



September 8, 2026

The Honourable Stephen Lecce
Minister of Energy and Mines
10th Floor
77 Grenville St.
Toronto, ON M7A 2C1

RE: ERO #026-0853: Economic and Strategic Assessment Framework for New Data Centres

Dear Minister Lecce,

On behalf of the Ontario Farmland Trust (OFT), thank you for the opportunity to provide feedback regarding ERO Posting 026-0853 on the “Economic and Strategic Assessment Framework for New Data Centres”. The framework establishes three pillars to assess data centres on their economic and strategic value. These pillars are to advance economic development; protect data security and digital sovereignty; and invest in communities and earn public trust. OFT commends the approach to establish a regulatory framework on this matter. However, the framework as proposed does not address one of our most critical resources, farmland. In response, OFT has proposed recommendations to address this gap, to ensure farmland protection and preservation is addressed moving forward.

Farmland Protection

The province has acknowledged a substantial land inventory that could accommodate the rapid growth in data centre development. However, it is important to consider the type of land that is used to accommodate this growth. Data centres can be accommodated in a variety of geographic settings and should therefore be directed away from agricultural lands, particularly where suitable alternatives exist. Given their reliance on significant infrastructure such as fibre optic infrastructure and servicing capacity, data centres are well suited to lands that provide the needed infrastructure support. Farmland loss is a national issue and according to the 2021 Census of Agriculture data, Ontario alone loses approximately 319 acres of farmland every day. Between 2016 and 2021, Canada experienced a 3.2% total decrease in farm area¹. The rate of loss, driven by urban sprawl, infrastructure development, and aggregate expansion is unsustainable.

¹ <https://ofa.on.ca/newsroom/ontario-farmland-under-intense-pressure>

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Farmland is a finite resource that comprises less than 5% of Ontario's land base yet supports the agri-food sector employing over 871,000 Ontarians and contributing more than \$51 billion annually to the province's GDP². Everyone relies on agriculture in some form or another. Therefore the loss of farmland impacts not only our access to quality local food, but also puts jobs at risk and impacts the economic resiliency of these markets. These lands are not just resources for Canada but also serve critical natural and cultural landscapes that are increasingly at risk.

Recognizing the significant economic role of farmland and agriculture, food and agribusiness in Ontario, a stronger mandate must be made to ensure that data centre development does not occur on farmland. OFT suggests that the Ministry of Energy and Mines look to incorporate a resource-protection component, for land and water, which are needed to grow our food, fuel and fibre into the proposed pillars that could assess, but is not limited to, the following:

1. Prioritizing brownfield, commercial or industrial sites and prohibiting the locating data centers on agricultural land.
 - a. Communities maintaining established urban areas with appropriate infrastructure capacity and limited agricultural activity due to their climate and terrain could also offer suitable locations for data centre development, providing opportunities to support economic growth while minimizing pressure on productive farmland.
2. Prioritizing locating closer to existing urban networks for ease of services. This limits the potential fragmentation of large swaths of agricultural land that would otherwise be used to establish a data centre but also to connect to existing infrastructure that may be located far away.
3. Protecting water supply resources by establishing mandatory thresholds. Data centres can consume high volumes of water daily. It is critical to protect existing aquifers, municipal wells, groundwater resources and designated source water protection areas for not only public health but also for its contributions to irrigation and livestock operations.
4. Balancing energy demands across all industries to ensure that data centres do not take precedence over the demands of energy intensive farming operations (e.g., food processing facilities).

² www.ontario.ca/page/2025-local-food-report



5. Establish and maintain firm local land use planning authority so that data centres align with existing agricultural official plan policies and zoning, and other protections that may be in place.

About the Ontario Farmland Trust

OFT is a charitable, not-for-profit organization dedicated to protecting Ontario's farmlands and associated agricultural, natural and cultural landscapes. We do this through direct land securement, stewardship, research and policy advocacy to ensure it remains available for agriculture and community benefit in perpetuity.

Since its founding, OFT has worked with farmers, landowners, municipalities, conservation organizations, and governments to:

- Secure conservation easements on farmland
- Protect working agricultural landscapes
- Support sustainable agriculture
- Provide land access opportunities for new farmers
- Promote farmland stewardship and education

Conclusion

In conclusion, OFT emphasizes the importance of integrating farmland protection into the proposed pillars developed by the Ministry of Energy and Mines, while prioritizing development opportunities in areas with compatible and supportive infrastructure outside of agricultural lands, thereby minimizing impacts on productive farmland. OFT thanks the Ministry of Energy and Mines for the opportunity to provide comments on ERO-026-0853. I remain available for further discussion.

Sincerely,

Martin Straathof, MSc
Executive Director
Ontario Farmland Trust

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