

Office of the President and
Chief Executive Officer

Cabinet du président
et chef de la direction

May 21, 2009

The Honourable Jim Prentice, P.C., M.P.
Minister of the Environment
Gatineau, Quebec K1A 0H3

The Honourable Rob Renner, M.L.A.
Minister of Environment
Edmonton, Alberta T5K 2B6

The Honourable Daniel Shewchuk, M.L.A.
Minister of Environment
Iqaluit, Nunavut X0A 0H0

The Honourable Nancy Heppner, M.L.A.
Minister of Environment
Regina, Saskatchewan S4S 0B3

The Honourable John Gerretsen, M.P.P.
Minister of the Environment
Toronto, Ontario M4V 1P5

The Honourable Roland Haché, M.L.A.
Minister of Environment
Fredericton, New Brunswick E3A 5T8

The Honourable Richard E. Brown, M.L.A.
Minister of Environment, Energy and Forestry
Charlottetown, Prince Edward Island C1A 7N8

The Honourable Barry Penner, M.L.A.
Minister of Environment and
Minister responsible for
Climate Action Secretariat
Victoria, British Columbia V8W 9E2

The Honourable Michael Miltenberger, M.L.A.
Minister of Environment and
Natural Resources
Yellowknife, Northwest Territories
X1A 2L9

The Honourable Elaine Taylor, M.L.A.
Minister of Environment
Whitehorse, Yukon Y1A 2C6

The Honourable Stan Struthers, M.L.A.
Minister of Conservation
Winnipeg, Manitoba R3C 0V8

The Honourable Line Beauchamp, M.N.A.
Minister of Sustainable Development,
Environment and Parks
Quebec, Quebec G1R 5V7

The Honourable David M. Morse, M.H.A.
Minister of Environment
Halifax, Nova Scotia B3J 2P8

The Honourable Charlene Johnson, M.H.A.
Minister of Environment
and Conservation
St. John's, Newfoundland A1B 4J6

420 - 360, rue Albert St.
Ottawa, Ontario
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Dear Ministers of the Environment in Canada:

The federal government and several provinces are pursuing a number of different approaches to climate change policy and this situation raises some very substantive concerns for those affected. Among the most significant is the uncertainty that has been exacerbated for businesses who are trying to find survival strategies in these economic times. We will continue to engage you and others on the “big picture” issues; nevertheless, the purpose of this letter is to ask you for help in aligning one key administrative element that is moving forward now -- the numerous details of measuring and reporting emissions.

Measuring and reporting emissions are basic to the implementation of carbon pricing policy. Government and industry experience in British Columbia and Alberta is that there is a range of degrees of accuracy of measurement that can be strived for at the initial stages of implementation. Different protocols for quantification and monitoring are being considered across jurisdictions in the United States and Canada, and different approaches to assurance of data quality. Finally, in Canada we have used and are considering different reporting systems.

We believe that the federal and provincial governments should approach these issues in a practical way with the aim of putting in place a single approach and system for the country. The initial requirements should be pragmatic and recognize that the system will be improved over time on the basis of experience and capacity.

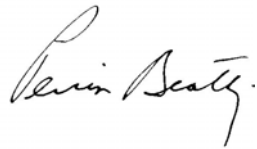
At the initial stage, all jurisdictions should commit themselves to common protocols that draw on the considerable work already done for the various industry sectors as well as one single reporting window that would help minimize the regulatory burden. Before commencing another round of discussions on reporting designs, we ask that you appoint one body that will be charged with the task of emission quantification protocols, monitoring protocols, and data quality assurance via verification and audit requirements within a one window reporting system.

Canada has had some remarkable successes in single window reporting. The Canada Revenue Agency is a model of success that has enabled individuals and companies a single interface with tax collection while at the same time reducing costs of compliance for both governments and tax filers.



With decisions imminent on emission reporting questions, we ask that you commit to working toward a single GHG reporting system that can be used by all governments. This matter may be secondary to the larger issues associated with economic competitiveness, international coverage, and technological solutions to the challenges facing Canada and indeed the international community. Regardless, the task that we describe is a good example of how to avoid more red tape and a clear opportunity to ensure the federation is working more collaboratively.

Sincerely,



Perrin Beatty

and on behalf of the:

Aluminum Association of Canada
Business Council of British Columbia
Canadian Association of Petroleum Producers
Canadian Chemical Producers Association
Canadian Council of Chief Executives
Canadian Electricity Association
Canadian Energy Pipeline Association
Canadian Gas Association
Canadian Fertilizer Institute
Canadian Lime Institute
Canadian Manufacturers & Exporters
Canadian Petroleum Products Institute
Canadian Steel Producers' Association
Cement Association of Canada
Coal Association of Canada
Conseil patronal de l'environnement du Québec
Forest Products Association of Canada
Mining Association of Canada





**Environment
Office of the Minister**

PO Box 442, Halifax, Nova Scotia, Canada B3J 2P8 • www.gov.ns.ca/nse

our file number:

10700-40
35-09-0011

JUN 10 2009

Honourable Perrin Beatty
President and Chief Executive Officer
Canadian Chamber of Commerce
420 - 360 rue Albert Street
Ottawa ON K1R 7X7

Dear Mr. Beatty:

Thank you for your May 22, 2009, letter to Minister Morse concerning the development of a single approach and common protocols for greenhouse gas measuring and reporting. The Minister has asked that I respond on his behalf.

The province of Nova Scotia agrees with this principle and, as such, is working with the federal government, the Climate Registry, and the Canadian Standards Association to ensure a single approach is developed in Canada that is the same as or compatible with US and international protocols.

It is Nova Scotia's view that the federal government should be responsible for collecting all greenhouse gas measuring and reporting data that would then be distributed back to the provinces. This would provide a "one window" system for Canadian industries and companies.

If you have any questions, or would like to further discuss which protocols or systems should be used, please contact Mr. Jonah Bernstein, senior policy advisor, Climate Change Directorate. Jonah can be reached at (902) 424 - 4612 or bernstjs@gov.ns.ca.

Sincerely,

Nancy Vanstone
Deputy Minister

c: Hon. David Morse, Minister, Nova Scotia Environment
Jonah Bernstein, Senior Policy Advisor, Climate Change Directorate

Ministry
of the
Environment

Office of the Minister

135 St. Clair Ave. West
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ENV1283MC-2009-2380

July 9, 2009

Mr. Perrin Beatty
President and Chief Executive Officer
Canadian Chamber of Commerce
420 – 360 Albert Street
Ottawa ON K1R 7X7

Dear Mr. Beatty:

Thank you for your letter of May 21, 2009 to me and the other Ministers of the Environment across Canada about the need for a single reporting system for greenhouse gases (GHGs).

Cap-and-trade is an effective approach to combat climate change. It can help to create a green economy and is a key component of Ontario's Climate Change Action Plan. Ontario recently introduced Bill 185, Environmental Protection Amendment Act, (Greenhouse Gas Emissions Trading, 2009), and released a discussion paper called "Moving Forward: A Greenhouse Gas Cap-and-Trade System for Ontario" to inform the development of a provincial cap-and-trade system that can be integrated with other systems across North America and internationally. As noted in our discussion paper, it is Ontario's intention to work with the Canadian federal government to harmonize our reporting process and avoid duplicate regulatory requirements. Our discussion paper is available at the Ministry of the Environment's climate change web site at <http://www.ene.gov.on.ca/en/air/climatechange/capAndTrade.php>.

Ontario believes that reporting needs to be harmonized with emerging national and sub-national systems to ensure that Ontario can link to broader markets. Efforts are underway in the U.S. and Canada to ensure consistency in reporting policies. Ontario is pursuing several avenues in order to develop and work within a common trading system including joining the Climate Registry – a collaboration aimed at developing and managing a common GHG emissions reporting system across borders and industry sectors – membership in the International Carbon Action Partnership (ICAP) which links established and emerging cap-and-trade programs by promoting consistent regulatory frameworks across national borders, and collaboration with our Western Climate Initiative (WCI) partner provinces.

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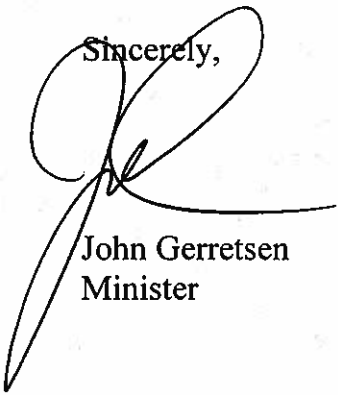


Mr. Perrin Beatty
Page 2.

As you noted in your letter, emissions reporting and good quality data are essential to support the development of a Cap-and-Trade system. Ontario recognizes both the opportunity and the need for the provincial and federal governments to work together to harmonize reporting requirements. Further, we also appreciate the importance of aligning administrative elements of regulatory requirements across Canada wherever practical and possible to avoid unnecessary burden on Canada's businesses and industries.

Again, thank you for your thoughtful letter on this important issue.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long tail, positioned to the left of the printed name.

John Gerretsen
Minister

ALBERTA
ENVIRONMENT*Office of the Minister
MLA, Medicine Hat*

AR 36405

June 23, 2009

Honourable Perrin Beatty
President and Chief Executive Officer
The Canadian Chamber of Commerce
420 - 360 Albert Street
Ottawa, Ontario
K1R 7X7

Dear Mr. Beatty:

Thank you for your letter dated May 21, 2009, regarding the need to establish a single greenhouse gas reporting system that can be used by all governments in Canada.

The Government of Alberta agrees that consistency in measuring and reporting emissions would be advantageous, and is interested in reaching an agreement with the Government of Canada to ensure only a single set of rules applies. In addition to participating in successful discussions on an agreement with the federal government, Alberta is a member of the Climate Registry, which is working toward common reporting and quantification in Canada and the United States.

A shared perspective on the overall system is required to implement a single emissions reporting window for Canada. Due to Alberta's unique circumstances, we will work to ensure environmental management approaches best reflect the needs of our province. Our position remains that Alberta will be the regulatory authority for climate change in our industry. The approaches advocated in our province make sense and are generally supported by Alberta industry.

Sincerely,

Rob Renner
Minister

c.c. Distribution List Attached.

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Distribution List

- c.c. Hon. Jim Prentice, Minister of the Environment, Canada
- Hon. Daniel Shewchuk, Minister of Environment, Nunavut
- Hon. Nancy Heppner, Minister of Environment, Saskatchewan
- Hon. John Gerretsen, Minister of Environment, Ontario
- Hon. Roland Haché, Minister of Environment, New Brunswick
- Hon. Richard E. Brown, Minister of Environment, Energy and Forestry, Prince Edward Island
- Hon. Barry Penner, Minister of Environment, British Columbia
- Hon. Michael Miltenberger, Minister of Environment and Natural Resources, Northwest Territories
- Hon. Elaine Taylor, Minister of Environment, Yukon
- Hon. Stan Struthers, Minister of Conservation, Manitoba
- Hon. Line Beauchamp, Minister of Sustainable Development, Environment and Parks, Quebec
- Hon. David M. Morse, Minister of Environment, Nova Scotia
- Hon. Charlene Johnson, Minister of Environment and Conservation, Newfoundland



Office of the Minister
Box 2703, Whitehorse, Yukon Y1A 2C6

July 17, 2009

Honourable Perrin Beatty
President and Chief Executive Officer
Canadian Chamber of Commerce
420 – 360 Albert Street
Ottawa, Ontario
K1R 7X7

Dear Mr. Beatty:

Thank you for your letter dated May 21, 2009 regarding a unified approach to measuring and reporting greenhouse gas (GHG) emissions in Canada.

With the release of the Yukon Government Climate Change Action Plan (CCAP) in February of this year came the ability to assemble a regional Climate Change Secretariat, now in its final stages of establishment. The Secretariat will oversee the effective implementation of the CCAP and will provide government wide leadership and coordination on the Yukon government's response including Yukon's monitoring and reporting requirements as it relates to GHGs and climate change.

While a Yukon wide GHG target is currently being reviewed (to take effect in 2011), steps have already been taken to address the Yukon government operation's target of becoming carbon neutral by 2020. To help reach these targets and fulfill the related monitoring and reporting requirements, the Yukon government has joined The Climate Registry (TCR) as a member, accepting that TCR is a recognized platform for administering consistent and verifiable measurement of GHG emissions in North America.

The Yukon government fully supports your call for a single GHG reporting system in Canada. In this regard, Yukon remains committed to working with all levels and orders of government, industry, organizations and individuals to facilitate a comprehensive and coordinated approach to addressing climate change.

Again, thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Elaine Taylor".

Elaine Taylor
Minister of Environment

cc: Federal, Provincial and Territorial Ministers responsible for Environment

Minister of the Environment



Ministre de l'Environnement

The Honourable L'honorable

Jim Prentice

Ottawa, Canada K1A 0H3

JUL 3 1 2009

The Honourable Perrin Beatty, P.C.
President and Chief Executive Officer
The Canadian Chamber of Commerce
420 – 360 Albert Street
Ottawa ON K1R 7X7

Dear Mr. Beatty:

Thank you for your letter of May 21, concerning reporting and monitoring requirements for greenhouse gas emissions.

The Government of Canada is committed to ensuring effective and efficient monitoring and reporting, with the intent to minimize overlap and regulatory duplication and reduce the reporting burden on both government and industry. The harmonization of existing and emerging monitoring and reporting requirements for greenhouse gas emissions in Canada is a priority issue that needs to be addressed.

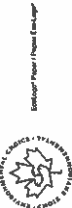
In moving forward on harmonization, we intend to build upon the experience of the federal government and Government of Alberta. The two governments have harmonized mandatory greenhouse gas reporting obligations under the Alberta Specified Gas Reporting Regulations and the federal Greenhouse Gas Reporting Program under the *Canadian Environmental Protection Act, 1999*, section 46.

Efforts are also being made to streamline reporting processes and to provide a single-window, harmonized system for mandatory reporting of all air emissions and related information. To this end, we are carefully monitoring emerging requirements in other jurisdictions, including the United States.

Please be assured that the Government of Canada recognizes industry's concerns that multiple reporting regimes would cause an unnecessary and costly administrative burden. We thus intend to work with industry experts in moving forward on this important issue.


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Canada



I appreciate receiving your comments, and extend my best regards.

Sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

The Honourable Jim Prentice, P.C., Q.C., M.P.



OCT 28 2009

Québec, le 5 octobre 2009

Monsieur Perrin Beatty
Président et chef de la direction
La Chambre de commerce du Canada
420-360, rue Albert
Ottawa (Ontario) K1R 7X7

Monsieur,

Nous avons lu avec attention votre lettre du 21 mai dernier concernant la comptabilisation de la déclaration obligatoire des émissions de gaz à effet de serre (GES). Nous partageons vos préoccupations face au développement de différentes approches proposées par les provinces et le gouvernement fédéral.

Une harmonisation de la quantification et de la déclaration des émissions de GES est non seulement souhaitable au niveau canadien, mais également au niveau nord-américain. À cet effet, le gouvernement du Québec, comme toutes les provinces canadiennes, la majorité des États américains et quelques États mexicains, est membre du Climate Registry, un organisme à but non lucratif créé en mai 2007, qui vise à constituer un registre nord-américain des émissions de gaz à effet de serre (GES), notamment par le développement de protocoles de quantification standardisés.

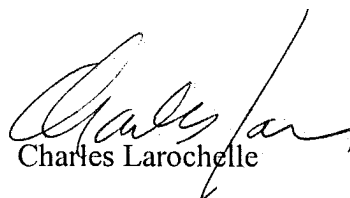
Le gouvernement du Québec est également membre partenaire de la Western Climate Initiative, un regroupement de sept États américains et de quatre provinces canadiennes dont le but est de développer un système régional nord-américain de plafonnement et d'échange de droits d'émission de GES, lequel pourrait favoriser et faciliter une éventuelle harmonisation des systèmes fédéraux canadien et américain.

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En terminant, j'aimerais vous informer qu'à la demande des ministres provinciaux de l'environnement, le Conseil canadien des ministres de l'environnement a créé un comité de travail dont le mandat porte sur une éventuelle harmonisation des protocoles de quantification et sur la mise en place d'un portail unique de déclaration des émissions de GES au Canada. Le gouvernement du Québec participe activement à ces travaux et nous sommes confiants que ceux-ci résulteront en un système de déclaration harmonisé à l'échelle canadienne qui répondra aux intérêts de l'industrie et des provinces.

Veillez agréer, Monsieur Beatty, mes sentiments les plus distingués.

Le sous-ministre adjoint aux changements
climatiques, à l'air et à l'eau,



Charles Larochelle



December 17, 2009

Mr. Perrin Beatty
President and Chief Executive Officer
Canadian Chamber of Commerce
360 Albert Street, Suite 420
Ottawa, ON K1R 7X7

Mr. Beatty:

Subject: Single Window Reporting

Thank you for your letter encouraging governments to work together to minimize the reporting burden on industry.

New Brunswick does not currently require industrial facilities to report greenhouse gas (GHG) emissions under the provincial *Clean Air Act*. Instead, we rely on data collected by Environment Canada (EC) from the Large Final Emitter Program and the National Inventory Report to measure emissions from industrial facilities.

New Brunswick supports the Canadian Council of the Ministers of the Environment (CCME) initiative to ensure that jurisdictions are able to measure, track and report progress on the reduction of GHG. CCME Ministers have agreed to work together to minimize duplication and reduce the reporting burden for industry and governments through the development of a single-window GHG reporting system.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Miles".

Rick Miles
Minister

