



April 5, 2016

Ms. Rebecca Teare, Policy Advisor
Ministry of Energy
Conservation and Renewable Energy Division
77 Grenville Street, 5th Floor
Toronto, ON M7A 2C1

Dear Ms. Teare,

Re: EBR #012-6904 – Large Building Energy and Water Reporting and Benchmarking

The Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on EBR #012-6904, *Large Building and Water Reporting and Benchmarking*. BFO represents 19,000 beef producers in Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development.

BFO strongly supports the proposed exemption for agricultural operations under requirements to report energy and water use and greenhouse gas (GHG) emissions. The energy profiles for beef and other agricultural operations are fundamentally different than the energy profiles for traditional, large-building manufacturing and retail industries. BFO thanks the Ministry of Energy for recognizing these fundamental differences.

BFO views the decision to exempt agriculture from reporting requirements under new provisions of the *Green Energy Act, 2009* as an alignment with existing policies that recognize agriculture as a unique sector of the economy that requires different considerations than other, more traditional industrial sectors. Exemption as a regulated sector under the Ontario Cap and Trade program is a notable and recent example.

While we are strongly supportive of the proposed exemption, the importance of maintaining this exemption throughout the phase-in period and beyond cannot be understated, regardless of future square footage reporting thresholds. Beef producers already operate in a heavily regulated environment. Future requirements to report energy and water usage would represent a costly, additional and unnecessary regulatory burden for Ontario beef producers.

Energy is a significant financial cost in the production of beef and producers are acutely aware of this fact, given the low margin environment in which they operate. Energy conservation is therefore of paramount importance to our members, and is driven by Best Management Practice information jointly developed by industry and government regarding the efficient and effective use of water and energy.

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The beef industry is also highly export-oriented, with the United States as our largest and most important export market. Allowing public access to cost of production data creates U.S. antidumping investigation risks, which could lead to court action, whether justified or not. Public access to farm energy information also creates privacy and biosecurity concerns for farmers, particularly given the rise in radical animal activist behaviour in Ontario.

BFO would like to thank the Ministry of Energy for recognizing the necessity and importance of an agricultural exemption and for the opportunity to comment on the proposed *Large Building Energy and Water Reporting and Benchmarking* initiative. We would be pleased to meet with you to further discuss our comments.

Sincerely,

A handwritten signature in black ink that reads "Matt Bowman". The signature is fluid and cursive, with the first name "Matt" and last name "Bowman" clearly distinguishable.

Matt Bowman
President

cc: BFO Board of Directors

