

## **Landfill Gas Protocol Stakeholder Meeting**

Ontario & Quebec Adaptation March 16, 2017

## Agenda



- 1. Process update
- 2. Discussion points
- 3. Changes to draft protocol
- 4. Stakeholder questions
- 5. Next steps



## **PROCESS UPDATE**

## Work plan



Timeline (expected)	Task
January	PAT works with Ministries to develop teams and coordinate outreach.
February 10	Initial meeting (webinar) of the TTT.
February 16	TTT comments due to the Reserve.
February 17-22	PAT revised the protocol based on TTT comments.
February 27	Initial meeting (webinar) with the Stakeholder Team.
March 6	Stakeholder & TTT comments due
March 7-14	PAT will revise the protocol based on stakeholder and TTT comments
March 16	Second meeting (webinar) with the stakeholder group, including TTT members, to review the revised protocol
March 21	Stakeholder & TTT comments due
March 22-28	PAT will revise the protocol based on stakeholder and TTT comments
March 31	Final, revised protocol will be submitted to the Ministry for approval
April	MOECC will conduct formal public comment period (MDDELCC TBD)



## **DISCUSSION POINTS**

## Protocols vs regulations



- The Reserve is only able to address issues related to the protocols themselves, and not the implementation of the protocols
- Cannot address programmatic issues

## Regional additionality



- Several comments regarding the application of LFG control requirements from one jurisdiction as eligibility screens for projects located in other jurisdictions
- "Regional Additionality is a requirement in the Western Climate Initiative, Offset Essential Elements, July 2010 as referenced in Ontario's Compliance Offset Regulatory Proposal. This is a regulatory issue and not protocol related."
  - MOECC

## Legal Requirement Test



#### To clarify:

- All projects are subject to the same eligibility rules, regardless of location
- Projects are also subject to any additional legal requirements specific to their jurisdiction

## Early action GHG reductions



 This is a policy question for the Ministries and will not be addressed in this protocol adaptation process

## Marginal regulatory surplus



- Can destruction above and beyond regulatory mandate at regulated landfills be eligible for crediting?
- No
- Where LFG is required to be collected, the Ministries expect this to apply to all LFG generated at the site

#### Location



- The protocol applies to landfills anywhere in Canada
- Each Ministry will determine how the protocol will be implemented in their regulatory program

# Project emissions from supplemental natural gas



- These project emissions must be deducted
  - Policy decision supported by ON & QC
- The capping of fossil fuels under cap and trade does not take away from the environmental impact of these GHG emissions



## **PROTOCOL CHANGES**

#### Errors in current draft



- Additional scenario included in Section 3.4.2 regarding multiple landfills will be deleted
  - Applies to a specific situation in QC which can be dealt with outside of the protocol
  - Removed at request of MDDELCC
- 2<sup>nd</sup> half of 1<sup>st</sup> paragraph in Section 5.2 will be deleted
  - This text was discussed by the TTT and determined to not be necessary

## Minor changes



- Minor language reorganization and clarification throughout the document
- Addressed some typos and missing elements noted by TTT and Stakeholders
- Removal of content where it was redundant with other sections
- Renamed "non-qualifying device" to "ineligible device"
  - Renamed "NQ<sub>discount</sub>" to "BD<sub>discount</sub>"

## Pro-rating oxidation



- Propose allowing pro-rating of the OX discount factor
- For landfills where discrete cells may have a geomembrane, but not the entire landfill
- Pro-rating based on expected volume of LFG production in covered vs uncovered areas
  - Subject to verifier approval

### Data management & surveillance



- Require application of a transparent methodology to validate all project data
- Allow for averaging meters with application of the 10% discount for non-continuous metering
- Exempt operational monitoring where system engineering would prevent CH<sub>4</sub> release when nonoperational
- Relaxed cleaning and inspection requirements
- Remove temporary meter field check requirement

## Destruction efficiency



- Included missing default value for natural gas pipeline injection
- Clarified that site-specific values are encouraged and preferred, rather than defaults

#### Data substitution



- Allow for electricity production data to be used to fill data gaps larger than 7 days
- Electric output must be monitored continuously and totalized no less than monthly



## STAKEHOLDER QUESTIONS



## **NEXT STEPS**

#### Submit comments



- Stakeholder Team to review draft protocol and submit comments to the Reserve no later than:
  - Tuesday, March 21, 2017 (end of day)
  - max@climateactionreserve.org
- Microsoft Word document, organized by protocol section
- Any comments related to the regulation should be directed to the appropriate Ministry

#### **Contact Information**



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#### All documents posted here:

http://www.climateactionreserve.org/landfill-gas-capture-and-destruction/