

January 9, 2025

Ministry of Natural Resources
Public Input Coordinator
Development and Hazard Policy Branch
300 Water Street,
Peterborough, Ontario
K9J 8M5

Sent via email to resources.development@ontario.ca and uploaded to the Environmental Registry of Ontario

To the Public Input Coordinator;

RE: ER-019-9286 Proposed Amendments to the Oil, Gas, and Salt Resources Act

The Ontario Federation of Agriculture (OFA) is pleased to provide comments from the perspective of Ontario's rural agricultural sector, on the proposed amendments meant to mitigate hazardous wells, operations or equipment that could harm people, property or the natural environment.

OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. We are a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. Many of our members live and work in areas directly impacted by activities regulated under the Oil, Gas and Salt Resources (OGSR) Act.

Currently, in situations where an operator is unwilling or unable to address the hazard because of death, insolvency or bankruptcy of an operator, the Ministry of Natural Resources requires the Ministry of Environment Conservation and Parks to initiate the process to take actions to perform work on non-compliant or hazardous wells and associated equipment, without the permission of the operator. **OFA supports the amendments that will now expedite intervention in these circumstances and allow cost recovery by accessing operator financial security.** OFA applauds the Minister for incorporating strong provisions to hold companies accountable for adverse environmental, financial and safety impacts and enabling a faster response in these situations.

OFA recommends the Ministry ensure landowners concerns are considered during any processes that will increase activities under existing and new lease arrangements and specifically address the concerns of those living above oil, gas, and salt resources. This should include working with landowners and other stakeholders to better understand the long-term impacts of ceding personal land rights.

OFA recommends the Ministry ensure well operation proponents conduct Agricultural Impact Assessments prior to any processes that will increase activities under existing and new lease arrangements.

OFA strives to ensure agriculture has a voice in infrastructure policy discussions, and infrastructure design, construction and operation. This is meant to help insure the health, sustainability, and growth of our farm sector. We appreciate this opportunity to present a perspective from the viewpoint of Ontarians living in rural and farm communities.

Sincerely,



Drew Spoelstra
President

cc: Hon. Graydon Smith, Minister of Natural Resources
Hon. Rob Flack, Minister of Agriculture, Food and Agribusiness
Hon. Lisa Thompson, Minister of Rural Affairs
OFA Board of Directors