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642 Woolwich Street,

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June 19, 2017.

Attn: Chris Duke  
Program Analyst,  
Ministry Agriculture, Food and Rural Affairs,  
Food Safety and Environment Division,  
1 Stone Road West,  
Floor 5 NW,  
Guelph, ON  
N1G 4Y2

Dear Minister,

## **Re: EBR 013-0316 Discussion Paper: Proposed Agrifood Renewable Natural Gas for Transportation Demonstration Program**

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

There is significant opportunity to expand renewable fuels into our transportation fuel mix in Ontario. Transition to renewable fuels should be done in a way that builds economic opportunity for Ontarians. The CFFO encourages government to give priority to those forms 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. The “Proposed Agrifood Renewable Natural Gas for Transportation Demonstration Program” moves in precisely this direction. The CFFO has some specific recommendations for the proposed Demonstration Program.

In particular, the CFFO would like to see focus on finding viable and sustainable economic models to bring greater agrifood renewable natural gas adoption within the transportation sector. As part of this demonstration program, and ongoing research, government should be pushing to increase economic viability for a broader section of farms (based both on size and commodities) to be able to participate in renewable natural gas production. The full range of environmental benefits should be measured in considering the overall value and impact.

As Ontario increasingly adopts renewable fuels 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 social and economic impacts must also be weighed in the balance. Environmental benefits beyond greenhouse gas reduction should also be considered.

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

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expressly for fuel also has many benefits, however producing food should always be given priority, particularly on prime farmland. This is part of considering the social implications of differing agrifood renewable natural gas projects.

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. Any lifecycle analysis of GHG reductions needs to include the carbon sequestration as well as reduction that results from differing methods of producing agrifood renewable natural gas. These should all be considered as part of the social, economic and environmental value produced from these projects.

The Ontario government should invest into research and development to maximize our benefits from biofuel opportunities. The Ontario government's investment in the Ethanol Growth Fund was successful in building the ethanol production capacity in the province. Similar investment will see growth in the capacity and improvement to the technology and business models for agrifood renewable natural gas in transportation. In future, this innovation will benefit renewable fuel adoption in other sectors as well. This will benefit the province environmentally and economically.

Current technologies 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 make them affordable for a greater number of farmers thus maximizing the economic and environmental benefits.

Emphasis on variety within the projects should consider the opportunities each model creates for different types of farms (different commodities and sizes). This includes opportunities for farmers to participate in the providing inputs to the digesters, and opportunities to benefit from the output of digesters.

In summary, it will be important in this program to demonstrate viable economic models for agrifood renewable natural gas, as well as to consider the maximum environmental benefits that can be accrued from this initiative. The program should also seek to maximize the types (size and commodity) of farms that can participate in these projects. Thank you for this opportunity to provide our input.

Sincerely,

Clarence Nywening, President  
Christian Farmers Federation of Ontario