

DELIVERED VIA EMAIL

Vicky La
Financial Instruments Branch- Policy Unit
77 Wellesley Street West
Toronto ON M7A2T5
Canada

Vicky.La@ontario.ca

March 8, 2019

Dear Ms. La,

Re: Streamlining and Updating of Greenhouse Gas Reporting Requirements, ERO Posting 013-4595

Please accept the following submission of the Canadian Environmental Law Association (“CELA”) regarding the proposed changes to Ontario’s Greenhouse Gas Reporting Requirements.

1. Should Ontario harmonize with the federal reporting requirements under the Greenhouse Gas Reporting Program (GHGRP) (e.g., mandatory methods, Global Warming)?

CELA supports Ontario harmonizing with the federal reporting requirements under the GHGRP. CELA recognizes the importance of aligning provincial and federal reporting requirements in order to develop better, consistent greenhouse gas (“GHG”) estimates.

In particular, it is our understanding that the mandatory requirements under the GHGRP captures a broader range of emitters compared to the Ontario regime. Mandatory reporting under GHGRP applies to facilities that emit 10,000 tonnes or more of GHGs in carbon dioxide equivalent (CO₂e) units per year, whereas in Ontario mandatory reporting is required for facilities that emit 25,000 or more tonnes of GHGs in carbon dioxide equivalent per year. CELA supports this more stringent standard for mandatory reporting.

2. Should Ontario continue to require reporting of fuel distribution/supply reporting?

CELA opposes the Ontario Government’s proposal to remove mandatory reporting and verification requirements for petroleum product supply and natural gas distribution. Such a measure will reduce our understanding of the extent and effects of emissions from the downstream effects of fuel sold by oil and gas companies. It is necessary to ensure that Ontario’s GHG Reporting standards allow for sound, well-informed policy choices. Timely, accurate emissions data is critical to the development, implementation, and evaluation of Ontario’s climate change policies and strategies.

Canadian Environmental Law Association

3. Should third party verification of emissions requirement be maintained for the voluntary participants as defined in O. Reg. 390/18?

CELA recommends that verification requirements apply to emitters of GHGs above 10,000 tonnes of CO₂e per year. The current Emissions Performance Standards program proposal, which is currently open for comment, recommends emitters be covered at either 25,000 or 50,000 tonnes of CO₂e per year.¹ However, since emitters above 10,000 tonnes of CO₂e will be able to voluntarily participate into the program, it would be beneficial for all emitters at that level to accurately and verifiably collect emissions data. It is also clear that in order to become “net zero” by 2050, as urged by the International Panel on Climate Change in its recent report on limiting climate change to 1.5 degrees, emitters at lower levels will need to be targeted by climate change mitigation policies. Ontario requires accurate data to underpin those programs.²

4. Other Comments

CELA recommends that the Ontario Government update the global warming potentials of GHGs to the most recent international standards by adopting the IPCC AR5 Global Warming Potentials (“GWP”), as opposed to the 2007 IPCC AR4 GWP.

Thank you for the opportunity to comment on the proposed changes.

Yours truly,



Jacqueline Wilson
Counsel



Jessica Karban
Counsel

¹ Ontario, Environmental Registry of Ontario, Making polluters accountable: Industrial Emission Performance Standards, ERO number 013-4551: <https://ero.ontario.ca/notice/013-4551>

² Intergovernmental Panel on Climate Change, “Global Warming of 1.5°C: Summary for Policymakers” (January 2019), online: https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_version_stand_alone_LR.pdf