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June 19, 2017

Ontario Ministry of Agriculture, Food and Rural Affairs
1 Stone Road West, 3rd Floor SE
Guelph, Ontario
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Attention: Chris Duke, Program Analyst

**RE: Proposed Agrifood Renewable Natural Gas for Transportation
Demonstration Program (EBR Registry Number 013-0316)**

On behalf of Ontario's more than 3,000 environment and cleantech firms, the Ontario Environment Industry Association (ONEIA) is pleased to provide our comments on Ontario Ministry of Agriculture, Food and Rural Affairs' (OMAFRA) discussion paper on a proposed *Agrifood Renewable Natural Gas (RNG) for Transportation Demonstration Program*.

By way of background, Ontario is home to Canada's largest group of environment and cleantech companies. The most recent statistics from the federal government show that Ontario's environment sector employs more than 65,000 people across a range of sub-sectors. This includes firms working in such diverse areas as materials collection and transfer, resource recovery, composting and recycling solutions, alternative energy systems, environmental consulting, brownfield remediation and water treatment – to name just a few. These companies contribute more than \$8-billion to the provincial economy, with approximately \$1-billion of this amount coming from export earnings.

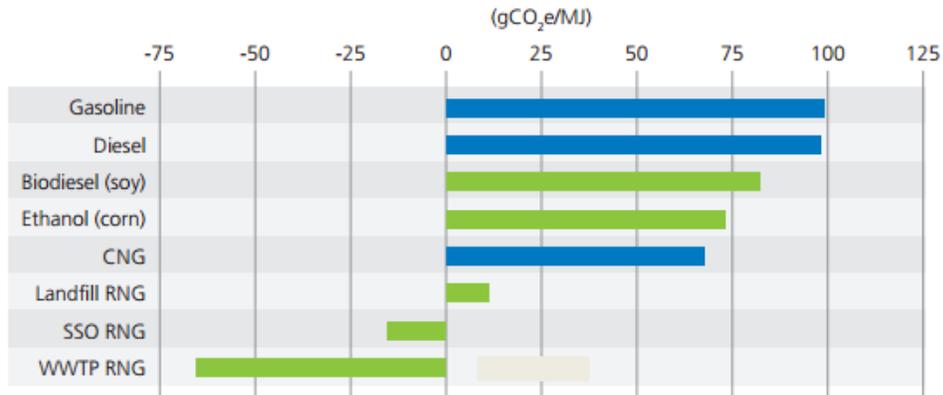
Members of ONEIA are committed to engaging the Federal Government and the Province of Ontario as they develop policies and regulations that are consistent with the principles of sound science, environmental responsibility and economic growth. To that end, we convened a working group of members drawn from across the resource recovery services and climate change sectors to review OMAFRA's discussion paper on an Agrifood RNG for Transportation Demonstration Program.

In its review, ONEIA applauds OMAFRA for the program it is looking to undertake in this area, and would request that OMAFRA engage with appropriate federal government agencies on the Clean Fuel Standard (CFS), as well as the Ministry of Environment and Climate Change (MOECC). As Ontario has a Greener Diesel Regulation and an Ethanol in Gasoline Regulation, we have consulted with them on the Renewable Fuel Standard (RFS) that the province is considering as well as the renewable content requirements for RNG which ties into OMAFRA's work on this program.

Renewable Natural Gas

The conversion of methane from landfills, biogas and wastewater treatment facilities to electricity or natural gas is a decades old technology. Compared to other transportation fuels, the carbon intensity of these energy sources is considerably less than traditional sources of transportation fuels.

CARBON INTENSITY OF VARIOUS FUELS



Data Source: Carbon Intensity Lookup Table for Diesel and Fuels that Substitute for Diesel, California Air Resources Board, 2012

This biogenic source of energy is used extensively in the United States. In Canada, only a handful of companies and municipalities are converting methane to electricity but there is significant potential to expand the use of this technology for the development of alternative low carbon fuels.

In the last decade, landfill companies, primarily in the United States, have been increasingly switching from generating electricity to developing pipeline quality gas, specifically as a direct substitute, or offsetting the use of natural gas or electricity at industrial facilities (e.g. automotive, pulp and paper and cement manufacturers). Today, landfill operators are moving towards supplying pipelines with RNG as pipeline companies are seeking to receive as much RNG as possible. ONEIA supports the development of an RNG system that is market driven and allows private entities generating RNG to sell the associated attributes for the highest return available in the marketplace.

As an example, Waste Connections (WC) built and operates a large-scale biogas facility at its Lachenaie Landfill in Quebec. This facility converts landfill gas to pipeline quality gas, which is supplemental to its landfill gas to electricity facility. The company recently closed its landfill gas to electricity operation and redirected all the landfill gas generation to its RNG facility. WC intends to develop a similar facility at its Ridge Landfill near Chatham, ON. Walker Industries is taking a similar approach at its Niagara Landfill.

Renewable Natural Gas as a Transportation Fuel

As example of the advantages of migrating to RNG as a transportation fuel, in 2014, Ontario used approximately 5 billion litres of diesel for road motor vehicles. Based on organics, biosolids and landfill gas production, Ontario could transition 33% of its entire diesel fuel use to compressed RNG and therefore, provide a low carbon fuel source, supporting the mitigation of short-lived climate pollutants. MOECC has discussed a program that would look to achieve 2% usage of RNG by 2020 and 10% by 2030. However, to achieve these objectives, regulatory approvals and the development of the required infrastructure will need to be hastened significantly. These proposed timelines do not align with the federal and provincial climate change goals. Sources and their RNG generation potential are detailed in the table below which are based on a Canadian Biogas Association study from 2013:

Source	Generation Potential of Millions m3 RNG	Generation Potential of Millions of Litres of Diesel Fuel Equiv.
Wastewater WWTP	119	123
IC&I Food Waste	122	126
Animal Manure	637	657
Residential SSO	72	74
Landfill Gas	654	675
Subtotal	1,604	1,655

The use of natural gas as a transportation fuel has been growing exponentially. It is predominantly used with return to base fleets such as waste collection and municipal transit. The waste services industry began using liquid natural gas (LNG), predominantly in California, over two decades ago. The switch to compressed natural gas (CNG) began in the mid to late 2000s. Today, Waste Management (WM), Republic and WC have the largest CNG powered waste and recycling collection fleets in North America, respectively. In Ontario, WM, PWS and Emterra Environmental have CNG powered collection vehicles operating in Ottawa, Waterloo and the Regions of Peel and Simcoe County. It should be noted that municipal governments are increasingly adding the use of CNG as a prerequisite to outsourcing their residential connection contracts. This has resulted in an effective means to driving the use of CNG.

There are numerous environmental benefits to converting from diesel to CNG. For every vehicle that is converted to natural gas, use of diesel fuel is reduced by an average of 36,400 litres (8,000 gallons) per year. This reduces greenhouse gas emissions by over 22 metric tons per year, per truck. Vehicles powered by CNG result in: nearly zero particulate emissions; a 50% reduction in smog-producing nitrogen oxide emissions compared to the cleanest diesel trucks; cut greenhouse gas emissions by over 20 percent; and are far quieter than diesel trucks.

While the conversion of CNG to compressed C-RNG is not a new phenomenon, its uptake is starting to take root. WM in partnership with Linde, is converting landfill gas into LNG at WM's Livermore Landfill in northern California and transporting the LNG to southern California to fuel its LNG powered fleet. In St. Landry's Parish, LA, WC is fueling its CNG powered vehicles with landfill gas directly from the St. Landry Landfill. In Surrey, BC, the City is completing the development of a bio-digester that will process the organics collected in the city, and generate pipeline quality gas. The generation of RNG from waste-based sources will continue to originate primarily from landfills, due to their large and consistent flow volumes. However, biogas and wastewater treatment plant (WWTP) facilities also show significant potential for RNG generation.

Response to Discussion Paper Questions

As requested in the discussion paper, ONEIA is providing responses to the various questions that were asked in regards to RNG as a transportation fuel demonstration program.

- 1. What are the best opportunities for successful agrifood RNG for transportation projects? Which business or organizations are best prepared to successfully deploy RNG anaerobic digesters and natural gas fueled fleets? What other business partners and business relationships will need to be in place for projects to succeed?**

ONEIA believes that the best opportunities for the successful development of agrifood RNG for transportation projects are to initially use the existing infrastructure that is available in the province of Ontario. These businesses, including: farms; WWTPs; and industrial/municipal biogas facilities, are best prepared to successfully deploy RNG units. Other opportunities to demonstrate the value of converting from diesel to CNG and further, the use of RNG transportation include working with municipalities and fleets that return to base every night for the conversion from diesel to CNG and thus the use of RNG for transportation. Utilities also have a role to play in this supply chain. Thus, engaging these partners and capitalizing on MOECC's work in diverting organics from landfills will be needed to succeed. However, this is contingent on the province and the federal government providing a marketplace to monetize RNG and its attributes.

OMAFRA should work with other ministries to continue to develop the natural gas pipeline infrastructure in the province to facilitate new sources of RNG that could come on-line, and that otherwise, would be restricted due to proximity to pipelines and the associated costs to interconnect them.

2. What are the key financial opportunities that will help projects to succeed?

ONEIA believes that the key financial opportunities that will help RNG demonstration projects succeed include a viable market to sell RNG in Ontario and Canada. As outlined to other ministries, ONEIA recommends that the government provide options for the sale of RNG and its environmental attributes. This includes a method for producers to obtain fixed-price contracts. However, the producers of RNG should not be obligated to sell under this framework. As discussed earlier, ONEIA believe that the market should be open and competitive, so projects can monetize their environmental attributes based on site-specific carbon intensities.

3. At what scale would a project have to be deployed to be successful? How much RNG production? How many vehicles?

This is a difficult question to answer, as it depends on the price point that each individual producer is able to sell their RNG, as well as the technical capabilities of each of the various upgrading technologies available in the marketplace. In the case of farm-based anaerobic digestion (AD), further study is required to assess the viability of livestock agriculture and its ability to reduce the methane that is emitted into the atmosphere given the manure management systems found in the province of Ontario.

4. Are business and organizations ready to develop and deploy RNG for transportation projects? Are there gaps in the supply chain? What would improve companies' readiness?

ONEIA believes that businesses/organizations are ready to develop and deploy RNG for use as a transportation fuel. As outlined above, a number of gaps exist in the supply chain that need to be addressed. To achieve short-term success, we recommend that OMAFRA focus on the sources of RNG that have a lower barriers of entry into this industry. We suggest that OMAFRA work in parallel with other provincial ministries to address existing gaps, and the federal government to allow other companies/projects to grow.

The use of RNG for transportation is occurring on a large scale in the United

States and other jurisdictions, and Ontario should not be left behind. As outlined above, currently, no market exists to sell the RNG in Ontario. Efforts to address this issue along with the conversion of fleets from diesel to CNG should occur.

By way of background, ONEIA has also responded to the MOECC about the timelines for the various efforts that it has underway, especially with respect to an organics diversion strategy, as they also do not align match with climate change goals. To achieve the Ontario government's stated goal of 2% RNG by 2020 and 10% by 2030, approvals for the development of infrastructure will need to be hastened significantly from their current levels. ONEIA recommends that OMAFRA work closely with the MOECC to ensure that the staging of any RNG mandate is completed appropriately and expeditiously. ONEIA also recommends harmonizing the various regulations in this area including the ethanol and biodiesel mandates. Various levels of government should allow for a level playing field that supports the Province's efforts to achieve its greenhouse gas (GHG) reduction targets. ONEIA believes that the Province should set short, medium and long term targets in regards to RNG, and assess the scalability of programs RNG from various sources to support these targets.

5. What barriers do you foresee to developing a successful project? How can these barriers be overcome?

As previously stated, ONEIA recommends harmonizing the various regulations in this area including the ethanol and biodiesel mandates. OMAFRA should work with MOECC on the RFS to afford a level playing field in the marketplace, and that allows the province to achieve its GHG targets. We believe that OMAFRA and other government agencies should broaden their focus to include landfill gas, biogas from food waste, WWTP biogas, etc. ONEIA also suggests that OMAFRA work with MOECC to modernize the approvals process to support and facilitate the transition to lower carbon transportation fuels.

In terms of engagement with gas utilities, ONEIA supports an open and transparent market for the procurement and sale of RNG. As with any other products generated in the Province, the manufacturers of RNG have the right to market and sell their product to the customers they choose. It is not the role of either Enbridge or Union Gas (the distribution system) to sell renewable content or the associated compliance units, as they do not own them and cannot be mandated to do so.

Where the distribution system does add value, is by providing a conduit between the producer facilities and the end customer, who are participating in a competitive market to purchase either renewable content or the associated compliance units. This does not preclude distributors, such as Enbridge or Union Gas, from also purchasing from the manufacturers. They would be participants in an open and free market for these products.

6. How long would it take to deploy an RNG for transportation project from conception to successful operation?

ONEIA has assessed the timelines to deploy an RNG for transportation project from conception to successful operation for existing facilities. Currently, the approvals process with MOECC would take approximately 1.5 years to amend an existing environmental compliance approval. Once the amendment is given, the procurement of the equipment is approximately 40 weeks plus installation and commissioning. In the case of greenfield projects, the timelines would be longer to allow for development of a new site, and could take between 1-3 years depending

on the project dynamics.

7. Describe the types of government support needed to successfully deploy RNG for transportation projects.

ONEIA believes that the types of government support needed to successfully deploy RNG for transportation projects includes:

- a) Certainty on feedstock availability;
- b) Development of RNG markets;
- c) Programs for low cost financing;
- d) Programs to support conversion of fleets from diesel to CNG;
- e) Streamlining/modernization of environmental approvals;
- f) Clarity on zoning/siting requirements;
- g) Certainty on interconnection costs; and
- h) Continued development of natural gas service to rural areas.

8. What are some criteria or project attributes that should be considered or prioritized for a project to be supported through this program?

ONEIA believes that the criteria or project attributes that should be considered or prioritized for a project to be supported by the program include focusing on existing biogas sources such as farms, purpose-built industrial facilities and WWTPs that could co-digest agrifood residuals.

ONEIA provided feedback to the MOECC on its efforts to develop renewable content requirements for natural gas. ONEIA believes that this program would drive GHG reductions in the natural gas supply due to the low carbon nature of RNG. However, ONEIA recommends that the Province look at it more holistically, and focus on the displacement of the highest carbon intensity fuels first, given the Province's mandates for 2020. We believe that RNG should be treated like other low carbon fuels in terms of their carbon intensity, and support the Province in meeting its goals for lower GHG emissions as well as the Federal Government's vision and objectives for a CFS.

9. What should be included in this program to ensure broader uptake of RNG for transportation after the program is completed?

ONEIA believes that the program needs to ensure broader uptake of RNG for transportation after the program is completed include the facilitation of fleet conversion to natural gas as well as provision of incentives to procure RNG, thereby ensuring that the producers of RNG have a market to sell to.

In ONEIA's correspondence with MOECC, we outlined member feedback on the different sources of RNG in the Province and the challenges that surround each one. ONEIA also reviewed the Alberta Innovates Report on RNG Potential from May 2011 as well as the Electrigaz report from 2011 that assessed the amount of RNG that could be created and the costs associated with this fuel. ONEIA believes that these costs are out of date along with the projected volumes of RNG that could be generated. It believes that the government should assess the resource recovery efforts and determine the volume of gas that is reasonably achievable now and in the future.

Existing sources of RNG and the feedstock supply are described later in this letter. In regard to new/different feedstock sources, we have outlined our initial thoughts for reference purposes:

- a) Biomass – the Province does an excellent job of sustainable forestry management through the Ministry of Natural Resources. A considerable amount of this biomass is allocated to companies that send the product to the power generation markets in Canada and Europe or into the residential market for bio heat. Therefore, it is unlikely that the use of this material as a feedstock for RNG purposes could be achieved in the next 10 years. These feedstocks would need to be gasified to produce RNG, and since they are mainly dry streams then it is more likely to combust them for energy/heat recovery. The use of thermal gasification still has considerable uncertainties surrounding its development and thus, the timelines are also uncertain for the development of gasification facilities and the production of syngas that is suitable for RNG. These materials are better used for biochemical, biomaterials, and bioenergy (fuel, heat, etc.) as heat is the largest component of Ontario’s energy use.
- b) Agricultural crop residues – the Province is considering the use of these materials for RNG, which is surprising given the dry nature of this material. The most recent IEA Bioenergy report from 2017 states that this material is not as good as forest woody biomass for the purpose due to the cost of the collection and management of crop residues and the current use of this material as animal bedding, animal feed. This material is also important to the management of soil health, which is also a focus for OMAFRA. The use of agricultural crop residues also relies on the original intent for the crop which is tied to the world grain markets. This would lead to questions surrounding the cost and infrastructure to collect and deliver the residues, the bulk density of the residues and the feedstock availability.
- c) Purpose grown energy crops – the Province should assess the land inventories and the economics for the agricultural sector to develop, construct and operate purpose grown energy crop digestion facilities that produce RNG to facilitate the GHG mandates that the Province has undertaken. However, further work on the indirect land use changes would need to be evaluated.
- d) Power to Gas – the Province should assess the viability of power to gas at RNG production facilities due to the source of pure carbon dioxide that could be used to assist in the conversion of surplus electricity to hydrogen and RNG. This could assist the province in increasing RNG production and alleviating the pressures to sell surplus renewable electricity.

As with any burgeoning market, the technology that supports the development of RNG projects is advancing quickly. The costs for this technology are also changing. It would be difficult to establish a benchmark for cost/unit production of RNG as each facility has unique gas streams, infrastructure requirements and scale of operations that require a project-specific approach to technology solutions. These challenges also highlight the need to let the RNG producers develop projects by matching the needs of the project to the technology solution that suits the individual facility operations.

10. Please comment on any other requirements or considerations for Agrifood RNG for Transportation Demonstration program.

ONEIA has additional comments on the other requirements/considerations for the program. ONEIA has seen several “mixed” messages regarding the amount of renewable content that is being pursued by the Province. On a few occasions, the Province has stated that they wanted to focus on buildings and transportation, and to replace NG with RNG and hydrogen. We have also seen presentations by the

Canadian Biogas Association (CBA) that requested up to 2% of system gas by 2020 and the technical (not economic) potential of 10% of all NG consumed in Ontario by 2030. ONEIA believes that the request for 2% of system gas by 2020 was subsequently revised to 2% of all gas by 2020. This is an extremely ambitious initial target given the current uses of biogas and the long timelines for amendments/approvals from MOECC to allow the implementation of the infrastructure to produce RNG. Further study is required of the barriers/constraints that exist for the existing sources of RNG.

In correspondence with the MOECC, ONEIA outlined as an example, its thoughts on the major types of RNG sources and provided commentary on some of these barriers/constraints for each:

1. Farm Based AD

- a. Dairies – This is the most feasible source of RNG due to the manure management techniques and the likelihood of having the land base to handle off-farm organics that could be co-digested. They have heavy-duty vehicles entering their site on a regular basis and most likely will have a natural gas connection on the property. Other sources of manure are, at present, less feasible to produce RNG.
- b. Interconnection – As outlined above, most dairies will have a natural gas connection. However, the NG infrastructure may not be large enough to handle gas flowing in the other direction, as with biogas to electricity projects that were developed on farms.
- c. Price – The price that would be required for existing dairy farms to switch over would be significant and the price for new sources of RNG would have to be tiered depending on farm size. The farm feasibility should be done on a manure only basis or with energy crops as the overreliance on off-farm organics has been a challenge over the past number of years.
- d. Approvals – Clarity on the farm based AD systems and the oversight by OMAFRA and MOECC would require further assessment.
- e. Existing vs planned – The 2020 target would only apply to the existing biogas sources from farms in Ontario and possibly the farms that have recently been approved for electricity under feed-in tariff (FIT) contracts. New sources would not likely be feasible in this timeframe but could be investigated for longer-term projects. However, MOECC needs to consider TPP/NAFTA negotiations and their impact on the dairy sector.
- f. FIT obligations – Existing dairies engaged in FIT contracts will have contract provisions for supply that will need to be understood further. Subsequent discussions would need to occur with IESO/Ministry of Energy on their obligations and conversion over while stranding the assets.

2. Commercially Generated Organics

- a. Feedstock – The feedstock market has been challenging over the past 5 years as new capacity came on line for processing organics. The MOECC is working on an organics diversion program that would divert more organics from landfills in the form of source separated organics (SSO). However, the required infrastructure and end markets are not prepared for this today.
- b. Approvals – The timelines for new approvals or amendments to existing environmental approvals to facilitate the conversion of facilities to produce RNG is currently over 1.5 years and thus would need to be revised to allow for the 2020 target to be achieved in any capacity. The lead-time on the equipment is also a challenge as the procurement cycle is approximately 8 to 12 months from order due to compressor lead times.
- c. Resource Recovery – As outlined above, the feedstocks are required to produce the biogas. The Waste Free Ontario Act (WFOA) and the provincial

organics diversion policies do not line up with the RNG mandate that is being considered. Additional work also needs to be completed to understand the organic fraction of municipal solid waste (MSW) that is still available even after SSO efforts have occurred in the municipalities.

- d. Existing – A few facilities are currently in operation in the Province and would have the same challenges as the farms from the perspective of FIT and the cost of conversion.

3. WWTP

- a. Existing – We are aware of an existing RNG system at the Woodward Wastewater Treatment Plant in Hamilton demonstrating that other WWTPs could make this conversion. However, most WWTPs have been focused on installing CHPs to manage their biogas as the price of electricity has risen (i.e. Region of Waterloo). Thus, the amount of gas that is possible within the next few years would be minimal.
- b. New/Capital, Planning – The municipalities that own these treatment plants provide a public service, and have clear planning and budgeting cycles. Any changes/improvements to these facilities would take several years and would have to go through a public procurement program prior to commencing the construction of the project, thereby delaying its execution.
- c. Co-digestion – Little to no co-digestion of organic waste is occurring in the Province today. In other jurisdictions, the WWTP sector is actively seeking organics that need to be diverted from landfills to enhance the production of biogas at their WWTPs. This approach could occur in Ontario. However, the ramp up would likely be protracted as the municipalities adopt the technology that allows co-digestion and biomethane capture, and implement contracts to secure SSO and the construct infrastructure to move the resultant RNG to market. The upside of co-digestion is that it may allow WWTPs that are currently producing very low volumes of biogas to become viable as an RNG production facility.

4. Landfill Gas

- a. Connection and off-taking capacity – Many of the landfills in the Province have significant volumes of Landfill Gas that could be converted to RNG. One challenge is the ability of the local utilities to take on such large quantities of gas in relatively small geographical areas, particularly on zero degree days (heat of the summer when only hot water tanks are using gas), where curtailment issues can hamper some large-scale projects. One solution is to ensure access to mainline systems (e.g. Trans Canada) is not restricted by the local distribution companies (LDCs).
- b. Permitting – Large, regional landfills have the potential to be a significant source of RNG in the Province. One of the biggest hurdles to the development of any new landfill facility is the onerous and lengthy permitting process. Although there are technical standards in place (O. Reg. 232/98) and widely understood EA requirements, the protracted nature of the Province's current review and approval process means years of delays and missed opportunities to have stable, reliable and long-term sources of RNG come on line.
- c. Remote locations – The location of several of the landfills in the Province may not be conducive to providing RNG. Further assessment work will be required to determine the feasibility of interconnection and the prices that would facilitate it.

ONEIA is aware of the Request for Information that OMAFRA has released in terms of Agrifood Renewable Natural Gas Transportation Industry Sector Readiness Assessment. In an effort to be concise, ONEIA has included responses

to the relevant questions to its members below.

- a) How would you participate in an agrifood RNG transportation fueling project? Describe the opportunity, service, experience, or product that you bring to a project.**

ONEIA's membership is capable of participating in the agrifood RNG transportation fueling project across the entire supply chain from development, technology, construction and operation. The members have broad experiences and are more than willing to collaborate with OMAFRA and the other ministries in the government to develop the program.

- b) How ready are you to initiative or participate in an agrifood RNG transportation fueling project?**

ONEIA responded to this question in Question 4.

- c) What would improve your readiness to participate in an agrifood RNG transportation fueling project?**

ONEIA responded to this question in Question 4.

- d) What examples of the businesses and business relationships that you would have to enter into successfully deploy this type of project? How would you connect with and work with these business partners?**

ONEIA responded to this question in Question 1.

- e) At what scale would you have to deploy a project to be successful? How much RNG production? How many vehicles?**

ONEIA responded to this question in Question 3.

- f) What barriers do you foresee to developing a successful project? How can these be overcome?**

ONEIA responded to this question in Questions 5 and 10.

- g) How long would it take to deploy your part of an agrifood RNG transportation fueling project from conception to successful operation?**

ONEIA responded to this question in Question 6.

- h) Please comment on any other requirements for an agrifood RNG for transportation fueling demonstration project from your business or organizations point of view.**

ONEIA responded to this question in Question 10.

- i) Please feel free to provide additional information about your business and its plans related to producing or using natural gas vehicle fuel, RNG production, reducing GHG emission or participating in other ways in such a project**

ONEIA is willing to meet with OMAFRA to discuss additional information on its membership and their plans related to producing and using NG and RNG while

supporting Ontario's efforts to reduce GHG emissions.

SUMMARY

ONEIA appreciates the opportunity to provide its comments and suggestions, and stands ready to work with the OMAFRA in the development of this program.

Should you have any questions about the information contained herein, please do not hesitate to contact the co-chairs of our working group, Brandon Moffatt and/or Wes Muir, and/or Randy Cluff or feel free to contact the ONEIA office directly at 416-531-7884.

Yours truly,

A handwritten signature in blue ink, appearing to read 'D. Grant Walsom', with a long, sweeping flourish extending to the right.

D. Grant Walsom, B.A.Sc., P.Eng. QP
Chair of Board of Directors

cc Heather Pearson, Director, Air Policy Instruments and Programs Design
Branch, Ontario Ministry of Environment and Climate Change

Wendy Ren, Director, Resource Recovery Branch, Ontario Ministry of
Environment and Climate Change