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Office of the President
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February 10, 2020

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4

Attention: Board Secretary

Submitted via: Email

Re: Letter of Comment on EB-2019-0159 Procedural Order No. 1

To whom it may concern:

The Ontario Greenhouse Alliance (TOGA) represents approximately 380 farmers responsible for over 4,000 acres of greenhouse crops grown across Ontario. To put the economic contribution of our sector in context, please consider the following key facts:

- Farmgate sales were over \$1.75 billion in 2018
- Direct jobs exceed 19,500 positions – employment is growing
- Exports for major greenhouse products often exceed 50% of total value – ours is a heavily trade dependent sector operating in a global economy

In reviewing the aforementioned procedural order, we are concerned that the proposal to consider upstream and downstream greenhouse gas (GHG) emissions impacts will have unintended consequences that will negatively impact economic growth.

We believe that consideration of such impacts without also considering the additional societal benefits afforded by the project will ultimately stifle development and in the case of our sector, the production of fresh, local food and plants that make a vital contribution to human health and the environment.

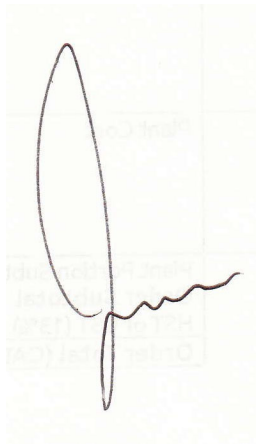
Natural gas is a key crop input for greenhouse farms. Not only does it provide heat to keep the crop growing through the winter months at this latitude, but the many greenhouse farmers capture carbon dioxide off their boiler stacks and supply it to the crop during periods of high growth. Without this addition of carbon dioxide, greenhouse crops would not achieve the yields required to remain competitive.

While we understand the intent behind the proposal, we believe there are existing mechanisms to promote positive behaviors with respect to limiting GHG emissions such as the Federal Carbon Pricing Program and Clean Fuel standards, and provincial level energy efficiency incentive programs.

Looking forward, even if Ontario were to be excluded from the Federal Carbon Pricing Program, the establishment of carbon pricing mechanism would fall under the jurisdiction of the Ontario Ministry of Environment, Conservation and Parks (MECP), and not the Ontario Energy Board. The use of this forum to assess GHG impact is out of scope and will only serve to increase the length and complexity of this and potentially future hearings. Given the Ontario government's focus on Red Tape Reduction and positioning Ontario as Open for Business, we find this proposal is at cross-purposes to these objectives.

We appreciate the opportunity to provide input into this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jan VanderHout". The signature is written on a light-colored, slightly textured background. The letters are cursive and somewhat stylized, with a prominent loop at the end of the last name.

Jan VanderHout
Chair