2020, have reduced the overall average GHG emissions per vehicle from 4.5 to 3.7 tonnes per vehicle per year (a .56 tonne reduction) ICE vehicles are each still (on average) emitting approximately 3.7 tonnes of emissions annually. *Reference Appendix A – Tab 7-On Road by Age.*

[45] Burke, A., & Thurton, D. (2026, February 5). Goodbye EV sales mandate, hello purchase rebates: Carney shakes up Canada's auto industry. CBC News. https://www.cbc.ca/news/politics/carney-dropping-ev-mandate-introducing-new-emissions-standards-9.7075302
[46] Appendix A – Tab-3-Current Fleet YE 2024

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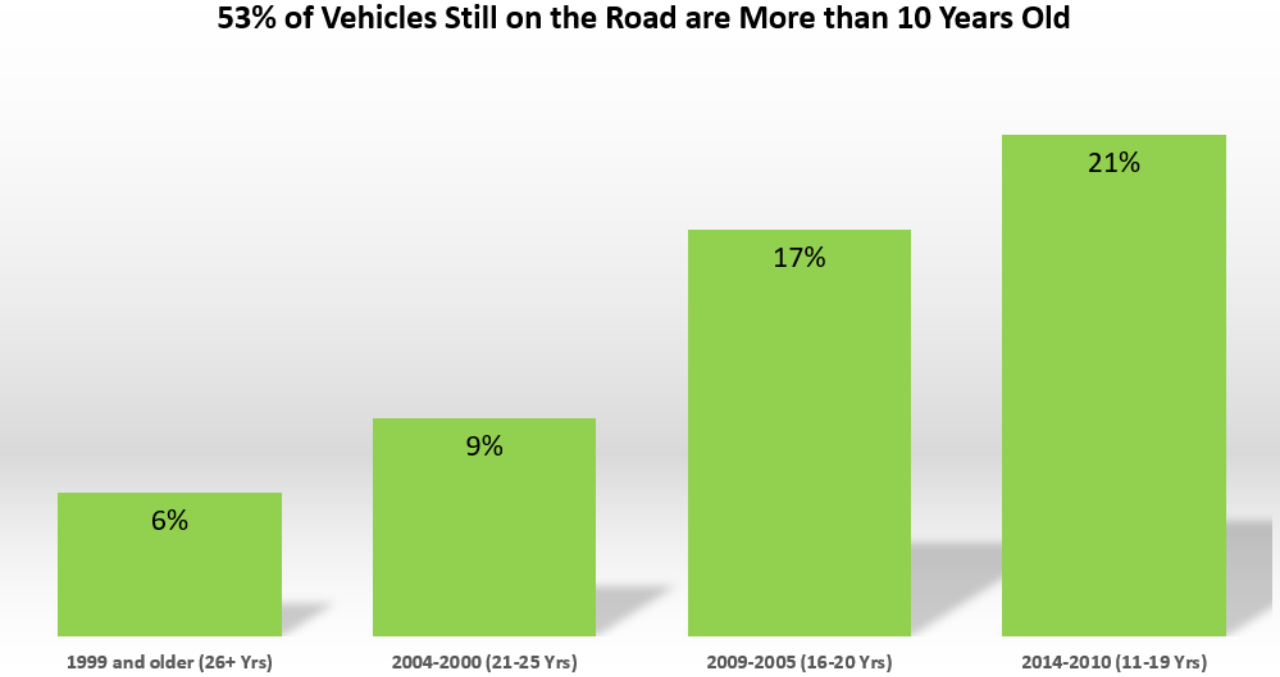
There are over 1.7 million vehicles model year 2014 and older currently in operation in B.C. On average, each one of these vehicles emits between 4.5 and 3.9 tonnes of GHGs per year. Those 1.7 million vehicles represent 53% of B.C.'s current fleet.



2.08 Million (63%) Meet Tier 2 (or Less) Emission Standards

The following is a snapshot of B.C.'s current fleet (for all model years), by age, as it pertains to the emissions standards that were set out for manufacturers. *Reference Appendix A – Tab 5-Age & Emissions Standards.*

Number	Model Year	Age Range	Emissions Standard Met
583,737	1980 to 2005	44 to 19 Yrs	2001 NLEV or less
1,497,087	2006 to 2016	18 to 8 Yrs	Tier 2 or less
2,080,824	Total		

2,080,824 or 63% of B.C.'s current ICE vehicles are 8 years or older and meet the Tier 2 (or less) emissions standards.

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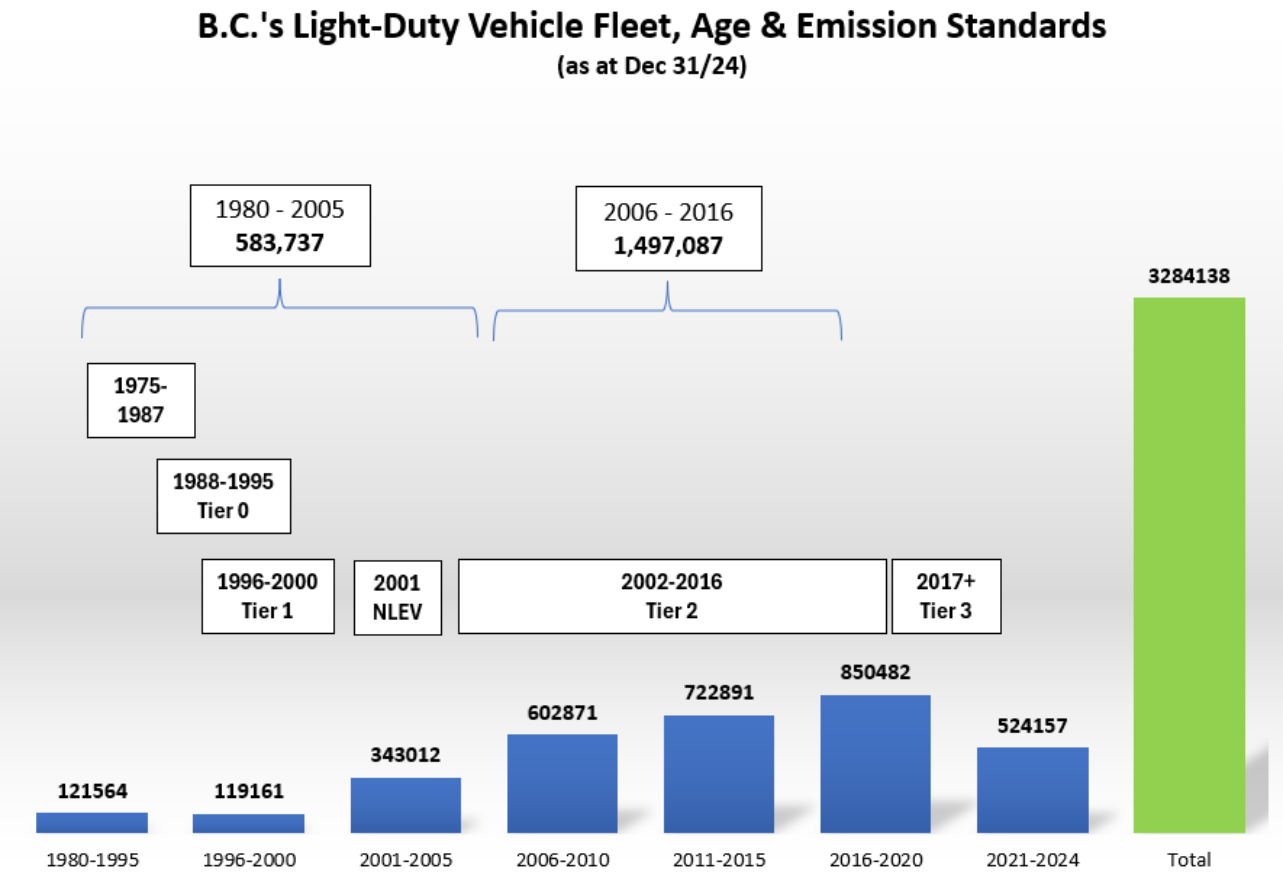

Population Growth vs. Light-Duty ICE Vehicle Ownership

Because it's not easy to forecast specific vehicle demographics (makes, models, and registration years), this analysis is based on a rudimentary population projection to assess the future BC fleet. *Reference Appendix A – Tab 10-Population & Registrations*.

The following methodology was applied:

- Used the official BC Stats population projections (2024–2030) to establish a baseline for total vehicle demand.[47]
- Maintained a fixed ownership rate of 58%, reflecting the 2024-2025 ratio of light-duty ICE vehicles B.C.

[47] Province of British Columbia, BC Stats. (2025). *BC Stats population projections (2024–2030)*. https://bcstats.shinyapps.io/popApp/

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- Maintained the 58% ratio throughout the projection period to allow for continued demand in the used ICE market, (likely to be driven by current inflation issues combined with the cost differential for new ZEVs).
- Allowed for a 1:23.33 (ZEV to ICE) drop-off for purchases of ZEVs (based on the 2024 ratio between ICE and ZEVs registered in 2024) of 4.11%.

This provides an estimated prediction that a minimum of 3,191,248 light-duty ICE vehicles will continue to be licensed in the province annually between 2024 and 2030.

Why doesn't the 58% drop? We are predicting that until the prices of new and used ZEV and ICE vehicles align, a larger portion of the population (based on affordability), will continue to have no choice or will prefer to drive an ICE vehicle due to price.

New ICE Vehicles Continue to be Sold into the Marketplace

New ICEs Still Emit Average of 3.7 tonnes of GHGs (each, per year)

On average, newer vehicles have improved fuel efficiency by about 1.8 L/100 km, resulting in lower GHG emissions. However, average fuel consumption increased slightly (by 0.1 L/100 km) across model years between 2015 and 2024. *Reference Appendix A – Tab-11-New ICE Reg by Fuel*.

According to Statistics Canada data, *"at the end of 2024, 79% or 169,014 of all vehicle types (not just light-duty) registrations in B.C. were still gasoline and diesel."*[48]

NOTE: In reality, most new ICE vehicles sold by a dealer in B.C. eventually becomes a used ICE vehicle once it is purchased. The number of new ICE vehicles sold (give or take, accidents, interprovincial moves, etc.) will on average becomes the number of used ICE vehicles resold in the same marketplace, plus any additional used vehicles being imported (US, other provinces) for resale in B.C.

[48] Statistics Canada. (n.d.). [New motor vehicle registrations, quarterly, by geographic level, annual sum] (Table 20-10-0025-02). Government of Canada. https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=2010002502

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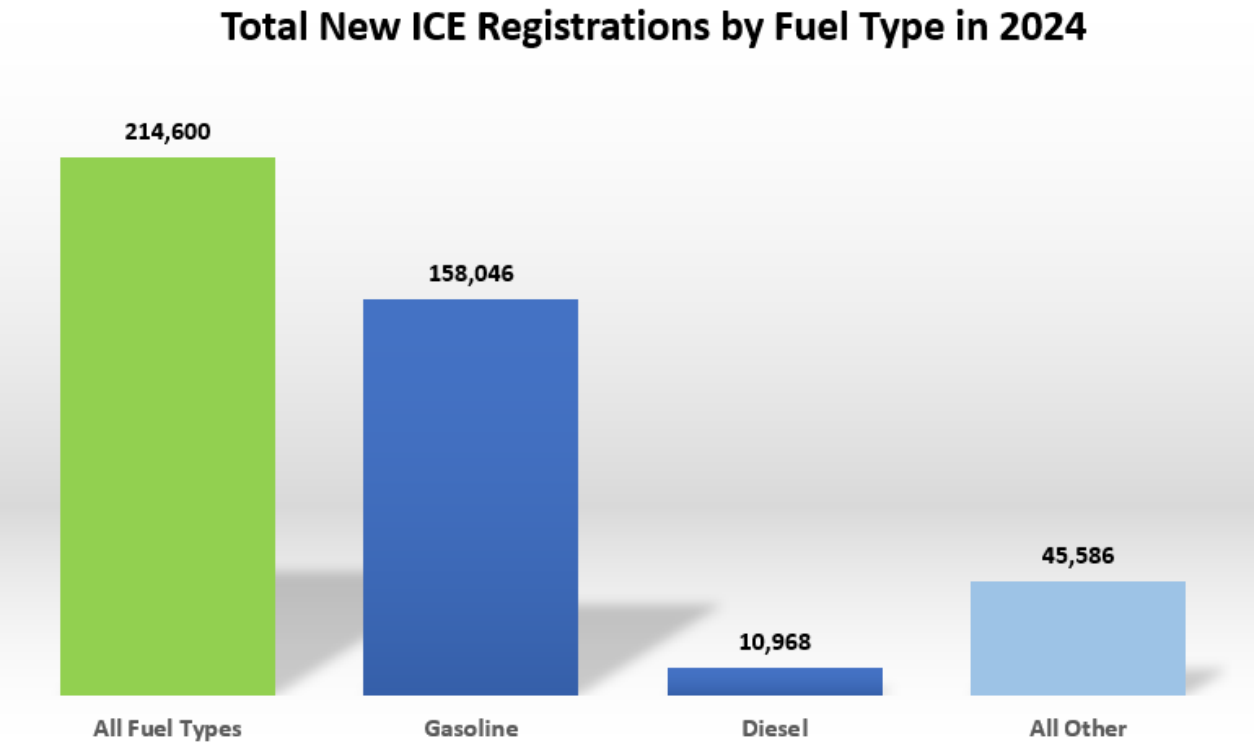

- Looking only at new ICE registration in 2024, the GHG emissions from these light-duty gas and diesel vehicles alone average 3.7 tonnes each or 625,352 tonnes per year collectively.

- Because incremental efficiency improvements have been insufficient to materially reduce per-vehicle emissions, this number will only eventually decrease by 30% if 100% of the regulated carbon-intensity reductions under the LCFS are achieved by 2030 (625,352 – 187,606 = 437,746 tonnes).

- This means the reduction burden for over 3.28 million ICE vehicles, plus those new/used sold/imported into B.C. is therefore placed on the CI of fuel.

- The 30% CI reduction requirement will also apply to all the new/used ICE light-duty vehicles are sold/imported into the B.C. marketplace each year between 2025 and 2027 (when the new federal emissions standards take effect).

Used ICE Vehicle Sales in B.C.

Throughout June and July of 2024, an independent search for used vehicles was completed identifying those that were older than 2014 and for sale in B.C. 1,913 records

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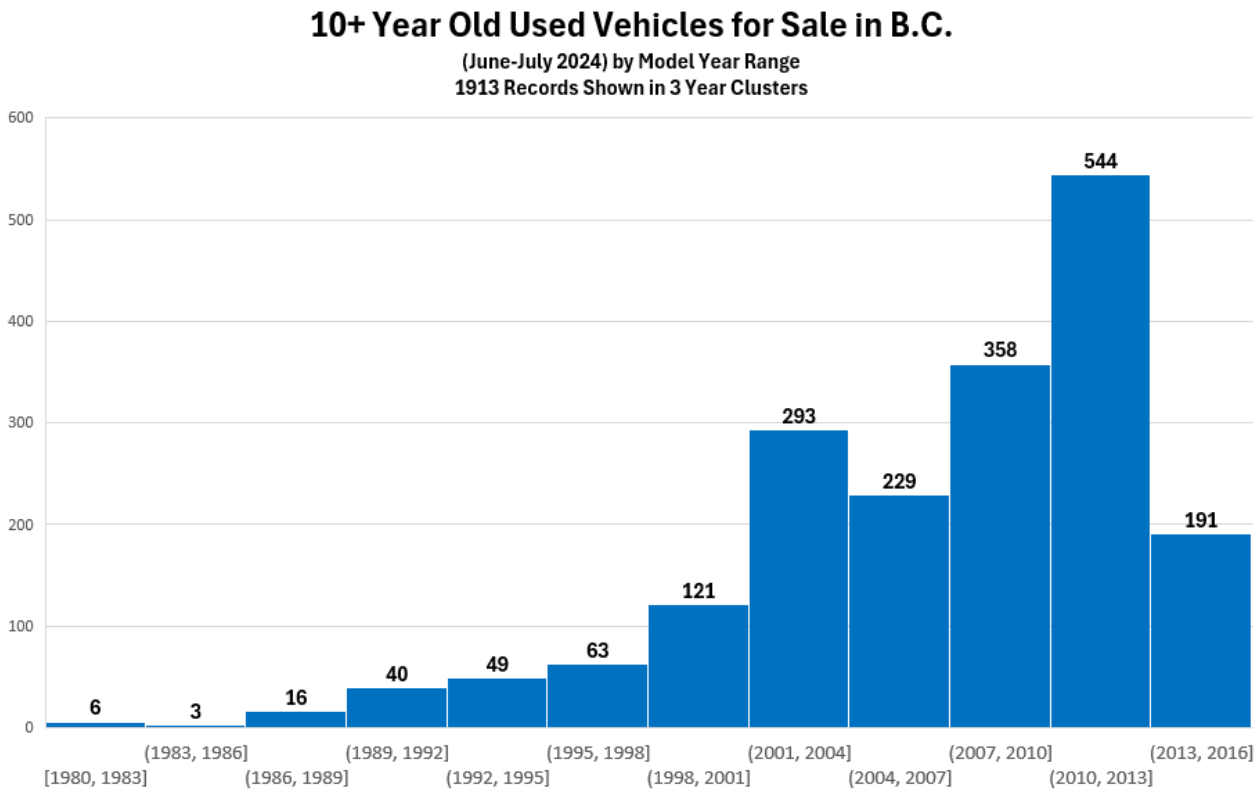
were found at that time. The vast majority were on AutoTrader (and were associated with a new car dealer location). Others were private sales and/or used car (only) dealers. *Reference Appendix A – Tab-14 Used ICE Sales*.

How polluting are these vehicles?

All the vehicles found (identified for the sample) were in the 1980 to 2016 model year range, which are vehicles that meet Tier 2 (or less) emissions standards. In other words, part of the 63% that have the worst fuel consumption ratings. *Reference Appendix A – Tab 15->10 Yr Used ICEs for Sale.*



Used ICE Vehicle Sales & Imports

It's challenging to reduce emissions if the total number of ICE vehicles on the road remains stagnant or increases due to used imports from other provinces or countries.

B.C. does not currently have any laws or environmental regulations that specifically restrict or ban the import of used ICE vehicles. While the province has set ZEV sales targets for the sale of *new* vehicles (soon to align with Federal sales mandates), the used

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market remains unrestricted.

Although the automotive landscape in Canada is changing daily at the national, political level, the current situation is as follows:

- If you bring a used ICE vehicle into B.C. from another province, there are only standard administrative and safety inspections, and taxes. There are no "green" restrictions per se.

Since there is no “carbon tax” or “import quota” on used ICEs coming into B.C. from anywhere in Canada, you can still buy a 2024 Ford F-150 in Calgary and register it in B.C. without (an emissions related) penalty.

NOTE: Because BC ended the AirCare program in 2014[49] there is no chemical emission tests on imported vehicles from other provinces. Under the B.C. Motor Vehicle Act Regulations, the ICE vehicle will be checked to ensure factory-installed emission control devices are there and functioning. Tampering with these systems is not allowed.[50]

If a vehicle is being imported from the USA, it must meet Transport Canada standards.[51] For some vehicles imported from the USA with high fuel consumption, an Excise Tax (Green Levy) may be added, however that is a tax based on the vehicle’s fuel consumption, not a cap on emissions, quota, or a requirement to reduce GHGs.[52]

The used market is why the 4–5% (current percentage of the B.C. fleet that is ZEV) is so hard to move. While government can mandate new car sales, they have not stopped:
- The import into B.C. (CAD or USA) of used ICE vehicles;
- The eventual resale of new ICE vehicles as used;
- Residents moving into B.C. with used ICE vehicles;

The used ICE market acts as a counterforce to B.C.’s ZEV goals.

Light-Duty ICE Vehicle Life Expectancy

The average life expectancy for all vehicles in B.C., based on the number of current registrations (by model year) is 20 years. *Reference Appendix A – Tab 6-Life Expectancy of BC Fleet.*

15%	Greater than 20 years

[49] British Columbia Ministry of Environment. (2014, December 29). *AirCare program comes to an end*. Government of British Columbia. https://news.gov.bc.ca/releases/2014ENV0112-001944
[50] DriveSmartBC. (2026). *Vehicle pollution enforcement*. https://www.drivesmartbc.ca/miscellaneous/vehicle-pollution-enforcement
[51] Transport Canada. (2025, January 22). Frequently asked questions – Importing vehicles purchased in the United States into Canada. https://tc.canada.ca/en/road-transportation/importing-vehicle/frequently-asked-questions-importing-vehicles-purchased-united-states-canada
[52] Canada Revenue Agency. (2026, February 24). *Rates of excise tax on fuel-inefficient vehicles*. https://www.canada.ca/en/revenue-agency/services/tax/technical-information/excise-taxes-special-levies/list-vehicles-associated-rates-excise-tax-fuel-inefficient-vehicles.html

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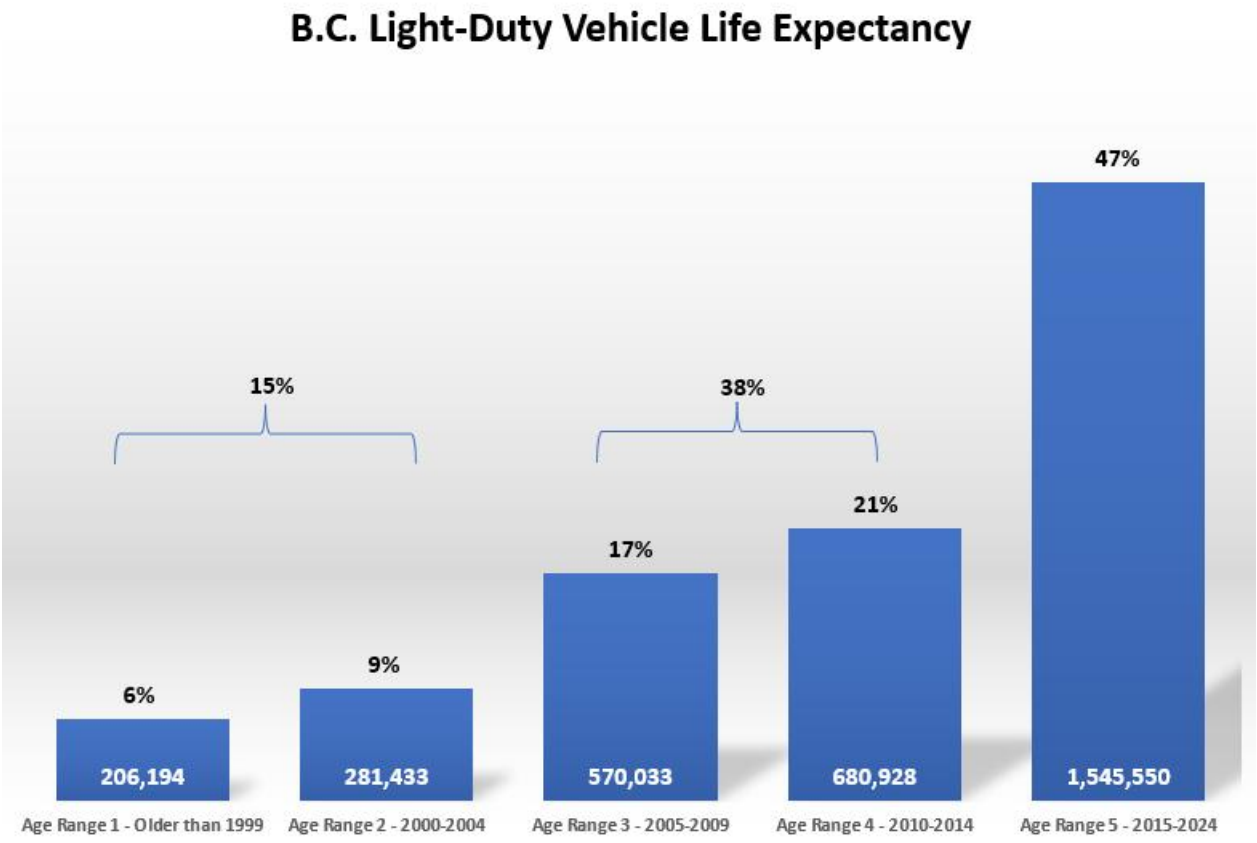
38%	Greater than 10 years
47%	10 Years or less



Why the Above Average Life Span

B.C. is known for having the longest-lasting light-duty vehicle fleet in Canada. Multiple factors contribute to the longevity (longer lifespan).

Rust Related Corrosion

B.C.'s mild climate means significantly less road salt is used in the winter months. Salt is an accelerator for rust and is particularly hard on the metal frame of the vehicle.

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Extreme Temperature Fluctuations

Freeze and thaw temperature cycles cause expansion and contraction. This process erodes rubber seals, gaskets and plastic components. The milder temperature fluctuations in B.C. prevents this cycle from occurring as often, preserving these parts longer.

Shorter Driving Distance Averages

According to data from the *Automotive Industries Association of Canada*, "*B.C. drivers average approximately 13,100 km per year, compared to roughly 16,000 km in Ontario.*[53]"

Shorter distances results in less wear and tear on the vehicle and longer timelines to reach a 230,000 km end-of-life average.

Economic Factors

The high cost of living in B.C. (i.e. housing) will often influence how spending is prioritized. For reasons mentioned above, an older vehicle can "look newer" for longer, and therefore consumers often elect to repair a vehicle rather than replace it. Because vehicles in BC are "rust-free" they hold resale value for longer and therefore a 10-year-old vehicle is still considered to be in good condition. Whereas in Montreal (for example) it may be reaching end-of-life.

The Transition of B.C.'s Fleet

EV Adoption Rates

In 2025 the New Car Dealers Association of B.C. reported a shift in ZEV sales.

According to a press release issued by the New Car Dealers Association of B.C. (March 5, 2025) there has been a "*softening in the ZEV market*."

"…if the government is committed to the transition to clean energy vehicles, they need to support the CleanBC Go Electric Vehicle Rebate Program, especially as we see a softening in the ZEV market. Where two years ago ZEVs represented almost 23% of

[53] Automotive Industries Association of Canada. (2021). *National vehicle kilometres travelled metrics, 2019–2021*.

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Light-Duty passenger vehicle sales in British Columbia, in 2024 we saw sales slip to 20.9% in Q3 (per stats Canada), so initiatives like this are critical."[54]

"After a noticeable dip in zero-emission vehicle (ZEV) market share in early to mid-2025, more recent data shows that sales rebounded later in the year. In British Columbia, ZEVs accounted for about 15.6% of new light-duty vehicle sales in Q2 2025 but rose to approximately 22.1% by Q4 2025, indicating a recovery toward previous levels."[55]

The ZEV rebound in 2025–2026 appears to be primarily driven by federal incentives, affordability conditions, supply availability and regulatory mandates, with rising fuel prices in early 2026 acting as a secondary reinforcing factor rather than a primary cause.

While this increase, likely influenced in part federal incentive support, suggests renewed momentum, ZEVs still represent a relatively small share of BC's fleet.

NOTE: Any differences in registration numbers between this report, ICBC data and CleanBC publications may be a result of:

- *B.C. government reports including all ZEV sales (e.g. including medium-heavy or off-road non-gasoline/diesel fuelled, which were not in-scope for this report).*
- *Data not reflecting deregistration's at the time of collection (accidents, intra-provincial moves, secondary sales, etc.) as noted in the next section of this report.*
- *Different data collection methods and/or reporting periods (cut-offs).*

Not all ZEVs Purchased in B.C. Stay in B.C.

For a number of reasons, ZEVs sold in B.C. do not necessarily stay here. Although there are many, some of the main reasons for this include:

- Relocation: The owner moves to another province.
- Insurance Write-off: The ZEV is in a major accident and ICBC declares it a total loss.
- Insurance Rebuild: According to the BC ARA, only about 20% of the salvaged ZEVs in B.C. are successfully rebuilt.
- Online Markets: Because B.C. has a mature ZEV market compared to other provinces, an owner may sell the vehicle to an out-of-province owner (e.g. Manitoba or Saskatchewan) where there are less available and therefore get a better price.

[54] New Car Dealers Association of British Columbia. (2025, March 5). *Budget 2025 doesn't go far enough to prepare for new economic reality/impact of US tariffs, say B.C.'s new car dealers*. https://www.newcardealers.ca/news-releases/budget-2025-doesnt-go-far-enough-to-prepare-for-new-economic-reality-impact-of-us-tariffs-say-bcs-new-car-dealers/

[55] Government of British Columbia. (2025). Zero-emission vehicle update 2025. https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/2025_zero_emission_vehicle_update.pdf

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- Leased Fleet Turnover: Many EVs are leased, when those vehicles are returned, they are considered "used" (and therefore no longer qualify for rebates). At this point companies may choose to move that inventory to a different province where they can often get a better resale price.

There is no one publicly available report that summarizes the out-flow of ZEVs from B.C. which is why it's important to focus on annual ICBC vehicle registrations, vs. new ZEV sales numbers when estimating GHG emission reductions.

"The data reveals that despite a high number of EVs being designated for rebuilding, only 20% of these vehicles were successfully rebuilt and passed Commercial Vehicle Safety and Enforcement (CVSE) inspections. This analysis highlights the significant exportation of salvaged EVs, which impacts British Columbia's ability to develop a local zero-emission vehicle (ZEV) recycling and repurposing infrastructure."

"The data shows that of the 652 EVs sold at ICBC auctions in 2023, 90% were designated for rebuilding, yet only 20% of these vehicles were successfully rebuilt and inspected."

"For example, while 414 Tesla's were sold to rebuilders, only 47 were successfully rebuilt and inspected, representing a rebuild success rate of just over 11%."[56]

ZEVs in B.C. are Starting to Reach End-of-Life

According to ICBC data, as of 2026, there are 8,850 ZEVs registered in B.C. that are between 10 and 19 years old.

A recent Geotab study, which includes a large-scale analysis of over 22,700 vehicles,[57] concludes that modern EV batteries are highly durable and typically outlast the usable life of the vehicle, with an average degradation rate of about 2.3% per year under real-world conditions. This translates to roughly 80–82% remaining battery capacity after 8 years, implying an expected functional lifespan of approximately 12 to 15 years or more before significant performance limitations emerge. These findings realistically support 180,000 to 300,000 km of driving, with many vehicles falling into the 200,000 to 250,000 km range under typical conditions.

While battery aging is inevitable, the findings emphasize that operational factors such as frequent high-power fast charging, hot climates, and heavy utilization can accelerate

[56] Automotive Retailers Association. (2024, October 18). *Summary analysis of electric vehicles sold through ICBC salvage auctions and rebuilt electric vehicle inspections by the CVSE (2023)*. https://ara.bc.ca/wp-content/uploads/2024/11/Final-Draft-Summary-Anaysis-of-Electric-Vehicle-Salvage-Exports.pdf

[57] Argue, C. (2026, April 28). How long do electric car batteries last? The updated guide to real-world EV battery health. Geotab. https://www.geotab.com/blog/ev-battery-health/

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degradation, whereas strategic charging and usage practices can meaningfully extend battery health.

The province is aware that the EV fleet is aging, and reports have suggested that B.C. has the opportunity to be the leader in ZEV battery repurposing and/or recycling.

"*New report shows B.C. can lead on EV battery Recycling*[58]"

Every year more ZEVs will reach end-of-life, and because of the "big push" for consumers to move into ZEVs really began around the same time as the CleanBC Go Electric Rebate Program began in 2015, you see the increase in sales grow considerably, but this also means the number of end-of-life ZEVs year-over-year will also grow considerably.

The measurement of ZEV impacts on GHG reductions should include a factor for the deregistration of ZEVs in order to be accurate. This also supports the recommendation that ZEV impacts on GHG reductions be based on ICBC registration data year over year and move away from new ZEV sales numbers or targets.

Reference Appendix A – Tab 16-ZEV End-of-Life

[58] Tam Wu, K. (2021, December 7). *B.C. can lead on EV battery recycling* [Media release]. Pembina Institute. https://www.pembina.org/media-release/bc-can-lead-ev-battery-recycling-report

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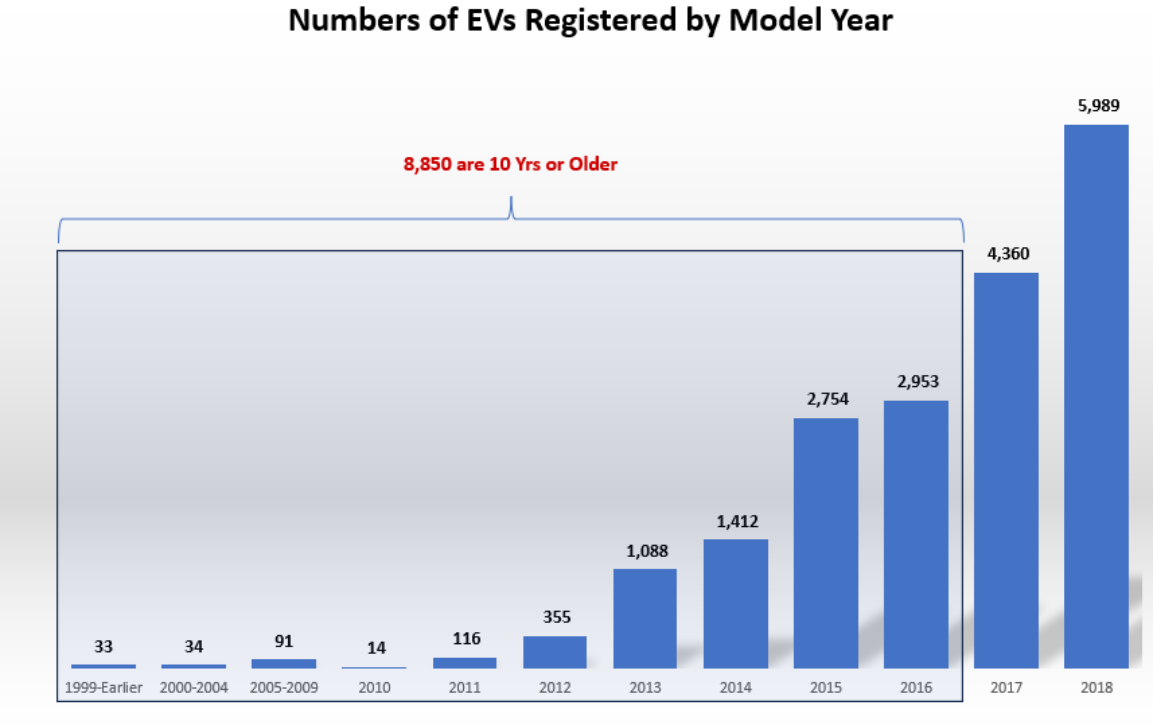

Impact of the LCFS on B.C.'s Current Light-duty Fleet

Based on the regulated carbon intensities, as of the end of 2024, 200,176,409 tonnes of GHG emissions were produced by B.C.'s current fleet. This is in spite of the fact that there were 166,254 light-duty ZEVs registered in B.C. as of December 31, 2025.

The future continued GHG emissions from the same fleet of vehicles, with carbon intensities adjusted to the LCFS targets, and driven to an estimated end-of-life of 20 years (230,000 KMs) is an additional 547,050,001 for a total of 747,226,410 tonnes. *Reference Appendix A – Tab 2-Future Years CI Reductions.*

Year	Future Emissions from Vehicles Currently Registered in B.C. (if 100% of CI reductions happen every year)
2023	200,176,409
2024	115,254,765
2025	101,180,291
2026	88,126,372

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2027	76,083,998
2028	65,176,193
2029	55,117,884
2030	46,110,498
Total	**747,226,410**

The estimated future GHG emissions to the end-of-life for those 3.2 million ICE vehicles is based on life expectancy, average kms travelled and gradual decrease in the CI of the fuel surpasses 747 million tonnes.

It is important to note that this calculation accounts for a significant drop-off of older ICE vehicles at approximately 20 years of age but does not account for additional used ICE vehicles entering the provincial fleet through fleet turnover, including the resale of new ICE vehicles into the used market or the importation of used ICE vehicles between now and 2030. Those used ICE vehicles (resale/import) will undoubtedly push the 747 million tonnes of GHG number upwards.

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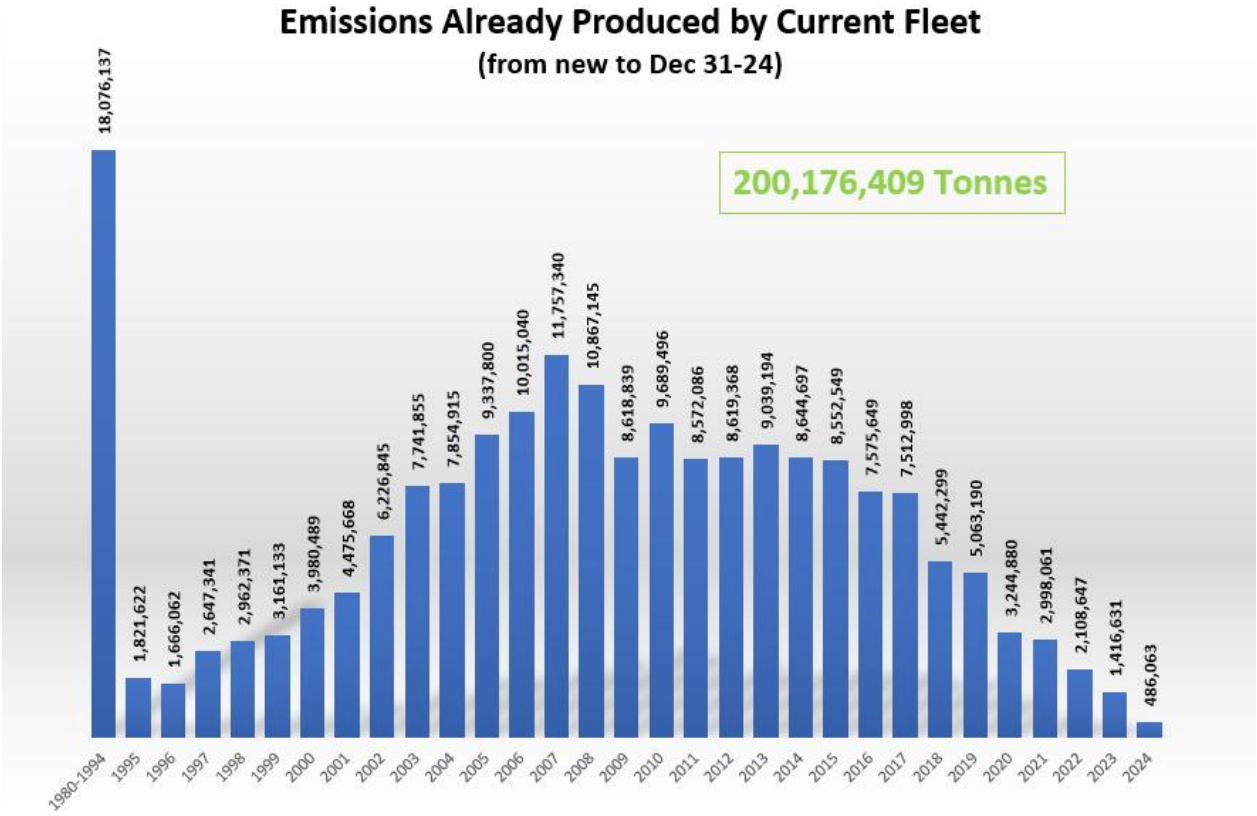
Continued Emissions (Even with CI reductions)

Continued emissions from B.C.'s current fleet are an important input. *Reference Appendix A – Tab 8-Continued Emissions*. They are the very basis on which ZEV sales mandates and targets have been formed. A goal to reduce GHG emissions by a certain date means a baseline and projection exists. In other words, to calculate future emission reductions from ZEV sales, it makes sense to also calculate the emissions that, currently and in the future, will be produced by ICE vehicles.

How many tonnes of GHGs will be released into the atmosphere when B.C.'s current fleet continues to operate for the full 20-year life expectancy?

> The emissions already produced by the current fleet exceeds 200 million tonnes and the continued emissions will exceed 547 million tonnes even if all CI reduction targets are met.

Note: The calculations for current and continued emissions is based on assumptions of distance driven, therefore the declining emissions shown in the charts below relates to the vehicle's age and the estimated number of kilometres driven (not fuel consumption or reductions in the CI of the fuel).



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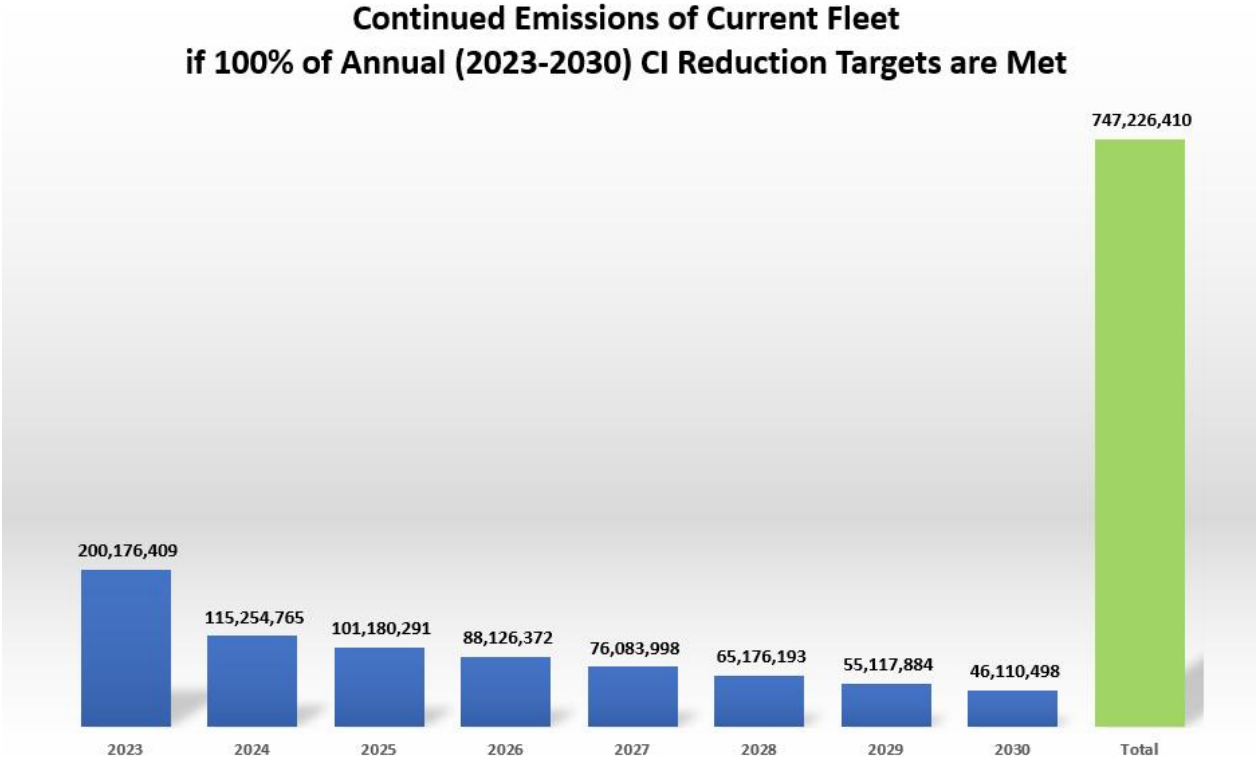

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Summary of Findings

The findings below summarize the reasons why B.C. transportation sector emissions are not declining at the rate required to meet provincial goals.

Fleet Composition & Emissions Reality

Older, long-lasting ICE vehicles are the main reason transportation emissions remain high in B.C., despite growing ZEV adoption.

- As of Dec 31, 2024, 96% of B.C.'s 3.28 million light-duty vehicles are ICEs. ZEVs account for only 4%. The ZEV count (including 2025 and Q1 2026) remains too low to meaningfully reduce total fleet emissions in the near or medium term.
- There are over 1.7 million vehicles model year 2014 and older currently in operation in B.C. On average, each one of these vehicles emits between 4.5 and 3.9 tonnes of GHGs per year. Those 1.7 million vehicles represent 53% of B.C.'s current fleet.
- 63% of currently active ICE vehicles are 8 years or older and only meet the Tier 2 (or less) emissions standards.
- Older ICE vehicles emit 3.9 to 4.5 tonnes per year. Even newer ICEs average 3.7 tonnes.
- B.C. is known for having the longest-lasting light-duty vehicle fleet in Canada. Multiple factors are attributed to the longer lifespan (milder temperatures, less rust, shorter driving distances, economic factors).

Continued & Future Emissions Burden

Past and future emissions from the current ICE fleet create a long-term liability that cannot be meaningfully reduced without accelerated fleet turnover.

- The emissions already produced by the current fleet exceeds 200 million tonnes.
- The continued emissions will exceed 547 million tonnes even if all CI reduction targets are met.
- These numbers exclude future additions to the fleet e.g., imported used or newly sold ICE vehicles.

New & Used ICE Market Dynamics

High volumes of new ICE sales and unrestricted used-vehicle sales and imports are undermining the impact of ZEV mandates.

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- New ICE vehicles continue to be sold into the B.C. marketplace at a high rate (approximately 150,000 to 170,000 annually). These vehicles still produce on average 3.7 tonnes of GHG emissions per year, per vehicle.
- Each new ICE vehicle sold today brings with it a 20-year commitment to emissions mitigation.
- While government has mandated new ZEV sales, they have not stopped the import into B.C. (from CAD or USA) of used ICE vehicles; the eventual resale of new ICE vehicles as used; or residents moving into B.C. with used ICE vehicles.
- The used ICE market acts as a counterforce to B.C.'s ZEV goals.

LCFS Performance & Constraints

LCFS performance is increasingly challenged by ongoing ICE sales, compliance complexity, and consumption volumes that dilute the impact of carbon-intensity targets.

- As new/used ICE vehicle sales/imports continue, it will be imperative for LCFS targets for CI intensity to keep pace. The current trend suggests it will not.
- A new ICE vehicle sold today is a 20-year commitment to emissions that the Low Carbon Fuel Standard (LCFS) may only partially mitigate.
- Although it could still be considered "early days" as it relates to the actual implementation of the LCFS at the oil industry level, considering the complexity of challenges fuel suppliers face in order to achieve the targets, it makes sense to see penalties being paid, and credits being traded in order to meet the current (and potentially future) compliance obligations.
- Because the LCFS targets the intensity of the fuel (i.e. how "dirty" it is), and not the volume of fuel burned. If the number of ICE vehicles on the road stays the same or grows, the regulation is fighting against a larger pool of consumption.
- There is a disproportionate reliance on achieving aggressive CI reduction targets across a fleet of over 3.28 million vehicles, as well as continued vehicle inflows. In practice, this creates a binding constraint on obligated parties, given practical limits to fuel decarbonization, while the supply of new and used ICE vehicles remains effectively unrestricted.

Zero-Emission Vehicle Act Gaps & Limitations

Current ZEV mandate requirements do not address used ICE imports, consumer preferences, or long-lived ICE vehicle turnover.

- While B.C. has strict mandates requiring a percentage of new vehicle sales to be zero-emission, this applies to manufacturers, not individuals.

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- There is currently no law preventing a B.C. resident from buying a new or used ICE truck or SUV in another province and bringing it home, nor is there any emissions standards testing upon import/registration.

Federal Emissions Standards

To-date, Federal standards have not made ICE vehicles clean enough to support B.C.'s climate goals.

- New ICE vehicles have been thought of as more fuel efficient and technologically cleaner, but the analysis shows that on average, over 35 years, they have only become approximately 1.8L/100km more fuel efficient. Vehicle weight appears to be a contributing factor.
- For model years 2015 and 2024 the average fuel consumption actually *increased* by 0.1 L/100km.
- Federal emission standards have not solved the problem and it's yet to be determined if the new federal framework will in the future.

ZEV Population Monitoring

Registration-based monitoring provides a more accurate picture of whether ZEVs are truly replacing ICE vehicles.

- There is no one publicly available report that summarizes the outflow of ZEVs from B.C. which is why it is important to focus on annual ICBC vehicle registrations, vs. new ZEV sales numbers when estimating GHG emission reductions.
- Tracking registrations, rather than sales, reveals whether ZEVs are actually displacing ICE vehicles in B.C.
- Tracking registrations could provide a more transparent view of whether the ZEV population is actually displacing ICEs and support an accurate calculation of the associated emission reductions.
- The reporting of sales against sales targets may still be required, but this reporting should not be relied upon for emission reduction calculations.

Population Growth & Vehicle Demand

Vehicle demand will remain strong as the population grows, sustaining high ICE ownership levels.

- Light-duty vehicle demand will increase with population growth.
- An estimated 3.19 million ICE vehicles will be driven annually through to 2030.
- Affordability factors such as high housing and living costs limit ZEV affordability.

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- Many B.C. households will be financially “locked into” driving older ICE vehicles.

ZEV Fleet Retirement will Reduce Emission Reduction Calculations

As early ZEVs reach end-of-life, they stop contributing to ICE displacement, lowering overall emission-reduction impact.

- Batteries last on average (depending on climate, driving, and charging habits) 180,000 to 300,000 km, with many vehicles falling into the 200,000 to 250,000 km range under typical conditions and have an expected functional lifespan of approximately 12 to 15 years or more before significant performance limitations emerge.
- According to ICBC data, as of 2026, there are 8,850 ZEVs registered in B.C. that are between 10 and 19 years old.
- The first major wave of older ZEVs (2016 and older) are now approaching retirement and have begun exiting the fleet, as a result, they no longer add to displacement of ICEs or reductions in emissions.
- This further supports the need for registration-based tracking as it relates to emission reduction calculations.

Conclusions

The goal of this analysis was to provide insight into the reasons why the province’s transportation sector carbon emissions targets are not being met and may not be met in the future. Based on the analysis contained in this document, the following is a summarized list of the conclusions reached:

1. **B.C.’s existing ICE fleet is the main barrier to reducing transportation emissions. With 96% of the fleet still fossil-fuel powered, and vehicles lasting 20 years, emissions are locked-in for decades.**
   Most light-duty vehicles on the road are older, long-lasting gasoline and diesel models, and they will continue emitting for another decade or more. ZEVs currently make up a small percentage of the fleet and cannot offset these emissions in the near term.

2. **Past and future emissions from the current fleet far exceed what current policies can address.**
   The fleet has already produced over 200 million tonnes of GHGs, and its remaining

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lifetime emissions are projected to exceed 747 million tonnes (plus all future ICE additions to the fleet) even if all LCFS carbon-intensity targets are met.

3. **Ongoing ICE sales and unrestricted used-ICE imports are sustaining high emissions.**
   New ICE vehicles continue to enter the market at high volumes and used ICE vehicles flow freely into B.C. from other provinces and the U.S., counteracting ZEV adoption efforts.

4. **ZEV adoption remains insufficient to meaningfully shift the fleet.**

5. **The LCFS alone cannot offset a large and stable ICE fleet.**
   The LCFS reduces fuel carbon-intensity, but not the volume of fuel burned. As ICE vehicle numbers remain high, the LCFS faces growing compliance pressure and limited emissions-reduction potential.

6. **Current policy tools influence new vehicles but do not address the existing fleet.**
   ZEV mandates, federal emissions standards, and the LCFS are not designed to reduce the millions of older ICE vehicles currently on the road, the primary source of transportation-sector emissions.

7. **Accelerated fleet turnover is essential.**
   Meaningful emissions reduction will require policies or programs that directly retire older ICE vehicles and increase access to lower-emission alternatives, rather than relying on new-vehicle policy tools alone.

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The Gap

ZEV Act – What It Is Designed to Achieve	The Gap – What Is Actually Happening	LCFS – What It Is Designed to Achieve
• Increase the number of ZEVs in B.C. • Improve ZEV affordability for consumers • Regulate new-vehicle sales to reduce transportation emissions • Set mandatory ZEV sales targets for automakers • Ensure automaker compliance • Expand charging infrastructure • Prepare the market for medium- and heavy-duty ZEVs	**Fleet Reality** • High emissions from long-lasting ICE vehicles • Older ICE vehicles remain on the road for ~20 years • New and used ICE vehicles entering the province • Consumer shift toward larger, more polluting vehicles • Population growth sustaining long-term ICE demand **Market & Consumers** • ZEVs remaining a small percentage of the total fleet • Affordability barriers still limit uptake • ZEV mandates apply to automakers—not consumers **Policy & Regulatory Constraints** • Pressure on LCFS performance • LCFS compliance increasingly difficult • Federal emissions standards, no meaningful improvements in ICE efficiency to-date, future is yet to be determined • Registration-based tracking necessary for accurate emissions reporting	• Reduce B.C.'s reliance on fossil fuels • Lower the lifecycle carbon-intensity of transportation fuels • Reduce transportation-sector GHG emissions • Increase renewable and low-carbon fuel supply • Support credit/debit compliance mechanisms • Encourage electricity use as a low-carbon transportation fuel • Advance B.C.'s broader climate goals

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Consideration of “No-Go” Policy Options

Achieving a more substantial transition away from internal combustion engine (ICE) vehicles may require consideration of additional policy measures. Some of these options, however, would likely face significant political and public resistance. Examples include:

- **Restricting interprovincial ICE imports**, which would prevent the registration of used ICE vehicles brought in from other provinces.
- **Restricting resale of older ICE vehicles**, whereby vehicles exceeding a specified age would no longer be eligible for resale and would require mandatory retirement.
- **Personal income tax deduction for ZEV owners,** where those who make the transition are rewarded through a provincial income-tax deduction. This could be claimed for the first three years of ownership/lease with a requirement to provide proof of ownership (e.g. ICBC registration) upon request.

These measures would compliment the Zero-Emission Vehicles (ZEV) Act, which is intended to fully phase out the sale of new ICE vehicles over time, and support the LCFS by reducing the pool of consumption the regulation is fighting against.

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Recommendation to Address the Gap

The recommendation below does not require taxpayer funds from the provincial government to support rebates or administration.

Based on the analysis above regarding fleet composition, continued emissions, and the limitations of existing regulatory tools, a targeted program is identified as a potential means to narrow the emissions gap.

CleanStart Vehicle Exchange Program

The CleanStart Vehicle Exchange Program concept is provided as a separate document.

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