

Oxford County Report on Withdrawal from the Partners for Climate Protection (PCP) Program

Prepared by: KICLEI Canada, Maggie Hope Braun

Date: April, 5, 2025

Executive Summary

Oxford County joined the Federation of Canadian Municipalities (FCM) and ICLEI Canada's Partners for Climate Protection (PCP) program in 2017 as part of a broader effort to access provincial funding and support climate policy initiatives. This decision was made through Council resolution without meaningful public consultation or a full understanding of the long-term financial and governance implications.

Since that time, PCP participation has led Oxford County to adopt Paris Agreement-aligned emissions reduction targets, commit to costly infrastructure upgrades, and implement policies that exceed what is legally required by either the federal or provincial governments. Staff-driven planning processes and a lack of accessible financial reporting have further reduced transparency.

This report provides a comprehensive review of the origins, legal context, financial burden, environmental realities, and governance implications of Oxford County's continued participation in the PCP program. It estimates that the total long-term cost of implementation could range from \$8.2 million to over \$212 million. Moreover, Oxford County already possesses significant natural carbon sinks—including over 27,000 hectares of forest and nearly 14,000 hectares of wetlands—that help sequester emissions locally.

Given the absence of legal mandates to adopt PCP or net-zero frameworks, the waiver of liability from FCM and ICLEI, and the lack of ongoing community support or clear cost transparency, this report recommends that Oxford County Council withdraw from the PCP program. It also provides a draft resolution and outlines practical next steps to restore fiscal responsibility and local control over climate policy.

Section 1: Origins of Oxford County's PCP Commitments

In November 2017, Oxford County Council adopted Report CAO 2017-15 and Resolution No. 16, which together cemented the County's participation in the FCM–ICLEI Partners for Climate Protection (PCP) Program. These decisions were not made in isolation but were in direct response to the Ontario government's launch of the Municipal Greenhouse Gas (GHG) Challenge Fund under its 2016 Climate Change Action Plan (CCAP).

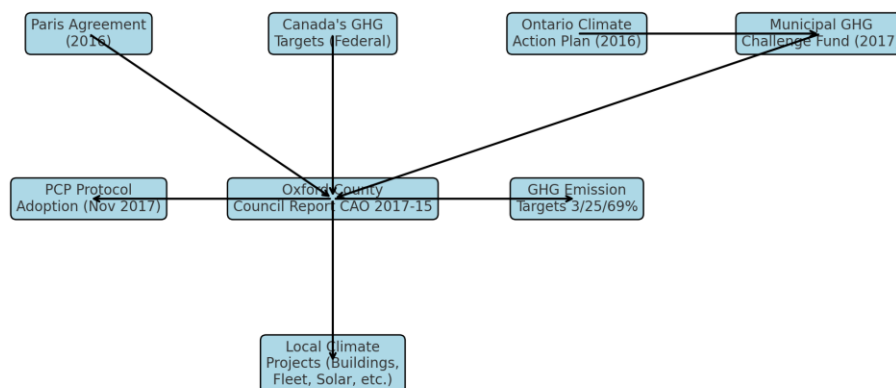
Participation in the PCP program—and the adoption of its five-milestone framework for GHG management—was a precondition for funding eligibility. Oxford County staff explicitly noted that joining PCP would strengthen the County's application for up to \$10 million in provincial funding.

Through this process, the County adopted aggressive emissions targets—3% by 2020, 25% by 2030, and 69% by 2050—based on 2015 levels. These targets align with federal and provincial climate goals and the Paris Agreement but were not based on comprehensive public consultation or local referenda.

- Key facts:
- • PCP adoption was tied to provincial funding eligibility.
- • The resolution endorsed Paris Agreement targets and federal emissions goals.
- • Oxford adopted the PCP Protocol as the County standard for GHG accounting.
- • No long-term financial implications or public debate were documented.
- • The plan and projects were staff-driven and top-down in structure.

The following flowchart illustrates the top-down influence of global and provincial policy instruments on Oxford County's local climate strategy and decisions made in 2017.

How Global and Provincial Policies Influenced Oxford County's Climate Commitments



Section 2: Governance, Liability, and Legal Context for Ontario Municipalities

Under Section 224 of the Ontario Municipal Act, 2001, elected councillors are entrusted with specific responsibilities, including representing the public, evaluating municipal policies and programs, and ensuring transparency and accountability. These duties underscore that all final decision-making authority lies with council—not staff or consultants.

Municipalities operate within international, federal, and provincial policy frameworks, but remain autonomous in their local decisions. Neither the Paris Agreement nor federal or provincial net-zero policies legally bind municipalities to specific emissions targets.

The Paris Agreement

The Paris Agreement is an international treaty that obligates nations—not municipalities—to set greenhouse gas reduction targets. Municipal participation in climate programs inspired by the Paris Agreement, such as ICLEI's PCP, remains entirely voluntary.

Federal Legislation: The Canadian Net-Zero Emissions Accountability Act

Canada's Net-Zero Emissions Accountability Act commits the federal government to national net-zero goals by 2050. However, the Act imposes no mandatory compliance on municipalities, who retain full discretion to define local strategies.

Ontario's Climate Policy Context

Ontario repealed its Climate Change Mitigation and Low-Carbon Economy Act in 2018, effectively ending the provincial cap-and-trade system. No binding legislation currently requires Ontario municipalities to adopt net-zero targets or PCP-style milestone frameworks.

Liability Waivers and Implications for Municipalities

Despite offering funding and frameworks, the Federation of Canadian Municipalities (FCM), ICLEI Canada, and the Government of Canada have waived all liability for outcomes associated with PCP participation. Their disclaimer reads:

"This project was carried out with assistance from the Green Municipal Fund, a Fund financed by the Government of Canada and administered by the Federation of Canadian Municipalities, and from ICLEI – Local Governments for Sustainability (Management) Inc. Notwithstanding this support, the views expressed are the personal views of the authors, and ICLEI Canada, the Federation of Canadian Municipalities, and the Government of Canada accept no responsibility for them."


This disclaimer leaves municipalities legally and financially responsible for the full implementation, monitoring, and performance of any climate plans enacted under PCP. Any cost overruns, data mismanagement, or failure to meet targets becomes the sole responsibility of local government.

Section 3: Oxford County's Carbon Footprint and Natural Sequestration Capacity

Oxford County is a mid-sized jurisdiction in southwestern Ontario with a population of 121,781 residents (2021 Census) and a land area of approximately 2,038 square kilometers. Based on Ontario's per capita greenhouse gas emissions of 10.4 tonnes of CO₂ equivalent per person annually, Oxford County's estimated annual emissions total approximately 1.27 million tonnes of CO₂e.

Crucially, Oxford also possesses extensive natural carbon sinks—forests, wetlands, farmland, pasturelands, shelterbelts, and urban green spaces—that help absorb and store atmospheric carbon dioxide (CO₂). According to the County's 2023 Natural Heritage System Study and supporting provincial land use data, these ecosystems play a significant and underappreciated role in climate regulation:

Estimated Annual Carbon Sequestration in Oxford County

Ecosystem Type	Area (ha)	Sequestration Rate (t/ha/yr)	Annual CO ₂ Absorbed (tonnes)
Woodlands	27,308	9 (avg. of 7–11)	245,772
Wetlands	13,905	1.85	25,724
Farmland (cropped)	100,000	3.1	310,000
Pastureland & buffers	21,000	2.5	52,500
Shelterbelts & Hedgerows	2,500	5	12,500
Urban Greenspace	500	2	1,000
 Total	—	—	~647,496 tonnes CO ₂ /year

These conservative estimates indicate that Oxford's ecosystems may naturally sequester **up to 650,000 tonnes of CO₂ per year**, offsetting **over 50%** of the County's total estimated emissions. However, this may still be an undercount. If more precise figures were available for hedgerows, riparian zones, and non-cultivated field edges, Oxford's annual sequestration could exceed **800,000 to 1 million tonnes CO₂**.

Moreover, Oxford's local carbon sinks exist within a broader provincial context that is rarely acknowledged in net-zero planning. Ontario as a whole is already a **net carbon sink**. Based

on 2023 federal and provincial emissions data, Ontario emits approximately **205.9 million tonnes of CO₂ per year** (based on Ontario's per capita emissions of 14.2 tonnes multiplied by 14.5 million residents) but sequesters an estimated **893.2 million tonnes** annually through forests, wetlands, and agricultural lands. That results in a **net carbon absorption of over 687 million tonnes per year**.

This raises a critical question: Why are rural counties like Oxford being pressured to meet global net-zero targets when our region—and our province—already absorbs more CO₂ than it emits?

Despite these realities, none of Oxford's natural absorption capacities are credited in net-zero frameworks or the PCP milestone system. PCP and similar programs prioritize costly, technology-driven solutions while ignoring—or even displacing—existing natural systems that provide these services at no cost to the taxpayer.

Properly valuing Oxford's ecological assets could fundamentally alter the cost-benefit analysis of continuing participation in PCP. Recognizing and protecting these ecosystems is not just environmentally sound—it's fiscally responsible.

References

- [1] Statistics Canada, 2021 Census Profile: Oxford County, Ontario. <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?DGUIDlist=2021A00033532>
- [2] Canada Energy Regulator, Ontario Energy Profile. <https://www.cer-rec.gc.ca/en/data-analysis/energy-markets/provincial-territorial-energy-profiles/provincial-territorial-energy-profiles-ontario.html>
- [3] Oxford County Natural Heritage System Study 2023. <https://webresources.oxfordcounty.ca/Documents/Council/Attachments/Attachment%202%20ONHSS%202023%20Report%20Final%20Draft.pdf>
- [4] Wikipedia – Oxford County, Ontario. https://en.wikipedia.org/wiki/Oxford_County,_Ontario
- [5] Lal, R. (2004). Soil carbon sequestration impacts on global climate change and food security. *Science*, 304(5677), 1623–1627.
- [6] Natural Resources Canada. Forest Carbon Accounting Resources. <https://www.nrcan.gc.ca/climate-change/impacts-adaptations/climate-change-impacts/forest-carbon/13107>
- [7] Ducks Unlimited Canada. The Carbon Storage and GHG Benefits of Wetlands in Canada.
- [8] Municipal Natural Assets Initiative (MNAI), BC Urban Parks Sequestration Guide.
- [9] City of Toronto Green Space Carbon Budget Estimates (2020 Internal Memo).
- [10] Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA). Soil and Hedgerow Management Best Practices.
- [11] Canada's Greenhouse Gas Inventory 2023. <https://www.canada.ca/en/environment-climate-change/services/climate-change/greenhouse-gas-emissions/inventory.html>

Section 3: Lack of Public Mandate for Net-Zero and PCP Commitments

Oxford County's participation in the FCM–ICLEI Partners for Climate Protection (PCP) Program and adoption of Paris Agreement-aligned emissions targets was never subject to direct public consultation or voter approval. These decisions were made through staff-led reports, such as CAO 2017-15, primarily to qualify for provincial funding under the Municipal GHG Challenge Fund, and not in response to local public demand.

In contrast, the County's own 2022 Community Engagement Survey—used to help guide environmental policy updates in the Official Plan—reveals that residents overwhelmingly expressed a strong desire to protect natural spaces, rivers, streams, and public parks for recreation, health, and long-term use. Nowhere in the survey summary or associated outreach materials is there evidence that respondents:

- Requested the adoption of net-zero by 2050 targets;
- Supported the Paris Agreement's emission reduction timelines;
- Endorsed large-scale public spending on green infrastructure, fleet conversions, or carbon tracking dashboards;
- Were even made aware of the County's formal commitments to an international climate framework.

Despite this, Oxford County continues to expand its obligations under the PCP program and embed national and international climate goals into its planning framework—without a clear democratic mandate or community consultation process to support such sweeping policy shifts.

This discrepancy highlights a serious issue: climate policy is being written into Official Plans and multi-million-dollar spending frameworks without ever being voted on or clearly communicated to the public.

Section 4: The Hidden Financial Costs of PCP Participation

Although the Partners for Climate Protection (PCP) program is marketed as a free, voluntary framework, the reality for municipalities—especially rural and small communities—is far more costly. Oxford County’s participation in the PCP program and pursuit of its five milestones entails considerable direct and indirect financial commitments that are not publicly itemized or easily accessible in County budgets or reports.

The lack of financial transparency makes it extremely difficult for the public and even members of council to determine the actual costs incurred to date or projected in the future. However, based on a conservative assessment and cost modeling from comparable jurisdictions, the following estimates illustrate the scale of PCP-related expenditures that Oxford County may already be undertaking or expected to undertake under continued participation in the program:

- Baseline Emissions Inventory: \$10,000–\$50,000
- Emissions Reduction Targets: \$5,000–\$25,000
- Local Action Plan Development: \$20,000–\$100,000
- Implement Action Plan: \$50,000–\$1,000,000+
- Monitor and Report Results: \$10,000–\$50,000 annually
- Municipal Fleet Upgrades: \$500,000–\$5,000,000+
- EV Charging Stations: \$100,000–\$1,000,000+
- Municipal Building Upgrades: \$1,000,000–\$10,000,000+
- Smart City Technology: \$500,000–\$5,000,000+
- Circular Economy Initiatives: \$1,000,000–\$10,000,000+
- 15-Minute City Model: \$5,000,000–\$50,000,000+
- Active Transportation Networks: \$1,000,000–\$20,000,000+
- Urban Densification: \$5,000,000–\$100,000,000+

Estimated Total Cost Range:

- Modest Implementation: \$8.2 million
- Comprehensive Implementation: \$212 million+

These conservative estimates underscore the substantial financial burden imposed by PCP participation. Oxford County has not provided a comprehensive breakdown of these costs to the public, which limits informed debate and accountability. A detailed cost analysis of both historical spending and future projections should be considered essential prior to any further advancement under the PCP program.

Section 5: Green Fleet Recommendations vs. Reality — A Financial Disconnect

Oxford County's 2021 Green Fleet Plan outlined a strategy to reduce 398 tonnes of CO₂ emissions annually through the phased replacement of municipal fleet vehicles with alternative fuel and electric models, along with supporting infrastructure upgrades.

Fleet Plan Recommendations (2021)

The full plan detailed a proposed procurement of **109 vehicles** at a projected cost of **\$12,840,500**. Key recommendations included:

- 35 hybrid pickup trucks
- 7 BEV (battery electric) pickup trucks
- 8 BEV cargo vans
- 5 hybrid ambulances
- 16 anti-idling retrofits
- 2 compressed natural gas (CNG) snowplows
- Multiple ERVs (emergency response vehicles), PHEVs (plug-in hybrid electric vehicles), and hybrid SUVs

The plan projected a total emissions reduction of 398 tonnes of CO₂e per year, with estimated paybacks ranging from 5 to 30 years depending on the vehicle type and application.

Perspective: Global Impact

The proposed \$12.84 million investment to achieve a **398-tonne annual CO₂ reduction** would represent just **0.00000013% of total atmospheric CO₂**. The scale of this reduction is statistically negligible at the global level.

This stark contrast between cost and impact underscores the importance of reassessing whether programs like PCP offer a responsible and results-driven path for rural municipalities like Oxford.

Conclusion

This is a clear case of misplaced priorities. Climate change is a global issue—and one that municipal fleets are not equipped to solve. Spending **\$12.84 million** to reduce emissions by a fraction of a percent, while ignoring more cost-effective, local strategies, represents a serious misalignment between purpose and outcome.

Had Oxford instead invested in community-based stewardship programs—like tree planting, stormwater protection, or rural conservation—they could have achieved greater

local benefits at a fraction of the cost. Moreover, conventional vehicles, already compliant with fuel-efficiency standards, would have cost significantly less to procure and maintain.

Rather than being drawn into globalized net-zero agendas with high-cost compliance and low-yield results, Oxford County should refocus on its strengths: local ecosystems, community needs, and practical fiscal governance.

References:

- [1] Oxford County Green Fleet Plan: 2021–2025 (WSP Canada, May 2021)
- [2] Oxford County Council Report – March 26, 2024: Council Highlights
- [3] Oxford County News Release: 'Oxford County expands green fleet with battery electric trucks' (oxfordcounty.ca, 2023)
- [4] Crestline and Oxford County Announce Canada's First Hybrid Ambulance (EMS1.com, 2017)
- [5] Oxford County Financial Statements – 2023 Budget Review (Fleet Fuel Expenditures)
- [6] Oxford County Council Meeting Agenda and Tender Approval for Snowplow Purchase (pub-oxfordcounty.escribemeetings.com, 2024)
- [7] Canadian Climate Normals (Environment and Climate Change Canada)
- [8] IPCC and NASA Data on Atmospheric CO₂ Concentration and Global

Section 7: Recommendations and Next Steps

In light of the findings outlined in this report, Oxford County Council is urged to consider the following actions to restore transparency, fiscal responsibility, and local autonomy in climate-related policy decisions.

1. Conduct a Full Cost Audit of PCP Participation

Undertake a comprehensive, independent financial review of all spending associated with PCP participation, including staff time, infrastructure projects, consulting fees, and reporting requirements. This audit should be made publicly available.

2. Re-Evaluate Oxford County's Climate Commitments

Review the emissions targets and program obligations adopted under PCP and determine whether they reflect the actual priorities, financial realities, and environmental conditions of Oxford County. This includes accounting for the County's carbon sinks and current emissions levels.

3. Suspend PCP Reporting Obligations

Until the full financial and policy implications are understood, Oxford County should suspend non-essential reporting to the PCP program and pause implementation of future milestones.

4. Engage in Public Consultation

Hold public forums and surveys to determine whether residents support continued participation in the PCP program, and whether they agree with the Paris Agreement-aligned goals and associated costs.

5. Prepare a Resolution to Withdraw from PCP

Draft and present a resolution to formally withdraw Oxford County from the Partners for Climate Protection program. This resolution should reaffirm Council's commitment to evidence-based, locally-driven environmental stewardship.

DRAFT MUNICIPAL COUNCIL RESOLUTION

Withdrawal from the Partners for Climate Protection (PCP) Program

- WHEREAS the Council of the County of Oxford is committed to responsible governance, fiscal transparency, and evidence-based policy making;
 - AND WHEREAS Oxford County joined the Federation of Canadian Municipalities (FCM) and ICLEI's Partners for Climate Protection (PCP) program in 2017 by adopting a resolution that aligned the County with international emissions reduction targets established under the Paris Agreement;
 - AND WHEREAS participation in the PCP program has resulted in financial obligations and policy commitments that were not fully disclosed to or endorsed by the public through direct consultation or referendum;
 - AND WHEREAS municipalities are not legally required to adhere to international climate frameworks or adopt net-zero targets under Canadian or Ontario law;
 - AND WHEREAS the Federation of Canadian Municipalities (FCM), ICLEI Canada, and the Government of Canada have waived all liability for municipal outcomes under the PCP program, placing full legal and financial responsibility on local governments;
 - AND WHEREAS Oxford County possesses significant carbon-sequestering natural assets—including over 27,000 hectares of woodlands and 13,000 hectares of wetlands—that contribute meaningfully to its local emissions balance and environmental stewardship;
 - AND WHEREAS the financial implications and administrative burden of continued PCP participation are not justified in light of the County's existing sustainability policies and capabilities;
1. THEREFORE BE IT RESOLVED THAT the Council of the County of Oxford hereby withdraws from the Partners for Climate Protection (PCP) program effective immediately;
 2. AND THAT Oxford County Council instructs staff to suspend all reporting requirements, milestones, and related PCP activities;
 3. AND THAT Council directs staff to conduct a full review of local environmental programs with a focus on cost-effectiveness, autonomy, and alignment with the County's natural strengths and community values;
 4. AND THAT a copy of this resolution be forwarded to the Federation of Canadian Municipalities (FCM), ICLEI Canada, the Ontario Minister of Municipal Affairs and Housing, and all member municipalities in Oxford County.