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November 18, 2017.

Shelley Hyatt
Senior Policy Advisor
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Air Policy Instruments and Program Design Branch
77 Wellesley West
Floor 10
Ferguson Block
Toronto, ON
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Dear Minister,

EBR 013-1460: Ontario Offsets Credits Regulation under the Climate Change Mitigation and Low-Carbon Economy Act, 2016

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

Offset Regulations

Recognizing that the government has a goal to reduce provincial greenhouse gas (GHG) emissions, the selection of a Cap and Trade model is intended to provide a lower cost solution. Offsets are intended to provide further reduction of GHGs beyond the capped sectors.

Offset regulations and protocols should have been in place from the beginning of the establishment of the Cap and Trade system in Ontario. We encourage the government to establish commencement of these regulations as part of the Cap and Trade system in Ontario as soon as possible.

Some offset projects will take place in more remote areas of the province, and this may limit the number of accredited verification bodies that can perform verifications. This being the case, provisions should be made in the proposed regulations to allow for the same verification body to perform the necessary reports where no other body is available within reasonable distance.

Offset Protocols

We recognize that consultations have already begun for many of the proposed offset protocols. However, it is disappointing to see that at the moment, only the draft protocol for the Landfill Methane Destruction is included for consultation to lead to

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



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incorporation. The CFFO would like to see all of the protocols intended to be included in the compliance offsets progressing more quickly to incorporation.

Linking to Larger Markets

These offset regulations, as well as protocols for all the government's intended compliance offsets, should be in place before linking with California and Quebec.

We appreciate this opportunity to respond to these proposed offset regulations and protocol and thank you for consideration of our comments.

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario
SA