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May 21, 2009

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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

