

NATIONAL CATTLE FEEDERS' ASSOCIATION

Consultation on Federal Offset Protocol:
Reducing Enteric Methane Emissions from Beef Cattle



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#6, 11010 46th Street SE Calgary, Alberta T2C 1G4



GENERAL COMMENTS

National Cattle Feeders' Association (NCFA) represents Canadian cattle feeders on national issues and works collaboratively with other stakeholders to strengthen the Canadian beef industry, and we appreciate the opportunity to provide comments for the Consultation on the Reducing Enteric Methane Emissions from Beef Cattle Federal Offset Protocol (Public Consultation Draft, December 2023).

NCFA supports the concept of **voluntary** protocols which incentivize responsible management practices and support our National Beef Strategy's 2030 goals. The fed cattle sector has demonstrated leadership in innovation and are an integral part of the equation in which a kilogram of beef produced in Canada has an emissions footprint less than half of the global average. As such, many cattle feeders have already adopted technologies and management techniques to optimize production efficiencies.

We ask for the following considerations during the refinement of this protocol:

1. Inclusion of environmental technologies.

This would include feed additives and technologies such as 3-NOP which have been proven to reduce methane emissions, regardless of their impact on production. The inclusion of methane-reduction feed additives and technologies in the protocol is an opportunity for Canadian beef producers to be part of the solution in addressing our reduction targets both as an industry and a country, and will help us maintain our status as global leaders in sustainable beef production.

2. Simplified process.

While the outlined calculations in this protocol appear rigorous and credible, they will be difficult for most producers to implement and as such are not likely to translate to notable uptake in the industry. The intense quantification process means that third-party verifiers and aggregators will be capturing a significant portion of the value of the credits, reducing the benefits of the protocol for producers.

3. Historical baseline calculation.

Many feedlots implemented activities which would qualify for this protocol prior to 2017, therefore this protocol results in a disadvantage for early adopters and progressive producers. We request that the timeframe for the baseline and project scenarios be moved back a minimum of 5 years and ideally 10 years, so that the earliest the baseline could be calculated would be in the five years before the project start date, with the earliest project start date being 2007.

NCFA has some additional suggestions for the protocol as well as some requested clarifications, *outlined in italics* in the remainder of this document.



1.0 INTRODUCTION

“A project undertaken using this protocol cannot generate GHG emission reductions...from the use of emerging feeds or technologies that directly inhibit enteric methane production without improved animal performance.”

- Several products with demonstrated reduction of methane emissions in cattle are already approved in other countries and we are starting to see approvals in Canada. Waiting for a revision of the protocol will delay incentivization of using these products and create a competitive disadvantage for Canadian beef producers. We strongly urge that the protocol includes an allocation for approved products to be included based on methane emission reductions calculated in scientifically validated trial work.

2.0 TERMS AND DEFINITIONS

Confinement area means an indoor or outdoor enclosure for cattle including but not limited to barns, boxes, stalls, barnyards, winter feeding yards or feedlots.

- *This definition does not accurately reflect the industry. Suggest removing “boxes, stalls, barnyards, winter feeding yards” and instead say “including but not limited to **barns, corrals, feedlots and other confined feeding areas.**”*

Dressing percentage means the mass of the animal after slaughter and dressing (removal of internal organs and inedible portions) over the live weight.

- *Suggest clarification be added to define if it is specifically **hot carcass weight** being referenced (vs. chilled carcass weight) as the baseline for the calculation.*

Suggested Additions to Definitions (based on repeated references within the document):

- **GHG (Greenhouse gas)** – should outline which GHGs are relevant to the SSRs in this protocol (see page 8: “7.0 Project GHG boundary”).
- **SSR (sources, sinks and reservoirs)** – would benefit from a definition given the references throughout the document.



3.0 BASELINE SCENARIO

3.1 Baseline Conditions

- *No comments.*

3.2 Determining the baseline scenario.

The proponent may use animal groups from three non-continuous years from within the past five years if the crude protein content of the diet for each animal group did not exceed 14%.

- *NCF supports the inclusion of this flexibility to accommodate the variability in production parameters which often occurs within the beef cattle sector.*

4.0 PROJECT SCENARIO

4.1 Project Conditions

“Eligible project activities must not have been implemented before January 1st, 2017.”

- *Many feedlots would have implemented activities which would qualify for this protocol prior to 2017, therefore this requirement would result in a disadvantage for early adopters and progressive producers. We request that the timeframe for the baseline and project scenarios be moved back a minimum of 5 years and ideally 10 years, so that the earliest the baseline could be calculated would be in the five years before the project start date, with the earliest project start date being 2007.*

4.2 Eligible project

Table 1: Categories of eligible project activities

Other innovative strategies: Other innovative strategies that improve the feed efficiency or animal performance.

- ***Suggested: “Other innovative strategies that improve the feed efficiency or animal performance, or that reduce methane production.”***

Table 2: Other permitting GHG mitigation activities

- *No comments*



5.0 ADDITIONALITY

5.1 Legal additionality

- *No comments*

5.2 Performance and standard test

- *No comments*

6.0 GENERAL REQUIREMENTS

6.1 Project start date

- *No comments*

6.2 Project site and geographic boundaries

- *No comments*

6.3 Environment and social safeguards

- *No comments*

7.0 PROJECT GHG BOUNDARY

Table 3: Details on baseline and project scenario SSRs

SSR #8: Manure transportation and field application

- *Would composting manure on-site prior to hauling/spreading impact this calculation based on lower volumes or product and lighter density of transported materials (reduced moisture content means less trucks required)? If so, this should be considered for inclusion in the calculation.*



8.0 QUANTIFICATION METHODOLOGY

8.1 Baseline scenario GHG emissions

- *No comments*

8.2 Project scenario GHG emissions

- *No comments*

8.3 Stratification and animal groups

- *No comments*

8.4 Leakage

- *No comments*

8.5 GHG emission reductions

- *No comments*

9.0 MEASUREMENT AND DATA

9.1 Measurement method and frequency

- *No comments*

9.2 Feed analysis

- *No comments*

9.3 Quality assurance and quality control

- *No comments*



10.0 RECORDS

10.1 General record keeping requirements

- *No comments*

10.2 Project site

- *No comments*

10.3 Animal inventory and performance information

“Documentation demonstrating the date of animal entry and exit from the project site linked to the RFID tags for each animal. Documentation must be in a format that confirms the date of entry and exit to calculate number of days of feed for each animal group.”

- *We suggest that an average DOF (days on feed) should be permissible to quantify exit dates for each group of cattle rather than requiring individual RFID tags to be captured on departure. This would capture the same information but would not require the individual tags to be recorded when leaving the site, which may involve additional handling of cattle and can present labour and animal welfare challenges. Large pens or groups of cattle may be shipping by truckloads but could be simply pulling a “gate run” of cattle from a pen based on how many head they need to fill trucks that day, not necessarily pulling them by specific tag number.*

10.4 Project activities and diet information

- *No comments*

10.5 Stratification and animal groups

- *No comments*

10.6 Qualified professionals

- *No comments*

11.0 REPORTING

- *No comments*