



Ontario Federation of Agriculture

Ontario AgriCentre

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3
Tel: (519) 821-8883 • Fax: (519) 821-8810 • www.ofa.on.ca

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Rebecca Teare, Policy Advisor
Ministry of Energy
Conservation and Renewable Energy Division
Conservation and Energy Efficiency Branch
Energy Conservation Policy
77 Grenville Street, 5th Floor
Toronto, ON M7A 2C1

Ms. Teare,

RE: EBR Registry Number: 012-6904 Large Building Energy and Water Reporting and Benchmarking

We appreciate the opportunity to comment on EBR 012-6904, in relation to Bill 135 energy and water conservation and GHG reductions –important subjects vital to a sustainable Ontario farm sector.

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing over 36,000 farm family businesses. These farm businesses form the backbone of our rural communities and our robust food system has the potential to drive the Ontario economy forward.

Agri-food is the number one industry in Ontario, generating \$34 billion in GDP and employing 740,000 people in Ontario. Ontario is home to the second largest food processing sector in North America. The agri-food sector runs on competitively priced energy. So prudent investments and smart, efficient regulations are critically important and will enable our agri-food sector to contribute even more to the Ontario economy.

With respect to Large Building Energy and Water Reporting and Benchmarking (EWRB), we concur with the proposed exemption of agricultural buildings from these reporting requirements.

A statistically small number of agriculture buildings would even meet the minimum size threshold where EWRB requirements begin to apply. These buildings, mostly greenhouses, are unique with atypical energy requirements that would detract from EWRB efforts to develop meaningful benchmarking estimates. Agricultural energy profiles are inherently different than residential, retail, warehouse or manufacturing sectors; therefore including agricultural buildings would skew benchmarking results.

Energy is a significant cost for food production. Releasing cost of production figures puts Canadian agricultural exporters at risk of US Antidumping investigations - court action pursued when US producers believe, however unfounded, that Canadian exported products are sold below cost. The release of any cost data could prompt such action. The expense incurred to

dispute claims, and lost income during suspension of exports throughout an investigation, would be significant.

The OFA recognizes energy reporting data may prove useful when measuring Ontario's performance towards our GHG emission reduction targets. However, agriculture is not a regulated sector under the cap and trade carbon pricing mechanism being designed for Ontario. Therefore, exempting agricultural buildings from the large building reporting requirements will not impact Ontario's performance measurement.

Cost-effective water and energy management are very central to agricultural production. We know Ontario farm building owners are acutely aware of their water and energy costs. In fact, for quite some time Best Management Practices have been developed and implemented related to water and energy conservation and demand management, and statistics show the agriculture sector, in general, has far exceeded the norm in terms of early adoption of conservation measures.

Recently, AAFC announced a \$400,000 investment to help Ontario greenhouse farmers introduce cost-effective waste water treatment systems - a top priority for the sector. This investment will help growers reduce pollutants in runoff water from greenhouses and nurseries.

Climate impacts agriculture more than any other industry and climate change poses a real threat to food production and our food security. Our members are already focused on conservation and demand management.

We support the proposed regulation given it exempts agricultural buildings from the EWRB reporting and benchmarking initiative. We appreciate the opportunity to outline some of the many valid reasons for such an exemption.

Sincerely,



Don McCabe
President