



# Biological Carbon Canada's Comments to the Climate Action Reserve on the Canada Grassland Project Protocol

August 21, 2019

## Background

The Climate Action Reserve is welcoming comment on a draft protocol titled ‘Canada Grassland Project Protocol - Avoiding Greenhouse Gas Emissions Related to the Conversion of Grassland to Cropland in Canada Version 1.0’.

This draft protocol was adapted from the U.S. Grassland Project Protocol V2.0 with the support, either financial or in-kind, of the following organizations: The Canadian Forage and Grassland Association, Viresco Solutions, The Ontario Ministry of Environment and Climate Change Agriculture and Agri-Food Canada.

This draft protocol is summarized as “the GHG reduction project is defined as the prevention of emissions of GHG to the atmosphere through conserving grasslands, shrublands, rangelands, or pasture land belowground carbon stocks and avoiding crop cultivation activities on an eligible project area.”



## Specific Comments and Improvement Suggestions

Page	Section	Issue	Comments and Improvements
6	2.3.1	Treatment of lands owned by the Crown and leased to cattle owners.	<p>The Protocol should address a mechanism to handle the transfer of rights from the Crown to the grass grazer.</p> <p>In western Canada, there are significant native rangelands under management of ranches, but the owner is the Crown.</p>
10	2.4	Land Management Standard	Because of different standards across Canada, the Protocol should set a minimum standard and if the provincial jurisdiction has a higher standard for the management of crown lands, the higher would apply.
14	3.3.1.1	Standard of licence to conduct an appraisal.	<p>Because of the different professional standards across Canada, the first profession to do the farm work is a Professional Agrologist. Agrologists can conduct appraisals but not all appraisers can do the agrology work.</p> <p>Modify what defines a certified appraiser.</p>
17	Figure 3.1	CLI Map	<p>Make the map available in a KML/KMZ format.</p> <p>Conservative approach – when the line crosses a parcel of land, the parcel is given the lower land class.</p>
19, 24	3.3.2 3.6	Attestation	<p>We have seen in jurisdictions attestation is not enough in terms of evidence.</p> <p>Change the declaration to a Statutory Declaration under Oath.</p> <p>Depending on the jurisdiction each province will have legislation covering evidence.</p> <p>The legislation that shall apply on the oath will be the province where the project is located.</p>



25	3.7	Range Assessment	The protocol should outline those with Professional Agrologist designations and have declared range assessment as part of their licence are the only persons eligible to issue the protocol's range assessment.
56	6.1.1	Range Assessment	The protocol should outline those with Professional Agrologist designations and have declared range assessment as part of their licence are the only persons eligible to issue the protocol's range assessment.
56	6.1.1	Historical land use	Change the notarized affidavit declaration to a Statutory Declaration under Oath.  Add a Professional Agrologist opinion under seal.
59	6.3	Prevention of Overgrazing	The protocol needs to better define what this looks like.
60	Footnote 42	Assessment timing	Recommend a baseline and then once every 5 years.
90	A.1.1	Financial Threshold	The protocol should outline those with Professional Agrologist designations and have declared agricultural economics as part of their licence are the only persons eligible to issue the protocol's range assessment.
	all	An opinion	In the protocol draft there are several places where an opinion is required in the project. These opinions form a number, like valuation, in which calculations are conducted. There may be some convenience if a Canadian company is certified under a federal government program but this is not sufficient.



			When an opinion is needed, the protocol should state an Agrologist or other registered professional with the training and capacity to make the opinion is defined.
		Attestations	In various places the word 'attestation' is used for the project owner to support a conclusion.  Recommend the wording be changed to an Oath. If administered correctly the Oath has the force of law under various pieces of legislation covering evidence.

## More Information

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