

Input on the BC Zero-Emission Vehicles Act and Regulation

Submission from the Community Energy Association on behalf of the BC Electric Mobility Peer Network

August 2025

Introduction

The [Community Energy Association](#) (CEA), on behalf of the BC Electric Mobility Peer Network (EMPN), is pleased to provide input on the BC Zero-Emission Vehicle Act (ZEV Act) and Regulation in advance of the forthcoming regulatory review. At the BC ZEV Forum held on June 18, 2025, staff from the Ministry of Energy and Climate Solutions indicated that a review of the ZEV Act and Regulation will take place in 2025 and invited written input from stakeholders.

This submission represents the voices and insights of local government staff participating in the EMPN. Through 2024-2025, the network has engaged over 157 individuals representing nearly 56 communities from across BC. On July 30, 2025, CEA hosted a targeted working group meeting with EMPN members to inform this submission. The working group included 21 individuals representing 16 local governments. The objective of the meeting was to answer the guiding questions posed by the province and determine what key messages or priorities should be elevated to the province regarding the future of the ZEV Act, based on the local experience and regional needs of communities.

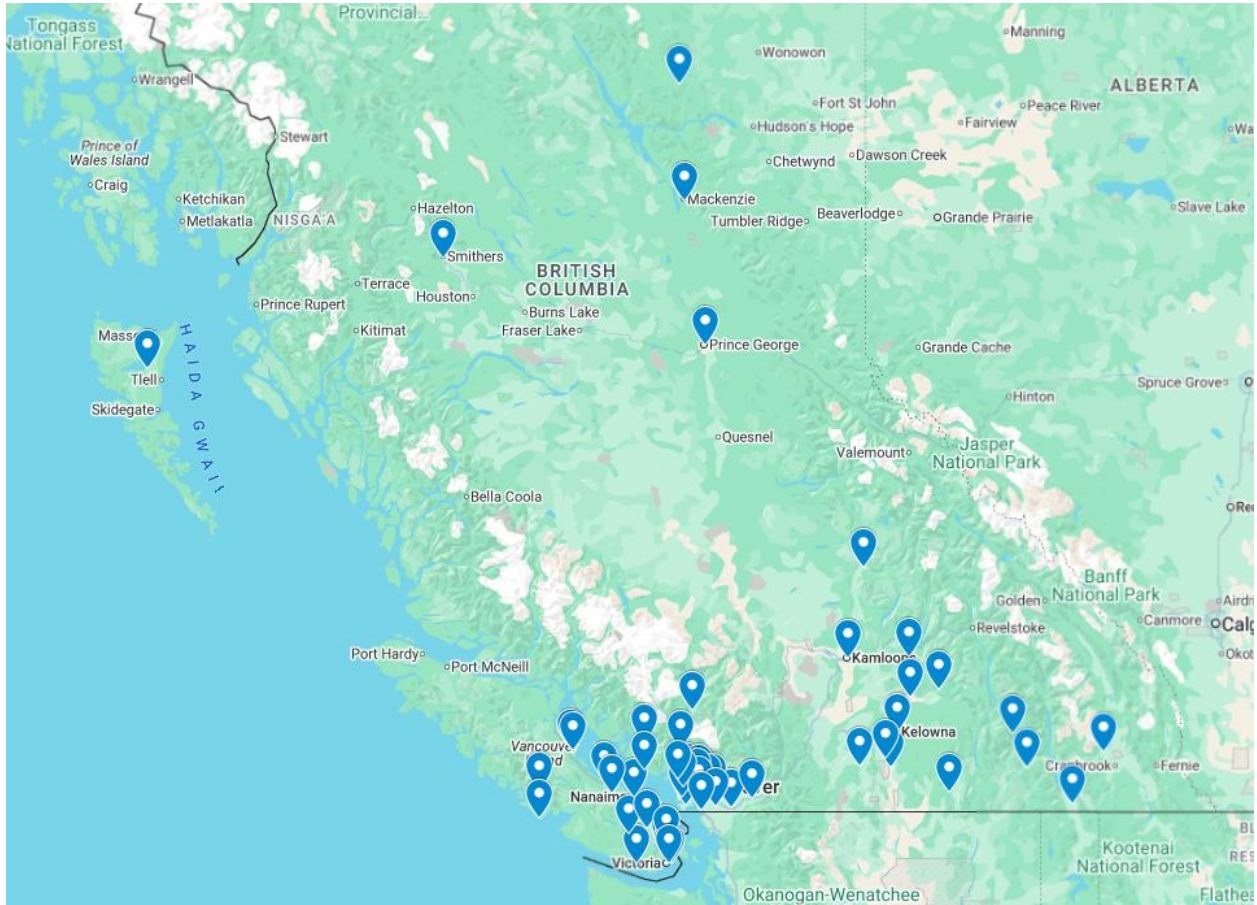


Figure 1. Map of the 56 communities across British Columbia that participated in the Electric Mobility Peer Network in 2024–2025. The network engaged over 157 individuals from these communities.

Table 1. A list of the 56 communities engaged in the Electric Mobility Peer Network through 2024-2025 in British Columbia.

Community	Area Assoc.	Population
Central Kootenay (Regional District)	Kootenay	50,000+
Creston (Town)	Kootenay	5,000-10,000
Kimberley (City)	Kootenay	5,000-10,000
Kootenay-Boundary (Regional District)	Kootenay	10,000-50,000
Nelson (City)	Kootenay	10,000-50,000
5		
Alberni-Clayoquot (Regional District)	Vancouver Island	10,000-50,000
Capital (Regional District)	Vancouver Island	50,000+
Central Saanich (District)	Vancouver Island	10,000-50,000
Comox Valley (Regional District)	Vancouver Island	50,000+
Courtenay (City)	Vancouver Island	10,000-50,000
Cowichan Valley (Regional District)	Vancouver Island	50,000+
Nanaimo (City)	Vancouver Island	50,000+
Nanaimo (Regional District)	Vancouver Island	10,000-50,000
North Cowichan (District)	Vancouver Island	10,000-50,000
Oak Bay (District)	Vancouver Island	10,000-50,000
Qualicum Beach (Town)	Vancouver Island	5,000-10,000
Saanich (District)	Vancouver Island	50,000+
Sechelt (District)	Vancouver Island	10,000-50,000
Sidney (Town)	Vancouver Island	10,000-50,000
Sunshine Coast (Regional District)	Vancouver Island	10,000-50,000
Ucluelet (District)	Vancouver Island	1,000-5,000
Victoria (City)	Vancouver Island	50,000+
17		
Abbotsford (City)	Lower Mainland	50,000+
Burnaby (City)	Lower Mainland	50,000+
Chilliwack (City)	Lower Mainland	50,000+
Coquitlam (City)	Lower Mainland	50,000+
Delta (City)	Lower Mainland	50,000+
Langley (Township)	Lower Mainland	50,000+
Maple Ridge (City)	Lower Mainland	50,000+
Metro Vancouver (Regional District)	Lower Mainland	50,000+
New Westminster (City)	Lower Mainland	50,000+
North Vancouver (District)	Lower Mainland	50,000+
Pitt Meadows (City)	Lower Mainland	10,000-50,000
Port Moody (City)	Lower Mainland	10,000-50,000
Richmond (City)	Lower Mainland	50,000+
Squamish (District)	Lower Mainland	10,000-50,000
Surrey (City)	Lower Mainland	50,000+
Tsleil-Waututh Nation	Lower Mainland	1,000-5,000
Vancouver (City)	Lower Mainland	50,000+
West Vancouver (District)	Lower Mainland	10,000-50,000
Whistler (Resort Municipality)	Lower Mainland	10,000-50,000
White Rock (City)	Lower Mainland	10,000-50,000
20		
Mackenzie (District)	Northern	1,000-5,000

Peace River (Regional District)	Northern	50,000+
Port Clements (Village)	Northern	<1,000
Prince George (City)	Northern	5,000-10,000
Smithers (Town)	Northern	5,000-10,000
5		
Clearwater (District)	Interior	1,000-5,000
Kamloops (City)	Interior	50,000+
Kelowna (City)	Interior	50,000+
North Okanagan (Regional District)	Interior	50,000+
Okanagan-Similkameen (Regional District)	Interior	50,000+
Penticton (City)	Interior	50,000+
Salmon Arm (City)	Interior	10,000-50,000
Summerland (District)	Interior	10,000-50,000
Vernon (City)	Interior	10,000-50,000
9		

Maintain and Strengthen the ZEV Act

As BC’s legislative foundation for reducing transportation emissions, the ZEV Act has been highly successful at creating a strong market for electric vehicle (EV) sales in BC. The introduction of the ZEV Act demonstrated provincial leadership and has resulted in BC becoming a North American leader in EV sales. While the ZEV Act is facing industry pressure, it is more important than ever to maintain and strengthen the Act. A critical objective of the ZEV Act is to provide a stable policy signal to support the ZEV market in BC. The targets are essential market drivers that signal direction and commitment, supporting consumer choice and private sector investment. Local governments and others involved in the EV transition need consistency and long-term certainty; changing or weakening targets could disrupt planning. Changes to the legislated sales targets in the ZEV Act would also undermine the intent of the legislation and the credibility of the BC government and their policies. Instead, maintaining sales targets will support the continued supply of EVs in the BC market and foster planning and investment in electric and low-emissions transportation. Rather than reducing sales targets, the Province should reaffirm its commitments in the ZEV Act and expand the Act to include medium- and heavy-duty vehicles—particularly where zero-emission options like electric school buses and refuse trucks are already viable. Clear timelines and expectations enable local governments and industry to plan accordingly and make necessary adjustments.

“Stay the course. If we don’t, we offer mixed signals. It also signals that the government is willing to backtrack – not something we want to do in the current political climate.” – EMPN working group participant

Provide Additional Support

While most local government staff engaged through the EMPN working group support maintaining ZEV Act sales targets, there was acknowledgment that implementation needs to be realistic and account for current constraints. Working group participants noted that achieving targets requires adequate provincial support, such as reintroducing incentives and ensuring consequences for automakers that don't comply. Furthermore, supports are needed to ensure equitable adoption across BC, particularly in rural areas where communities may rely more on gasoline vehicles, face limited access to EVs, and often travel longer distances. Targeted actions will help these communities overcome barriers and benefit from EV cost savings and emissions reductions. To support the rapid transition to EVs, a correspondingly rapid deployment of public and private charging options is needed. The ZEV Act has created a stable EV market that enables local governments, BC Hydro, and other private and public sector partners to make long-range planning and investment decisions to develop a comprehensive EV charging network. To ensure equitable access, further provincial support is needed for charging network development in rural and northern regions where infrastructure is lagging.

“Recent pauses to provincial and federal EV rebate programs, combined with market disruption from tariffs, likely contributed to a decline in EV sales in early 2025. To help reverse this trend, EV purchase rebates should be reintroduced.” – EMPN working group participant

Improve EV Affordability

High vehicle purchase price remains a major barrier to EV adoption. The ZEV Act supports consumers by increasing the availability and affordability of EVs. Reduced sales requirements will hinder affordability and access to ZEVs for residents and businesses, negatively impacting consumers. The discontinuation of EV rebates tied to the elimination of the Carbon Tax may further hamper EV adoption. The Province should reinstate rebates for EVs and EV chargers to enable residents to participate in the clean transportation transition and affordably access EVs. Local governments encourage the Province to be leaders in the clean energy transition and to take measures to improve the long-term affordability of EVs.

“Supports are critical in order for current targets to remain in place.” – EMPN working group participant

Responses to Questions from the Province

1. Should the light-duty ZEV sales targets be adapted?

No, light-duty ZEV sales targets should not be adapted.

- There is strong support among EMPN members for maintaining and recommitting to ZEV Act sales targets. The targets are seen as essential market drivers that signal direction and commitment.
- Maintaining targets supports market stability and policy consistency. Changing or weakening targets could undermine trust, disrupt planning, and reduce the effectiveness of provincial policy.
- Achieving targets requires adequate provincial support, such as reintroducing incentives.
- Targets are seen as directional tools rather than punishments. Even if exact milestones aren't met, having strong targets helps shape market behaviour and policy alignment.

2. What is the role of plug-in hybrid and extended range EVs in the Province?

Plug-in hybrid electric vehicles (PHEVs) and extended-range electric vehicles (EREVs) can play a role in the gradual shift toward a fully electric light-duty vehicle fleet. Continuing the current approach—progressively increasing the minimum electric range requirements for these vehicles while phasing down their credit eligibility—will support this transition.

- Many EMPN members see PHEVs and extended-range EVs as having a role in the short- to medium-term, especially for drivers without access to home charging or in rural/remote areas. However, this role should be temporary and phased down over time as charging infrastructure improves and consumer adoption of battery-electric vehicles (BEVs) increases.
- There is concern that allowing too many low-range PHEVs to count toward ZEV targets could undermine the spirit of the ZEV Act and delay the transition to fully electric vehicles. There is strong opposition to reducing current eligibility or range requirements.
- Strong minimum range requirements are key if PHEVs are to be counted toward ZEV compliance. Members suggested a minimum range that covers ~80% of daily driving needs—suggesting 50–80 km as a reasonable benchmark.
- PHEVs should include features like larger battery packs and ideally Level 3 (DC fast) charging to remain relevant in the evolving EV market.
- While PHEVs can serve a transitional function, fully battery-electric vehicles (BEVs) are preferred as the end goal. Policies should encourage a shift toward BEVs rather than entrench PHEVs as long-term solutions.

3. Would reducing the range requirements for plug-in hybrid vehicles benefit both consumers and automakers?

No, it is unlikely to benefit consumers, and it is unclear whether it would benefit automakers across the industry.

- There is strong opposition among EMPN members to lowering range requirements for PHEVs. Reducing the electric-only range requirements would not benefit consumers and would primarily serve to ease compliance for automakers.
- Range standards should be maintained or strengthened, not weakened. Lowering the bar is a step backward that could stall innovation and slow the transition to fully electric vehicles.
- Some EMPN working group participants support a gradual ramp-up toward an 80 km minimum range, but emphasize that the range should not drop below 55 km. This is seen as a compromise that still keeps policy moving in the right direction while giving automakers time to adapt.
- Range matters more to consumers than automakers. Reducing requirements offers little to no benefit for drivers, especially those relying on PHEVs as a bridge toward fully electric vehicles.
- While there is broad support for making ZEVs more affordable and widely available, lowering technical standards is not the way to achieve this.

4. Could adding new Initiative Agreements pathways support affordability for consumers and provide flexibility for automakers to comply with the sales requirements?

It is unclear that this would significantly impact consumers. Adding new initiative agreement pathways should be reviewed with caution to guarantee tangible benefits to consumers, and that they do not dilute the core objectives of the ZEV Act to ensure an adequate supply of ZEVs. However, additional pathways could enable automakers to receive multiple credits for each sale, making it easier to meet sales targets by reducing the actual number of required ZEV sales.

- Several EMPN working group participants expressed support in principle for expanding Initiative Agreement pathways, particularly if they help make ZEVs more affordable and accessible for consumers.
- There is interest in new options such as car share programs that could increase access and reduce costs for consumers, even if these measures don't directly accelerate sales targets.
- Expanding these pathways is unlikely to meaningfully contribute to meeting climate targets. Flexibility should not dilute the core goals of the ZEV Act.
- A few participants supported giving automakers room to adapt through expanded agreements, as long as this flexibility is part of a transition strategy, not a permanent alternative to compliance.

- There are concerns about undermining existing incentives. It was noted in the working group that the ZEV Act already encourages manufacturers to offer consumer incentives, and changing Initiative Agreements could weaken that existing intent.

Conclusion

There is strong support among local government staff engaged through the EMPN for maintaining and strengthening the ZEV Act. As BC's foundational regulatory tool for reducing transportation emissions, maintaining provincial commitments is critical to support local governments that are proactively addressing climate action in communities across BC. Stable policy signals are also key to supporting private sector investment and the continued supply of EVs in the BC market, enabling consumer choice and affordability. EMPN members emphasized the importance of staying the course while improving the clarity, predictability, and accessibility of tools needed for implementation. This is not the time to pause or pull back, but rather to maintain and strengthen commitments while providing support to those who need it.

To strengthen implementation and scale impact, this submission calls on the Province to:

- **Maintain and Strengthen the ZEV Act**
 - Reaffirm provincial commitments in the ZEV Act and expand the Act to include medium- and heavy-duty vehicles.
 - Ensure the timeline for ZEV Act implementation is transparent and stable to support planning and investment.
- **Provide Additional Support**
 - Rural and northern communities face additional barriers to EV adoption and require targeted support to ensure equitable access to the benefits associated with EV adoption.
 - To support the rapid transition to EVs, a correspondingly rapid deployment of public and private charging options is needed, including targeted support to rural and northern regions where infrastructure is lagging.
- **Improve EV Affordability**
 - The ZEV Act increases EV availability and affordability. Reducing sales targets could limit access and slow cost reductions for consumers.
 - Reintroduce provincial EV sales rebates and provide funding for local governments to offer incentives for EVs and EV chargers.

About CEA Peer Networks

CEA is a BC-based non-profit organization with over 30 years of experience supporting local governments and First Nations to advance climate and energy solutions. CEA's interconnected [peer network ecosystem](#) enables collaboration, knowledge-sharing, and coordinated implementation of local climate solutions across British Columbia. CEA currently facilitates 16 regional and topical peer networks, supporting staff and elected officials from communities across BC and beyond. In fiscal year 2024–2025 alone, CEA delivered 69 peer network sessions, engaging 1,161 individuals from 124 local governments and 16 Indigenous communities. These networks support local government staff to navigate policy and implementation challenges by learning from peers, sharing tools, and advancing solutions collaboratively.