

January 9, 2025

Ministry of Natural Resources
Public Input Coordinator
Development and Hazard Policy Branch
300 Water Street,
Peterborough, Ontario
K9J 8M5

Sent via email to resources.development@ontario.ca and uploaded to the Environmental Registry of Ontario

To the Public Input Coordinator;

RE: ER-019-9299 Enabling the Development of Commercial-Scale Geologic Carbon Storage in Ontario: *The Geologic Carbon Storage Act*

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. We are a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. Many of our members live and work in areas directly impacted by activities governed under the *Oil, Gas and Salt Resources Act* and potentially impacted by commercial-scale geological carbon storage.

Our comments on the *Geologic Carbon Storage Act* are from the perspective of Ontario's agricultural sector and rural communities. Our key comments and recommendations include:

1. Hold companies accountable for adverse environmental, financial and public safety impacts.
2. Continue broad engagement with relevant Ontario Ministries, the Federal government, and impacted municipalities related to responsibilities necessary to protect water, ensure municipal supports, ensure agricultural sustainability, and for the protection of people, land rights and businesses potentially impacted.
3. Require all permit applicants to conduct Agricultural Impact Assessments, considering the logistics of transporting CO₂ to commercial-scaled storage sites.
4. Require information submitted in support of applications be prepared by qualified persons, including regulated Professional Engineers, and Professional Geoscientists, and made available for external review.
5. Continue to work with landowners and other stakeholders to better understand the long-term impacts of ceding personal land rights, and to ensure fair compensation.
6. Share findings with the public about test and demonstration projects to help the public make informed decisions.

For many decades, landowners in southwestern Ontario, where the majority of oil and gas wells are located, have struggled to get abandoned wells decommissioned. They have dealt with multiple company changes, restructures and bankruptcies of original lease holders, and abandonment of those assets. We are pleased that the Minister has adopted strong provisions to

hold companies accountable for adverse environmental, financial and safety impacts, including recent proposed *Oil, Gas, and Salt Resources Act* amendments to authorize intervention when operators are non-compliant and allow cost recovery by accessing operator financial security.

The proposed Carbon Storage Stewardship Fund is an important step towards insuring geologic carbon storage companies cover the costs associated with the long-term monitoring and maintenance of carbon storage sites.

OFA also appreciates the engagement the Ministry conducted with municipal, Indigenous, and agricultural stakeholders to help inform the development of this framework. It is important that landowner and land steward concerns are considered during processes that will increase activities under existing and new lease arrangements, and specifically address the concerns of those living above areas designated for deep geological carbon storage.

In July 2024, the Ministry posted the *Regulating Commercial-Scale Geologic Carbon Storage Projects in Ontario* discussion paper through ERO-019-8767, on the design of a framework for commercial-scale carbon storage. OFA recommended the Ministry seek consensus from Ontario Ministries of Municipal Affairs and Housing, Environment, Agriculture, Food and Agribusiness, and Rural Affairs, the Federal government, and impacted municipalities, related to responsibilities necessary to protect water, ensure municipal supports, ensure agricultural sustainability, and the protection of people, land rights and businesses potentially impacted.

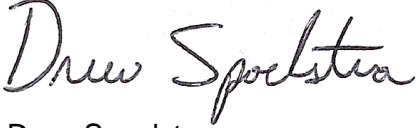
OFA supports the proposed requirement in the *Geologic Carbon Storage Act* for project permit applicants to confirm municipal endorsement, and that applicants must assess potential impacts to agricultural operations and systems, drinking water sources, and surface or subsurface uses, and identify suitable mitigation measures. OFA recommends that the Ministry require information submitted in support of an application be prepared by qualified persons, including regulated Professional Engineers, and Professional Geoscientists, and made available for external review.

As carbon storage transitions to commercial-scale operations, OFA recommends applicants be required to conduct Agricultural Impact Assessments, considering the logistics of transporting CO₂ to commercial-scaled storage sites. New CO₂ pipelines will impact landowners and trucking will significantly increase traffic density which is a concern in rural areas with limited roadway options.

While geologic carbon storage is not new to Canada, it is new to Ontario. OFA recommends the Ministry continue and broaden educational outreach to ensure Ontarians understand the risks associated with carbon storage activities, continue to work with landowners and other stakeholders to better understand the long-term impacts of ceding personal land rights, and share findings with the public about test and demonstration projects to help the public make informed decisions. It is important that government understand that informed consensus may not be possible; until residents know the scale and type of site models that will be eligible, and their locations, they cannot appreciate the consequences of increased pipeline and trucking activity, or risks to the environment.

OFA strives to ensure agriculture has a voice in infrastructure policy discussions, and infrastructure design, construction and operation, including carbon sequestration. This is meant to help insure the sustainability, growth and modernization of our farm sector and the safety of our environment. We appreciate this opportunity to present comments from the viewpoint of Ontarians living in rural and farm communities.

Sincerely,



Drew Spoelstra
President

cc: Hon. Graydon Smith, Minister of Natural Resources
Hon. Rob Flack, Minister of Agriculture, Food and Agribusiness
Hon. Lisa Thompson, Minister of Rural Affairs
OFA Board of Directors