



ALUS Canada
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September 16, 2019

Max DuBuisson
Policy Director
Climate Action Reserve
West Hartford, CT
max@climateactionreserve.org

Dear Mr. DuBuisson,

Thank you for the opportunity to comment on version 1.0 of the Canada Grassland Project Protocol: Avoiding Greenhouse Gas Emissions Related to the Conversion of Grassland to Cropland in Canada.

ALUS Canada is a federally registered charity that works with local partners in five provinces (AB, SK, MB, ON, QC) to deliver the community-developed and farmer-delivered ALUS program. The program focuses on the production of ecosystem services on farms and ranches. The types of projects most common in the program (grassland restoration; wetland restoration and enhancement; shelterbelts and ecobuffers; riparian buffers; and afforestation) have climate mitigation and adaptation benefits.

Climate Action Reserve and your Canadian partners are to be applauded for promoting the inclusion of natural climate solutions into regulatory and voluntary markets. Please accept these comments in the cooperative spirit in which they are offered. We share your organization's objective to "encourage actions to reduce GHG emissions and work to ensure environmental benefit, integrity, and transparency in market-based solutions to address global climate change."

ALUS' ability to work on a contractual basis with agricultural landowners is limited only by resources. We have waiting lists for community program establishment and for projects within our existing programs. The ALUS program was designed to fit within farmers' and ranchers' business models. Over the more than ten years that the program has developed we have learned that keeping relationships and agreements straightforward and practicable is core to our success.

In our view the project lifetime requirement for the tonne/tonne option of 130 years will be a barrier to broad uptake given the disinclination of most farmers and ranchers to significantly limit future options. Conversely, the tonne/year option pays (at current market rates for carbon) such a small amount that the administrative and verification requirements would not be seen to be worth the effort.



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Issues we would like to better understand are (and apologies if we missed relevant material in the protocol or elsewhere):

Why is permanence deemed to be a century?

Why isn't carbon captured deeper than 30 cm included? Many prairie species have much deeper roots (some up to 20 feet) that would not be disturbed in the event that land use change occurs. The deeper carbon sequestered is therefore permanent (or more permanent) and could be included in this protocol in the event that subsurface rights are owned by the land (surface) owner/manager.

Are their plans to develop a protocol for grassland (re)establishment which would provide 100% and uncontestable additionality?

Is CAR (and/or partners) developing a nitrous oxide reduction protocol for agricultural operations?

Sincerely,

Lara Ellis
VP Policy and Partnerships