

March 7, 2022

Vanessa Ieraci  
Transmission Policy, Ministry of Energy  
77 Grenville Street, 6th Floor  
Toronto, ON  
M7A 2C1

Via email [vanessa.ieraci@ontario.ca](mailto:vanessa.ieraci@ontario.ca)  
and the online Environmental Registry of Ontario

Dear Vanessa Ieraci,

**Re: ERO # 019-4926 - Supporting Critical Transmission Infrastructure in Southwestern Ontario**

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. We are a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in legislation that impacts the sustainability and growth of our farm businesses.

Ontario's agri-food sector is a powerhouse for the province. Ontario farms grow and produce more than two hundred farm and food products, fuelling rural communities, driving Ontario's economy, and generating more than 860,000 jobs and over \$47 billion in annual Ontario GDP.

We are pleased to provide comments from an agricultural and rural Ontario perspective on the proposed initiative to support transmission infrastructure in Southwestern Ontario. Our comments pertain to two parts of Ontario's proposed actions.

1. Prioritize certain transmission projects

OFA agrees with the IESO forecast for electricity demand growth in Southwestern Ontario, largely driven by the expanding agricultural greenhouse industry. We understand that the ministry views three projects as priorities and is considering a declaration to require OEB to accept that they are

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in the public interest during Leave to Construct reviews. We agree that these transmission lines are important for the agricultural sector and other industries in the area.

In considering projects in the public interest, we recommend ENERGY, OEB and Hydro One (HONI) continue to work with Ontario's agriculture sector to balance the needs of industry with the concerns of local farm operations impacted along various routes proposed for these projects.

While OFA is not involved in collective bargaining the best deal for landowners (legal representation entering discussions with a project proponent), there have been positive experiences shared with us when farmers were addressed as a group rather than individuals.

OFA works to ensure the most current and transparent information is available to make informed landowner decisions and secure fair compensation. OFA has worked with HONI, other utilities and Ministries to make sure farm interests are considered in landowner agreements and in assessing cropland and crop production damages related to project activities.

For example, we worked with Hydro One to inform their Cropland Out of Production pamphlet, and we published Fact Sheets on Easements and Right-of-Ways to help members weigh their concerns. We support HONI leveraging opportunities to bring fiber optic connectivity to farmers along these three project routes and any transmission or distribution asset works moving forward.

Infrastructure projects are critical to driving Ontario's economy. We support the continuation of processes to engage with impacted landowners, including hosting townhalls, engaging with farm organizations, and providing fair and balanced information to farmers; typically the people impacted by rural powerline routes selected to circumvent more costly urban route options.

## 2. Require Hydro One to undertake early development work on future projects

The Ministry also proposes to expedite preliminary work on two new transmission projects. In the interest of saving Ontario ratepayers unnecessary costs, we support conducting early development work on these lines in concert with the projects you plan to declare as priorities.

Environmental Assessments are regulated for electricity, waste management, or transit projects. Many of these projects impact agriculture, as do transportation, pipeline, and municipal infrastructure projects. Moving project development and operation through environmental impact assessments is an important undertaking.

We continue to stress the need for mandatory Agricultural Impact Assessments (AIA) for projects that have a potential to impact agricultural land or operations including projects under regulated, comprehensive, or streamlined environmental assessment, and any projects exempted from these processes.

AIAs should address the full lifespan of a project, from design, construction, and operation, through to decommissioning. All stages are relevant in evaluating potential environmental and agricultural impacts of a project.

We support initiatives that save time and money while protecting the sustainability of agriculture. Undertaking AIAs ensures the sustainability of farming in Ontario. I look forward to further discussions with the Ministry to see how we can continue to work together to support project



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solutions throughout all of Ontario, meet our growing demand, protect landowner interests, and sustain our farms.

Sincerely,

A handwritten signature in black ink that reads 'Peggy Brekveld' followed by a period. The signature is written in a cursive, flowing style.

Peggy Brekveld  
President

cc: The Honourable Caroline Mulroney, Ontario Minister of Transportation  
Mark Poweska, President and CEO, Hydro One  
OFA Board of Directors