

January 16, 2026

Client Services and Permissions Branch
Policy and Program Development Section
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Via email: permissions.modernization@ontario.ca

To Whom it May Concern:

Re: ERO 025-1367 – Amending the Renewable Energy Approval regulation to remove certain project types from the process and streamline the review of Natural Heritage Assessments

We are excited to see the proposed REA amendment as per ERO 125-1367 which will streamline the approval process for certain renewable energy projects. However, Oxford County respectfully requests that the proposed exemptions be expanded to include on-farm anaerobic digestion (AD) projects, recognizing that these facilities are an integral part of modern agricultural operations and contribute to both sustainable farm management and local energy generation.

In reviewing the proposed amendment, we firmly believe that on-farm AD has tremendous energy potential that is overburdened by bureaucracy and red tape. Below are recommendations to reduce red tape for Ontario farmers seeking to integrate on-farm AD as a continuation of their on-farm process and as a means to generate more energy to power Ontario as the most competitive economy in the G7.

[Amendment to Ontario Regulation 359/09: Removal of REA requirements for certain project types](#)

We believe that Class 1 and Class 2 AD should be included for consideration under this proposal, as AD is an established and integral component of modern farm operations – one that farmers increasingly rely on to sustainably manage agricultural waste and operate viably. Moreover, the environmental impacts of electricity generation via anaerobic digestion create a net positive and are already addressed via existing legislation (e.g. Nutrient Management Act, Planning Act). Exempting Class 1 and Class 2 AD facilities would reduce the regulatory duplication for farmers and reflect the practical reality that Ontario’s extensive agricultural operations are a logical and efficient location for on-farm energy generation that ultimately contributes to provincial supply.

[Streamlining the process via the Provincial Planning Statement](#)

Rightfully, non-agricultural energy generation in prime agricultural areas is not supported by the Province. However, we believe that Class 1 and Class 2 AD facilities – as an inherent continuation of farming – should be explicitly identified as an example of “agricultural use” in

provincial guidance supporting the implementation of the Provincial Planning Statement (2024), and therefore protected and promoted in prime agricultural areas across municipalities in Ontario.

This common-sense approach reflects the reality of these on-farm AD facilities in that they can only be appropriately located on farms, where the agricultural feedstocks, infrastructure, and operations already exist. Recognizing AD as an agricultural use would ensure municipalities can confidently support and permit on-farm AD without excessive local planning approvals, consistent with approaches already adopted by municipalities such as Oxford via its Official Plan.

Furthermore, explicitly defining on-farm AD as “agricultural use” may afford these facilities greater protection from nuisance complaints (e.g. odour, noise, flies) as “normal farm practices” under the *Farming and Food Production Protection Act, 1998*, recognizing that Class 1 and Class 2 AD facilities are, in fact, normal farm practices and often demonstrably reduce many of the cited nuisances associated with on-farm manure management.

This exemption would also support a fairer long-term procurement process (e.g. IESO’s LT2 Procurement) by ensuring that agricultural operations are not unjustly penalized for being located where they logically and operationally belong – within agricultural areas.

[Designating a single ministry as the lead approval authority](#)

Currently, AD is subject to a multi-ministry approval process that doesn’t align with this government’s otherwise streamlined approach to projects. This leads to a fragmented, often overly complex procedure that prevents on-farm AD projects from coming to fruition. To ease this burden, we recommend that the Ministry of Energy become the lead for AD approvals to provide clear accountability, reduce duplication and ensure alignment with policy, legislation, procurement and provincial energy objectives.

Thank you for considering our submission. We appreciate the opportunity to provide input through this ERO posting and respectfully ask that our feedback be carefully considered as the Province moves forward.

Sincerely,



Chelsea Martin, Coordinator of Community Environmental Sustainability
Oxford County

Cc: Honourable Stephen Lecce, Minister of Energy and Mines

Honourable Sam Oosterhoff, Associate Minister of Energy-Intensive Industries

Oxford County Community Planning

Sarah Hamulecki, Manager of Strategic Initiatives and Intergovernmental Relations