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March 12, 2017.

Attn: Rebecca Tan
Senior Policy Advisor,
Ministry of the Environment and Climate Change,
Climate Change and Environmental Policy Division,
Air Policy Instruments and Programs Design Branch,
77 Wellesley Street West
Floor 10
Ferguson Block,
Toronto, ON
M7A 2T5

Dear Minister,

Re: EBR 012-7923 Discussion Paper: Developing a Modern Renewable Fuel Standard for Gasoline in Ontario

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

As Ontario considers a modern renewable fuel standard for gasoline the social, economic and environmental impacts all need to be carefully considered. While lowering transportation sector greenhouse gas (GHG) emissions is an important goal, the economic impacts must also be weighed in the balance.

The ever-increasing costs for energy from electricity to various fuels in Ontario has put our agricultural industry at a significant competitive disadvantage within the rest of Canada, with the United States and globally. These economic and social impacts for farmers, food processors and other businesses cannot be ignored in the pursuit of reduced GHG emission targets.

For this reason, the CFFO is not in favour of further pressure on the price of gasoline that would result from the proposed five percent reduction of GHG through the introduction of a modern renewable fuel standard. Ontario already has renewable fuel content required for both diesel and gasoline. With the introduction of Cap and Trade, there are further incentives in place to encourage adoption of greater fuel efficiency, and adoption of renewable alternatives.

There is, however, significant opportunity to expand renewable fuels into our transportation fuel mix. Transition to renewable fuels should be done in a way that also builds economic opportunity for Ontarians. A Renewable Fuel Standard should not,

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



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therefore, be based strictly on lifecycle GHG, but also on wider environmental and economic benefits that each different renewable fuel technology offers for Ontario over its lifecycle. Priority should be given to those sources of renewable energy that can be sourced and processed within Ontario allowing the province to replace imports of both biofuels and fossil fuels and become more energy self-sufficient.

It makes sense for Ontario to capitalize on the biofuel opportunities that exist from agricultural residues, and food and animal waste generated in the agri-food system. Growing crops expressly for fuel also has many benefits, however producing food should always be given priority, particularly on prime farmland. Active farmland produces complex environmental and social benefits including healthy soils, water cycling, carbon sequestration, and increased biodiversity, all while also capturing energy from the sun for food and fuel. These should all be considered, including carbon sequestration, in GHG lifecycle analysis of various fuel options.

Ontario should invest into research and development to maximize our benefits from these biofuel opportunities. The Ontario government's investment in the Ethanol Growth Fund was successful in building the ethanol production capacity in the province. Investment in further development of renewable natural gas and cellulosic ethanol as well as ongoing support for ethanol production will benefit the province environmentally and economically.

Current technology for capture of methane from manure storage, and for biodigesters are suited to larger farming operations. Research and development should give particular focus to developing these technologies to a scale that would allow a greater number of farmers to participate in biofuel production from various means.

In summary, the CFFO is not in favour of increased pressure on the price of gasoline from the proposed renewable fuel standard. There is, however, opportunity for the government to support development of biofuel alternatives to gasoline in the province. Focus on biofuels should consider the potential local environmental and economic benefits for Ontario, and should emphasize those solutions that can be produced and processed within the province.

Thank you for this opportunity to provide our input.

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario