

November 27, 2020

The Honourable Jeff Yurek
Minister of Environment, Conservation and Parks
College Park 5th Floor
777 Bay Street
Toronto, ON
M7A 2J3

Minister Yurek,

Re: ERO-019-1134 - Proposed amendments to regulations under the *Environmental Protection Act* and the *Environmental Assessment Act* for combined heat and power systems that use natural gas or wood biomass as fuel

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA supports the proposed regulatory amendments to streamline permissions for natural gas or wood biomass combined heat and power (CHP) systems. OFA supports a risk-based approach to protect human health and the environment. This proposal aligns approval for natural gas or wood biomass CHP systems with the level of risk. The proposed amendments will help reduce regulatory burden and enable more timely adoption of energy efficient CHP technologies for rural and regional food processors.

Under this proposal, qualified low-impact and less complex micro-systems that meet criteria would be exempt for section 9 of the *Environmental Protection Act* (EPA) and would therefore not require an Environmental Compliance Approval (ECA) or a Renewable Energy Approval (REA). Because farm-based CHP systems are regarded as low-impact and less complex, the proposed regulatory amendments would save time and costs for proponents choosing to install these systems.

Sincerely,



Peggy Brekveld
President

cc: Julie Green, Senior Program Advisor, Policy and Program Development, Ministry of Environment, Conservation and Parks
OFA Board of Directors