



March 27, 2015

Kathy Hering, Senior Policy Analyst  
Ministry of the Environment and Climate Change  
Climate Change and Environmental Policy Division  
Air Policy and Climate Change Branch  
10<sup>th</sup> Floor, 77 Wellesley Street West  
Toronto, Ontario M7A 2T5

Dear Ms. Hering,

Re: *Climate Change Discussion Paper consultations*

The Beef Farmers of Ontario (BFO) appreciates the opportunity to make preliminary comments on the Ministry of the Environment and Climate Change's ***Ontario's Climate Change Discussion Paper: 2015***. BFO represents the 19,000 beef producers in Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development.

In order to truly assess the effects of any proposed carbon pricing system on Ontario's beef industry, more detailed information on the province's long-term climate change strategy and action plan is required. Though more information is required before BFO can fully comment on a carbon pricing model that Ontario beef producers would be willing to support, the following guiding principles outline the needs of Ontario's beef industry:

**Price on Carbon.** The goal of a successful carbon pricing system should be a reduction in global Greenhouse Gas (GHG) emissions while retaining and enhancing a stable economic base, stimulating the development of clean technology and market innovation and fuelling new, low-carbon drivers of economic growth. A carbon tax which applies to all agricultural carbon input purchases and emissions may not be effective in reducing global Greenhouse Gas (GHG) emissions, while having the net effect of shifting jobs and development from Ontario to other jurisdictions.

**Trade Competitiveness and Economic Growth.** Climate change policy should not provide a barrier to appropriate expansion and growth of Ontario agriculture in response to global market demands. The impact of Greenhouse Gas (GHG) emissions is global in scope. Barriers to Ontario agricultural production would likely lead to it being replaced by less carbon-efficient agricultural production systems elsewhere, thus having a net negative impact on global greenhouse gas emissions. The focus should be on improving efficiencies to reduce Greenhouse Gas (GHG) emissions per unit of production, while fostering a viable local food economy. Ontario agriculture also has an important role contributing to the global food supply and is supportive of the Premier's Agri-Food Growth Challenge targets.



**Consultative Process for New or Developing Regulations that Include Regulatory Impact Analysis.** The introduction of any new policies and regulations, including carbon pricing, should be consistent with the Ontario Open for Business Agriculture and Agri-Food Sector Strategy commitment. An inclusive consultative model that actively involves the agriculture and agri-food sector early in the regulatory development process will provide an opportunity for the details of the proposed price-on-carbon system to be tabled, discussed and evaluated in a forum that considers both the benefit and potential effects on the agriculture and agri-food sector.

**Best Practices.** Agriculture is uniquely positioned to benefit from the development and broader adoption of best management practices that improve resource utilization efficiency (e.g. energy, feed conversion, feed quality, rumen enteric fermentation emissions, manure management) resulting in reduced carbon emissions. The agriculture sector is encouraged that the need for systems of innovation to support the development and deployment of low-carbon technologies is recognized.

**Science and Technology.** The complexity of agricultural Greenhouse Gas (GHG) emissions and the opportunities to sequester and increase soil carbon is a challenge. There is a need for continued research to more fully understand and quantify agriculture sector Greenhouse Gas emissions and mitigation options. There remains a great deal of variability in the methods and credibility of carbon footprint and carbon life cycle analysis (LCA) models utilized nationally and internationally.

**Adaption.** Climate change could have an impact on current agricultural production practices. Adaption needs may involve the development of more resilient drainage systems to cope with intense rainfall events, irrigation system infrastructure, improved and more reliable weather forecasting, research to develop climate resistant plant varieties, changes to livestock building design to cope with heat stress and the development and deployment of technology to promote improved water use efficiency.

The Beef Farmers of Ontario would like to thank the Ministry of the Environment and Climate Change for the opportunity to comment on *Ontario's Climate Change Discussion Paper 2015*. We would be pleased to meet with you to discuss the contents of this letter and we look forward to participating in further consultations on this important issue.

Sincerely,



Bob Gordanier  
President

cc: BFO Board of Directors  
Ontario Pork  
Ontario Sheep Marketing Agency  
Grain Farmers of Ontario  
Ontario Federation of Agriculture

