

# Feedback Form

## LT2-RFP Joint Session, February 22, 2024

### Feedback Provided by:

Name: Suzanne Armstrong

Title: Director of Policy and Research

Organization: Christian Farmers Federation of Ontario (CFFO)

Date: March 7, 2024

To promote transparency, feedback submitted will be posted on the LT RFP engagement webpage unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark as "confidential".

Following the February 22, 2024, LT2-RFP joint engagement with Ministry of Municipal Affairs and Housing (MMAH) and Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) webinar, the Independent Electricity System Operator (IESO) is seeking feedback on items discussed during the webinar. The webinar presentation and recording can be accessed from the LT RFP [engagement web page](#).

**Please submit feedback to [engagement@ieso.ca](mailto:engagement@ieso.ca) by March 7, 2024.**

Topic	Feedback
<p>What are some considerations if certain technology types were limited, or restricted from being developed on Ontario's prime agricultural areas?</p>	<p>Siting for energy projects, be they for generation, storage, or transmission, should not be located within lands defined as Prime Agricultural Areas in municipal official plans. Siting for energy projects within rural lands not defined as Prime Agricultural Areas, but with active farming, should make every effort to avoid or at least minimize both loss of productive acres and interference with ongoing farm businesses.</p>
<p>Given the limited amount of specialty crop areas in the province, how would diverting or restricting energy projects from these areas impact your ability to develop your energy project?</p>	<p>Specialty crop lands are selected for their unique climate and production capabilities. These need to receive the highest protection and should not be considered for energy projects.</p>
<p>What would the impact be if there were requirements to avoid, minimize and mitigate agricultural impacts in prime agricultural areas?</p>	<p>Prime agricultural areas are highly valuable as a source of food, as an economic driver and as a provider of environmental goods and services. It is vitally important that this limited resource is not put at risk. Energy projects do not need to be sited on arable land, and should be sited elsewhere.</p>
<p>Based on what you heard today, do you require additional clarity on agriculture land restrictions? Why or why not?</p>	<p>More information needs to be made available to municipalities and project proponents on how the definition of "infrastructure" does or does not apply to privately owned energy projects, especially if Prime Agricultural Areas are to be impacted by these types of projects.</p>

## General Comments/Feedback

The CFFO is concerned about the protection of productive agricultural land. This land is highly valuable as a source of food, as an economic driver and as a provider of environmental goods and services. The IESO report "Pathways to Decarbonization" suggests that the increased need for non-emitting energy production in Ontario will result in the need for approximately 8,700km<sup>2</sup> (or approximately 2,149,817 acres) in new land area. This is close to the total area currently growing corn in Ontario. The majority of this land, (estimated at 7,064 km<sup>2</sup> or 1,745,552 acres) would be for increased onshore wind energy production. Wherever possible, energy generation and storage

projects should be sited close to where the energy is needed, in urban or settled areas, or within existing transmission corridors. This will reduce energy loss, ensure the energy can be transmitted to where it is needed, while avoiding loss of farmland. While energy generation, storage and transmission are important to meet the basic needs of Ontarians, agricultural production is also vital to the Ontario economy and to the basic needs of Ontarians. Suitable consideration of land use impacts from proposed energy projects needs to properly consider other land uses, most especially agricultural land uses. Energy projects do not require arable land and can and should be sited elsewhere. The CFFO recommends that siting for energy projects, be they for generation, storage, or transmission, should not be located within lands defined as Prime Agricultural Areas in municipal official plans. Siting for energy projects in rural lands outside Prime Agricultural Areas, but which are actively farmed or near farms, should make every effort to avoid or at least minimize loss of productive acres and interference with ongoing farm businesses.