



2019-03-06

Vicky La
Financial Instruments Branch – Policy Unit
Ministry of the Environment, Conservation and Parks
77 Wellesley Street West
Toronto, ON M7A 2T5
Canada

RE: ERO number 013-4595

Streamlining and Updating of Greenhouse Gas (GHG) Reporting Requirements

Dear Vicky La,

The Standards Council of Canada (SCC) would like to thank you for the opportunity to participate in providing feedback on the proposed amendments to Ontario's GHG reporting program.

SCC would like to offer its support to the Ontario Ministry of the Environment, Conservation and Parks, to harmonize requirements specifically for petroleum product suppliers, natural gas distributors and other large emitters under the *Greenhouse Gas Emissions: Quantification, Reporting and Verification Regulations*.

Supporting National Harmonization Initiatives for GHG

SCC is currently working with federal Environment and Climate Change of Canada's (ECCC's) Carbon Pricing Bureau to support the jurisdictions with implementation activities for emitters and use of accredited third party validation/verification bodies (VVB's).

SCC's GHG accreditation program development and implementation services include, but is not limited to:

- Providing information on the requirements for SCC's Accreditation Program for Greenhouse Gas Validation/Verification Bodies as defined by ISO 14065:2013 - Greenhouse gases -- Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition.
- Assisting in building capacity through engagement with the authorities having jurisdiction and GHG VVBs; building relationships and strategic support for implementation of the carbon pricing programs.
- Providing comment / feedback on proposed regulatory frameworks, with respect to the use of third-party verification bodies.
- Providing information on GHG standards and imminent updates (ISO 14065, ISO 14064-1, ISO 14064-2, ISO 14064-3, and ISO 14066)
- Providing assurances of quality through granting third party independent internationally recognized accreditation to VVBs



Memorandum of Understanding (MoU)

Since 2013, SCC and the Ministry have been collaborating under a signed MOU to fulfill GHG emission reporting using third party accredited organizations; in accordance with Ontario's GHG requirements and SCC's Greenhouse Gas Accreditation Program.

Canadian Leadership – National, Regional, International

SCC continues its commitment to identify and support such opportunities to align requirements and guidance documents with those of its national counterparts. SCC is also involved on the international stage with standards development and conformity assessment organizations.

With recognition that future legislative updates may be made as required, SCC would be happy to provide direction and/or guidance pertaining to regulatory frameworks that support the provincial greenhouse gas reporting (including the streamlining and updating of the requirements).

We welcome any questions you may have.

Sincerely,

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