



Ontario Federation of Agriculture

Ontario AgriCentre

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Kirsten Corrigan, Manager
Ministry of Natural Resources and Forestry
Policy Division
Crown Forests and Lands Policy Branch
Forest Legislation and Planning Section
70 Foster Drive, Suite 400
Sault Ste Marie, ON
P6A 6V5

Dear Ms. Corrigan,

RE: EBR Registry Number: 012-8685 - Ontario's Crown Forests: Opportunities to Enhance Carbon Storage? A Discussion Paper

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to the Ministry of Natural Resources and Forestry regarding the Opportunities to Enhance Carbon Storage in Ontario's Crown Forests Discussion Paper. 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.

In the spring of 2015, Ontario announced its intention to create a provincial Cap and Trade System to put a price on carbon, and that it would include opportunities for unregulated sectors (agriculture and forestry) to create and market offset credits. With regards to the two policy options presented in the Discussion Paper, the OFA favours the use of a market-driven approach based on forest carbon offset projects. OFA has long advocated for the potential of the agricultural sector to reduce atmospheric greenhouse gases through a carbon offset system.

Well-designed and practical forest carbon offset protocols that provide a reasonable rate of return on investments to project developers will provide the necessary stimulus to drive increased carbon storage in Ontario's Crown forests. Furthermore, given both California and Quebec have developed or are developing forest offset protocols, and that Ontario intends to link our Cap and Trade System with those jurisdictions, a market-driven approach to building the level of carbon stored in Ontario's forests would be the sensible policy direction.

In May of 2016, the Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) released a *Discussion Paper for Developing an Agriculture, Aquaculture and Food Processing Sector Strategy for Northern Ontario*. This strategy is intended to guide the further growth and development of the agriculture, aquaculture and food processing sector in Northern Ontario and build upon the *Growth Plan for Northern Ontario* into 2036.



Premier Wynne has issued a challenge to the Agri-Food Sector to double its growth rate and to create 120,000 new jobs by 2020. The Premier's 2014 mandate letter to OMAFRA also directed the ministry to work with other ministries and partners to explore opportunities to develop the agricultural sector in the North. Given the opportunity and importance of continuing agricultural development in Northern Ontario, the OFA strongly insists that any policy initiatives intending to build forest carbon storage must be aligned with the Northern agriculture strategy and not act independently or in opposition.

There are approximately 700,000 acres of farmland in Northeastern Ontario. There is potential to double the amount of cropland being farmed in Ontario, with 16 million acres of potentially fertile glacio-lacustrine soils in the Great Clay Belt (GCB) of Northeastern Ontario. Only about 2% of this land is currently being farmed. Making Crown land available for farmers to purchase or lease, at market value, without rules requiring contiguous plots of land, would support the expansion of farm businesses and enable young and beginning farmers to establish farms. The Ministry of Natural Resources and Forestry should take into account the socio-economic benefits of allowing farming on Crown land, including the return on investment through taxation. It is important to recognize that farmers are stewards of the land, and will mitigate negative environmental and ecological impacts while providing environmental benefits to Crown land.

Farmland and forestry in the Ontario's North are mutually beneficial providing source material for replanting and reforestation and providing and opportunities for the efficient use of biofuels. OFA appreciates this opportunity to comment on the Discussion Paper regarding the Opportunities to Enhance Carbon Storage in Ontario's Crown Forests. We look forward to continuing to explore opportunities to meet Ontario's greenhouse gas reduction obligations through carbon offsets generated on agricultural and forested lands.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Currie", is written over a light grey rectangular background.

Keith Currie
President