

**IETA Comments to Environment and Climate Change Canada:
Facilitating Projects on Crown and Public Land in Canada's Greenhouse
Gas Offset Credit System**

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Submitted to creditscompensatoires-offsets@ec.gc.ca

IETA welcomes this opportunity to share input with Environment and Climate Change Canada (ECCC) on its "[Facilitating Projects on Crown and Public Land in Canada's Greenhouse Gas Offset Credit System](#)" discussion paper published in August 2024. Since the launch of Canada's Federal Offset Credit System, IETA has supported the development and expansion of available offset protocols to best enable Canada's carbon pricing systems to incentivize high-integrity emissions reductions at the scale required to achieve Canada's ambitious climate targets. The inclusion of flexibility (including offsets) as part of Canada's world-leading carbon pricing program is essential to ensuring regulated entities can remain competitive while transitioning to a net zero economy.

The following document summarizes IETA's brief feedback in response to ECCC's discussion paper:

- 1) Upholding Indigenous Rights & Encouraging Indigenous Participation:** As federal offset regulations are finalized and protocols are developed, adopted and ultimately implemented for public and Crown lands, IETA and its members encourage inclusive consultation, capacity-building efforts, and confirmation of free, prior, and informed consent across Indigenous communities, with a view to not only realizing but

maximizing their participation in project development. In doing so, IETA believes the finalized protocols will facilitate frequent and authentic engagement with Indigenous peoples and, importantly, encourage Indigenous-led and Indigenous-developed projects.

- 2) Exclusive Entitlement:** IETA supports ECCC's emphasis on ensuring exclusive entitlement for offset projects. Exclusive entitlement is essential to prevent double counting, which is a crucial foundation necessary for high-integrity offset credits. Acknowledging the complexity of the process given Canada's patchwork policy landscape and the need to maintain provincial autonomy, our members reaffirm their support for this measure and believe that a review of existing protocols and best practices across Canada and internationally may shed light on this issue.

Furthermore, to support project facilitation that maintains exclusive entitlement, our membership would like to see ECCC play a more active role in aiding project developers and land managers — whether they be provincial or territory governments, Indigenous peoples, or another person or entity — to build capacity for formalized approaches to granting carbon rights. We suggest ECCC create guidance documents for project developers to complete pre-feasibility assessments for this work. In particular, we believe entitlement consideration will be needed for forested areas that cross Provincial or Territorial borders, or aggregated projects with non-contiguous areas.

- 3) Support for Inter-Provincial Fungibility:** IETA encourages ECCC to seek additional ways to support the fungibility of offset credits between provincial and federal carbon pricing programs. Leading into the upcoming 2026 carbon pricing review, we hope to

see an expansion of market links and credit fungibility in support of robust and aligned carbon pricing programs across Canada.

- 4) Considerations for Nature-Based Protocols on Public Land:** IETA views this discussion paper as a positive step towards enabling offset projects on Crown and public lands. Along with a potential Improved Forest Management protocol for projects on these lands, IETA would like to note that additional complementary nature-based protocols for public and Crown lands would be beneficial for climate action and investment.

Once again, IETA appreciates this opportunity to record our comments to support the deployment of offset projects on Crown and public lands. If you have questions about IETA's input, please contact Joey Hoekstra (hoekstra@ieta.org) or Jeremy Rubin (rubin@ieta.org).