

ENVIRONMENT north

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David Coates
Project Manager
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. Coates

Re: EBR Registry Number 012-9078
Ontario Cap and Trade Program: Offsets Credits Regulatory Proposal

Environment North has promoted sustainable communities and conservation of resources in Northwestern Ontario since 1972. Based in Thunder Bay, Environment North has been active in public education and awareness of climate change as well as participating in related government consultations for over a decade.

We applaud the Government of Ontario's progress in greenhouse gas (GHG) reductions beginning in 2005, primarily due to the end of coal fired generation of electricity, and in meeting the 2014 target.

As part of the next steps Environment North supports a carbon fee and dividend as the easiest to implement, most transparent and quickest way to further reduce GHG emissions. The cap and trade system takes much longer to implement and is not as transparent. Similarly, carbon offset programs also have challenges in implementation and in transparency. In addition, their validity, is often in question and/or difficult to determine. There are many concerns regarding additivity, leakage, permanency, to mention a few.

The goals of a climate change offset program need to support and not conflict with other environmental and social goals. Climate change impacts include additional stresses on wildlife and ecosystems. A climate offset program should promote biodiversity and the protection of endangered species and their habitat. In recognition of the rights of Indigenous Peoples, offset programs should require adherence to the principles of "Free and Prior Informed Consent" of affected communities.

There has been an exponential increase in severe weather in Canada in the past four decades. Real reductions are needed now and this will require the best quality offset projects and stringent verification. We will closely observe Ontario's GHG emission trends and in particular offset projects in our region.

Sincerely,

Graham Saunders
President, Environment North