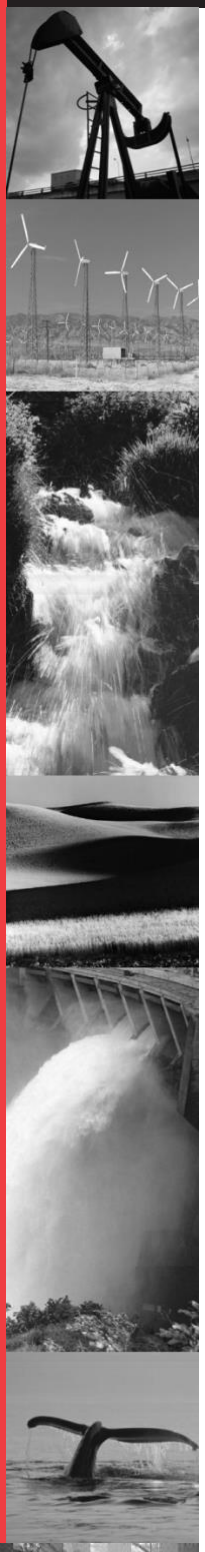
Canadian Institute of Resources Law
Institut canadien du droit des ressources

RESOURCES

NUMBER 125- 2022



REFLECTION ON COP26 AND THE GLASGOW CLIMATE PACT

Article by David V. Wright

Introduction

Stakes were particularly high at the twenty-sixth Conference of the Parties (COP26) to the United Nations Framework Convention on Climate Change[1] (UNFCCC). Parties needed to reach an agreement on final elements of the rulebook containing details of how the Paris Agreement[2] would be implemented, many parts of which will be the most important and consequential as implementation unfolds in years to come. Additionally, a number of long-standing issues remain unresolved, including long-term financial assistance for the most vulnerable countries to reduce emissions and respond to the impacts of climate change. Overall, COP26 was a key juncture for ensuring that party commitments would add up to keeping within reach the overarching goal of limiting global mean temperature rise to below 1.5 degrees.[3] It was these high stakes that led some to characterize this COP as "now or never"[4] and a "last-chance saloon" scenario.[5]

This article discusses several notable developments from COP26, some of which took place within the formal negotiations process (e.g. market mechanism rules, financial assistance), and some of which took place in parallel (e.g. Global Methane Pledge, US-China bilateral announcement). Part one focuses on the latter parallel developments, which primarily emerged in the first week of the conference. Part two focuses on the former, which largely materialized during the second week.[6]

Part 1: Developments Parallel to Formal Negotiations and Relevance for Canada

As with any COP, there were a number of high-profile, high-level announcements made throughout the event, largely concentrated during appearances of world political leaders during week one of the two-week conference. Developments presented here focus on announcements that involve Canada or have the most relevance for Canada.

Cap on Oil and Gas

On day one of the summit, Canada announced that it would impose a cap on oil and gas sector greenhouse gas (GHG) emissions as a measure to achieve net-zero emissions by 2050.[7] Details were scarce, as they typically are with such an announcement at such an event. However, this is consistent with a 2021 fall election Liberal party platform commitment,[8] and the path to implementing this commitment is sketched out in a letter from Ministers Guilbeault and Wilkinson to the federal government's net-zero advisory board, which requests the board's assistance with "key guiding principles to inform the development of quantitative five-year targets."[9]

In short, and subject to further legal analysis to come, from a legal perspective this is completely possible in the Canadian context. As noted in previous scholarly commentary, the federal government has ample constitutional authority to regulate GHG emissions and has indeed been doing so for many years.[10] The most controversial example in recent years has been the *Greenhouse Gas Pollution Pricing Act*,[11] recently found to be constitutional by the Supreme Court of Canada,[12] but the longer-standing approach has been through targeted direct regulation. Examples include regulating vehicle emissions,[13] coal-fired power plants,[14] and methane emissions.[15] While a significant announcement, capping oil and gas emissions will likely be done through this existing regulatory approach under the *Canadian Environmental Protection Act*.[16] It is also possible that this cap initiative is implemented cooperatively between provinces and the federal government. Alberta, of course, has itself enacted a legislated cap on oil sands emissions in the form of the *Oil Sands Emissions Limit Act*,[17] as commented on in an Ablawg post from my colleague Nigel Bankes.[18]

In terms of specific quantitative caps, details remain to be seen and the announcement certainly triggers many questions. A few key issues to wrestle include: coverage (what specifically does "oil and gas sector" mean?), sources (which facilities and actors are subject to this regulation?), time horizons (what does "today" mean?), what might we see every five years toward net-zero?), and contribution to national reductions (where and how does this fit in Canada's existing GHG emission reductions plan?). These questions and more are in play in the subsequently announced House of Commons Standing Committee on Natural Resources study on the proposal to cap greenhouse gas emissions from the oil and gas sector.[19]

As an aside, one way to view this announcement is as an illustration of the value of Canada's recently created climate accountability regime.[20] The new *Canadian Net-Zero Emissions Accountability Act*[21] requires that the federal government release a detailed, comprehensive emissions reduction plan for 2030 within six months of that statute coming into force, and then ongoing plans and reports on progress until 2050. That plan is expected to be released by the end of March 2021. This new regulatory initiative to cap oil and gas will have to be included in that plan, complete with details regarding its role in achieving emission reductions. Having this comprehensive bird's eye view of Canada's emissions reduction approaches will be a benefit for everyone regardless of specific interests and positions.[22]

Ending Fossil Fuel Subsidies

On November 04, Canada and a group of 21 other countries, including the United States and United Kingdom, announced a commitment to "end" public support for the fossil fuel sector by the end of 2022.[23] This "Statement on International Public Support for the Clean Energy Transition"[24] builds on previous commitments, including by the G7,[25] and is bundled with a commitment to prioritize "support fully towards the clean energy transition." Similar to the oil and gas sector cap announcement, details were scarce. Rather, the government has indicated that it "will develop policy direction that will define the scope of this policy".[26] There are, however, important qualifiers apparent at the moment. Specifically, the commitment is to "end *new* direct public support for the international unabated fossil fuel sector by the end of 2022" [emphasis added], and there is a potentially significant exception: "in limited and clearly defined circumstances that are consistent with the 1.5 degree Celsius and the goals of the Paris Agreement".[27]

What all of this means at the practical level in the Canadian context remains to be seen. Reducing subsidies for fossil fuels has been discussed for many years but has been challenging to implement for a number of reasons. One significant issue is the challenge of defining and identifying what actually constitutes a subsidy (e.g., does this include industry-friendly royalty rules?). A 2019 report from Canada's federal Commissioner of the Environment and Sustainable Development presents an accessible view of the matter.[28] Such a high-profile, broad-based coalition announcement at COP26 suggests that things could be different this time, but only time will tell, and the qualifiers noted above mean this will likely not result in a stark change in the short term. It should be noted, however, that a smaller group of national and sub-national governments, including Quebec, went a step further by creating the "Beyond Oil and Gas Alliance"[29], which commits to a "managed phase-out of oil and gas production" including through ending new licensing rounds for oil and gas exploration and production.[30]

Methane

Canada was also part of a group of nations that officially launched the "Global Methane Pledge"[31] at COP26. This Pledge was actually announced in September 2021 and Canada confirmed its support the following month[32], but the Pledge was showcased at the climate summit[33] in an effort to build momentum behind the Pledge and for the summit more broadly. The number of countries that signed on increased throughout COP26, growing to more than 100 by the end. The Pledge calls for countries to cut methane emissions by at least 30% of 2020 levels by 2030.

Canada has been acting on this issue for some time. For example, in 2016 Canada committed to reducing methane emissions from the oil and gas sector by 40-45% below 2012 levels by 2025 and has put in place regulations to do so. Canada has also committed to reducing methane emissions from oil and gas by at least 75% below 2021 levels by 2030.[34] As such, signing onto this international Pledge does not represent much significant new action on Canada's part, though implementing these commitments will likely require a next phase of the methane regulations with increased stringency. Notably, the US was also a high-profile part of this pledge at COP, and this builds on the Biden Administration's climate change initiatives[35] that essentially picked up from where the Obama Administration left off on methane.

One specific issue to watch in the implementation of these commitments in North America is the use of the "social cost of methane" in the cost-benefit analysis of those draft regulations.[36] Canada is currently using a high value for the social cost of carbon in its regulatory rule-making process,[37] and this will almost certainly be the case in the methane context. Depending on timing, Canada may use figures based on the reboot underway in the US, which will produce a fresh set of updated numbers in 2022.[38]

Phasing out Coal-powered Electricity Generation

During COP26, more than 40 countries announced a commitment to phase out the use of coal for electricity generation. This group, named the "Powering Past Coal Alliance[39]", included both developed and developing

countries, with the former committing to a faster phase out than the latter. Canada was part of this group[40], largely just reiterating a transition already underway under the existing coal-fired power plant regulations noted above. While this was not a big, new step for Canada, it was a significant development at COP26 given that the group included a number of countries heavily reliant on coal, such as Poland, South Korea, Indonesia, and Vietnam. This group did not, however, include several key coal-burning jurisdictions, including China, India, and Australia. As noted in part two of this article, this coal phase-out commitment in week one provided momentum for inclusion of a similar provision in what would become the Glasgow Climate Pact[41] at the end of week two; however, the attempt to explicitly refer to coal "phase-out" in the final text was changed in the final hours to a weaker articulation as a "phase down."

Reincarnated US-China Bilateral Pact

In an unexpected development in week two of the COP, the US and China announced a bilateral declaration called the "US-China Joint Glasgow Declaration on Enhancing Climate Action in the 2020s".[42] It focuses on cooperative action on clean energy, methane, deforestation, and several other areas. This is a reincarnation of the Obama Administration-led 2014 US-China bilateral pact that played a critical role in the lead up to COP21 in Paris and the relative success that became the Paris Agreement.[43] The Trump Administration pulled out of that agreement,[44] and also withdrew from the Paris Agreement.[45] While many details are yet to come, and its scope is more limited than its predecessor, this restored bilateral arrangement is a significant development that reinstalls a foundational piece of common ground between the world's two largest emitters. One detail in the Declaration that has been overlooked in the fervour around the abovementioned shift from phase-out to phase-down language in the final COP26 outcome is that a seed for that specific text change was actually sown in this bilateral pact. It states, "China will phase down coal consumption during the 15th Five Year Plan and make best efforts to accelerate this work".[46]

Ambiguity notwithstanding, this bilateral Declaration provided important political momentum for the COP26 negotiations. It was a boost because it demonstrated clearly to other nations that the US and China are firmly operating inside the Paris Agreement paradigm and that these major emitters approach climate change as an issue that transcends their many other political differences. While Canada is obviously not part of this bilateral agreement, the development does provide assurance that Canada's largest trading partner is also taking a relatively ambitious approach to climate change and is going to use its international influence to move other key trading partners in a similar direction. This is starkly different from the Trump Administration years. Of course, political winds shift, but for now this is a relatively helpful tailwind for Canada's current approach.

Part 2: Developments in UNFCCC & Paris Agreement Implementation

This part briefly discusses notable developments (or lack of) within the formal negotiations process with respect to the implementation of the Paris Agreement and United Nations Framework Convention on Climate Change (UNFCC). A key objective for this particular conference was to finalize the rulebook for implementation of the Paris Agreement.[47] This did indeed happen, and most would agree that this constitutes a success even if there is discontent with some of the final features. It is a particularly significant step forward as there was a risk that Parties would not reach an agreement on the rulebook entirely, resulting in further delay in implementation (on top of losing a year due to a pandemic-induced postponement last year) and loss of confidence in the basic structure and approach of the Paris Agreement. The following discusses several of the notable developments on the rulebook front, as well as several other (but not all) matters.

Mitigation Ambition

Earlier in 2021, well before COP26 but formally within the ongoing Paris Agreement process to raise ambition in parties' respective "Nationally Determined Contributions" to reducing greenhouse gas (GHG) emissions, Canada announced an updated emission reduction target of 40-45% below 2005 levels by 2030.[48] There was worry in the lead-up to COP26 that too few parties had taken a similar step. That amplified long-standing concerns around the persistent "emissions gap" between commitments under the Paris Agreement, most specifically to keep warming to 1.5 degrees, and actual measures that parties would take at the domestic level to implement Paris commitments.[49] Many were watching to see whether fresh rounds of higher ambition pledges before and during COP26 would add up to emission reductions in line with the 1.5-degree goal.

In the end, that did not happen. However, during COP26 a number of parties did indeed announce more ambitious reductions commitments, and the Glasgow Climate Pact does reiterate the overarching goal of "holding the increase in the global average temperature to well below 2 °C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5 °C above pre-industrial levels".[50] The Pact also recognizes the need for "rapid, deep and sustained reductions in global greenhouse gas emissions, including reducing global carbon dioxide emissions by 45 per cent by 2030 relative to the 2010 level and to net zero around mid-century".[51] Viewed at a high level, this was unofficially the 'Net-Zero COP', where much of the focus was on Parties making long-term commitments to net-zero emissions several decades from now. On that front, most developed countries have now committed to net-zero emissions by 2050, and other countries, including high-emitting states such as China, Brazil, Russia, and India, have also set a net-zero target, even though time horizons are further

out. For example, India committed to net-zero by 2070,[52] China by 2060,[53] and Russia also by 2060.[54]

To be clear, these announcements will not close the gap between Party commitments and the 1.5-degree objective, let alone the gap between party commitments and party action, sometimes referred to as the "credibility gap".[55] As noted in a COP26 side event presentation by authors of the 2021 Emissions Gap Report,[56] if all Parties follow through on their most recent commitments, the world would still be on track for approximately 1.8 degrees warming.[57] However, commitments announced at COP26 were steps in the right direction and the process remains open to parties increasing their ambition. On that specific point, the Glasgow Climate Pact "requests" that Parties "revisit and strengthen the 2030 targets in their nationally determined contributions as necessary to align with the Paris Agreement temperature goal by the end of 2022".[58] This is primarily directed to Parties who did not submit such updated commitments at COP26 or in the lead-up to COP, and it is a significant acceleration beyond the five-year cycles agreed to in the Paris Agreement, which now seems too slow and too out of line with staying on a 1.5 degrees pathway.

From a broader Paris Agreement implementation perspective, these are significant developments as Parties to the Paris Agreement essentially doubled down on the regime's international peer pressure, trust-based approach to compliance.[59] In practical terms, that approach means the more contact between parties the better, and commitments and interactions at COP26 suggest that parties are on-board with frequent contact and stock-taking with their peers. Put conversely, there is and will always be a risk that Parties stall or reduce their ambition in isolation, risking a breakdown of the Paris Agreement architecture.

Finance

The perennially contentious issue of financial assistance to developing countries for mitigation and adaptation activities was very much alive at COP26. In a context where developed countries had fallen short on implementing finance commitments for many years, the latest episode has seen developed countries miss the annual $100 billion by 2020 that was pledged in Paris. As such, trust was low going into COP26. Concern with this inadequacy is explicitly included in the Pact's final text[60] and in the long-term climate finance decision document.[61] More notably, the final text "urges" developed countries to at least double the funding to developing countries for adaptation.[62] Parties did not, however, reach an agreement on financing beyond 2025. As such, expect this aspect of the negotiations to be front and center in COP27 next year in Egypt.

Loss and Damage

Another long-standing contentious issue is how states most affected by climate change impacts will receive support from other states, particularly those countries with high historical and current emissions levels. As explained by Lind Siegele, this dimension has been developing for decades, particularly through the persistence of small island developing states.[63] In short, parties to the UNFCCC process have never reached an agreement on the thorny issues of responsibility for historical emissions and the flip side of that issue, liability for associated damages caused by those emissions. As previously quipped by Professor Saleemul Huq, "loss and damage"' has become a euphemism that is used to avoid the contentious matters of "liability and compensation."[64]

In the COP26 context, the most significant development was that there was no big development. Parties achieved limited progress on this issue at COP26. Though parties did take one more small step in further formalizing and flowing technical assistance under what is called the "Santiago Network on Loss and Damage",[65] this is distinct and different from the "Glasgow Loss and Damage Facility" that many parties were calling for. The latter is envisioned as a new funding mechanism for loss and damage, but after COP26 it remains non-existent. Instead, the Pact only "[d]ecides to establish the Glasgow Dialogue".[66] So the only commitment at the moment is to more dialogue. In short, though vocal throughout the COP26, states most vulnerable to climate change impacts will be forced to pursue the issue in future negotiations, notwithstanding this being a multi-decade campaign in a context where impacts are intensifying.

Article 6

Reaching agreement on the rules for implementing Article 6 of the Paris Agreement was one of the highest stakes issues at COP26. Article 6, which has the somewhat uninformative title of "Voluntary Cooperation", contains provisions that provide for states to use market mechanisms such as emissions trading and offsets to achieve emission reduction commitments. The logic here, notwithstanding caveats and nuances, is that these market mechanisms will assist Parties in reaching emissions reduction commitments in a cost-effective manner. However, Article 6 provisions contain "constructive ambiguity" that left parties much more work to do, and left much potential for double-counting of emissions.[67] Specifically, parties needed to wrestle long-standing technical issues such as those pertaining to baselines (i.e. starting point for calculating what constitutes an avoided emission in the future), GHG accounting (e.g. no double-counting of emission credits), environmental integrity (i.e. reductions on paper are actually reductions in the atmosphere and do not unduly harm other elements of the environment) and continuation of existing emission reduction credits. Additionally, parties were under increasing pressure to include explicit consideration of human rights and the rights of indigenous peoples in an effort to ensure that emission-reducing projects are not at the expense of populations already most vulnerable to climate change impacts.

In the end, Parties did indeed manage to finalize these rules at COP26. These rules allow for transfers of emission reduction credits between governments, as well as between governments and non-state actors. Comprehensive coverage and analysis is beyond the scope of this article as complexities will take time to parse and understand; however, in short, the following are initial high-level takeaways. The focus here is on Articles 6.2 and 6.4, which are of the highest consequence.

- Rules of implementation are now in place for Article 6.2, which provides for Parties to use "internationally transferred mitigation outcomes" (ITMOs) toward achieving Nationally Determined Contributions (NDCs – i.e., GHG emission reduction commitments). This is essentially a way for Parties' emissions trading systems to link and to do so within the Paris Agreement system, complete with GHG accounting requirements. In addition to detailed rules on calculating and reporting ITMOs, notable features in the final text include safeguards against double-counting and net increases in emissions (primarily implemented through what are called "corresponding adjustments"), explicit requirements for Parties to ensure environmental integrity, and explicit requirements to consider and report on human rights, the rights of Indigenous peoples, gender equality, and intergenerational equity. The Article 6.2 guidance also strongly encourages Parties using ITMOs to "contribute resources for adaptation" with particular attention to Parties that are most vulnerable to climate impacts; however, there is no "share of proceeds" requirement for 6.2 as there now is for Article 6.4. Details are all set out exhaustively (and exhaustingly) in this Decision.[68]

- Rules of implementation are now in place for Article 6.4, which provides for a new centralized UN mechanism that facilitates the trading of emission reduction credits generated by specific projects. This is essentially the Paris Agreement's next iteration of the Clean Development Mechanism and Joint Implementation market mechanisms under the Kyoto Protocol. Many of the Article 6.2 safeguards and requirements summarized above are also present in the 6.4 rules agreed to at COP26 (though there are fewer requirements for emission reductions that will not be used toward achieving an NDC), all of which is overseen by a Supervisory Body with formal membership rules and rules of procedure. Unlike 6.2, any transactions under the mechanism in 6.4 requires that a "share of proceeds" of 5% go to vulnerable nations. Details are all set out exhaustively in this Decision.[69]

Phasing… "down" of Coal

Throughout the final stages of COP26 there was tension regarding the text in the cover decision, particularly with respect to whether and how to include explicit reference to fossil fuels, and attention to coal specifically. In the end, this aspect survived text-level negotiations, but it was significantly watered down through one small change. On the last day (actually the additional overtime day), in the very final hours of COP proceedings, India led a forceful and eventually successful push to change text referring to a "phase-out" of unabated coal power to a "phasedown".[70] While in the long term this may have minimal impact on emission reduction trajectories and the actual time horizons for complete phase-out of coal, particularly given that India, China, and other coal-dependent nations have pledged net-zero commitments later this century, it was significant at this COP in two ways. First, on the process front, this was a *very* late text change to a provision that had been on the table for days prior and there was no longer any time or opportunity for consultation on the change. Allowing this type of significant, extremely late intervention disrupts the existing process and norms of COP proceedings and could set a destabilizing precedent from a negotiations process perspective into the future. What if many more Parties were to take similar action in future COPs?

Second, and further to the above point that the Paris Agreement is structured on international peer pressure and trust, this change is likely to have a demoralizing effect on Parties most vulnerable to climate change impacts, for whom the phasing *out* of coal represents a key part of avoiding the existential threats posed by climate change. Time will tell whether this text change has any material impact on achieving the goals of the Paris Agreement, but an intuitive interpretation of this change suggests it envisions a slower and incomplete path away from coal-fired electricity generation. Having said this, the Pact does still have explicit reference to coal, and, as noted above, it did ultimately include reference to the "phase-out of inefficient fossil fuel subsidies"[71] which represent the first-ever explicit reference to fossil fuels. As such, this will be viewed by many as a step forward, even if the weaker wording will be disappointing for many others.

Concluding Reflections

One need only look at the horrific extreme weather catastrophes that unfolded across Canada and the world in 2021 to appreciate the importance of urgent, multilateral, global action to respond to the collective action problem that is climate change. Such action is particularly important from a nation like Canada which is a major current and historical GHG emitter that enjoys wealth accumulated through decades of disproportionate exploitation of the planet's atmospheric carrying capacity. If Canada doesn't do its fair share, no country can be expected to.[72] And if too few countries act, then the collapse of the Coquihalla, incineration of Lytton, Calgary flooding, and Fort McMurray wildfires will be dwarfed around the world for decades to come. This is not alarmism. It is reality,[73] no matter how hard that is to fathom, especially in Alberta.

In this context, the stakes were high for Canada and the rest of the world going into COP26. Reflecting on outcomes from the conference, notwithstanding the reality that no Parties or observers were completely content with the final outcomes, COP26 represents a qualified success. The conference was never going to accomplish everything. Finalizing the rulebook, strengthening the system for increased ambition, concerted steps on emission reduction initiatives, open discussion about the phasing out of fossil fuels, and a flurry of net-zero commitments from major emitters are all steps in the right direction. While tenuous, most would agree that the outcomes of COP26 keep the goal of 1.5 degrees warming within reach, even if just barely. That is very significant. What's more, COP26 saw all parties meaningfully engage within the Paris Agreement paradigm, as opposed to stepping away in a fundamentally different or subversive direction. In this way, it would appear that COP26 had a net positive impact on trust in the system. That is no small matter in a regime that has trust and international peer pressure at its core.

Closer to home, Canada had a very high profile at COP26. While many of the announcements were instances of re-announcing existing commitments and measures, doing so in concert with other developed and developing countries provided momentum within the formal negotiations. As with everything in this realm, implementation is the critical next step, and Canada certainly has set an ambitious law and policy agenda for the months, years and decades ahead. Following through on that agenda will be important for achieving emissions reductions, and it will also be critical for the purposes of setting an example within an international climate change regime that is built on multilateral peer pressure and trust between the Parties.

However, shortfalls on financial assistance, unresolved issues on loss and damage, persisting ambition and credibility gaps, devilish market mechanism implementation details, and ever delicate trust in the process, especially from major emitting developing countries and the most vulnerable Parties, mean that the work is far from over. The hard work is really just beginning, finally. Everywhere at the COP26 venue in Glasgow was signage with big block letters saying, "The Time Is Now." The time to act was actually decades ago. Now will have to do, but now will only do if all Parties to the Paris Agreement get moving quickly to make up for lost time and inaction. The Glasgow Climate Pact and COP26 outcomes are steps in the right direction, but the pace needs to quicken dramatically.

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CIRL UPDATE

Workshops

CIRL co-sponsored the following workshops in partnership with the File Hills Qu'Appelle Tribal Council, Lands, Resources, Environment & Stewardship, during January and February:

CIRL Research Fellow David Laidlaw – Cumulative Effects and Canada's Adoption of the United Nations Declaration on the Rights of Indigenous Peoples Act (Bill C-15), January 22, 2022

Dr. Robert Hamilton, Assistant Professor – The Assessment of Cumulative Impacts in the Crown's Duty to Consult and Accommodate, February 5, 2022

CIRL research Fellow David Laidlaw – Aboriginal Water Rights on the Prairies and Cumulative Effects, February 12, 2022

Dr. Robert Hamilton, Assistant Professor – *Yahey v. British Columbia*: Considering Cumulative Effects and the Piecemeal Infringement of treaty Rights, February 19, 2022

Forthcoming CIRL Publications

The following CIRL Occasional papers will be published during May and June. They will be accessible for free from the CIRL website at www.cirl.ca

A Guide to the Canada Energy Regulator by Professor Alastair Lucas

Basic Ecology and Law for Albertans – Dr. Judy Stewart

A Guide to the Alberta Utilities Commission by Indra Maharaj

For a complete list of Occasional Papers, see CIRL's website: www.cirl.ca

Other Forthcoming Publications

Environment in the Courtroom – Volume 2 – Alastair Lucas and Allan Ingelson ed., University of Calgary Press

Allan Ingelson wrote Alberta energy regulatory update commentaries to be published in CELS Alberta Volume Release 2022-1, by Thomson Reuters (Toronto) in April

Upcoming Events:

Associate Professor Greg Hagen – Do "artificially intelligent 'investors' deserve patents?" - Saturday Morning at the Law School, April 23, 10:00 – noon
Professor Sandi Zellmer, Montana State University – the workshop will be held in person at the University of Calgary – Energy & Mining - the American Approach to Wildlife Management and Conservation, Saturday May 14, 10:00 a,m. – noon
Associate Professor Nickie Nikolaou – Oil Sands Regulatory Update – Saturday June 4, 10:00 a.m. - noon

Other News:

Allan Ingelson was interviewed by the Lawyer's Daily (Lexis Nexis) on liability for orphan well-clean up in Alberta and Saskatchewan.

RESOURCES

NUMBER 125– 2022

Resources is published by the Canadian Institute of Resources Law. The purpose is to provide timely comments on current issues in resources law and policy. The opinions presented are those of the authors and do not necessarily reflect the views of the Institute. *Resources* is e-mailed free of charge to subscribers. (ISSN 0714-5918)

Editor: Alastair R. Lucas, Q.C.

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