



April 8, 2021

Emma Heffernan  
Ministry of Energy, Northern Development and Mines  
Distribution and Consumer Assistance Policy Branch  
Via email: [emma.heffernan@ontario.ca](mailto:emma.heffernan@ontario.ca)

**RE: 019-3191 Phase 2 of the Natural Gas Expansion Program**

Dear Ms. Heffernan,

Thank you for the opportunity to provide comments on the Natural Gas Expansion Program (Phase 2) through the Environmental Registry of Ontario. If nothing else, the COVID-19 pandemic has highlighted the need to maintain the province's capacity for domestic fruit and vegetable production, with global value chains disrupted. To support this essential local production, the Ontario Fruit and Vegetable Growers' Association (OFVGA) believes farmers need access to natural gas and compressed natural gas options.

Natural gas expansion to farming and rural communities should be a top priority for infrastructure investment to support on farm production, but also the local services that are critical to getting fresh fruits and vegetables to consumers. OFVGA supports a multi-year expansion plan for rural energy infrastructure, which can lead to increased efficiency of greenhouse vegetable growers, fruit and vegetable storage facilities, and processing operations that add value to Ontario grown fruits and vegetables. The investments in funding support for expansion projects realize immediate and continued direct and indirect economic benefits.

The use of reliable sources of natural gas and the critical need for sources of lower carbon emitting fuels are not mutually exclusive. Attaining carbon sequestration targets means transitioning from fossil to renewable fuels. During the transition, and to make renewable fuel crop production viable, requires compressed and natural gas, as lower-carbon-intense alternatives to propane and diesel fuel. OFVGA believes hydrogen and renewable natural gas fuels will ensure new and existing natural gas assets have long term and strategic value. The OFVGA supports projects underway that are driving future access to renewable sources.

Rural farms are partners with small communities. Combining residential natural gas expansion proposals with outlying farm businesses can increase feasibility for many expansion projects and enable otherwise non-viable projects. Long term growth of a sector should also be considered, accounting for future energy needs in a region and the sector.

OFVGA supports the Ontario Federation of Agriculture's recommendation that the government consider additional criteria to inform the selection for applications for funding consideration. The challenge for



government is not determining the most viable projects, but in combining that criteria with a multi-year vision, looking at strategic projects that in turn, enable more projects, and by encouraging strategic partnerships with farm communities and rural businesses, to increase natural gas connection opportunities for rural and regional Ontario.

The OFVGA appreciates the opportunity to comment on this regulatory posting. We look forward to continuing to support natural gas expansion opportunities for fruit and vegetable farmers and its value chain for a more sustainable local food system. Please contact us should you have any questions about our comments and wish to discuss further.

Sincerely,

A handwritten signature in black ink that reads "Brian H. Gilroy".

Brian Gilroy  
Chair, OFVGA Energy, Property, and Infrastructure Section

Cc:

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

**About the OFVGA:**

The OFVGA is the leading voice for Ontario's fruit and vegetable farmers. Our sector includes more than 3,500 family run farms that employ over 30,000 people directly on-farm. For every on-farm job, it is estimated there are 2.2 jobs created downstream, or approximately 96,000 jobs combined. Fruit and vegetable production drives Ontario's rural and urban economies by generating more than \$4.2 billion in economic activity annually, along with \$600 million in combined tax revenues for all levels of government. Ontario fruit and vegetable farmers compete with global producers for domestic and export markets that demand low cost quality produce. Fruit and vegetable exports from Ontario total over \$1.6 billion, almost half of which originates from the greenhouse vegetable sector.