

May 18, 2023

Andrew Ogilvie
MNR Resources Planning and Development Policy Branch
Resources Development Section
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Peterborough, ON
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Submitted online and to the Public Input Coordinator resources.development@ontario.ca

Dear Andrew Ogilvie,

Re: ERO 019-6752 Proposed changes to the OGSRA

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

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating nearly 750,000 jobs, and contributing over \$47 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to drive the economy forward.

OFA is pleased to provide comments from the perspective of Ontario's agricultural sector, on proposed amendments to the Oil, Gas and Salt Resources Act (OGSRA) to regulate projects to assess, pilot or demonstrate new geological storage activities and technologies. The proposed changes would create new and adapting authorities, processes and requirements where flexibility is needed to address special projects.

Under proposed OGSRA amendments, geological carbon storage pilots or demonstrations could use existing wells to access underground geologic formations. Over decades, landowners in southwestern Ontario, where the majority of salt solution-mining, oil wells, and gas wells are located, have struggled to have closed wells decommissioned, and dealt with multiple company changes and bankruptcies of original lease signees. Repurposing leases for other uses, such as compressed air energy and carbon storage, risks contravening the intent of the underlying agreement to permit one identified activity.

While proposed OGSRA amendments are meant to assist Ontario's transition to a low-emission energy system and increased electricity demands, OFA recommends MNRF work to ensure landowners concerns are considered during processes that will increase activities under existing lease arrangements. OFA recommends that the ministry collaborate with landowners to better understand the long-term impacts of ceding personal land rights or Crown property rights to better protect people.

Geologic carbon storage could play an important role in greenhouse gas sequestration. OFA supports stronger oversight towards preventing impacts to public safety and the environment, and the intention to create or amend future regulations to establish a clear framework for special projects to identify, assess and mitigate potential impacts.

While regulating geologic carbon storage pilot projects will provide clarity for business and investment planning, OFA supports including measures to enhance the protection of public safety and the environment, such as court and inspector's orders for carbon storage.

OFA strives to ensure farming and agri-food has a voice in energy policy and the design, construction and operation of energy infrastructure. This is meant to help insure the sustainability, growth and modernization of our farm sector. We appreciate this opportunity to present a perspective from the viewpoint of Ontarians living in rural and farm communities.

Regards,



Peggy Brekveld
President

cc: OFA Board of Directors