

Feedback Form

LT2-RFP Joint Session, February 22, 2024

Feedback Provided by:

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To promote transparency, feedback submitted will be posted on the LT RFP engagement webpage unless otherwise requested by the sender. If you wish to provide confidential feedback, please mark as "confidential".

Following the February 22, 2024, LT2-RFP joint engagement with Ministry of Municipal Affairs and Housing (MMAH) and Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) webinar, the Independent Electricity System Operator (IESO) is seeking feedback on items discussed during the webinar. The webinar presentation and recording can be accessed from the LT RFP [engagement web page](#).

Please submit feedback to engagement@ieso.ca by **March 7, 2024.**

What are some considerations if certain technology types were limited, or restricted from being developed on Ontario's prime agricultural areas?

We expect that Ontario will fail to meet its procurement targets, if all renewables are banned on (prime) agricultural lands in Ontario.

By restricting development on agricultural lands, projects could generally only be located in Northern Ontario, which would mean we would expect to see three major impacts:

1. Significantly higher costs due to more complex terrain, poorer wind and solar resources than southern and Eastern Ontario; snow load and icing issues which will reduce production; tree clearing and land preparation/grading costs; road improvements; complex/difficult transportation of equipment; labour shortages, etc.

2. Increased environmental impacts. Development on nonagricultural lands create higher risks and larger environmental impacts as they are likely to consist more of lands with higher ecological/biophysical values, such as wetlands and wooded areas which host habitats for birds, bats, amphibians, and other species.

3. Increased pressure on the grid. Projects would be forced into one area, creating reliability and curtailment issues.

We do not believe that wind energy, and/or energy storage development should be restricted on prime agricultural lands, as the footprint is limited and can be easily integrated into existing agricultural practices.

Developers work carefully with landowners to minimize impacts and locate roads, wind turbines, batteries, and associated project components, to avoid issues for future farming use.

Many existing operational wind projects in Ontario are located on agricultural lands and are being actively farmed by satisfied landowners, benefitting from the multiple uses of their lands and the additional income.

We recognize that solar projects have larger impacts on agricultural lands due to its footprint, and therefore, requires more consideration. However, there have been significant advancements in agrivoltaics in recent years, demonstrating the feasibility, benefits, and efficiencies of

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	co-existence, and if solar projects can integrate farming practices into the design, this should also be permitted. See https://agrivoltaicscanada.ca/ for more information.
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Given the limited amount of specialty crop areas in the province, how would diverting or restricting energy projects from these areas impact your ability to develop your energy project?	It would depend on the size of the area being contemplated but if the geographical areas of where specialty crops grown are small, this would likely not have a significant impact.
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What would the impact be if there were requirements to avoid, minimize and mitigate agricultural impacts in prime agricultural areas?	<p>If there was a complete ban of development on prime agricultural lands, this would drastically reduce the ability to develop any renewable projects in southern Ontario and would put the ability of Ontario to meet its energy goals in jeopardy.</p> <p>Northern Ontario is not well suited for solar development due to poor solar resource and terrain, increased snow loads, and the need for tree clearing, which increase impacts to the environment.</p> <p>We believe the best approach is to allow wind and energy storage projects on prime agricultural areas as there are negligible impacts and solar should only be allowed if there is a suitable agrivoltaics strategy in place.</p> <p>We would strongly recommend that this be left to municipalities to decide.</p>
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Based on what you heard today, do you require additional clarity on agriculture land restrictions? Why or why not?	Yes, we require additional clarity. It is unclear if developers can site renewable energy projects on prime agricultural lands or not. It seemed that if the municipality allowed it through local planning rules, then there were no further restrictions, but a clear response is needed.

General Comments/Feedback

We have been developing wind projects on agricultural lands across Canada with negligible impacts on farming for over a decade. The feedback we receive from our farmers, is that the steady and dependable revenues they receive from leasing their lands for renewables, is a significant benefit and allows them to continue to maintain the family farm and is a hedge against volatile crop prices and increasing costs. So, for the farmers, it's a complimentary use – not an obstacle.

We, and all responsible developers, work closely with our landowners to ensure impacts to their normal farming operations are negligible by siting roads and infrastructure in the right locations. As result, the feedback we often get is that they are happy to make use of the improved roads and road entrances that the project creates, as they can also use them for their farming machinery and harvesting.

All of the wind projects we developed on farmlands in Canada, continue to be used as farmland.

We recognise that solar development has a larger impact on farmlands and should be treated differently to wind and energy storage, if they are proposed on prime agricultural lands. We believe implementing innovative practices such as agrivoltaics, can help benefit both the farmers and the developers to co-exist by harnessing the resources while maintaining and/or continuing farming practices on prime agricultural lands.

We believe that a blanket approach of prohibiting renewable development on agricultural lands is not the best solution to siting and that it should be managed between the developer and the local municipality. Given that Municipal Support Resolution (MSR) is required, it will be incumbent upon the developer to demonstrate a suitable plan for siting and mitigation as needed to gain support.

We believe a blanket ban for all technologies on agricultural lands would be catastrophic to Ontario's ability of meeting its future energy goals and would result in higher environmental impacts and significantly increased costs.