April 29, 2021

Honourable Jason Nixon
Minister of Environment and Parks
Office of the Minister
323 Legislature Building
10800 – 97 Avenue
Edmonton, AB T5K 2B6

Honourable Devin Dreeshen
Minister of Agriculture and Forestry
Office of the Minister
229 Legislature Building
10800 – 97 Avenue
Edmonton, AB T5K 2B6

Re: Alberta Environment and Parks Climate Engagement Stakeholder Feedback

Dear Ministers:

Team Alberta would like to thank you for the opportunity to provide stakeholder feedback on Alberta's Climate Engagement for Technology and Bio-based Solutions. We worked with Biological Carbon Canada as we prepared our submission to provide insightful climate-related policy solutions to challenges and barriers faced by the agriculture sector (see attached).

Team Alberta is a collaborative initiative led by four of the province's crop commissions, Alberta Barley, Alberta Canola, Alberta Pulse Growers, and the Alberta Wheat Commission. Each of our commissions are members of Biological Carbon Canada (BCC), which is a coalition of stakeholders representing farmers, ranchers, and foresters across Canada. BCC assists in the investment of people and technology to support the achievement of Canada's economic and environmental objectives.

This submission is part of Team Alberta's commitment to work with government to ensure the producer's perspective is considered in the development of climate-based policies and offsets for bio-based industries. If you have questions or comments about Team Alberta's submission, then

please contact Karla Bergstrom, Manager of Government and Industry Affairs, with Alberta Canola at 780-819-1450 karla@albertacanola.com and Shannon Sereda, Senior Manager, Government Relations and Policy with the Alberta Wheat and Barley Commissions at 403-219-6263 ssereda@albertawheatbarley.com .

Sincerely,

Ward Toma
General Manager, Alberta Canola

Leanne Fischbuch
Executive Director, Alberta Pulse Growers

Tom Steve
General Manager, Alberta Wheat and Barley Commissions

Cc: Ms. Bev Yee, Deputy Minister of Environment and Parks
Mr. Shannon Marchand, Deputy Minister of Agriculture and Forestry
Mr. John Conrad, Assistant Deputy Minister of Agriculture and Forestry

Stakeholder Feedback Form

Please use the accompanying Discussion Guides for additional context as you complete this stakeholder feedback form.

Stakeholders who wish to provide written feedback to the ongoing consideration and development of Alberta's climate related policies and programming can complete the following steps:

1. Provide contact information in the table below (**please limit stakeholder submissions to one per organization or community**)
2. Complete responses to questions within the spaces provided – do not feel obligated to respond to all questions
3. Email the completed form to engagement@gov.ab.ca by April 25, 2021.

Organization/Community	Team Alberta
Contact Name	Karla Bergstrom and Shannon Sereda
Contact Email Address	karla@albertacanola.com (refer to question 16)
Contact Phone Number	780-454-0844, 403-219-6263
Title within organization/community *(if applicable)*	Team Alberta Managers
TIER Regulated Facility *(if applicable)*	Click or tap here to enter text.
Primary sector for organization, community, or facility	Agriculture/Food Production and Processing
If 'other' was selected, please identify the primary sector	Click or tap here to enter text.

* Information you provide to Alberta Environment and Parks (AEP) is collected under the authority of section 33(c) of the Freedom of Information and Protection of Privacy (FOIP) Act and is managed in accordance with Part 2 of the FOIP Act. Your name, organization, and contact information you provide will be used for the purpose of analysis and contact, should AEP have follow-up questions based on your input. Any feedback you provide in this survey will be used for analysis in consideration of Alberta's climate policy and programming. AEP will not use or disclose your information for any other purpose without your written consent or unless required to do so by law. If you have any questions or you wish to request the change or removal of information you provided, please contact engagement@gov.ab.ca.

Alberta’s Climate Approach

Alberta seeks to build off its track-record of developing cost-effective policies that achieve environmental outcomes while meeting the needs of our communities and key industries. Alberta is interested in creating climate policy and programs that accomplish multiple objectives, in addition to reducing greenhouse gas emissions. These include:

- Maximize investment attraction and job growth in Alberta.
- Reinforce Alberta’s strong environmental, social and governance approach.
- Leverage availability of public funding opportunities, ensuring a fair share is allocated to support Alberta's objectives.
- Mitigate negative impacts of external climate policy on Alberta.
- Maintain control of climate policy.
- Mitigate risks and leverage the opportunities of American and other trading partners’ climate policies.

Tell Us About Your Organization's Climate-Related Goals

1. What are your organization's climate-related objectives and intended pathways to support their achievement?

Agriculture needs a competitive, predictable, and open trade environment to enhance food security in existing and new markets both globally and domestically. Farmers are continually adopting and investing in beneficial management practices and advanced technology and equipment to improve their long-term viability and sustainability. Climate-related objectives emerge as improved industry efficiency and productivity. Agriculture is part of the climate challenge and solution. Most of agriculture operates along a very fine margin in a trade exposed environment unable to pass along additional costs of climate policy to customers. Alberta's $6 billion crop sector is a primary driver of our economy. The economic sustainability of the sector is imperative in order to support inter-generational land transfers and continue to support rural economic development. Team Alberta is a collaborative initiative led by four of the province's crop commissions. Our commissions are producer elected, directed, and funded organizations established to represent the interests of crop producers across the province. Collectively our commissions invest millions of dollars to support agronomic and research outcomes that help farmers adapt to the changing environment and help to mitigate the contributing factors to of climate change and GHG emissions. Team Alberta advocates on behalf of our farmer members for effective policies that benefit the crop sector and the environment relating to: land, water, air, biodiversity, offsets, biofuels, trade, and business development, and more.

2. What are the benefits and rationale for setting your climate-related objectives and intended pathways?

Team Alberta will continue to communicate with various levels of government to ensure the producer's perspective is considered in the development of agricultural and climate-based policies. Agri-environmental policy that supports farmers will support sustainable agriculture. Acknowledgement of past and current practices, including the voluntary adoption of innovations that have proven to intersect with farmers increased productivity, yields and economic sustainability have simultaneously had a positive impact on the reduction of emissions, and enhanced soil carbon to improve the ability of their land to sequester additional carbon. Keeping farmers informed about both federal and provincial climate plans is essential to achieving reduced emissions with sound, science-based stewardship practices. Directors of the crop commissions are elected farmers who set board policies that benefit their memberships and advance the crop sector, enabling our commissions to provide meaningful feedback on climate policies and any unintended consequences. Investment in biotechnology, innovation, and extension will continue to move the needle in the area of carbon sequestration and mitigation. Improved water quality and biodiversity that supports beneficial insects, and reduced pathogen load are environmental co-benefits and are direct results of climate related objectives and pathways.

3. What do you see as challenges and barriers to achieving your organization's climate-related objectives and implementation of pathways?

CHALLENGES: In the last few years, there has been a rationalization of public service experts with climate and carbon-related expertise. Government staff must be available to meet with agriculture on a regular basis to gather a better understanding of farming operations, beneficial management practices, and financial constraints and barriers to mitigate unintended policy outcomes. BARRIERS: Farmers are price takers and cannot pass on their costs of production. Government policy does not recognize farmer stewardship in a meaningful way.

4. Where do you see opportunities for Government of Alberta to support achievement of your organization's climate-related objectives and preferred pathways?

Funding of research and development is the largest opportunity for government to help achieve climate-related objectives. TIER funds need to be allocated to Results Driven Agriculture Research (RDAR) and earmarked for climate-related research and extension. E.g., increasing yields while maintaining or reducing land use, and innovative plant genetic-traits with improved pest resistance, drought tolerance, water use efficiency, and nutrient use efficiency. Funding needs to be available for protocol development as well as investment into

climate-related technologies and their adoption. The Government of Alberta was a leader in this area in the 2000's. It needs to recommit investing in subject matter experts within the Ministries of Agriculture and Forestry and Environment and Parks to review protocol development and work in concert with project developers.Biofuels are also a piece of the pathway that provides real economic value today. It lowers compliance costs and adds stability in the domestic market for farmers. Agriculture is a trade-exposed industry and a domestic biofuel market is one way to lessen our reliance on increasingly fickle global markets; and it keeps more dollars in the pockets of Albertans. Low carbon biofuels can help the Government of Alberta achieve its climate goals with zero cost to government as we transition to the next generation; biofuels only require a predictable and clear regulatory environment to attract investment. A Made in Alberta policy design that is aligned with the western provinces for blending 10% ethanol and 5% biodiesel made from low carbon feedstocks, sets a competitive environment for companies to make significant investments in our province. A climate policy review must be done, through an agricultural lens, using a whole-in-government approach. The government must ensure the oversight in allowing the loss/failure to Proclaim the property right for carbon for surface landowners is rectified. Property rights (the right to sell, protect, exclude others and right of compensation for full or partial expropriation) should be expanded to include other environmental goods and services, e.g., ensuring the current public lands lease agreement with the cattle industry is replaced with a real property lease. All EGS credits including carbon associated with wetlands, not expressly claimed by the Crown, must remain the property of the landowner, which would enable trading of wetland associated carbon credits.

5. Has investor concern related to climate change impacted your organization or sector's ability to attract investment and/or impacted your organization's competitiveness? Please provide examples.

Even prior to introducing a price on carbon, investment in value added agri-processing has been limited due to relatively significant higher costs of industrial real estate, transportation, capital, as well as a lack of government support and regulatory uncertainty. Investor confidence in market-based carbon offsets due to political instability and changes to policies with election cycles has stymied true market-based offset trading. The US agriculture sector has benefited from government support, which puts Canadian farmers at a competitive disadvantage. Government must ensure stakeholders and industry have a known and a sure path forward in regulatory approvals for both the NERP (revised) and future nature-based protocols. Climate change has also begun to shift insect and pathogen boundaries, which result in crop loss and degradation of quality that reduces the crop sector competitiveness and the sector's ability to contribute to domestic and global food security. Private investment into plant breeding for increased water use efficiency, fertilizer use efficiency, pest and disease resistance has been limited due to continued shifts in global, regulatory harmonization.

6. What are the key challenges and opportunities that your organization will face regarding national/international climate policies to align with goals set under the United Nations Paris Agreement on climate change?

The key challenge will be a lack of global harmonization of carbon pricing. A significant percentage of our grain is destined for export to international markets and we are at a competitive disadvantage in countries that do not have a price on carbon. Our sector may also be subject to border carbon tariff adjustments from jurisdictions with a higher price on carbon than within our province/country. As a trade-exposed industry, our sector will be challenged by national carbon pricing policies and Article 6 of the Paris agreement. Supporting value-added processing and development of domestic markets allows for reinvestment in our communities while promoting sector growth. Carbon sinks need to be recognized with made in North America programs. These programs need to be compatible with international policies, internationally transferred mitigation outcomes (ITMOs), and ensure that our farmers are not subjected to carbon border tariffs adjustments. Review of biological systems and the strict definitions of additionality, permanence and baseline is essential. Reviewing the most current science on enhanced soil carbon and technologies, such as sectional control in seeding equipment, and other beneficial management practices is necessary to ensure that farmers are part of the solution in meeting international climate goals and are consistent with the Paris Accord and international efforts.

Tell Us How Alberta Can Build on its Climate Success

7. How can the Government of Alberta shape our climate related policies to attract investment towards emission reduction technology development and implementation?

Agriculture is one of the fastest industries to adopt and embrace technological change when there is a strong economic benefit. Many Canadian equipment manufacturers are introducing climate change mitigation technologies. However, their emissions mitigating technologies adoption rates are not being accelerated by government policies and they are subject to increased costs due to carbon pricing. TIER should help new emerging firms who are close to commercializing farm robotics, data management, soil carbon enhancement amendments, and/or increased soil sequestration. Government programs that help demonstrate return on investment or reduce the cost of adoption of multi-million-dollar machinery/technology by independent farmers can expediate adoption levels and drive further investments in technology development in Alberta. For governments to meet its climate-related goals, it will need to invest in climate-related research, innovation and technology, provide incentives, and support flexible policies that would encourage rapid adoption. For example, investments in GPS correction signal towers and simple programs to match funding for equipment upgrades (e.g., light bars for tractor guidance in the early 2000s) had a significant impact on the uptake of precision agriculture that reduced overlap of crop inputs and fuel use.

8. How can the Government of Alberta shape our climate policies to leverage the availability of federal funds towards Alberta's emission reduction areas of focus?

The Government of Alberta should commit to matching federal funds 50/50, for any climate related research and development, adoption of technologies or other programs relating to reducing/mitigating emissions, building climate resiliency, and increasing ecological goods and services. Matching federal dollars for nature-based solutions would provide a strong signal that Alberta is serious about achieving climate-related outcomes. Stacking of ecological goods and services and offsets should be a shared priority between provincial and federal governments. For example, governments can recognize vegetative filter strips as a carbon sink, as a mitigative measure for nutrient and pesticide runoff, and as a biodiversity ecosystem for beneficial insects and pollinators. Other areas to leverage are in scientific research and applied demonstrations of climate-related emission reduction practices.

9. How can the Government of Alberta shape climate policy to maximize cost effectiveness in the face of external pressures while increasing the province's ability to thrive as international climate policy changes?

The GOA can continue to be a leader in market-based carbon offsets through a commitment to continue protocol development with industry partners. Alberta has led on the international stage in this area and can continue to maximize cost effectiveness through trading of carbon offsets and ensuring consistent policy drivers. Market-based solutions reduce compliance costs for obligated parties. Biofuels are also a piece of the pathway that provides real economic value today. It lowers compliance costs and adds stability in the domestic market for farmers. Agriculture is a trade-exposed industry and a domestic biofuel market is one way to lessen our reliance on increasingly fickle global markets; and it keeps more dollars in the pockets of our farmers. Low carbon biofuels can help the Government of Alberta achieve its climate goals with zero cost to government as we transition to the next generation; biofuels only require a predictable and clear regulatory environment to attract investment. Biofuel mandates exist around the world and a Made in Alberta policy design that is aligned with the western provinces for blending 10% ethanol and 5% biodiesel made from low carbon feedstocks, sets a competitive environment for companies to make significant investments in our province. Government of Alberta should also provide clarity around a weights and measures framework for Alberta to ensure common trading metrics for all environmental goods and services. This would ensure consumer protection is provided for the seller of EGSs and support biodiversity by providing habitat for many beneficial insects.

10. Where do you see opportunities within the Technology Innovation and Emissions Reduction (TIER)

regime (both the TIER Regulation and Alberta's Emission Offset System) to drive innovation and technology development to further reduce greenhouse gas emissions?

Funds from TIER must be used in the Ag and Forestry sector as there is huge potential for additional carbon reductions TIER funds should be allocated to RDAR and earmarked to drive innovation and technology development related to climate, biodiversity, and emission reductions. These funds should be available for protocol development and wetland assessment costs. Alberta has large demand for offsets as well as great potential in agriculture to generate offsets. The ability for Alberta-based offsets to be prioritized for Alberta large final emitters is good policy. The GoA should also ensure there are amendments to the TIER regulations, so that non-agricultural companies with aggregated emission locations, who emit more than 50,000 tonnes of CO2e over multiple locations, are also subject to the levy. In addition to the weights and measures mentioned in response to question 9, Alberta must ensure there is an effective mechanism for trading offsets from Alberta outward to other provinces and vice versa. Ministry policy must ensure that agricultural offsets have the same treatment (in risk and expiration dates) as a facility credit and ensure the expiration limits on existing and registered agricultural offsets are removed. These measures will allow agriculture to have a fair and active role in the carbon offset system while supporting viability of the system.

11. Alberta had identified advancement of **technology and innovation** as a key focus area.

a. What approaches can be used to drive cost-effective near-term reductions while addressing the need to invest in innovation for reductions in the future?

Investment into programs that encourage cost effective innovations and their adoption in agriculture will increase short and long-term emissions reductions. A functional marketplace for emission credits allows those who are cost competitive to be sold to final emitters who may have enormous capital costs to reduce emissions. The Alberta hybrid system of tax and trade allows for the efficient allocation of emission reduction technologies. Longer term solutions include investment in emergent technologies that are evaluated in cost-per-tonne reductions. Agriculture has many low-cost efficiency upgrades across the provincial landscape that should be studied and adopted to meet near and longer term emission reductions targets. The GoA should also ensure information pools for agriculture risk production zones are appropriately reviewed to address changes in growing regions, including frost, precipitation, and other associated risks to support industry advancements. The GoA needs to recommit investing in subject matter experts within the Ministries of Agriculture and Forestry and Environment and Parks to review protocol development, work in concert with project developers, and ensure effectiveness of climate-related activities. The GoA should also adjust regulations municipal assessments of wetlands. Assessors should verify a wetland is not Crown property to include those acres in a parcel's assessment on private property.

12. Alberta had identified **reducing methane emissions** as a key focus area.

a. As Canada looks to establish oil and gas methane targets and associated regulations for 2030 and 2035, what should Alberta consider to prepare for engagement?

N/A

b. What objectives should government consider for the review of the provincial oil and gas methane requirements set to occur by the end of 2022?

N/A

c. What opportunities may exist for Alberta to strengthen its methane emission reduction initiatives beyond the current 45% reduction target for the oil and gas sector by 2025 (e.g. expand scope to other sectors, increase oil and gas reduction target, etc.)?

N/A

d. What do you see as challenges and barriers to methane emissions reductions beyond the current 2025 oil and gas reduction target?

N/A

e. What are the key considerations and opportunities for improvements related to methane emissions data in Alberta (e.g. detection, quantification, reporting, and tracking)?

N/A

13. Alberta has identified **carbon capture utilization and storage (CCUS) and other negative emission technologies (NETs) including nature-based solutions (NBS)** as a key focus area.

a. What role should government play in advancing CCUS investment, adoption, and deployment in Alberta?

Alberta must recognize nature-based solutions for their potential for Alberta to meet its climate change and emission reduction goals. Environmental stewardship practices that include conservation tillage, cover crops, and diversified crop rotations, represent a massive biological carbon sink opportunity. Governments needs to better understand the biological processes, emerging science, and modern agriculture's emission reduction potential. The adoption of improved stewardship practices and investment in technology has been happening on Alberta farms in absence of government regulations. Alberta needs to recognize the net carbon reductions on Alberta farms and encourage further adoption of beneficial management practices. Mechanisms include: protocol development, financial incentives for capital intensive upgrades of new emissions-compliant equipment, autonomous tractors, drones and robotics. Limitations of rural broadband is a barrier for adoption of advanced technology on farms. Government investment into public infrastructure, such as three phase power and natural gas to farm sites is also solutions achieve large reductions in GHG emissions on farms.

b. What policy solutions and partnerships are required to accelerate investment in innovative negative emission technologies such as Bioenergy with CCUS and Direct Air Capture in Alberta?

Alberta farms represent the largest solar collectors in Alberta and capture million of metric tonnes of carbon every year. The process of photosynthesis and direct air carbon capture is present in Alberta and it is time for government to recognize this process to advance a leading carbon trading scheme.

c. Where do you see policy opportunities to enhance the use of natural carbon sequestration (e.g. forests, vegetation, soils, etc.) to support climate change mitigation in Alberta?

Natural carbon sequestration is being accelerated by reduced tillage, the use of chemical fertilizers in cropping systems, diverse crop rotations including pulses, perennial forages, cover crops, and intercropping. Government can enhance opportunities by investing in protocol development.The government can also plant trees and encouraging this for shelterbelts and vegetative filter strips. This will increase the effectiveness of those trees to mitigate climate change and pesticide and nutrient run off in water, as well as collect snow for improved moisture retention.In the event a federal ministry expropriates an offset through any means, including a condition of accepting program funding, the taking of an offset is eligible for compensation. The GoA needs to provide clarity surface land owners regarding their rights to the pore space above the base of ground water. Ensure a surface landowner has the same rights of compensation when activities are approved for the removal of hydrogen and geothermal subsurface reservoirs.

14. The **oil sands sector** including mining, in situ, and upgrading activities, is a key focus area of opportunity for further greenhouse gas emissions mitigation in Alberta.

a. What policy solutions should government consider to further reduce oil sands emissions? What are the challenges and barriers to these solutions?

N/A

b. What emissions objectives should be established for oil sands emissions to build credibility to support

investment attraction, project approval, and market access and support corporate net zero by 2050 goals?

N/A

c. How can the Oil Sands Emission Limit (legislated 100 megatonne cap on oil sands emissions) be revised to better reflect today's climate ambitions, public and investor concerns and economic challenges?

N/A

d. What are the emission boundaries for the oil sands sector and what exemptions, if any, should be considered?

N/A

15. If your organizations/community is interested in providing feedback to any of the additional questions included in the Discussion Guides that accompany this form, please use the space below to submit your response. Multiple questions can be addressed in the space below. Please identify the Discussion Guide question you are providing feedback for.

Click or tap here to enter text.

16. In addition to the areas identified in Questions 10-14, what other opportunities should government consider to build on the success of Alberta's current climate approach to support emission reductions and economic growth?

Team Alberta's submission was written in collaboration with representatives from Alberta Barley, Alberta Canola, Alberta Pulse Growers, the Alberta Wheat Commission, and Biological Carbon Canada. If you need further clarification, please follow up with: Leanne Fischbuch, Executive Director, Alberta Pulse Growers Commission, lfischbuch@albertapulse.com - Shannon Sereda, Government Relations and Policy Manager, Alberta Wheat and Barley Commissions, ssereda@albertawheatbarley.com - Karla Bergstrom, Manager of Government & Industry Affairs, Alberta Canola Producers Commission, karla@albertacanola.com

Climate Policy Improvements

Issue	Suggestion and Improvements
Whole of Government	• Highly recommend and ensure a climate policy review be done on a whole-in-government approach. • Ensure cross Ministry sharing of data is not treated as advocation or other less than objective data and information.
Property Rights	• Ensure the oversight in allowing the loss/failure to Proclaim the property right for carbon for surface landowners is rectified. • Ensure and expand a property right (the right to sell, protect, exclude others and right of compensation for full or partial expropriation) to include other environmental goods and services. • Ensure the current public lands lease agreement with the cattle industry is replaced with a real property lease. • Ensure all EGS credits including carbon associated with wetlands not expressly claimed by the Crown remain the property of the landowner. • Ensure the Crown's Climate Policy enables trading of wetland associated carbon credits.
Climate Adaptation Funding	• Match the Federal Government's Nature Based Solutions funding. • Ensure the Ministry makes a significant investment in Results Driven Agriculture Research (RDAR) from TIER funds. • Ensure a review of agriculture production risks associated with changes to growing zones, frost zones, drought zones and other associated risks is conducted. • Commit to the Agricultural Sector funding to counter an estimated $50USD per tonne abatement cost for agriculture. • Ensure ecological goods and services are included in the final climate policy. • Ensure TIER funds exist for wetland assessment cost abatement.
Clean Fuel Standard	• Ensure and adjust (improve) the farm tax emption by 10% for farm diesel made natural feedstocks. • Ensure a policy exists for ethanol production from cereals, straw and starches in addition to the policies for hydrocarbon ethanol production.

Tree Nursery Agricultural Status	• Ensure and adjust all assessment for taxation regulation so that seedling nurseries are deemed farming if more than 50% of their stock goes to trees in the white area of the province. • Ensure TIER funds are used to secure production of trees for shelterbelts and other filter strips in agricultural production practices.
Municipal Assessment	• Ensure and adjust the regulations so a municipal assessor must show a wetland is not Crown property in order to include those acres in a parcel's assessment.
Weights and Measures	• Ensure and establish for Alberta a weights and measures framework to ensure common trading metrics for all environmental goods and services. • Ensure consumer protection is provided for the seller of an environmental good and service including carbon offsets.
Carbon Offset Markets	• Ensure there is an effective mechanism for trading of offsets from Alberta outward to other provinces. • Ensure and improve Ministry policy so that agricultural offset has the same treatment in risk and expire dates as give a facility credit. • Ensure the expire limits on existing and registered agricultural offsets are removed. • Ensure TIER funds are available for protocol development.
Expropriation and Partial Expropriation	• In the event a Federal Ministry expropriates an offset through any means including a condition of accepting program funding, the taking of an offset is eligible for compensation. • Ensure the pore space above the base of ground water is returned to the surface owner.
Subsurface Hydrogen Development	• Ensure a surface landowner has the same rights of compensation when activities are approved for the removal of hydrogen and geothermal subsurface reservoirs.
Article 6	• Ensure Alberta will treat nature-based offsets the same as Crown mineral related offsets when engaging the Federal government in their Article 6 negotiations.

Water Security for Agriculture in a Changing Climate	• Ensure there is investment in on stream storage on every river that leaves Alberta. Without the storage Alberta is unable to keep its full share of water. • Ensure an existing water license is not revoked or modified to satisfy the need to use water to make hydrogen.
Speed of Business	• Ensure there is investments in GPS correction signal towers to aid precision agriculture adoption. (Driving straighter saves fuel) • Ensure Alberta matches funding with the Federal Government on high-speed rural internet.
Fugitive Emissions	• Ensure there is amendments to the TIER regulations so that a non-agricultural company (aggregated emission locations) who emits to the atmosphere more than 50,000 tonnes of CO2e over multiple locations are subject to the levy.
Ministry Competence and Capacity	• Ensure there is investment in licensed professionals to give the Ministry subject matter expertise on science and other issues for protocol approvals.
Regulatory Certainty	• Ensure stakeholders and industry have a known and a sure path forward in regulatory approvals for both the NERP (revised) and Conservation Cropping (revised-post 2021) protocols. • Ensure stakeholders and industry have a known and a sure path forward in regulatory approvals for post 2020 protocol development. • Ensure the correct data is used to evaluate business as usual decisions.