

September 13, 2022

Maryanna Lewyckyj  
Renewable Facilitation and Analysis Unit  
Renewables Integration and Distributed Energy Resources Branch  
Conservation and Renewable Energy Division  
Ministry of Energy  
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**Re: ERO Posting 019-5816**

Submitted via email

Dear Maryanna Lewyckyj,

On behalf of the Ontario Forest Industries Association (OFIA), thank you for the opportunity to comment on ERO posting 019-5816, *Development of a Clean Energy Credit Registry*. We support this proposal and request ongoing engagement with the Ministry of Energy as the project continues to evolve.

The OFIA and the Pulp and Paper Coalition represent over forty companies across Ontario, many of which produce clean energy through the use of forest biomass. Ontario's forest industry currently employs 149,000 people across all regions of the province and generates \$18 billion in revenue annually. Ontario's forest industry has been a leader in reducing greenhouse gas (GHG) emissions, and many of our facilities have been deeply committed to producing and using clean energy for years.

We are supportive of the proposal as a whole, on the condition that forest biomass is considered a clean form of energy eligible for credits under the program, consistent with the world's leading carbon-reduction jurisdictions.

We are concerned that the credits can only be generated and sold within Ontario under this proposal. There is a demand for clean electricity credits extending far outside our province's borders, and limiting sales within Ontario will significantly reduce the potential of this economic opportunity. The registry must be recognized in other jurisdictions. An Ontario-only registry that is not accepted by other provinces, the federal government, or foreign jurisdictions will not allow organizations to buy Ontario credits to meet their climate goals, limiting the significant economic opportunity of the registry.

We thank you for the opportunity to comment on this proposal and look forward to working with you on the registry's next steps.

Thank you,



Olivia Auriat  
Policy Manager  
Ontario Forest Industries Association/Pulp and Paper Coalition