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General Considerations Survey (Draft 2)

To: stakeholders currently involved in the review of the Renewable Low-Impact Electricity Standard

The purpose of this survey is to collect stakeholder votes and comments regarding the proposed EcoLogo Renewable Low-Impact Electricity Standard (CCD-003 Draft 2). A vote is required for each of the proposed criteria statements that will follow. The voting period will last from Oct 26 to Nov 27. The proposed Draft 2 renewable low-impact electricity standard and comment report associated with this survey can be found at: <http://www.ecologo.org/en/criteria/revision/>. Only registered stakeholders are allowed to vote. Negative votes must be accompanied by a comment explaining why the criteria statement was rejected or it will not be counted. Participants are to vote on all survey questions for the ballot to be valid. Participants' names and other details are required for internal purposes only. All participant names will be kept anonymous.

Your time and effort in helping us develop an environmental leadership standard for renewable low-impact electricity is greatly appreciated.

Sincerely,

The EcoLogo Program



First Name*

Last Name*

Email*



1. Please select the stakeholder category that best determines your affiliation.
You can find a definition of each category below.



User



Producer



General Interest



Academia, Public Health and Safety, and Regulation

Stakeholder Classification

User:

Individuals representing the end users of the subject product, material or service and who are not predominantly involved in its production and/or regulation. Included in this category is representation from:

- **consumer protection organizations**
- **professional purchasing associations**
- **individual consumers**
- **individual professional procurers**
- **government purchasing representatives**

Producer:

Individuals representing organizations / companies that are involved in the production, manufacture, promotion or distribution of the subject product, material, or service. Included in this category is representation from:

- **industry representatives**
- **trade associations (both 501c3 and 501c6)**
- **industry associations**
- **lobbyists**
- **retailers with a vested interest in a particular product (i.e. their own brand)**

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Individuals not associated with the production,

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- standards development bodies / organizations
- third-party product certifiers
- testing laboratories

Academia, Public Health and Safety, and Regulation:

Individuals representing public agencies (local, regional, state, federal, or international), regulatory bodies, academia or others representing the public good. Included in this category is representation from:

- academic and other non-industry researchers
- research organizations (including governmental or pseudo-governmental)
- municipal, state-provincial and federal regulators
- governmental area specialists

2. Definitions (1)

Do you agree with this underlined change to the definition of “water quality”?

“water quality” means characteristics of water, specifically including amount of dissolved oxygen, pH, total phosphorus, turbidity, transparency and chlorophyll, and any other item that is critical for habitat and wildlife or unique to the operating area;

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

(a) be accompanied by evidence that appropriate consultation with communities and stakeholders has occurred, issues of concern have been reasonably addressed, and, where applicable, reasonable mitigation of negative impacts has been addressed;

5. General requirements (2)

How do you think “irreparable/unmitigable” could be further defined to ensure that the criteria statement below can be adequately audited?

4. To meet the requirements of this standard, the renewable low-impact electricity products must:

(c) be accompanied by evidence that the project will not result in irreparable/unmitigable degradation or loss of the site’s heritage, cultural, recreational and/or touristic values;

6. General Requirements (3)

Which proposal below do you prefer to address point 4.(f) of CCD-003 Draft 1? (changes are underlined)

Proposal A:

Keep criteria statement as is found in CCD-003 Draft 1:

4. To meet the requirements of this standard, the renewable low-impact electricity products must:

(f) be generated in a manner such that no adverse impacts

are created for any species designated as endangered or threatened; and

Proposal B:

Change to:

To meet the requirements of this standard, the renewable low-impact electricity products must:

-be generated in a manner such that it will not jeopardize the survival or recovery of any species designated as endangered or threatened; and

Note: The proponent suggests that this wording would ensure consistency with the federal Species at Risk Act

Proposal C:

To meet the requirements of this standard, the renewable low-impact electricity products must:

-be generated in a manner such that no significant impacts are created for any species designated as endangered or threatened; and

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Proposal C, Affirmative
- Proposal C, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

In section *B. Communicating the Emissions Avoidance Value of a Green-e Energy Certified Product of the Code of Conduct and Customer Disclosure Requirements*, Green-e mentions that, regarding GHG emissions:

- Participants can market their certified products as instruments to address the indirect carbon dioxide emissions associated with the consumption of electricity arising from the purchase of electricity generated through the combustion of fossil fuels, classified as “Scope 2” emissions by the World Resources Institute’s Greenhouse Gas Protocol.
- The explicit marketing of Green-e Energy Certified renewable energy products as a means to reduce or offset emissions from anything other than the consumption of electricity purchased from the grid is not be permitted.
- Participants can suggest that the purchase of a Green-e Energy Certified product can be used to directly address the emissions associated with electricity consumption

Do you think that EcoLogo should follow a similar approach to Green-e as described above?

Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain

8.

General Requirements (5)

Green-e also claims in the same document referred to in the previous question that:

The first step in making such claims is often a conversion to tons of CO2 emissions avoided. The maximum conversion factor that Green-e Energy will permit for use in such carbon-related equivalency claims will be based on the non-

baseload output emission rate of electricity generation of the NERC region in which the renewable MWh is generated . In cases where a Participant does not explicitly provide upfront geographic disclosure of a Product's supply to consumers, the Default National Rate (1,118.86 lbs of CO2/MWh) is the maximum rate that may be used. This national figure represents the non-baseload output emission rate of electricity generation in the NERC region with the lowest of such a rate .

Green-e Energy recognizes that Participants may want to use another methodology to make these conversions in certain cases. Participants can only use rates higher than non-baseload output emission rate for the relevant NERC region of generation with the express pre-approval from the Center for Resource Solutions. In cases where such exceptions are granted, it will be required that in all marketing materials displaying such carbon equivalency claims that the source of the calculation methodology used is appropriately cited. Participants may, however, use rates below these maximum levels without the need to seek pre-approval from the Center for Resource Solutions. Regardless of the methodology and/or emission rates used, all Participants should be able to provide their carbon calculation methodology to substantiate stated environmental claims upon request.

Do you think the EcoLogo Program should follow a similar approach to Green-e above when it comes to GHG claims?

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

9. General Requirements (6)

Can you please suggest a similar approach as proposed by

Green-e in the last question that would be better adapted to Canada?

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

10. Cumulative Effects

Which proposal below do you prefer? (changes are underlined)

Proposal A:

Remove allusions to cumulative effects in section 4 of CCD-003.

Proposal B:

4. To meet the requirements of this standard, the renewable low-impact electricity products must:

(h) demonstrate that the cumulative effects have been properly assessed and adequately mitigated or avoided.

Proposal C:

4. To meet the requirements of this standard, the renewable low-impact electricity products must:

(h) when mandated by regulators, demonstrate that cumulative effects have been assessed and potentially mitigated or avoided following a Cumulative Effects Assessment in Canada or a Cumulative Effects Analysis in the United States.

Note: CCD-003 draft 1 currently states that:

4. To meet the requirements of this standard, the renewable low-impact electricity products must:

(h) demonstrate that cumulative effects have been assessed and potentially mitigated or avoided following a Cumulative Effects Assessment in Canada or a Cumulative Effects Analysis in the United States

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Proposal C, Affirmative
- Proposal C, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

11. Contracts

Do you agree with the proposal below regarding electricity contracts certified under previous versions of CCD-003?

Proposal:

The EcoLogo Program should apply grandfathering to all EcoLogo-certified electricity products contracts (eg. power purchase agreements) for those products that have been certified under a previous CCD version. All marketers or sellers of EcoLogo certified products that were certified prior to a new standard must state in all transactions under which CCD the product was certified.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)

12. **Energy from Waste (from non-renewable resources) (1)**

Which proposal below do you prefer?

Proposal A:

Do not include new Energy-from-Waste technologies in CCD-003.

Proposal B:

Adopt the same criteria statements as Green-e which states that:

Municipal Solid Waste is eligible if it is first converted to a clean burning fuel that is then used to generate electricity. The solid waste conversion facility for converting the municipal solid waste to a clean burning fuel must meet the following criteria:

-The facility uses a non-combustion thermal process to convert the municipal solid waste to a clean burning fuel.

-The technology is designed to produce no discharges of air contaminants or emissions, including greenhouse gases.

-The technology produces no discharges to surface or groundwaters. -The technology produces no hazardous wastes.

-To the maximum extent feasible, the technology removes all recyclable materials, including plastics, and marketable green waste compostable materials from the solid waste stream prior to the conversion process and the owner or operator of the facility certifies that those materials will be

recycled or composted.

-The facility complies with all applicable laws, regulations, and ordinances.

Note: This standard is based on the California Integrated Waste Management Bureau standard.

Proposal C:

Some stakeholders are advocating for the inclusion of waste to energy technologies into CCD-003. One such proposal includes the one below: Proposed Revision to Draft Standard: To include EfW, the standard should be revised to include "Energy from Waste" as an additional source of renewable low-impact electricity such that:

"energy from waste electricity" means electricity generated from the combustion, gasification, or pyrolysis of municipal solid waste.

And:

Under General requirements, they propose adding the following paragraph:

To meet the requirements of this standard, Energy from Waste electricity must be generated in such a manner that:

(a) the total of load points assessed for operational air emissions of carbon monoxide (CO), particulate matter (PM), nitrogen oxides (NOx measured as NO2) and sulphur oxides (SOx measured as SO2), as determined in Appendix 2, does not exceed 6;

(b) each local government unit from which waste processed by the Energy from Waste facility originates operates, participates in the operation of, contracts for, or otherwise provides for recycling services for its residents;

(c) Pursuant to Article 23 of the EU Directive issued on November 19th, 2008 the energy yield parameter, calculated based on gross boiler design, is equal to or above :

(i) 0.60 for installations in operation and permitted before 1 January 2009 or 0.65 for installations permitted after 31 December 2008; and

(ii) the energy yield parameter is calculated as follows:

*Energy yield parameter = $(E_p - (E_f + E_i))(0.97 \times (E_w + E_f))$
In which: E_p means annual energy produced as heat or electricity. It is calculated with energy in the form of electricity being multiplied by 2.6 and heat produced for commercial use multiplied by 1.1 (GJyear) E_f means annual energy input to the system from fuels contributing to the production of steam (GJyear) E_w means annual energy contained in the treated waste calculated using the net calorific value of the waste (GJyear) E_i means annual energy imported excluding E_w and E_f (GJyear) 0.97 is a factor accounting for energy losses due to bottom ash and radiation.*

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Proposal C, Affirmative
- Proposal C, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain



13. **Energy from Waste (from non-renewable resources) (2)**

If "Energy from Waste" is included in CCD-003, do you think this type of electricity product would have to meet other criteria statements? If so, what do you think they should be? These proposals will be presented to the Advisory Committee for further consideration.

14. Waste Heat (1)

Do you think this definition of electricity from heat rejected to the environment should be included within CCD-003?

"Electricity from heat rejected to environment" means electricity generated from a supplemental process, and or equipment to alter, and or add to the processes of an existing operation in order to generate electricity from thermal energy from renewable and non-renewable resources that would otherwise be vented, or rejected into the environment. The existing operation must not have been originally designed or intended for electricity generation, nor had any processes in place at the time of commissioning that would have facilitated electricity generation. Examples of electricity generation from recovered waste heat sources include, inter alia, stack heat, radiator heat or condenser heat, and other waste heat captured from an industrial or commercial process that is fuelled by a thermal energy source where that thermal energy would otherwise be vented to the atmosphere.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

15. Waste Heat (2)

Do you think that waste heat from non-renewable resources not utilizing an incremental amount of energy to produce electricity should be included in CCD-003?

- Affirmative



Affirmative, with Comment



Negative, with reasons (must be provided to be counted)



Abstain



16. Waste Heat (3)

If you think "electricity from heat rejected to the environment" should be included in CCD-003, can you please suggest criteria statements you think this type of electricity product would have to meet? These proposals will be presented to the Advisory Committee for further consideration.



17. Age of Electricity

Which proposal below do you prefer as potential changes to CCD-003 Draft 1 (changes are underlined)?

Proposal A:

Remove:

To meet the requirements of this standard, marketers of electricity must be able to demonstrate to the satisfaction of the EcoLogo Program, that the portion of their multi-sourced power product conforming to this standard incorporates a minimum of 50% Type II Electricity and/or Type III Electricity and a maximum of 50% Type I Electricity.

And replace it with:

To meet the requirements of this standard, marketers of electricity must indicate the age of the facility in their product disclosure information.

Proposal B:

13. To meet the requirements of this standard, marketers of electricity must be able to demonstrate to the satisfaction of the EcoLogo Program that the portion of their multi-sourced power product conforming to this standard incorporates a minimum of 50% Type II Electricity and a maximum of 50% Type I Electricity.

“type I electricity” means EcoLogo Program-certified electricity from a generation facility that began operations (e.g. generating electricity) prior to January 01, 1997;

“type II electricity” means EcoLogo Program-certified electricity from a generation facility that began generating electricity after January 01, 1997 inclusive.

Facilities that have been completely decommissioned at any time and re-powered after January 01, 1997 inclusive are also eligible for Type II designation. Facilities that are decommissioned and re-powered solely to achieve Type II designation will not be granted this designation unless the following conditions are met:

(a) the facility’s useful life was less than two years prior to its decommissioning; and

(b) more than 75% of the fair market value of the business activity after re-powering is derived from the newly installed equipment and the changes resulting from the re-powering;

Incremental increases in electricity generated as a result of either facility upgrades (including inter alia efficiency improvements) or as a result of facility expansions (including inter alia new turbines or arrays) are eligible for Type II designation. In such cases, the average per annum generation capacity prior to the upgrades and/or improvements will provide the baseline on which to calculate the quantity of Type II electricity generation.

Proposal C:

13. To meet the requirements of this standard, marketers of

electricity must be able to demonstrate to the satisfaction of the EcoLogo Program that all of their multi-sourced power product conforming to this standard incorporates 100% certified electricity from a generation facility that began generating electricity after January 01, 1997 inclusive.

Facilities that have been completely decommissioned at any time and re-powered after January 01, 1997 inclusive are also eligible. Facilities that are decommissioned and re-powered solely to pass this standard will not be granted this designation unless the following conditions are met:

(a) the facility's useful life was less than two years prior to its decommissioning; and

(b) more than 75% of the fair market value of the business activity after re-powering is derived from the newly installed equipment and the changes resulting from the re-powering; Incremental increases in electricity generated as a result of either facility upgrades (including inter alia efficiency improvements) or as a result of facility expansions (including inter alia new turbines or arrays) are eligible.

Note: Proposal C achieves the greatest harmonization with Green-e since only new renewables are eligible to meet Green-e Energy's standard currently.

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Proposal C, Affirmative
- Proposal C, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

18. North Americanization (1)

Do you think the EcoLogo Program should attempt to harmonize with Green-e as much as possible?

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

19. North Americanization (2)

If you voted “affirmative” or “affirmative with comment” to the question above and if you think the EcoLogo Program has failed to address the harmonization of particular criteria statements with Green-e, which criteria statements are these?



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Geothermal-Powered Electricity Survey (Draft 2)

To: stakeholders currently involved in the review of the Renewable Low-Impact Electricity Standard

The purpose of this survey is to collect stakeholder votes and comments regarding the proposed EcoLogo Renewable Low-Impact Electricity Standard (CCD-003 Draft 2). A vote is required for each of the proposed criteria statements that will follow. The voting period will last from Oct 26 to Nov 27. The proposed Draft 2 renewable low-impact electricity standard and comment report associated with this survey can be found at: <http://www.ecologo.org/en/criteria/revision/>. Only registered stakeholders are allowed to vote. Negative votes must be accompanied by a comment explaining why the criteria statement was rejected or it will not be counted. Participants are to vote on all survey questions for the ballot to be valid. Participants' names and other details are required for internal purposes only. All participant names will be kept anonymous.

Your time and effort in helping us develop an environmental leadership standard for renewable low-impact electricity is greatly appreciated.

Sincerely,

The EcoLogo Program



First Name*

Last Name*

Email*



1. Please select the stakeholder category that best determines your affiliation. You can find a definition of each category below.



User



Producer



General Interest



Academia, Public Health and Safety, and Regulation

Stakeholder Classification

User:

Individuals representing the end users of the subject product, material or service and who are not predominantly involved in its production and/or regulation. Included in this category is representation from:

- consumer protection organizations
- professional purchasing associations
- individual consumers
- individual professional procurers
- government purchasing representatives

Producer:

Individuals representing organizations / companies that are involved in the production, manufacture, promotion or distribution of the subject product, material, or service. Included in this category is representation from:

- industry representatives
- trade associations (both 501c3 and 501c6) - industry associations
- lobbyists
- retailers with a vested interest in a particular product (i.e. their own brand)

General Interest:

Individuals not associated with the production, distribution, direct use, or regulation of the subject product, material, or service. Included in this category is representation from:

- non-governmental organizations (non-industry based)
- environmental non-governmental organizations
- standards development bodies / organizations
- third-party product certifiers
- testing laboratories

Academia, Public Health and Safety, and Regulation:

Individuals representing public agencies (local, regional, state, federal, or international), regulatory bodies, academia or others representing the public good. Included in this category is representation from:

- academic and other non-industry researchers
- research organizations (including governmental or pseudo-governmental)
- municipal, state-provincial and federal regulators - governmental area specialists

2. Do you think the EcoLogo Program should modify the current section on geothermal-powered electricity as described below?

From:

To meet the requirements of this standard, geothermal-powered electricity must be generated in such a manner that:

(a) boron emissions do not surpass 1 ppm in geothermal well waters;

(b) ammonia emissions do not surpass 1 ppm in geothermal well waters;

(c) lead emissions do not surpass 0.01 ppm in geothermal well waters;

(d) cadmium emissions do not surpass 0.005 ppm in geothermal well waters;

(e) radon emissions do not surpass 300 pCi/L in geothermal

well waters;

(f) arsenic emissions do not surpass 0.010 ppm in geothermal well waters;

(g) chloride emissions do not surpass 250 mg/L ppm in geothermal well waters;

(h) nickel emissions do not surpass 0.07 ppm in geothermal well waters;

(i) vanadium emissions do not surpass 1 µg/m³ (averaging time 24 hours) in geothermal steam condensate;

(j) fluoride emissions do not surpass 1.5 ppm in geothermal well waters;

(k) The IFC (2007) Environmental, Health, and Safety Guidelines for Geothermal Power Generation section Drilling Fluids and Cuttings is followed; and

(l) The IFC (2007) Environmental, Health, and Safety Guidelines for Geothermal Power Generation section Well Blowouts and Pipeline Failures is followed.

To:

To meet the requirements of this standard, geothermal-powered electricity must be generated in such a manner that:

(a) section 1.1 Environment of the IFC's Environmental, Health, and Safety Guidelines for Geothermal Power Generation must be followed.

(b) section 1.3 Community Health and Safety of the IFC's Environmental, Health, and Safety Guidelines for Geothermal Power Generation must be followed.

(c) section 2.1 Environment of the IFC's Environmental, Health, and Safety Guidelines for Geothermal Power Generation must be followed.

- Affirmative
- Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain



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Hydro-Powered Electricity Survey (Draft 2)

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The EcoLogo Program



First Name*

Last Name*

Email*



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General Interest



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- **government purchasing representatives**

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- **industry representatives**
- **trade associations (both 501c3 and 501c6)**
- **industry associations**
- **lobbyists**
- **retailers with a vested interest in a particular product (i.e. their own brand)**

General Interest:

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- standards development bodies / organizations
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- testing laboratories

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- academic and other non-industry researchers
- research organizations (including governmental or pseudo-governmental)
- municipal, state-provincial and federal regulators
- governmental area specialists

^{2.} Fish Protection

Please review the proposals below with regard to criteria statements in point 9 of CCD-003 Draft 1 below, and indicate which one you prefer. (changes are underlined)

9. To meet the requirements of this standard, hydro-powered electricity must be generated in such a manner that the generating facility:

(a) operates in compliance with all regulatory licenses, regulatory requirements and/or other authorizations pertaining to fisheries (including, for facilities located in Canada, the Fisheries Act), without regard to waivers or variances that may be granted or authorized;

(c) does not operate under any authorization with terms and conditions allowing the harmful alteration, disruption, or

destruction of fish habitat unless:

(i) such harmful alteration, disruption, or destruction is not affecting the limiting factor controlling productive capacity,

(ii) loss of the affected habitat is compensated by the creation of similar habitat, supporting the same stock, at or near the development site within the same ecological unit, such that the created habitat replaces lost productive capacity, within an approved safety factor.

For facilities located in Canada, these conditional authorizations include those issued under Section 35(2) of the Fisheries Act, by the Minister of Fisheries and Oceans or under regulations made by Governor in Council under the Fisheries Act.

(f) operates such that reduced water flows in the bypassed reach and reaches downstream of diversion dams and/or dykes are not detrimental to indigenous aquatic and riparian species;

(g) operates such that instream flows downstream of the tailrace are adequate to support downstream indigenous aquatic and riparian species at preproject ranges;

(i) operates such that any changes in water temperature caused by the facility in the head pond in reaches downstream of the tailrace, or downstream of any diversion dams and/or dykes are not detrimental to indigenous aquatic species;

(j) where a human-made structure is placed across a waterway where no natural barriers exist, provides fish passage when necessary for the purpose of maintaining pre-existing migration patterns for fish communities both upstream and downstream;

(k) provides any measures (including inter alia trash racks, oversized intake structures designed to slow intake velocities, underwater strobe and sound, fish screens) necessary to minimize fish mortality that would occur through impingement and entrainment.

Proposal A:

The EcoLogo Program should make these underlined changes to the points above:

To meet the requirements of this standard, hydro-powered electricity must be generated in such a manner that the generating facility:

(c) does not operate under any authorization with terms and conditions allowing the harmful alteration, disruption, or destruction of fish habitat unless:

i) such harmful alteration, disruption, or destruction is not affecting the limiting factor controlling productive capacity or;

ii) loss of the affected habitat is compensated by the creation of similar habitat, supporting the same stock, at or near the development site within the same ecological unit, such that the created habitat has been demonstrated to effectively replace lost productive capacity

(f) operates such that reduced water flows in the bypassed reach and reaches downstream of diversion dams and/or dykes do not pose significant adverse impacts to indigenous aquatic and riparian species;

(i) operates such that any changes in water temperature caused by the facility in the head pond in reaches downstream of the tailrace, or downstream of any diversion dams and/or dykes do not pose significant adverse impacts to indigenous aquatic species;

(k) incorporates engineered solutions (inter alia intake structures providing fish-friendly velocity profiles, fish screens, underwater strobe and sound) where they are known to be effective in minimizing fish mortality that could occur through fish entrainment and/or impingement.

Proposal B:

The EcoLogo Program should make these underlined changes to the points above:

To meet the requirements of this standard, hydro-powered electricity must be generated in such a manner that the generating facility:

(c) does not operate under any authorization with terms and conditions allowing the harmful alteration, disruption, or destruction of fish habitat unless:

i) such harmful alteration, disruption, or destruction is not

affecting the limiting factor controlling productive capacity or;

ii) loss of the affected habitat is compensated by the creation of similar habitat, supporting the same stock, at or near the development site within the same ecological unit, such that the created habitat has been demonstrated to effectively replace lost productive capacity to the satisfaction of regulatory authorities

(f) operates such that reduced water flows in the bypassed reach and reaches downstream of diversion dams and/or dykes do not pose significant adverse impacts to indigenous aquatic and riparian species;

(i) operates such that any changes in water temperature caused by the facility in the head pond in reaches downstream of the tailrace, or downstream of any diversion dams and/or dykes do not pose significant adverse impacts to indigenous aquatic species;

(k) incorporates engineered solutions (inter alia intake structures providing fish-friendly velocity profiles, fish screens, underwater strobe and sound) where they are known to be effective in minimizing fish mortality that could occur through fish entrainment and/or impingement.

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

3. **48-hour Shaping**

Which proposal below do you prefer? (changes are underlined)

Proposal A:

Keep criteria statements as-is as found in CCD-003 draft 1:

9. To meet the requirements of this standard, hydro-powered electricity must be generated in such a manner that the generating facility:

(a) operates in compliance with all regulatory licenses, regulatory requirements and/or other authorizations pertaining to fisheries (including, for facilities located in Canada, the Fisheries Act), without regard to waivers or variances that may be granted or authorized;

(e) as a maximum, causes as much water to flow out of the head pond as is received in any 48-hour period; In cases where this particular criterion cannot be met, the EcoLogo Program will nonetheless consider certification if the applicant submits evidence that indicates those hydrological and ecological components key to sustainability of the surrounding watershed are maintained.

As a minimum, this evidence must include environmental impact assessments and documentation from a formal public consultation process. In cases where neither of the above conditions is met, the applicant can opt to apply to a multi-stakeholder and public Electricity Review Process to demonstrate equal or lower adverse environmental impacts.

Proposal B:

To meet the requirements of this standard, hydro-powered electricity must be generated in such a manner that the generating facility:

(e) the hydrological and ecological components key to sustainability of the surrounding watershed are maintained

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

5. Water Quality(2)

Do you think that “unaltered bodies of water” should be replaced with “baseline bodies of water” in point 9. (h) above (found in CCD-003 Draft 1)?

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

6. Mercury

Do you think the EcoLogo Program should make this underlined change to the standard? From (in CCD-003 draft 1):

9. To meet the requirements of this standard, hydro-powered electricity must be generated in such a manner that the generating facility:

(l) mercury levels at 100m or less of the generating facility must not exceed 0.001ppm

To:

To meet the requirements of this standard, hydro-powered electricity must be generated in such a manner that:

(l) it must not be the responsible source causing methylmercury levels in fish found at the tailrace or the head pond to exceed 0.5ppm compared to pre-project background levels.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)

Abstain

7. Cumulative Impacts

Do you think the EcoLogo Program should certify run-of-river hydro projects on a river where there is already a large dam?

Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain

8. North Americanization

If you know of an equivalent American legislation as the Canadian one underlined in the criteria statements below (found in CCD-003 Draft 2), could you please let us know in the comment box below?

11. (a) if generated from hydro-powered electricity:

(i) operates in compliance with all regulatory licenses, regulatory requirements and/or other authorizations pertaining to fisheries (including, for facilities located in Canada, the Fisheries Act), without regard to waivers or variances that may be granted or authorized;

(iii) does not operate under any authorization with terms and conditions allowing the harmful alteration, disruption or destruction of fish habitat unless:

(1) such harmful alteration, disruption or destruction is not affecting the limiting factor controlling productive capacity,

(2) loss of the affected habitat is compensated by the creation of similar habitat, supporting the same stock, at or near the development site within the same ecological unit such that the created habitat replaces lost productive capacity, within an approved safety factor. For facilities located in Canada, these conditional authorizations include those issued under Section 35(2) of the Fisheries Act, by the Minister of Fisheries and Oceans or under regulations made by Governor in Council under the Fisheries Act.



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Renewable Energy Certificates Survey (Draft 2)

To: stakeholders currently involved in the review of the Renewable Low-Impact Electricity Standard

The purpose of this survey is to collect stakeholder votes and comments regarding the proposed EcoLogo Renewable Low-Impact Electricity Standard (CCD-003 Draft 2). A vote is required for each of the proposed criteria statements that will follow. The voting period will last from Oct 26 to Nov 27. The proposed Draft 2 renewable low-impact electricity standard and comment report associated with this survey can be found at: <http://www.ecologo.org/en/criteria/revision/>. Only registered stakeholders are allowed to vote. Negative votes must be accompanied by a comment explaining why the criteria statement was rejected or it will not be counted. Participants are to vote on all survey questions for the ballot to be valid. Participants' names and other details are required for internal purposes only. All participant names will be kept anonymous.

Your time and effort in helping us develop an environmental leadership standard for renewable low-impact electricity is greatly appreciated.

Sincerely,

The EcoLogo Program



First Name*

Last Name*

Email*



1. Please select the stakeholder category that best determines your affiliation.
You can find a definition of each category below.



User



Producer



General Interest



Academia, Public Health and Safety, and Regulation

Stakeholder Classification

User:

Individuals representing the end users of the subject product, material or service and who are not predominantly involved in its production and/or regulation. Included in this category is representation from:

- consumer protection organizations
- professional purchasing associations
- individual consumers
- individual professional procurers
- government purchasing representatives

Producer:

Individuals representing organizations / companies that are involved in the production, manufacture, promotion or distribution of the subject product, material, or service. Included in this category is representation from:

- industry representatives
- trade associations (both 501c3 and 501c6)
- industry associations
- lobbyists
- retailers with a vested interest in a particular product (i.e. their own brand)

General Interest:

Individuals not associated with the production,

distribution, direct use, or regulation of the subject product, material, or service. Included in this category is representation from:

- non-governmental organizations (non-industry based)
- environmental non-governmental organizations
- standards development bodies / organizations
- third-party product certifiers
- testing laboratories

Academia, Public Health and Safety, and Regulation:

Individuals representing public agencies (local, regional, state, federal, or international), regulatory bodies, academia or others representing the public good. Included in this category is representation from:

- academic and other non-industry researchers
- research organizations (including governmental or pseudo-governmental)
- municipal, state-provincial and federal regulators
- governmental area specialists

^{2.} Null Electricity (1)

Which proposal below do you think the EcoLogo Program should follow? (changes are underlined)

Proposal A:

Remove:

“For the purposes of this standard, a REC only represents the environmental benefits associated with the offsetting of null electricity from the grid.”

From:

“renewable energy certificate” or “REC” means an authorized electronic or paper representation of the environmental benefits associated with the generation of 1

MWh of renewable low-impact electricity. RECs allow the environmental, social and economic benefits of the electricity to be separated from the electricity itself, and passed on or sold as a separate product. For the purposes of this standard, a REC only represents the environmental benefits associated with the offsetting of null electricity from the grid.

And keep:

“renewable energy certificate” or “REC” means an authorized electronic or paper representation of the environmental benefits associated with the generation of 1 MWh of renewable low-impact electricity. RECs allow the environmental, social and economic benefits of the electricity to be separated from the electricity itself, and passed on or sold as a separate product.

Proposal B:

Change:

“renewable energy certificate” or “REC” means an authorized electronic or paper representation of the environmental benefits associated with the generation of 1 MWh of renewable low-impact electricity. RECs allow the environmental, social and economic benefits of the electricity to be separated from the electricity itself, and passed on or sold as a separate product. For the purposes of this standard, a REC only represents the environmental attributes associated with the offsetting of null electricity from the grid.

To:

“renewable energy certificate” or “REC” means an authorized electronic or paper representation of the environmental benefits associated with the generation of 1 MWh of renewable low-impact electricity. RECs allow the environmental, social and economic benefits of the electricity to be separated from the electricity itself, and passed on or sold as a separate product. For the purposes of this standard, a REC only represents the environmental benefits associated with the displacement of average system electricity from the grid.

Proposal A, Affirmative

Proposal A, Affirmative with Comment

Proposal B, Affirmative

Proposal B, Affirmative with Comment

Negative, with reasons (must be provided to be counted)

Abstain



3. Null electricity (2)

Which proposal below do you think the EcoLogo Program should follow (changes are underlined)?

Proposal A:

Remove:

“In other words, the renewable low-impact electricity must include all of the environmental benefits associated with the offsetting of the same quantity of null electricity from the grid.”

From (in CCD-003 Draft 1):

15. The renewable low-impact electricity must have attached all of the relevant environmental benefits associated with its generation to the full extent possible based on current regulatory and legal requirements. In other words, the renewable low-impact electricity must include all of the environmental benefits associated with the offsetting of the same quantity of null electricity from the grid.

And keep:

The renewable low-impact electricity must have attached all of the relevant environmental benefits associated with its generation to the full extent possible based on current regulatory and legal requirements.

Proposal B:

Change (from CCD-003 Draft 1):

15. The renewable low-impact electricity must have attached all of the relevant environmental benefits associated with its generation to the full extent possible based on current regulatory and legal requirements. In other words, the renewable low-impact electricity must include all of the environmental benefits associated with the offsetting of the same quantity of null electricity from the grid.

To (in CCD-003 Draft 2):

The renewable low-impact electricity must have attached all of the relevant environmental benefits associated with its generation to the full extent possible based on current regulatory and legal requirements. In other words, the renewable low-impact electricity must include all of the environmental benefits associated with the displacement of the same quantity of average system electricity.

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

4. Null electricity (3)

Which proposal below do you think the EcoLogo Program should follow? (changes are underlined)

Proposal A:

Remove:

“In other words, the RECs must represent all of the environmental attributes associated with the offsetting of the same quantity of null electricity from the grid.”

From (in CCD-003 Draft 1):

25. Renewable Energy Certificates must have attached all of the relevant environmental benefits associated with the generation of the renewable low-impact electricity to the full extent possible based on current regulatory and legal requirements. In other words, the RECs must represent all of the environmental attributes associated with the offsetting of the same quantity of null electricity from the grid.

And keep:

Renewable Energy Certificates must have attached all of the relevant environmental benefits associated with the generation of the renewable low-impact electricity to the full extent possible based on current regulatory and legal requirements.

Proposal B:

Change point 25 of CCD-003 draft 1 to:

Renewable Energy Certificates must have attached all of the relevant environmental benefits associated with the generation of the renewable low-impact electricity to the full extent possible based on current regulatory and legal requirements. In other words, where applicable, the RECs must represent all of the environmental attributes associated with the displacement of the same quantity of average system electricity from the grid.

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

5. **Null electricity (4)**

Which proposal below do you think the EcoLogo Program should follow? (changes are underlined)

Proposal A:

Change (from CCD-003 draft 1):

28. In no way can the environmental benefits associated with the RECs be counted more than one time.

(a) The environmental benefits associated with the renewable low-impact electricity in comparison to the null electricity it displaces from the grid must not have been sold or otherwise separated from the MWh of electricity, and then delivered to any other user besides the final end-use party. In no way can the environmental benefits associated with the RECs be counted more than one time.

To:

(a) The environmental benefits associated with the renewable low-impact electricity in comparison to the average system electricity it displaces from the grid must not have been sold or otherwise separated from the MWh of null electricity, and then delivered to any other user besides the final end-use party.

Proposal B:

Remove:

“in comparison to the null electricity it displaces from the grid”

From (in CCD-003 Draft 1):

28. In no way can the environmental benefits associated with the RECs be counted more than one time.

(a) The environmental benefits associated with the renewable low-impact electricity in comparison to the null electricity it displaces from the grid must not have been sold or otherwise separated from the MWh of electricity, and then delivered to any other user besides the final end-use party.

And keep:

In no way can the environmental benefits associated with the RECs be counted more than one time.

(a) The environmental benefits associated with the renewable low-impact electricity must not have been sold or otherwise separated from the MWh of null electricity, and then delivered to any other user besides the final end-use party.

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

6. Category Definition (1)

Do you think the EcoLogo Program should follow Green-e and allow RECs to be bundled with average system electricity to be sold as renewable low-impact electricity?

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain



7. Category Definition (2)

If you have voted “affirmative” to the question above, which proposal below do you prefer?

Proposal A:

A REC purchased inside a regional grid should only be bundled with this same regional average electricity and then sold as EcoLogo renewable low-impact electricity.

Or:

Proposal B:

When legally possible, a REC purchased in North America should be able to be bundled with any average system electricity within North America and sold as renewable low-impact electricity.

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

8. Vintage of Eligible Renewables

Which proposal below do you prefer?

Proposal A:

Continue to harmonize with Green-e Energy’s standard which states that: Vintage of Eligible Renewables Green-e Energy Certified product may include only renewables that are generated in the calendar year in which the product is

sold, the first three months of the following calendar year, or the last six months of the prior calendar year.

Proposal D:

Remove vintage of RECs and require disclosure of vintage year to the buyer.

- Proposal A, Affirmative
- Proposal A, Affirmative, with Comment
- Proposal D, Affirmative
- Proposal D, Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

9. Claims (1)

Do you agree with this proposed underlined change to CCD-003?

From (in CCD-003 Draft 1):

38. EcoLogo RECs are considered to be automatically retired when the one of the following actions occurs:

(a) A party promotes itself in association with the EcoLogo RECs, as owning the RECs, as owning the associated environmental benefits or as participating in the EcoLogo RECs Program.

To:

EcoLogo RECs are considered to be automatically retired when the one of the following actions occurs:

(a) A party promotes itself in association with the EcoLogo RECs, as owning the RECs, as owning the associated environmental benefits or as participating in the EcoLogo

RECs Program. An exception will be made for sellers of RECs who need to make claims associated with their ownership of RECs to be able to sell and market those RECs.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

10. Claims (2)

Do you agree with this proposed underlined change to CCD-003?

From (in CCD-003 Draft 1):

28. In no way can the environmental attributes associated with the RECs be counted more than one time.

(a) The environmental attributes associated with the renewable low-impact electricity in comparison to the null electricity it offsets from the grid must not have been sold or otherwise separated from the MWh of electricity, and then delivered to any other user besides the final end-use party.

To (in CCD-003 Draft 2):

In no way can the environmental benefits associated with the RECs be counted more than one time.

(a) The environmental benefits associated with the renewable low-impact electricity...must not have been sold or otherwise separated from the MWh of electricity, and then transferred for any other purpose than to eventually deliver them to the final end-use party.

- Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain

11. **Claims (3)**

Do you agree with this proposed underlined change to CCD-003?

From (in CCD-003 Draft 1):

35. Only the final end-use party (or owner) can make any claims about the RECs. This includes any printed, electronic or broadcast materials.

To:

Only the final end-use party (or owner) is allowed to make any claims about having used or retired the RECs. This includes, but is not limited to, any printed, electronic or broadcast materials.

Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain

12. **Claims (4)**

Do you agree with this proposed underlined change to CCD-003?

From (in CCD-003 Draft 1):

36. EcoLogo RECs can only be claimed, used, retired sold and/or donated by the final end-use party. The decision to claim, use, retire, sell and/or donate the RECs can only be made or agreed to by the final end-use party.

To:

EcoLogo RECs must only be claimed for use of renewable attributes, used, retired, sold, and/or donated by the final end-use party. The decision to claim, use, retire, sell, and/or donate the RECs must only be made or agreed to by the final end-use party.

Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain

13. Claims (5)

Do you agree with this proposed underlined change to CCD-003?

From (in CCD-003 Draft 1):

37. The final end-use party can claim, use or retire EcoLogo RECs one time only. Once claimed, they may no longer be used, sold, donated or claimed in any other way.

To:

The final end-use party must retire EcoLogo RECs one time only. Once retired, they must no longer be used, sold, donated, or claimed in any other way.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

14. **Claims (6)**

Do you think that the criteria statement below is applicable to retail customers? If not, we'd appreciate if you could explain why not as a comment.

37. EcoLogo RECs are considered to be automatically retired when the one of the following actions occurs:

(a) A party promotes itself in association with the EcoLogo RECs, as owning the RECs, as owning the associated environmental benefits or as participating in the EcoLogo RECs Program. An exception will be made for sellers of RECs who need to make claims associated with their ownership of RECs to be able to sell and market those RECs.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

15. **Marketing (1)**

Do you think the criteria statements below should only be applicable to commercial users?

39. The final end-use party is eligible to become an Authorized User and use the EcoLogo RECs symbol and/or the words “EcoLogo” or “EcoLogo RECs” in their own marketing and communications materials if all of the following conditions are met:

(a) The final end-use party must have signed an Authorized Use License Agreement with the EcoLogo RECs Program.

(b) The EcoLogo RECs symbol and/or the words “EcoLogo” or “EcoLogo RECs” must be accompanied by a criteria statement indicating the percentage of total electricity load represented by the RECs.

(c) The EcoLogo RECs Program must be able to review and approve of all marketing and communications materials using EcoLogo RECs symbol and/or the words “EcoLogo” or “EcoLogo RECs” when performing annual audits.

Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain

16. Marketing (2)

Do you agree with this proposed underlined change to CCD-003?

From (in CCD-003 Draft 1):

39. (c) The EcoLogo RECs Program must review and approve of all marketing and communications materials using EcoLogo RECs symbol and/or the words “EcoLogo”

or “EcoLogo RECs”.

To (in CCD-003 Draft 2):

The EcoLogo RECs Program must retain the right to review marketing and communications materials using EcoLogo RECs symbol and/or the words “EcoLogo” or “EcoLogo RECs” when performing annual audits.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

17. Product Disclosure (1)

Which proposal below do you prefer?

Proposal D:

Keep point 47 from CCD-003 Draft 1 mostly as-is yet remove (b) (age level) such that the criteria statement below would change from:

47. EcoLogo RECs must be accompanied by product disclosure information that includes, as a minimum, the following information:

(a) a description of what a tradeable renewable electricity certificate is;

(b) [the Level of the EcoLogo RECs (i.e. Level A or Level B) and a description of what that level means;]

(c) the quantity of renewable low-impact electricity that generated the EcoLogo RECs (i.e. the number of megawatt-hours);

(d) the physical location of the generation facility (i.e.

province/state and country);and

(e) the resource(s) used to generated the renewable low-impact electricity and the percentages of each used in the generation.

To:

EcoLogo RECs must be accompanied by product disclosure information that includes, as a minimum, the following information:

(a) a description of what a tradeable renewable electricity certificate is;

(b) the quantity of renewable low-impact electricity that generated the EcoLogo RECs (i.e. the number of megawatt-hours);

(c) the physical location of the generation facility (i.e. province/state and country);and

(d) the resource(s) used to generated the renewable low-impact electricity and the percentages of each used in the generation.

Proposal F:

Adopt a similar intent as these sections found in Green-e Product Disclosure Requirements found at http://www.green-e.org/docs/energy/Appendix_B-National_Code_of_Conduct_Cust_Disclosure.doc:

V. Certification Categories

VII. Customer Disclosure Requirements A, B, F 4 (a)., (b) and(c)

- Proposal D, Affirmative
 - Proposal D, Affirmative with Comment
 - Proposal F, Affirmative
 - Proposal F, Affirmative with Comment
 - Negative, with reasons (must be provided to be counted)
 - Abstain
-
-

18. Product Disclosure (3)

Do you agree with this proposed underlined change to CCD-003?

From (in CCD-003 draft 1):

51. The product disclosure information can be presented as a label, official certificate, information pamphlet and/or website information. A copy of all product disclosure and/or explanatory wording (in its final format for release or publication) must be provided to the EcoLogo RECs Program.

To:

The product disclosure information can be presented as a label, official certificate, information pamphlet and/or website information. A copy of all product disclosure and/or explanatory wording (in its final format for release or publication) must be provided to the EcoLogo RECs Program when the EcoLogo Program requests it.

- Affirmative
 - Affirmative, with Comment
 - Negative, with reasons (must be provided to be counted)
 - Abstain
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19. Product Disclosure (4)

Do you agree with this proposed underlined change to CCD-003?

From (in CCD-003 draft 1):

49. Product disclosure information must be delivered with the EcoLogo RECs to the final end-use party with each sale and/or billing invoice.

To:

Product disclosure information must be delivered with the EcoLogo RECs to the final end-use party with each contract. Note: This information can also be included in to billing invoices.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

20. Verification

Do you agree that the EcoLogo Program should remove points 43 and 58 below from the standard and leave in the more generic requirements below that pertain to yearly auditing requirements, points 56 and 59.

43. All Program licensees must notify the Program of any and all EcoLogo RECs transactions and/or sales.

58. The verification and audit process will make use of various company documents including, but not limited to, power purchase agreements, contracts, invoices, billing statements and other purchasing documents.

56. An audit and verification of all EcoLogo RECs transactions must be performed on an annual basis.

59. EcoLogo Program audit checklists, Sufficient Evidence Documents and other verification process documentation must be followed for all verification procedures.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

21. Tracking Systems (1)

Which proposal below do you think the EcoLogo Program should follow?

Proposal A:

The EcoLogo Program should harmonize with Green-e in the U.S and not require that RECs be tracked within tracking systems because of potential economic constraints.

Proposal B:

The EcoLogo Program should certify only RECs that have been issued by a recognized tracking system. With the advent of the North American Renewables Registry, we think it would be reasonable to make this requirement because tracking systems make it easier to verify claims and to reduce double-counting.

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

22. Tracking Systems (2)

In the event that the EcoLogo Program chooses proposal B above, which suggests:

The EcoLogo Program should certify only RECs that have been issued by a recognized tracking system. With the advent of the North American Renewables Registry. We think it would be reasonable to make this requirement because tracking systems make it easier to verify claims and to reduce double-counting

Should the EcoLogo Program require that renewable energy generators be issued one REC certificate by only one tracking system while keeping in mind that generators may however register with an unlimited number of tracking systems for the purpose of selling their RECs?

- Affirmative
 - Affirmative, with Comment
 - Negative, with reasons (must be provided to be counted)
 - Abstain
-
-
-
-
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-

23. Double Counting (1)

Do you agree with this underlined change to CCD-003?

From (in CCD-003 Draft 1):

28. In no way can the environmental attributes associated with the RECs be counted more than one time. (b) Prior to being passed on or sold to the final end-use party, the RECs, the environmental attributes or the electricity that generated them must not have been used to meet a

regulatory requirement including inter alia:

(i) cap-and-trade programs;

(ii) emissions control programs;

(iii) renewable portfolio standards;

(iv) air emission regulatory limits for the generating facility.

(c) Prior to being passed on or sold to the final end-use party, the RECs or the electricity that generated them must not have been used to meet a non-regulatory mandate including inter alia:

To:

In no way can the environmental attributes associated with the RECs be counted more than one time.

(b) Prior to being passed on or sold to the final end-use party, the RECs, the environmental attributes or the electricity that generated them must not have been used to meet a regulatory requirement including inter alia:

(i) cap-and-trade programs;

(ii) emissions control programs;

(iii) renewable portfolio standards;

(iv) air emission regulatory limits for the generating facility.

(c) Prior to being passed on or sold to the final end-use party, the RECs or the electricity that generated them must not have been used to meet a non-regulatory mandate including inter alia:

(i) fulfilling governmental procurement policies;

(ii) fulfilling private sector procurement policies; calculating another company's or institution's portfolio mix.

Only the end-use party can use a REC to fulfill one of the regulatory or non-regulatory mandates above.



Affirmative



Affirmative, with Comment



Negative, with reasons (must be provided to be counted)

Abstain

24. **Double Counting (2)**

Do you think that the EcoLogo Program should modify its wording of 28. a to d above (found in CCD-003 Draft 1) to reflect the concern that it is REC participants and not RECs themselves that should be monitored for double counting?

It has been raised by some stakeholders that a REC buyer should not be penalized for the later actions of a REC seller.

Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain

25. **Double Counting (3)**

If you voted "affirmative" or "affirmative with comment" to the previous question, could you please propose how you think point 28 should be re-worded?

26. **Edits**

Which proposal below do you prefer regarding point 63 of CCD-003 Draft 2?

63. Where compliance with this standard is established under the EcoLogo Program, the EcoLogo may appear in association with a product, subject to the following conditions:

(a) Only those components of a multi-sourced power product that fully satisfy all pertinent EcoLogo Program certification and licensing criteria are allowed to be identified as “EcoLogo Program-certified” and to carry the EcoLogo; and

(b) A criteria statement must appear with the EcoLogo whenever the EcoLogo is used in association with the electricity during sales and related transactions. The criteria statement must also appear with the EcoLogo in other promotional activities and materials. While the exact wording used in the criteria statement is left to the discretion of the licensee, the statement itself should provide clarification as to why the product was certified. The statement must not misrepresent the product nor the reason it received certification, and must contain at least the following information:

(i) for generators, identification of the amount of EcoLogo Program-certified electricity generated and/or marketed in quantitative units (e.g. kWh or MWh);

(ii) for marketers, identification of the amounts of EcoLogo Program-certified electricity received from generators and/or supplied to users as either percentages of larger multi-sourced power products or in quantitative units (e.g. kWh or MWh); and

(iii) for users, identification of the amounts of EcoLogo Program-certified electricity purchased/used as either percentages of larger multi-sourced power products or in quantitative units (e.g. kWh or MWh).

Proposal A:

The EcoLogo Program should harmonize with Green-e and ensure that renewable energy products must be denominated in megawatt-hours (MWh) or kilowatt-hours

(kWh) and therefore keep point 63 as-is.

Proposal B:

The EcoLogo should remove “KWh” in point 63(i) to 63(iii).

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

27. Definitions (1)

Do you think the definition of “commercial marketer” below could also include non-generating entities? If so, please provide as a comment an example of such a non-generating entity if you know of one.

“commercial marketer” means an entity that generates renewable low-impact electricity and the associated RECs, and then sells or passes on the RECs to commercial clients only (e.g. businesses, institutions, large procurers of electricity, other electricity marketers or generators). A commercial marketer has at least one REC product;

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

32. **Other (2)**

Whom do you think can sell RECs to the final end-use party in the criteria statement below found in CCD-003 Draft 1?

27. Renewable Energy Certificates must be either passed on or sold to the final end-use party (or owner) or be retired on behalf of final end-use party.



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Solar-Powered Electricity Survey (Draft 2)

To: stakeholders currently involved in the review of the Renewable Low-Impact Electricity Standard

The purpose of this survey is to collect stakeholder votes and comments regarding the proposed EcoLogo Renewable Low-Impact Electricity Standard (CCD-003 Draft 2). A vote is required for each of the proposed criteria statements that will follow. The voting period will last from Oct 26 to Nov 27. The proposed Draft 2 renewable low-impact electricity standard and comment report associated with this survey can be found at: <http://www.ecologo.org/en/criteria/revision/>. Only registered stakeholders are allowed to vote. Negative votes must be accompanied by a comment explaining why the criteria statement was rejected or it will not be counted. Participants are to vote on all survey questions for the ballot to be valid. Participants' names and other details are required for internal purposes only. All participant names will be kept anonymous.

Your time and effort in helping us develop an environmental leadership standard for renewable low-impact electricity is greatly appreciated.

Sincerely,

The EcoLogo Program



First Name*

Last Name*

Email*



1. Please select the stakeholder category that best determines your affiliation. You can find a definition of each category below.



User



Producer



General Interest



Academia, Public Health and Safety, and Regulation

Stakeholder Classification

User:

Individuals representing the end users of the subject product, material or service and who are not predominantly involved in its production and/or regulation. Included in this category is representation from:

- consumer protection organizations
- professional purchasing associations
- individual consumers
- individual professional procurers
- government purchasing representatives

Producer:

Individuals representing organizations / companies that are involved in the production, manufacture, promotion or distribution of the subject product, material, or service. Included in this category is representation from:

- industry representatives
- trade associations (both 501c3 and 501c6)
- industry associations
- lobbyists
- retailers with a vested interest in a particular product (i.e. their own brand)

General Interest:

Individuals not associated with the production,

distribution, direct use, or regulation of the subject product, material, or service. Included in this category is representation from:

- non-governmental organizations (non-industry based)**
- environmental non-governmental organizations**
- standards development bodies / organizations**
- third-party product certifiers**
- testing laboratories**

Academia, Public Health and Safety, and Regulation:

Individuals representing public agencies (local, regional, state, federal, or international), regulatory bodies, academia or others representing the public good. Included in this category is representation from:

- academic and other non-industry researchers**
- research organizations (including governmental or pseudo-governmental)**
- municipal, state-provincial and federal regulators**
- governmental area specialists**

2. Do you think the EcoLogo Program should modify the criteria statement pertaining to solar-powered electricity as described below?

From:

10. To meet the requirements of this standard, solar-powered electricity must be generated in such a manner that adequate arrangements (i.e., financial reserves) have been made for the proper disposal and/or recycling of all solid waste resulting from the manufacturing of solar cells and of the generation of electricity, including the disposal of batteries and machinery or equipment used in the generation process itself, that contains measurable levels of cadmium.

To:

Proposal B:

10. To meet the requirements of this standard, solar-powered electricity must be generated in such a manner that appropriate management plans are in place for the proper disposal and/or recycling of all solid waste resulting from the manufacturing of solar cells and of the generation of electricity, including the re-use or safe disposal of energy cells and machinery and equipment used in the generation process.

Proposal E:

10. To meet the requirements of this standard, solar-powered electricity must be generated in such a manner that appropriate management plans are in place for the proper disposal and/or recycling of all solid waste resulting from the generation of electricity, including the re-use or safe disposal of energy cells and machinery and equipment used in the generation process.

- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Proposal E, Affirmative
- Proposal E, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain





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Tidal and Wave-Powered Electricity Survey (Draft 2)

To: stakeholders currently involved in the review of the Renewable Low-Impact Electricity Standard

The purpose of this survey is to collect stakeholder votes and comments regarding the proposed EcoLogo Renewable Low-Impact Electricity Standard (CCD-003 Draft 2). A vote is required for each of the proposed criteria statements that will follow. The voting period will last from Oct 26 to Nov 27. The proposed Draft 2 renewable low-impact electricity standard and comment report associated with this survey can be found at: <http://www.ecologo.org/en/criteria/revision/>. Only registered stakeholders are allowed to vote. Negative votes must be accompanied by a comment explaining why the criteria statement was rejected or it will not be counted. Participants are to vote on all survey questions for the ballot to be valid. Participants' names and other details are required for internal purposes only. All participant names will be kept anonymous.

Your time and effort in helping us develop an environmental leadership standard for renewable low-impact electricity is greatly appreciated.

Sincerely,

The EcoLogo Program



First Name*

Last Name*

Email*



1. Please select the stakeholder category that best determines your affiliation. You can find a definition of each category below.



User



Producer



General Interest



Academia, Public Health and Safety, and Regulation

Stakeholder Classification

User:

Individuals representing the end users of the subject product, material or service and who are not predominantly involved in its production and/or regulation. Included in this category is representation from:

- consumer protection organizations
- professional purchasing associations
- individual consumers
- individual professional procurers
- government purchasing representatives

Producer:

Individuals representing organizations / companies that are involved in the production, manufacture, promotion or distribution of the subject product, material, or service. Included in this category is representation from:

- industry representatives
- trade associations (both 501c3 and 501c6)
- industry associations
- lobbyists
- retailers with a vested interest in a particular product (i.e. their own brand)

General Interest:

Individuals not associated with the production,

distribution, direct use, or regulation of the subject product, material, or service. Included in this category is representation from:

- non-governmental organizations (non-industry based)
- environmental non-governmental organizations
- standards development bodies / organizations
- third-party product certifiers
- testing laboratories

Academia, Public Health and Safety, and Regulation:

Individuals representing public agencies (local, regional, state, federal, or international), regulatory bodies, academia or others representing the public good. Included in this category is representation from:

- academic and other non-industry researchers
- research organizations (including governmental or pseudo-governmental)
- municipal, state-provincial and federal regulators
- governmental area specialists

^{2.} Protection of Marine Mammals and Fish

Do you agree with the proposed change to the criteria statement below?

From (in CCD-003 Draft 1):

11. To meet the requirements of this standard, tidal and wave-powered electricity must be generated in such a manner that the generating facility:

(a) does not operate under any authorization with terms and conditions allowing the harmful alteration, disruption or destruction of fish and marine mammal habitat unless such harmful alteration, disruption or destruction is not affecting the limiting factor controlling carrying capacity; and

To:

To meet the requirements of this standard, tidal and wave-powered electricity must be generated in such a manner that the generating facility:

(a) does not operate under any authorization with terms and conditions allowing the harmful alteration, disruption or destruction of fish and marine mammal habitat:

(i) if this harmful alteration, disruption or destruction is affecting the limiting factor controlling carrying capacity of fish and marine mammals; or

(ii) loss of the affected habitat is compensated by the creation of similar habitat, supporting the same stock, at or near development site within the same ecological unit such that the created habitat replaces lost productive capacity, within an approved safety factor.

Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain

3. Protection of Seabed

Do you agree with the proposed change to the criteria statement below?

From (in CCD-003 Draft 1):

11. To meet the requirements of this standard, tidal and wave-powered electricity must be generated in such a manner that the generating facility:

(b) does not cause significant adverse effects on the fundamental hydrodynamic processes of a tidal or wave regime (energy flow, erosion, sediment transportation and

deposition) or on biological processes

To:

To meet the requirements of this standard, tidal and wave-powered electricity must be generated in such a manner that the generating facility:

(b) is not expected to cause significant adverse effects on the fundamental hydrodynamic processes of a tidal or wave regime (energy flow, erosion, sediment transportation and deposition) or on biological processes

Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain

4. Definition (1)

Do you agree with the proposed change to the definition below in CCD-003 Draft 2?

From:

“tidal & wave-powered electricity” means electricity generated from the kinetic energy delivered by tidal and river currents and from waves nearshore.

To:

“tidal, wave, and in-stream-powered electricity” means electricity generated from the kinetic energy delivered by tidal and waves and the river hydro kinetic energy delivered by river currents.

Affirmative

Affirmative with Comment

Negative, with reasons (must be provided to be counted)

Abstain

5. Definition (2)

In CCD-003 Draft 2 both “tidal, wave, and in-stream-powered electricity” and “hydro-powered electricity” have been included under “water-powered electricity” as such:

11. To meet the requirements of this standard, water-powered electricity must be generated in such a manner that:

(a) if generated from hydro-powered electricity:

(b) if generated from tidal, wave, and in-stream-powered electricity:

Do you agree with the inclusion of the sub-category “tidal, wave, and in-stream-powered electricity” within “water-powered electricity” as found in CCD-003 draft 2 ?

Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain





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Wind-Powered Electricity Survey (Draft 2)

To: stakeholders currently involved in the review of the Renewable Low-Impact Electricity Standard

The purpose of this survey is to collect stakeholder votes and comments regarding the proposed EcoLogo Renewable Low-Impact Electricity Standard (CCD-003 Draft 2). A vote is required for each of the proposed criteria statements that will follow. The voting period will last from Oct 26 to Nov 27. The proposed Draft 2 renewable low-impact electricity standard and comment report associated with this survey can be found at: <http://www.ecologo.org/en/criteria/revision/>. Only registered stakeholders are allowed to vote. Negative votes must be accompanied by a comment explaining why the criteria statement was rejected or it will not be counted. Participants are to vote on all survey questions for the ballot to be valid. Participants' names and other details are required for internal purposes only. All participant names will be kept anonymous.

Your time and effort in helping us develop an environmental leadership standard for renewable low-impact electricity is greatly appreciated.

Sincerely,

The EcoLogo Program



First Name*

Last Name*

Email*



1. Please select the stakeholder category that best determines your affiliation. You can find a definition of each category below.



User



Producer



General Interest



Academia, Public Health and Safety, and Regulation

Stakeholder Classification

User:

Individuals representing the end users of the subject product, material or service and who are not predominantly involved in its production and/or regulation. Included in this category is representation from:

- consumer protection organizations
- professional purchasing associations
- individual consumers
- individual professional procurers
- government purchasing representatives

Producer:

Individuals representing organizations / companies that are involved in the production, manufacture, promotion or distribution of the subject product, material, or service. Included in this category is representation from:

- industry representatives
- trade associations (both 501c3 and 501c6)
- industry associations
- lobbyists
- retailers with a vested interest in a particular product (i.e. their own brand)

General Interest:

Individuals not associated with the production,

distribution, direct use, or regulation of the subject product, material, or service. Included in this category is representation from:

- non-governmental organizations (non-industry based)
- environmental non-governmental organizations
- standards development bodies / organizations
- third-party product certifiers
- testing laboratories

Academia, Public Health and Safety, and Regulation:

Individuals representing public agencies (local, regional, state, federal, or international), regulatory bodies, academia or others representing the public good. Included in this category is representation from:

- academic and other non-industry researchers
- research organizations (including governmental or pseudo-governmental)
- municipal, state-provincial and federal regulators
- governmental area specialists

^{2.} Protection of Bird and Bat Species

Do you agree with the proposed underlined change to CCD-003 below?

Modify (from CCD-003 draft 1):

12. To meet the requirements of this standard, wind-powered electricity must be generated in such a manner that: (a) the generating facility and its structures are not detrimental to indigenous or migratory avian and bat species;

To:

impacts on indigenous or migratory avian and bat species from the generating facility and its structures are minimized and mitigated

Affirmative

Affirmative, with Comment

Negative, with reasons (must be provided to be counted)

Abstain

3. **Recyclability of Materials**

Which proposal below do you prefer? (changes are underlined)

Modify:

12. (e) adequate arrangements (i.e., financial reserves) have been made for the proper disposal and/or recycling of all solid waste resulting from the generation of electricity.

To:

Proposal A:

adequate arrangements have been made for the proper disposal, recycling and/or reuse of all solid waste resulting from the construction phase, generation phase, and end of life of the electricity project

Note: Adequate arrangements in this case would include but may not be limited to management plans, financial reserves, contracts etc

Proposal B:

appropriate management plans are in place for the proper disposal, recycling and/or reuse of all solid waste resulting from the construction phase, generation phase, and end of life of the electricity project.

Proposal A, Affirmative

- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain



4. **Impacts on Fish, Shellfish and Marine Mammals of Offshore Wind-Powered Electricity**

How do you think the statement below should be audited?

12. To meet the requirements of this standard, wind-powered electricity must be generated in such a manner that:

(d) if generated offshore:

(i) negative impacts to indigenous or migratory marine mammal, fish, and shellfish species must be minimized and mitigated





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Biogas-Fuelled Electricity Survey (Draft 2)

To: stakeholders currently involved in the review of the Renewable Low-Impact Electricity Standard

The purpose of this survey is to collect stakeholder votes and comments regarding the proposed EcoLogo Renewable Low-Impact Electricity Standard (CCD-003 Draft 2). A vote is required for each of the proposed criteria statements that will follow. The voting period will last from Oct 26 to Nov 27. The proposed Draft 2 renewable low-impact electricity standard and comment report associated with this survey can be found at: <http://www.ecologo.org/en/criteria/revision/>. Only registered stakeholders are allowed to vote. Negative votes must be accompanied by a comment explaining why the criteria statement was rejected or it will not be counted. Participants are to vote on all survey questions for the ballot to be valid. Participants' names and other details are required for internal purposes only. All participant names will be kept anonymous.

Your time and effort in helping us develop an environmental leadership standard for renewable low-impact electricity is greatly appreciated.

Sincerely,

The EcoLogo Program



First Name*

Last Name*

Email*

1. Please select the stakeholder category that best determines your affiliation.
You can find a definition of each category below.



User



Producer



General Interest



Academia, Public Health and Safety, and Regulation

Stakeholder Classification

User:

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- professional purchasing associations
- individual consumers
- individual professional procurers
- government purchasing representatives

Producer:

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- industry representatives
- trade associations (both 501c3 and 501c6)
- industry associations
- lobbyists
- retailers with a vested interest in a particular product (i.e. their own brand)

General Interest:

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- non-governmental organizations (non-industry based)
- environmental non-governmental organizations
- standards development bodies / organizations
- third-party product certifiers
- testing laboratories

Academia, Public Health and Safety, and Regulation:

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- academic and other non-industry researchers
- research organizations (including governmental or pseudo-governmental)
- municipal, state-provincial and federal regulators
- governmental area specialists

2. Farm and Food-based Biogas Systems

Do you think the EcoLogo Program should modify the criteria statement below as described?

From:

6. (b) for farm and food-based biogas systems:

(i) the highest performance and nutrient management planning standards must be followed

(ii) 75% of phosphorus and nitrogen (by mass) from the systems must be returned to the land while following best nutrient management practices or used in another agronomic or horticultural application (such as producing a

compost-like byproduct, pots, bedding)

To:

General Interest 3 Proposal:

for farm and food-based biogas systems:

(i) best practices applicable to local conditions for nutrient management of agricultural materials must be followed

(ii) the project's Environmental Impact Assessment or a management plan must show how by-product P and N will be beneficially used, and not allowed to contribute to eutrophication where eutrophication could become an adverse effect It was suggested that section 6.(b).(i) would better reflect cases where "highest local standards" are not available.

Proposal D:

Modify both b)i) and b)ii) statements as such:

for farm and food-based biogas systems:

i) the highest local standard specified for nutrient management of agricultural materials must be followed

ii) the project's Environmental Impact Assessment or a management plan must show how by-product P and N will be beneficially used, and not allowed to contribute to eutrophication where eutrophication could become an adverse effect

- General Interest 3 Proposal Affirmative
- General Interest 3 Proposal Affirmative, with Comment
- Proposal D, Affirmative
- Proposal D, Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain



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Biomass-Fuelled Electricity Survey (Draft 2)

To: stakeholders currently involved in the review of the Renewable Low-Impact Electricity Standard

The purpose of this survey is to collect stakeholder votes and comments regarding the proposed EcoLogo Renewable Low-Impact Electricity Standard (CCD-003 Draft 2). A vote is required for each of the proposed criteria statements that will follow. The voting period will last from Oct 26 to Nov 27. The proposed Draft 2 renewable low-impact electricity products standard and comment report associated with this survey can be found at: <http://www.ecologo.org/en/criteria/revision/>. Only registered stakeholders are allowed to vote. Negative votes must be accompanied by a comment explaining why the criteria statement was rejected or it will not be counted. Participants are to vote on all survey questions for the ballot to be valid. Participants' names and other details are required for internal purposes only. All participant names will be kept anonymous.

Your time and effort in helping us develop an environmental leadership standard for renewable low-impact electricity products is greatly appreciated,

The EcoLogo Program

First Name*

Last Name*

Email Address*

1. Please select the stakeholder category that best determines your affiliation. You can find a definition of each category below.

User

Producer

Academia, Public Health and Safety and Regulation

General Interest

Stakeholder Classification

User:

Individuals representing the end users of the subject product, material or service and who are not predominantly involved in its production and/or regulation. Included in this category is representation from:

- consumer protection organizations**
- professional purchasing associations**
- individual consumers**
- individual professional procurers**
- government purchasing representatives**

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- industry representatives -trade associations (both 501c3 and 501c6)**
- industry associations**
- lobbyists**
- retailers with a vested interest in a particular product (i.e. their own brand)**

General Interest:

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- non-governmental organizations (non-industry based)
- environmental non-governmental organizations
- standards development bodies / organizations
- third-party product certifiers -testing laboratories

Academia, Public Health and Safety, and Regulation:

Individuals representing public agencies (local, regional, state, federal, or international), regulatory bodies, academia or others representing the public good. Included in this category is representation from:

- academic and other non-industry researchers
- research organizations (including governmental or pseudo-governmental)
- municipal, state
- provincial and federal regulators
- governmental area specialists

^{2.} **Following Organic Standards**

Regarding 7. (c) in CCD-003 draft 1, do you think the EcoLogo Program should:

Proposal A:

Remove:

7.(c) if generated from dedicated energy crops: (iii) at least 5% of the energy crops should be grown organically following the Canadian National Organic Production Standard specified in the Organic Products Regulations (SOR/2006-338) in Canada and the United States

Proposal B:

Address the fact that this criteria statement is generally not applicable to managed forests in Canada by stating:

7.(c) if generated from dedicated energy crops:

(iii) where applicable, at least 5% of the energy crops must be grown organically following the Canadian National Organic Production Standard specified in the Organic Products Regulations (SOR/2006-338) in Canada and the United States Department of Agriculture Organic Standard in the U.S.

- Proposal A, Affirmative
- Proposal A, Affirmative with comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

3. Use of Genetically Modified Organisms (1)

Do you think the EcoLogo Program should modify this criteria statement as indicated below?

From:

7. To meet the requirements of this standard, biomass-fuelled electricity must be generated in such a manner that:

(d) in the case where the generator of electricity and the producer of biomass residuals share common ownership, genetically modified products cannot be used.

To:

To meet the requirements of this criteria document, biomass-fuelled electricity must be generated in such a manner that:

(d) genetically modified products cannot be used where there is a possibility of gene leakage.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

4. Use of Genetically Modified Organisms (2)

If you voted "affirmative" or "affirmative with comment" to the previous question, how do you think "possibility of gene leakage" could be further defined to ensure the statement in the previous question can be adequately audited?

5. Criteria Air Contaminant Emissions-Normalized PM emissions/MWh

Please choose the proposal below you prefer (potential changes for CCD-003 draft 2 are underlined):

Regarding PM emissions:

Proposal A:

The EcoLogo Program should adopt the average PM emissions value found in AP-42 of 0.3 kg/MWh for fossil fuels for the load point calculations section of the standard.

Proposal B:

The EcoLogo Program should adopt the average PM emissions value found in the WEC LCA of 0.4 kg/MWh for fossil fuels for the load point calculations section of the standard.

Proposal C:

The EcoLogo Program should adopt the average PM emissions value found in AP-42 of 1.0 kg/MWh for CHP biomass-fuelled electricity for the load point calculations section of the standard.

Proposal D:

The EcoLogo Program should adopt the average PM emissions value found in the WEC LCA of 0.01 kg/MWh for CHP biomass-fuelled electricity for the load point calculations section of the standard.

Proposal E:

The EcoLogo Program should keep the average PM emissions value found in the current CCD-003 of 0.5 kg/MWh for biomass-fuelled electricity for the load point calculations section of the standard.

Proposal F:

The EcoLogo Program should drop specific caps on average CO and PM emissions in the load points in CCD-003 and instead include a general requirement in the standard which would require biomass and biogas-fuelled electricity facilities to use best available technologies.

Proposal G:

The EcoLogo Program should adopt the average PM emissions value found in the *Ontario Emission Limits for Internal Combustion Engines used for Non-Emergency*

Power Generation of 0.2 kg/MWh for the load point calculations section of the standard.

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Proposal C, Affirmative
- Proposal C, Affirmative with Comment
- Proposal D, Affirmative
- Proposal D, Affirmative with Comment
- Proposal E, Affirmative
- Proposal E, Affirmative with Comment
- Proposal F, Affirmative
- Proposal F, Affirmative with Comment
- Proposal G, Affirmative
- Proposal G, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

6. Criteria Air Contaminant Emissions-Normalized CO emissions/MWh

Please choose the proposal below you prefer (potential changes for CCD-003 draft 2 are underlined): Regarding CO emissions:

Proposal A:

The EcoLogo Program should adopt the average CO emissions value found in AP-42 of 0.2 kg/MWh for fossil fuels

for the load point calculations section of the standard..

Proposal B:

The EcoLogo Program should adopt the average CO emissions value found in AP-42 of 1.5 kg/MWh for CHP biomass-fuelled electricity for the load point calculations section of the standard.

Proposal C:

The EcoLogo Program should keep the average CO emissions value found in the current CCD-003 of 4.3 kg/MWh for biomass-fuelled electricity for the load point calculations section of the standard.

Proposal D:

The EcoLogo Program should drop specific caps on average CO and PM emissions in the load points in CCD-003 and instead include a general requirement in the standard which would require biomass and biogas-fuelled electricity facilities to use best available technologies.

Proposal E:

The EcoLogo Program should adopt the average PM emissions value found in the Ontario Emission Limits for Internal Combustion Engines used for Non-Emergency Power Generation of 3.5 kg/MWh for the load point calculations section of the standard.

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Proposal C, Affirmative
- Proposal C, Affirmative with Comment
- Proposal D, Affirmative
- Proposal D, Affirmative with Comment
- Proposal E, Affirmative
- Proposal E, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

7. Use of Food Crops (1)

Do you think the EcoLogo Program should modify the criteria statement below?

From:

“harvesting and industrial by-product residues” means a form of clean biomass, and includes inter alia:

(a) mill residues (e.g. residual by-products associated with the processing of forest materials such as bark, sawdust, solid trim, shavings, veneer clippings, clarifier sludge, pulping liquors),

(b) logging residues (e.g. residual materials left in the forest following harvesting such as slash, sortyard debris, thinning, stumps, roots removed for health reasons),

(c) crop residues (e.g. materials not needed for soil re-incorporation such as straw, chaff, corn cobs, bean residues, and dried stalks of harvested grain), and

(d) untreated construction and demolition wastes that cannot be re-used

(e) no biomass by-products with remaining food value

To:

“harvesting and industrial by-product residues” means a form of clean biomass with no remaining human food market value, and includes inter alia:

(a) mill residues (e.g. residual by-products associated with the processing of forest materials such as bark, sawdust, solid trim, shavings, veneer clippings, clarifier sludge, pulping liquors),

(b) logging residues (e.g. residual materials left in the forest

following harvesting such as slash, sortyard debris, thinning, stumps, roots removed for health reasons),

(c) crop residues (e.g. materials not needed for soil re-incorporation such as straw, chaff, corn cobs, bean residues, and dried stalks of harvested grain), and

(d) untreated construction and demolition wastes that cannot be re-used

- Affirmative
- Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

8. Use of Food Crops (2)

If you voted “affirmative” and “affirmative with comment” to the above question, how do you think the EcoLogo Program should further define “human food market value” to ensure that this requirement can be auditable?

9. Sound Environmental Management System

Do you think the current forest management systems mentioned below adequately address biomass removals for bioenergy?

- *The Canadian Standards Association (CSA)*

- *the Forest Stewardship Council (FSC)*
- *the Sustainable Forestry Initiative (SFI)*

Affirmative

Affirmative with Comment

Negative, with reasons (must be provided to be counted)

Abstain

^{10.} Sound Environmental Management Practices

Please choose the proposal below you prefer (potential changes for CCD-003 draft 2 are underlined):

Proposal A:

Do not address carbon in the section about "sound environmental management practices" and keep this section as-is in CCD-003:

"sound environmental management practices" means those practices and goals used to manage forest and/or agricultural products within a sound environmental management system, as defined in the definitions section of this criteria document, that have the objectives of maintaining environmental values of the surrounding ecosystem. At a minimum, these practices must address inter alia:

(a) species selection;

(b) soil structure, temperature and fertility;

(c) soil composition rates, compaction and conservation;

(d) erosion control;

(e) hauling distance from the harvesting site to the combustion/generation site;

(f) silvicultural practices and techniques;

(g) harvesting practices including techniques, rates and waste minimization;

(h) crop regeneration;

(i) road/trail construction and maintenance;

(j) protection of biodiversity, wildlife and rare, threatened and endangered species;

(k) water quality and quantity;

(l) watershed conservation and eutrophication control; and

(m) prior land use.

Proposal B:

Add this section pertaining to carbon in the “sound environmental management practices” section:

“sound environmental management practices” means those practices and goals used to manage forest and/or agricultural products within a sound environmental management system, as defined in the definitions section of this standard, that have the objectives of maintaining environmental values of the surrounding ecosystem. At a minimum, these practices must address inter alia:

(a) species selection;

(b) soil structure, temperature and fertility;

(c) soil composition rates, compaction and conservation;

(d) erosion control;

(e) hauling distance from the harvesting site to the combustion/generation site;

(f) silvicultural practices and techniques;

(g) harvesting practices including techniques, rates and waste minimization;

(h) crop regeneration;

(i) road/trail construction and maintenance;

(j) protection of biodiversity, wildlife and rare, threatened and endangered species;

(k) water quality and quantity;

(l) watershed conservation and eutrophication control;

(m) prior land use; and

(p) net benefits in carbon balance over full life-cycle analysis (from growing site to energy user)

Proposal C:

Add this section pertaining to carbon in the "sound environmental management practices":

“sound environmental management practices” means those practices and goals used to manage forest and/or agricultural products within a sound environmental management system, as defined in the definitions section of this standard, that have the objectives of maintaining environmental values of the surrounding ecosystem. At a minimum, these practices must address inter alia:

(a) species selection;

(b) soil structure, temperature and fertility;

(c) soil composition rates, compaction and conservation;

(d) erosion control;

(e) hauling distance from the harvesting site to the combustion/generation site;

(f) silvicultural practices and techniques;

(g) harvesting practices including techniques, rates and waste minimization;

(h) crop regeneration;

(i) road/trail construction and maintenance;

(j) protection of biodiversity, wildlife and rare, threatened

and endangered species;

(k) water quality and quantity;

(l) watershed conservation and eutrophication control;

(m) prior land use; and

(p) projected carbon balance over lifecycle of project

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Proposal C, Affirmative
- Proposal C, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

11. “Wood-Wastes and Agricultural Wastes” and Clean Biomass (1)

Please choose the proposal below you prefer (potential changes for CCD-003 draft 2 are underlined):

Proposal A:

From:

7. To meet the requirements of this standard, biomass-fuelled electricity must be generated in such a manner that:

(b) if generated from harvesting and industrial by-product residues, and in cases where the generator and the waste source share common ownership:

(i) use only harvesting and industrial by-product residues

that have been sourced from operations that have implemented a sound environmental management system and are adhering to sound environmental management practices,

(ii) ensure the rate of harvest does not exceed levels that can be sustained, and

(iii) not use harvesting and industrial by-product residues from species that are listed in the CITES Appendices;

Remove:

(b) if generated from harvesting and industrial by-product residues, and in cases where the generator and the waste source share common ownership:

And leave in the criteria stating that:

To meet the requirements of this standard, biomass-fuelled electricity must be generated in such a manner that:

(i) use only harvesting and industrial by-product residues that have been sourced from operations that have implemented a sound environmental management system and are adhering to sound environmental management practices,

(ii) ensure the rate of harvest does not exceed levels that can be sustained, and

(iii) not use harvesting and industrial by-product residues from species that are listed in the CITES Appendices;

Proposal C:

No change

- Proposal A, Affirmative
 - Proposal A, Affirmative with Comment
 - Proposal C, Affirmative
 - Proposal C, Affirmative with Comment
 - Negative, with reasons (must be provided to be counted)
 - Abstain
-
-

12. “Wood-Wastes and Agricultural Wastes” and Clean Biomass (2)

Which proposal below do you prefer?

Proposal A:

Keep this statement as-is:

Clean biomass" does not include materials for which other diversion methods are a viable alternative (e.g., soil amending, farm land applications, horticultural applications), nor the treated by-products of manufacturing processes (e.g., treated chipwood or plywood, painted woods, pressure treated lumber)

Proposal B:

Remove this entire section:

Clean biomass does not include materials for which other diversion methods are a viable alternative (e.g., soil amending, farm land applications, horticultural applications), nor the treated by-products of manufacturing processes (e.g., treated chipwood or plywood, painted woods, pressure treated lumber)

- Proposal A, Affirmative
- Proposal A, Affirmative with Comment
- Proposal B, Affirmative
- Proposal B, Affirmative with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

13. "Wood Wastes and Agricultural Wastes" and Clean Biomass (3)

If you opted for proposal A above, can you please let us know how you think "viable alternative" could be further defined to ensure that it is auditable? For instance, would this alternative have to be regionally or nationally available etc?

14. "Wood-Wastes and Agricultural Wastes" and Clean Biomass (4)

Do you think that veneer clippings with adhesives should not be allowed under the "harvesting and industrial by-product residues" definition below? If not, please let us know if you can, as a comment, of other more environmentally benign options for the proper management of such clippings.

"harvesting and industrial by-product residues" means a form of clean biomass with no remaining human food market value, and includes inter alia: (a) mill residues (e.g. residual by-products associated with the processing of forest materials such as bark, sawdust, solid trim, shavings, veneer clippings, clarifier sludge, pulping liquors);

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

and paper boilers burning salt-laden wood as specified in the Canada Wide Standards for Dioxins and Furans (Canadian Council of Ministers of the Environment); and

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain

17. Dioxins and Furans (2)

Do you think elemental chlorine bleaching is still used in pulp mills in North America? If not, we'd appreciate it if you could let us know what has replaced chlorine bleaching as a comment.

- Affirmative
- Affirmative, with Comment
- Negative, with reasons (must be provided to be counted)
- Abstain



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