



Ontario Federation of Agriculture

Ontario AgriCentre

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John Hutchison
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Air Policy Instruments and Programs Design Branch
77 Wellesley Street West, Floor 10
Ferguson Block
Toronto ON
M7A2T5

Dear Mr. Hutchison,

Re: EBR Registry Number 013-0480 – The Proposed Landfill Gas (LFG) Offset Protocol

The Ontario Federation of Agriculture (OFA) is the largest voluntary, general farm organization in Canada, representing over 36,000 farm families across Ontario. As a dynamic farmer-led organization based in Guelph, Ontario, OFA works to represent and champion the interests of Ontario farmers through government relations, farm policy recommendations, lobby efforts, community representation, media relations and more. OFA is the leading advocate and voice for Ontario farmers.

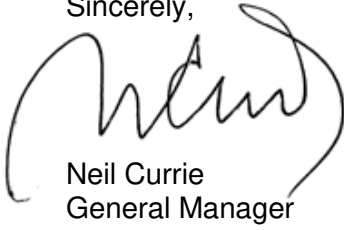
The proposed Landfill Gas (LFG) offset protocol appropriately considers additionality with a size threshold and a performance test to prove Greenhouse Gas destruction is from separate projects and not from system expansions. It also includes a legal test to ensure GHG reductions achieved by a project would not otherwise have occurred due to regulations or other mandates.

Renewable Natural Gas (RNG) initiatives and the Strategy for a Waste-Free Ontario compliment the Draft LFG Offset Protocol. Although the GHG Assessment Boundary of sources, sinks, and reservoirs (SSRs) in the protocol excludes the actual use of energy from a landfill project, government must consider the end use of LFG energy to strategically locate landfill methane capture projects. Part of the overall vision for LFG facilities must be to ensure pipeline infrastructure is in place to accommodate two-way flow of RNG, overlaid with Municipal Solid Waste (MSW), agri-food and agricultural feedstock sources to anaerobically producing biomethane.

Rural natural gas infrastructure, RNG pipeline injection and RNG fuel for rural transport are all needed to help Ontario achieve GHG reduction targets. With that in mind, we are encouraged that the government is engaging stakeholders to develop the class of voluntary carbon offsets for use by government and the private sector, derived from unique Ontario-based projects.

Thank you for considering these comments.

Sincerely,



Neil Currie
General Manager

cc: OFA Board of Directors