



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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January 30, 2017

Katie Zwick, Senior Policy Coordinator  
Ministry of the Environment and Climate Change  
Climate Change and Environmental Policy Division  
Air Policy and Climate Change Branch  
77 Wellesley Street West, Floor 10  
Toronto ON  
M7A 2T5

Dear Ms. Zwick,

**RE: EBR Registry Number: 012-9270 - Draft regulation establishing the Ontario Climate Change Solutions Deployment Corporation under the Development Corporations Act**

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to the Ministry of Environmental and Climate Change regarding the Draft regulation establishing the Ontario Climate Change Solutions Deployment Corporation under the Development Corporations Act. The OFA is Canada's largest voluntary general farm organization, representing over 36,000 farm families across the province. These farm businesses form the backbone of a robust food system; helping to drive the Ontario economy forward.

The draft regulation states that the object of the corporation is to, "stimulate the development of industry, trades and business undertakings in Ontario that further the deployment in Ontario of technology that is commercially available and that reduces greenhouse gas emissions from buildings and from the production of goods". OFA expects that agricultural buildings and goods are included under this description and that funded programs will be created to facilitate the deployment of greenhouse gas reducing technologies to our sector. Should this not be the case, we request immediate clarification on how funds from the Greenhouse Gas Reduction Account will be deployed to facilitate the adoption of technology applicable to greenhouse gas reductions on agricultural operations.

Our remaining comments regarding this draft regulation are focused on the composition of the Board of Directors for the Corporation. Ontario's farm operations face unique challenges in the production of agricultural goods that are not faced by other businesses. The task of growing biological organisms subject to weather conditions creates high risk and vulnerability to production, especially when the vast majority of our products are marketed in a domestic or international marketplace where competition is strong, margins are very tight, and the returns on investment are not dictated by the producer.



We believe the agricultural sector is deserving of special consideration when designing programs for the deployment of emission reduction technology. Furthermore, Schedule 1 of the Climate Change Mitigation and Low-carbon Economy Act, 2016 specifically identifies the Greenhouse Gas Reduction Account to fund initiatives relating to the reduction of greenhouse gas from agriculture, forestry and natural systems. Consequently, OFA requests that the existing regulation be amended to require that the board of directors has a member with experience and expertise in emissions reductions in the agricultural sector.

We are confident that with the right investments, the agricultural sector can help drive the Ontario economy forward while meeting our greenhouse gas emission reduction targets.

Sincerely,

A handwritten signature in black ink, which appears to read 'Keith Currie'. The signature is fluid and cursive, written over a light grey rectangular background.

Keith Currie  
President