

March 8, 2019

Submitted online at: <https://ero.ontario.ca/notice/013-4595>

Vicky La
Financial Instruments Branch - Policy Unit
77 Wellesley Street West
Toronto ON M7A 2T5
Canada

RE: EBR Proposal 013-4595 – Streamlining and updating of greenhouse gas reporting requirements

Dear Ms. La:

The Ontario Forest Products Industry GHG Emissions Reduction Coalition (the Coalition) thanks you for the opportunity to comment on the EBR Proposal 013-4595 – Streamlining and updating of greenhouse gas reporting requirements. The members of the Coalition include the following pulp and paper companies: Atlantic Packaging, AV Terrace Bay, Cascades, Domtar, Rayonier and Resolute Forest Products.

Currently, the Ontario forest products sector represents \$15.5 billion of economic activity and provides over 170,000 direct and indirect jobs in every region of the province. The sector is highly integrated meaning that wood products and pulp paper sectors rely on each other for optimizing efficiencies. The forest products sector has and continues to play an important role in helping tackle climate change. Specifically, between 2005 and 2015, the Ontario pulp and paper sector reduced its GHG emissions by 40%. These achievements were made by fuel switching and optimizing energy use. The next stage of reductions will be much more capital intense.

The Coalition supports requiring third party verification of emissions reports to those reporters that may have compliance obligations under the Emissions Performance Standards program. The coalition conditionally supports removing the verification for some reporters such as the voluntary participants as defined in O. Reg. 390/18 for annual emissions reports on the condition that these participants are not opting-in to the new Emissions Performance Standards program.

The Coalition does not support harmonizing with the federal reporting requirements under the Greenhouse Gas Reporting Program (GHGRP). There is a concern that changing the Ontario reporting requirements would create inconsistencies with past Ontario reporting and is not consistent with certain reporting obligations at the Federal level (i.e. landfill emissions). The Coalition also supports updating the global warming potentials to the most recent international standards by adopting the IPCC AR4 Global Warming Potentials (GWP) for all emissions reporting methods.

While streamlining measurement and reporting requirements is normally preferred, the Coalition does not support any other changes to Ontario's current calculation methodologies, sampling,

analysis and measurement requirements that are in place now to harmonized with the federal program. The Coalition has significant concerns with the federal proposed methodologies as outlined in the attached documents, dated May 25, 2018 and April 9, 2018, prepared by NCASI and submitted to the federal government. NCASI is a non-profit environmental research institute that seeks to create credible scientific information required to address the environmental information needs of the forest products industry in North America. The main issues of the federal proposal are related to evaluating landfill emissions which has huge uncertainties and the measurement of biofuels.

The Coalition recommends that Ontario continue to require reporting of fuel distribution/supply reporting since it is important for the GHG inventory. Furthermore, we suggest requiring the fuel supplier to prepare documents with the required information to provide to the participants for verification, signature and submission.

The Coalition further recommends that Ontario develop its program with the same thresholds for opting-in and mandatory participation the EPS program in order to avoid confusion. This is important for applying for the CRA fuel surcharge exemption.

If you have any questions, please feel free to contact myself or Barbara Mossop, the Environment and Energy Technical Advisor, at 647-231-1867 or bmossop@ofia.com.

Sincerely,



Ian Dunn, RPF
Director of Forestry and Environmental Policy
Ontario Forest Industries Association

Signed on behalf of the Ontario Forest Products Industry GHG Emissions Reduction Coalition:

Atlantic Packaging
AV Terrace Bay
Cascades
Domtar
Rayonier
Resolute Forest Products