



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

October 6, 2017

Katerina Minaeva
Ministry of Transportation
Policy and Planning Division
Environmental Policy Office (Toronto)
777 Bay Street, Suite 700
Toronto ON
M7A 2J8

Dear Ms. Minaeva,

Re: EBR013-1381 The Green Commercial Vehicle Program (GCVP)

The Ontario Federation of Agriculture (OFA) is the largest voluntary, general farm organization in Canada, representing over 37,000 farm families across Ontario. As a dynamic farmer-led organization based in Guelph, Ontario, OFA works to represent and champion the interests of Ontario farmers through government relations, farm policy recommendations, lobby efforts, community representation, media relations and more. OFA is the leading advocate and voice for Ontario farmers.

OFA supports a transition to cleaner vehicle fleets including natural gas, renewable natural gas, hydrogen, propane, and electric power, coupled with continued renewable fuel standards to improve conventional fuel options for biodiesel, green diesel and ethanol content.

Program costs must be reasonable. Ontario's Electric Vehicle Incentive Program (EVIP) has been in place since 2010, and is periodically updated to tailor incentives towards vehicle size, battery size and different technologies. However, the rebate was only recently adjusted to exclude vehicles priced above \$150,000 (caps should be aimed to incent that part of the industry where market viability exists).

The success of the GCVP hinges on attention to rural and remote options. This program must be part of a strategic long-term infrastructure plan. American fleets operate within a natural gas fueling network along trucking routes, but must switch to conventional diesel trucks for transport through Canada. Alternative green fuel infrastructure must be strategically located along all provincial routes from Windsor to Kingston, Niagara to the GTHA, and north along the 400 series and TransCanada routes.

Regulatory constraints pose a barrier to the CGVP's success. During the Feed-in-Tariff and Large Renewable Procurement programs, biogas options were regulatorily constrained, with limited success in biogas to electricity CHP facilities, instead of more efficient biogas to renewable natural gas production and pipeline injection. We recommend establishing sufficient regulations to efficiently design and build a series of strategically placed fuelling pilots prior to writing permanent unencumbered regulations.

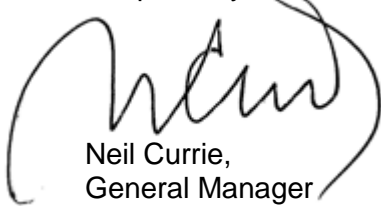
OFA expects MTO to collaborate with MEDC, MOECC and ENERGY on the larger impacts and objectives this program will touch. Alternative green fuels including hydrogen and renewable natural gas infrastructure must be brought outside the GTHA as part of a greater vision to ensure rural and remote communities have the infrastructure needed to expand their economies. This includes schools, healthcare, social services, high-speed internet and district/community energy infrastructure.

Without this combined long-term approach, commercial and industrial activity will remain congested in and around the GTHA, Ottawa and London, stifling the ability for urban centers to afford housing and any type of infrastructure maintenance or upgrade without enormous taxpayer expense.

Ontario recognizes that commercial transportation is both vital to Ontario's economy, and a significant contributor to Ontario's GHG emission profile. For success, the GCVP will see wider adoption of green vehicle technologies, an industry shift to incorporating lower emission vehicles into commercial fleets; and markets evolving towards more and lower priced green fleets and fuel-efficient technologies.

OFA believes that sending a clear signal to manufacturers, technologists and fleet managers must include clear long-term commitments to rural economic development through infrastructure investments, including the Green Commercial Vehicle Program.

Respectfully Submitted,



Neil Currie,
General Manager