

December 20, 2019

Vicky La
Ministry of the Environment, Conservation and Parks
Climate Change and Resiliency Division
Financial Instruments Branch, Policy Unit
8th Floor, 40 St Clair Ave West
Toronto, ON M4V 1M2

Re: TAF's Comments on the Ontario government's proposal to harmonize greenhouse gas reporting requirements (ERO #019-0570)

Dear Vicky La,

We would like to thank the Ministry of the Environment, Conservation and Parks for the opportunity to provide input on the proposal to harmonize greenhouse gas (GHG) reporting requirements with the federal regulatory requirements.

The proposed amendments would mean that fuel suppliers and distributors would no longer be required to report GHG emissions from the transmission and distribution of natural gas, thus eliminating the ability to track fugitive emissions.

Natural gas continues to be a major source of GHG emissions in the Greater Toronto Hamilton Area, and across the province. Addressing fugitive emissions from natural gas transmission and distribution may be one of Ontario's most cost effective opportunities for reducing emissions and reaching our 2030 target. We are concerned that without a requirement to report fugitive emissions, these cost effective GHG reduction opportunities will be foregone.

While we understand the need to reduce unnecessary costs and reduce regulatory burdens, the removal of this specific reporting requirement would result in the loss of valuable data about the province's GHG emissions. This raises some concerns and questions, such as:

- How will this impact the Province's reporting of natural gas related emissions?
- Will the Province continue to track emissions from fugitive and leaked gas? If so, will this data be publicly available?

Collecting and tracking comprehensive data about Ontario's GHG emissions helps us understand our progress towards our 2030 GHG reductions target. This data is critical to ensure that the Province can

take advantage of cost effective measures to reduce emissions, as it can provide insights into the areas where modest investment could achieve large reductions.

Thank you for your consideration in reviewing TAF's comments. Please don't hesitate to contact us directly should you have any questions.

Sincerely yours,



Bryan Purcell
VP Policy & Programs, The Atmospheric Fund

The Atmospheric Fund (TAF) is a regional climate agency that invests in low-carbon solutions for the Greater Toronto and Hamilton Area (GTHA) and helps scale them up for broad implementation. Please note that the views expressed in this submission do not necessarily represent those of the City of Toronto or other GTHA stakeholders. We are experienced leaders and collaborate with stakeholders in the private, public and non-profit sectors who have ideas and opportunities for reducing carbon emissions. Supported by endowment funds, we advance the most promising concepts by investing, providing grants, influencing policies and running programs. We're particularly interested in ideas that offer benefits in addition to carbon reduction such as improving people's health, creating local jobs, boosting urban resiliency, and contributing to a fair society.