



Toll-Free:

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January 15, 2018.

Vidya Anderson
Project Manager
Ministry of Environment and Climate Change
Environmental Programs Division
Program Planning and Implementation Branch
135 St. Clair Ave. W.
Floor 11
Toronto, ON
M4V 1P5

Dear Vidya Anderson,

EBR 013-1634 Developing a Voluntary Carbon Offsets Program for Ontario

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

The proposed Voluntary Carbon Offsets Program has the potential to be an important contributor to ensuring greenhouse gas (GHG) reductions and connected environmental benefits remain *within* Ontario. The CFFO encourages government to begin immediately adapting existing protocols and establishing new ones suitable for Ontario voluntary offsets. Since it is the government's goal to achieve carbon neutrality in 2018, partly based on this voluntary system, early action is required to get this system established.

Concerns About Cap and Trade

The selection of a Cap and Trade model and further linking with larger markets like Quebec and California is intended to provide a lower cost solution to GHG reduction. While the lower cost is a benefit, the CFFO continues to have serious concerns about the loss of Ontario Cap and Trade money to other jurisdictions, especially California. When Ontario participants purchase Cap and Trade compliance instruments from other jurisdictions, not only does the money leave Ontario but the GHG reductions and connected direct environmental benefits are also enjoyed elsewhere at Ontarians' expense.

Because a joint market will mean significant purchase by Ontarians of California compliance instruments, the money and emissions reductions will be in California, not Ontario. Recognizing the government has a goal to reduce Ontario greenhouse gas emissions, Ontario will need to find other solutions to reduce Ontario's GHG emissions

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beyond the Cap and Trade market. The CFFO supports the development of a voluntary offset market within Ontario in order to foster greater Ontario GHG reductions.

Project Types

The CFFO supports the development of a voluntary offset market based on offset projects that don't easily fit within the Western Climate Initiative (WCI) regulations for compliance grade offsets.

Many carbon sequestration offset projects, including many within agriculture, would fit well within this voluntary system. Projects, for example, that will not easily meet with the 100-year "permanence" requirement would be suitable candidates. These could include protocols for things like no or reduced tillage practices, long-term pasture/grasslands, cover crops, and forms of agriculture that work with trees such as fruit or maple syrup production, which may fall outside traditional forestry sector offset protocols.

It will be important that the protocols account for already established woodlots, orchards, grasslands/pastures, and no-till practices, as well as those that may start brand new projects.

It is important for this system, as with the compliance instrument offsets, that aggregation be allowed to ensure the broadest diversity of participants in projects. Also, it is important that farmers receive their fair share of the financial benefits from the GHG reductions and environmental co-benefits that result from their stewardship efforts in agricultural offset projects.

Environmental Co-Benefits

While greenhouse gases are a global problem, there are locally felt benefits to their reduction beyond contributing to the overall global GHG reduction. The discussion paper proposes that within the voluntary offset program, these environmental benefits will be considered. We would recommend that, as much as possible, these co-benefits be measured/modeled in the same way GHG reductions are calculated within the offset protocols.

Soil health and the resulting environmental co-benefits should be among the co-benefits that are prioritized for agricultural related voluntary offset projects. While carbon sequestration addresses reduction of GHGs, practices that sequester carbon also contribute to soil health. Healthy soil contributes to water quality, managing water flow (through greater infiltration) and reduction of erosion. Specific projects, such as cover crops or permanent pastures, also contribute to pollinator habitat and above ground

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biodiversity. Healthy soils also contribute to greater soil life biodiversity. These and other soil-related environmental co-benefits should all be given consideration.

Summary

The CFFO encourages the Ontario government to ensure, through various means, that there are significant direct emissions reductions within Ontario beyond the Cap and Trade system. The proposed voluntary offset program has the potential to be a significant contributor in this regard. Protocols within this system should look to encompass projects that will not fit within the WCI regulations for compliance grade offsets. Many agricultural projects will fit well within this proposed voluntary system. While recognizing connected environmental co-benefits is important, measuring these will add to public recognition of their value along with the value of GHG reduction.

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

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario
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