



April 16, 2021

Sarah Harrison  
Deputy Minister  
Ministry of Environment  
3211 Albert Street  
Regina, SK S4S 5W6

David Brock  
Assistant Deputy Minister,  
Climate Change and Adaptation Division  
Ministry of Environment  
3211 Albert Street  
Regina, SK S4S 5W6

### **Response to Saskatchewan's Greenhouse Gas Offset Program Discussion Paper**

On behalf of the Saskatchewan Chamber of Commerce and our members, we appreciate the opportunity to participate in the Greenhouse Gas (GHG) Offset Program and Protocol Development webinar sessions and to submit further written comments.

The Saskatchewan Chamber of Commerce has represented the Saskatchewan business community for over 100 years, and we have an active Environment Committee. Membership includes individual business firms, provincial business and professional associations and government agencies. The Chamber, and particularly its governing bodies, is charged with bringing together the diverse interests and needs of its members to shape and achieve goals that benefit its members, the organization and the province.

Businesses in Saskatchewan are concerned about being limited to Saskatchewan generated offsets because being able to use offsets produced elsewhere would help with their competitiveness and thus help them continue to thrive. Climate change is a global issue; therefore, offsets should be available across borders. Being able to use out-of-province offsets for compliance with GHG emission reduction requirements ensures Saskatchewan companies remain competitive.

We recommend creating a mechanism that harmonizes protocols from other jurisdictions. The Government of Saskatchewan should adopt protocols that have already been developed and tested in other jurisdictions, such as Alberta, rather than developing its own. These existing protocols can be evaluated and modified to fit the needs of Saskatchewan businesses. New protocols can be developed for specific situations as needed. This way, the offset system in Saskatchewan can be established and put in place quickly.

It is also important to consider how to integrate future protocols with existing ones. As it stands, the proposed program's cumbersome nature will prevent businesses from developing and participating in this system. If the final market of users is small and limited to Saskatchewan offsets and the program has low credibility, it is unlikely that the system will be used by anyone.



Lastly, the ministry's engagement sessions were more like information sessions and it did not seem open to comments from industry. We would welcome the opportunity for further wholesome engagement. We are all committed to making Saskatchewan a destination for investment, jobs and talent. Removing barriers, reducing costs and simplifying the process is essential for program uptake. Otherwise, existing and new businesses will choose to invest outside of Saskatchewan.

Thank you for your attention in this matter. The Saskatchewan Chamber of Commerce would be pleased to provide further comment at your convenience.

Sincerely,

A handwritten signature in black ink that reads 'MKreuger'. The signature is written in a cursive, flowing style.

Monica Kreuger, Chair

Saskatchewan Chamber of Commerce