canadian association for renewable energies

435 Brennan, Ottawa K1Z 6J9 (613) 728-0822 (fax) 728-2505 www.renewables.ca is hosted with wind power by GreenHosting.org

October 20, 2003

Commission for Environmental Cooperation

e-mail to <mpepin@ccemtl.org>

The *canadian association for renewable energies* is a membership-based national association incorporated in 1998 to promote feasible applications of renewable energy in Canada. We would like to make five suggestions for your review of the proposed CEC Operational Plan 2004–2006.

- 1. We commend your inclusion of renewable energies and your proposal to increase awareness of the environmental benefits of renewables, but suggest that the definition of 'renewable energy' be harmonized among the three nations. Canada has yet to release its guidelines on low-impact renewables and there is significant disconnect between our country and the U.S. over the eligibility of certain technologies, which may lead to future problems in cooperation.
- 2. We encourage greater consideration of GreenHeat applications (space conditioning and water heating by renewable energy technologies), which currently are over-shadowed by heavy emphasis on green power. Our belief is that GreenHeat has significant potential to reduce GHG emissions, but is under-emphasized in policy and awareness priorities.
- 3. We concur with your efforts to identify barriers which include gathering information on the market and environmental labelling and certification.
- 4. We encourage an acceleration in your timetable to promote the uptake of renewables (green power, green fuels AND green heat) faster than 2006. Canada has predicted that output from non-hydro renewables will drop two-thirds by 2010, and we suggest that promotion of renewables is a significant lead priority for the three nations.
- 5. We support your proposal to provide advice to Council in 2004 on the issue of renewables development in North America, subject to our earlier request that the term be harmonized. We trust that your advice will include concrete recommendations on how to increase the share of renewables in the total energy supply portfolios of all three nations.

We appreciate this opportunity to comment on your proposed plan, and offer our assistance in any aspect relating to renewable energies.

Bill Eggertson

Bill Eggertson

Executive Director