

April 30, 2020

Christopher Goode
Energy Networks and Indigenous Policy Branch
Ministry of Energy, Northern Development and Mines
77 Grenville St., 6th Floor
Toronto, ON M7A 2C1

Dear Mr. Goode,

RE: EBR 019-1371 Early Access to Land on Transmission Projects

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

Under *EBR019-1371*, Ontario proposes to allow access to private property for environmental studies prior to approval of Leave to Construct (LTC) for Transmission Projects. OFA recognizes the complexity of executing projects on this scale. Earlier access to lands before filing LTC applications could reduce proponent logistic challenges in exchange for better quality, site focused environmental data.

OFA supports amending processes to improve the quality of environmental data, if Ministry of Energy staff consider processes to ensure early access does not compromise biosecurity protocols, interrupt farming procedures, damage crops or farmlands. OFA insists that landowners should be notified before their lands are entered.

Enabling access to land earlier in the LTC process presents the potential to interfere with day-to-day farming activities, including planting, chemical treatments, pasturing and harvest. These earlier, less focused, and possibly relaxed restrictions for access to land potentially increase the number of accesses, thereby increasing the risk of soil compaction, crop damage and biosecurity protocol compromise. Those entering private lands must adopt processes to mitigate these issues, and should farmers be negatively impacted or unable to use all their land, recourse options for farmers need to balance those consequences.

Sincerely,



Keith Currie
President

cc: The Honourable Greg Rickford, Minister of Energy, Northern Development and Mines
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs