

COURT FILE
NUMBER

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE SASKATOON

APPLICANTS

CITIZENS FOR PUBLIC JUSTICE, KIKÉ DUECK a
minor by their litigation guardian KRIS DUECK,
SHERRY OLSON, MATTHEW WIENS, and the
SASKATCHEWAN ENVIRONMENTAL SOCIETY
INC.

RESPONDENT

THE GOVERNMENT OF SASKATCHEWAN

AFFIDAVIT

Affidavit of WILLARD METZGER on behalf of Citizens for Public Justice.

I, Willard Metzger, of the City of Drayton in the Province of Ontario, MAKE OATH
AND SAY:

1. I am the Executive Director of Citizens for Public Justice ("CPJ"). I hold a Bachelor of Theology Degree from Emmanuel Bible College, a Bachelor of Arts degree in Sociology from the University of Waterloo, a Master of Theological Studies at Conrad Grebel University College, and a Doctor of Ministry degree from Ashland Theological Seminary.
2. I have dedicated myself to ministry with young adults, with a particular focus on climate concerns and environmental stewardship. Throughout my service, I have expressed solidarity with the youth climate movement and actively engaged with them in their pursuits for a more sustainable world. My work in this field underscores my understanding of the intersection between faith, environmental ethics, and social justice, rendering my perspective valuable to the matter at hand.

3. My leadership at CPJ is driven by a vision that aligns with the organization's sixty-year commitment to climate justice. This vision, which informs our decision to be an applicant in this case, is firmly rooted in the intersection of faith, community, public policy, and environmental stewardship.
4. With a deep understanding of these complex relationships, I strive to guide CPJ in inspiring and empowering individuals and communities. Our collective goal is to create tangible efforts toward a more just and sustainable future, leveraging the unique perspective that CPJ brings to the conversation on climate justice. This case represents a critical aspect of that mission and CPJ is compelled to be involved in this case to challenge the Government of Saskatchewan's decision to refurbish and extend the reliance on conventional coal-fired generation to the year 2050.

CPJ'S HISTORY AND MANDATES AROUND CLIMATE JUSTICE

5. CPJ is a Canadian organization that has been at the forefront of social and environmental justice advocacy since its founding in 1963. Born from a unique movement to extend the Gospel's Good News into political life, CPJ began as the Christian Action Foundation in Edmonton. Young Christian activists later joined forces with the Committee for Justice and Liberty ("CJL"), resulting in the formation of CPJ.
6. For more than sixty years, CPJ has become a recognized voice for public justice across Canada. Its advocacy efforts have encompassed a wide range of issues, including the Mackenzie Valley Pipeline moratorium, Indigenous reconciliation, and the promotion of a just transition within various environmental contexts.
7. CPJ's commitment to justice extends beyond simple advocacy. The organization has actively engaged in shaping public policy by participating in key decision-making processes at both the national and international

levels. Within Canada, CPJ has regularly contributed to pre-budget consultations and served on advisory bodies such as Canada's Net-Zero Advisory Body, influencing critical decisions on social and environmental justice.

8. CPJ has also pursued environmental advocacy in the judicial context as demonstrated by CPJ's long history of involvement in strategic environmental litigation. CPJ recently participated as an intervenor in the *Mathur v Ontario* case (2024 ONCA 820 - CanLii) which would further support CPJ's standing as a public interest applicant in this action.
9. Internationally, CPJ's involvement as an observer in multiple UN Climate Change Conferences (COPs) showcases its alignment with global efforts to address climate change. This proactive and hands-on approach reflects CPJ's unwavering dedication to advancing meaningful change and fostering a more equitable and sustainable future.
10. CPJ's mandate includes:
 - a. communicating with and encouraging governments across Canada to adopt more robust climate change policy, recognizing the pressing need for proactive environmental stewardship;
 - b. advocating for climate justice and raising awareness among the public around the urgency of climate justice action, in line with national and global sustainability goals;
 - c. collaborating with local and national churches, faith communities, and secular organizations to provide resources and guidance for engaging in targeted advocacy on climate justice, fostering a collective approach to environmental responsibility; and
 - d. promoting sustainable climate policies through diligent research and analysis, emphasizing the necessity for equitable social

measures that align seamlessly with Canada's international climate commitments and contribute to a just and sustainable future.

11. CPJ consults with experts and historically disenfranchised groups, especially Indigenous communities, in developing the positions it advances before courts.
12. Formally known as the “CJL Foundation,” CPJ actively campaigned against the proposed Mackenzie Valley Pipeline, slated to traverse the traditional land of the Dene people in the Mackenzie Valley of the Northwest Territories for the purpose of transporting fossil fuels to American consumers.
13. In 1975, CPJ appeared before the Berger Inquiry, advocating for a 10-year moratorium on the pipeline. This marked one of CPJ's early and significant triumphs in protecting the rights and lands of Indigenous people. Its comprehensive efforts included educating Members of Parliament, Cabinet ministers, and the general public about sustainable energy policy, resource stewardship, and justice for the affected Indigenous people.
14. CPJ's recommendation later became a central component of the Mackenzie Valley Pipeline Inquiry led by Justice Thomas R. Berger and eventually resulted in a government-declared moratorium.
15. Relatedly, in 1976, the CJL Foundation litigated a case concerning the Mackenzie Valley Pipeline, which scrutinized the potential bias of Mr. Marshall Crowe who was connected to the Gas Arctic-Northwest Project and was designated to represent the National Energy Board (“NEB”) in hearings on the pipeline. The Supreme Court of Canada sided with the CJL Foundation and pronounced a reasonable apprehension of bias on Mr. Crowe's part. The decision is available on Canlii.org: *Committee for Justice and Liberty et al. v National Energy Board et al.*, 1976 CanLII 2 (SCC), [1978] 1 SCR 369.

16. Another example of CPJ's commitment to justice has involved former staff member John Olthuis, who provided legal representation for the Grassy Narrows First Nation after their homeland was contaminated with mercury. The legal process led to a compensation settlement in 1985, demonstrating CPJ's ongoing dedication to seeking just and equitable resolutions for those most affected by environmental harm.
17. CPJ has a long history of engaging in public policy research and consultation with affected communities on topics that are directly relevant to this case. It routinely conducts educational seminars, workshops, and climate justice campaigns to inform community members about the short-term and long-term repercussions of climate change. It has also met with politicians to provide input on climate-related policies and legislation. The following are a few examples of CPJ's past environmental and climate change initiatives:
 - a. In 2021, CPJ actively engaged with Canada's Net-Zero Advisory Body, following the enforcement of the Canadian Net-Zero Emissions Accountability Act, submitting its insights on achieving Canada's goal of net-zero greenhouse gas emissions by 2050.
 - b. In 2011, CPJ collaborated with the Canadian Council of Churches to orchestrate the Canadian Interfaith Call for Leadership and Action on Climate Change, earning the endorsement of over 60 faith institutions across Canada.
 - c. In 2012, CPJ was recognized as a "Clean Energy Champion" by the Pembina Institute, acknowledging the substantial contributions of then Executive Director, Joe Gunn, to the advancement of clean energy.

- d. In 2013, CPJ published *Living Ecological Justice: A Biblical Response to the Environmental Crisis* and in 2014 it released a series of faith and climate resources correlated with the UN Climate Summit, along with synchronizing an interfaith prayer vigil for COP20 in Lima as part of its Living Ecological Justice initiative.
 - e. In 2015, CPJ orchestrated an interfaith prayer chain during the international climate negotiations in Paris, echoing a global cry for determined action as part of the Cross-Canada Prayer Chain at COP21.
 - f. In 2016, CPJ released *Actions for a Canadian Climate Action Plan* as an attempt to harness the collective voice of Canadians to press for a robust climate action plan, in alignment with the principles and goals of the Paris Agreement.
 - g. In 2021, CPJ hosted a webinar on Environmental Racism by Ingrid Waldron, as part of its conference titled “Seeking Justice Together.” In 2022, CPJ organized a webinar titled “Preserving Biodiversity: Creation Care from Faith to Action,” which was aimed at raising awareness around COP15 on biodiversity, hosted in Montreal.
18. In all, CPJ’s unique fusion of Christian principles, environmental stewardship, and advocacy for Indigenous rights have informed its commitment to a just and sustainable approach to energy and natural resources.
19. CPJ’s long-standing involvement in climate justice both in the areas of public policymaking and legislation based on scientific research and the interests of marginalized communities places it in a unique position to assist this Court in addressing the issues raised in the appeal. A core component of CPJ’s mandate is to ensure that the rights of those who are

disproportionately affected by climate change are fully and properly considered by Canadian courts.

CONVENTIONAL COAL IN SASKATCHEWAN

20. CPJ is horrified by the decision of the Government of Saskatchewan to refurbish and extend conventional coal-fired generation to 2050. CPJ understands that the Government of Saskatchewan made this decision recently and first communicated the decision by way of a letter dated June 18, 2025, which was addressed to all employees of the provincial electrical utility, SaskPower.
21. CPJ notes that all other provinces in Canada have either eliminated coal-fired generation or will do so within the next few years. No other province in Canada is refurbishing or extending reliance on coal generation to 2050.
22. CPJ notes the widespread consensus around the world that dangerous climate change cannot be addressed without achieving net zero emissions. The Government of Saskatchewan's decision to extend conventional coal undermines the ambition to achieve net zero emissions and will also contribute millions of tonnes of additional cumulative emissions between now and 2050.
23. CPJ is seeking to be granted public interest standing in this Application to voice our concerns on behalf of all Canadians that the Government of Saskatchewan's decision to extend conventional coal generation is both unreasonable and legally incorrect because it ignores federal regulations drafted under the *Canadian Environmental Protection Act, 1999*.
24. CPJ supports this application because it aligns with CPJ's mandate promote social, environmental, and climate justice. CPJ is concerned that the Government of Saskatchewan is undermining the rule of law in Canada by ignoring valid federal law and claiming in its decision that "the federal

government has no standing in this discussion” with respect to the generation of electrical energy.

25. CPJ knows there is no climate justice without a just transition. CPJ is sympathetic to the many workers employed in Saskatchewan associated with coal-fired generation. However, CPJ cannot accept the decision as presented in the June 18, 2025, letter to extend coal as being justified or necessary given the many alternatives available to the Government of Saskatchewan to generate electricity. With respect, CPJ pleads for this Court to grant CPJ public interest standing on behalf of all Canadians and urges the Court to judicially review and quash the decision to extend conventional coal generation in Saskatchewan to 2050.
26. This affidavit is made in support of CPJ’s participation as an applicant in this matter, seeking public interest standing on behalf of all Canadians, and for no other or improper purpose.

SWORN (OR AFFIRMED) BEFORE ME
REMOTELY via electronic means
at Saskatoon, Saskatchewan,
this 15th day of July, 2025



A Notary Public in and for
the Province of Saskatchewan.
My Appointment expires:
Or Being a Solicitor.


Willard Metzger

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