



# CHRISTIAN FARMERS FEDERATION OF ONTARIO

ACCREDITED FARM ORGANIZATION

April 24, 2024

Hon. Todd Smith, MPP  
Minister of Energy  
77 Grenville St., 10<sup>th</sup> Floor  
Toronto, ON  
M7A 2C1

Via email: [MinisterEnergy@ontario.ca](mailto:MinisterEnergy@ontario.ca)

## Re: Siting of Energy Related Projects in Ontario

Dear Hon. Todd Smith,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

CFFO's Key Recommendations:

1. 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.
2. Siting for energy projects within rural lands not defined as Prime Agricultural Areas, but with active farming, should make every effort to avoid or minimize both loss of productive acres and interference with ongoing farm businesses.
3. Efforts to improve energy efficiency across all sectors of the economy need to be significantly increased.

### Land Use and Siting of Energy Projects

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.<sup>1</sup> This is close to the total area currently

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<sup>1</sup> IESO, "Pathways to Decarbonization: A Report to the Minister of Energy to evaluate a moratorium on new natural gas generation in Ontario and to develop a pathway to zero emissions in the electricity sector." Decemblers 15, 2022, Appendix B, p. 29 <https://www.ieso.ca/en/Learn/The-Evolving-Grid/Pathways-to-Decarbonization>

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**REPRESENTING FARMERS SINCE 1954**

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growing corn in Ontario.<sup>2</sup> 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.

Energy storage projects should be sited close to where the energy is needed, in urban or settled areas, or within existing transmission corridors. This will ensure the stored energy can be transmitted to where it is needed, while avoiding use 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 outside Prime Agricultural Areas, but still near active farming, should make every effort to avoid or minimize both loss of productive acres and interference with ongoing farm businesses.**

### **Energy Conservation**

IESO reports indicate that Ontario is moving from a period of energy surplus to a period where demand exceeds current generation supply. With increasing electrification across key sectors, including transportation, buildings and industry, further expansion of generation capacity will be necessary.

The current approach to energy conservation is to encourage consumers to use energy at lower-use times of the day or week. Generally speaking, the current energy system has encouraged consumers to use more energy, not less. Energy conservation efforts in the future need to bring about a social change in consumer expectations about not only when but how much electricity to use.

The predicted change in energy demands means that we will also need a cultural shift in terms of our attitudes toward the energy efficiency of the products that use electricity. We will need innovation to increase energy generation and bring new non-emitting technologies to scale. We also need innovation that will drive greater efficiency in the amount of energy used by products run on electricity.

**Efforts to improve energy efficiency of products run on electricity across all sectors of the economy need to be significantly increased.**

### **Conclusion**

We appreciate this opportunity to provide input on guidelines for siting energy projects in upcoming procurements. The estimation by the IESO “Pathways to Decarbonization” report

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<sup>2</sup> Statistics Canada reports 2.2 million acres in corn production in 2023, which is approximately 8,903 km<sup>2</sup>. <https://www150.statcan.gc.ca/n1/daily-quotidien/231204/dq231204a-eng.htm>

that 1,745,552 acres would be needed for onshore wind energy production alone is not a sustainable expectation, particularly within the most populated regions of Ontario, where the limited landscape has many competing land use needs.

The CFFO recommends that siting for energy projects should not be located within lands defined as Prime Agricultural Areas in municipal official plans. Siting for energy projects in rural lands near active farming should make every effort to avoid or minimize both loss of productive acres and interference with ongoing farm businesses. Efforts and innovation to improve energy efficiency of products run on electricity across all sectors of the economy need to be significantly increased.

We thank you for your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario

CC: Hon. Lisa Thompson, Minister of Agriculture, Food and Rural Affairs

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