
ALTO HSR CITIZEN RESEARCH INITIATIVE

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Five Hundred Farms

ALTO's agricultural commitments measured against the public demands of Canada's farm associations

On May 2, 2026, ALTO chief executive Martin Imbleau publicly estimated that approximately 1,700 properties would be acquired on the Ottawa–Montreal first segment — the initial phase of construction within the broader 1,000 km Toronto–Quebec City corridor — of which approximately forty per cent, roughly 500, would be farmland. ALTO has not yet disclosed comparable figures for the remainder of the corridor. Land acquisition on this first segment is to begin in late 2026 or early 2027. This brief takes the major Canadian farm associations' published demands, sets them beside ALTO's published agricultural commitments, and asks a single question: how do they compare?

Executive Summary

The Ontario Federation of Agriculture, l'Union des producteurs agricoles, the Canadian Federation of Agriculture, the Beef Farmers of Ontario, and the National Farmers Union have all issued formal positions on the ALTO high-speed rail project between February and April 2026. Each position contains specific, public, citable demands. ALTO has now published its Property Acquisition Process and Agricultural Land pages, which set out commitments for engaging with affected agricultural property owners.

This brief compares the two records, demand by demand, against ALTO's published commitments. The pattern is consistent across the four associations whose demands are operational rather than structural:

- **One area of substantive alignment:** ALTO's tile drainage commitments respond meaningfully to the OFA, UPA, CFA, and BFO concerns on this point. This is the strongest area of agreement between ALTO's framework and the associations' demands.
- **Three areas of partial alignment:** compensation reflects market value plus agricultural and business losses but not the going-concern recognition the associations have asked for;

appraisal-date neutrality on project-induced devaluation is a real concession; ALTO's commitment to cover owners' independent appraisal and legal costs is meaningful.

- **Five areas where the associations' specific demands are not met:** independent agricultural impact assessment before route selection; binding farm-access guarantees with minimum dimensions and spacing; protection of all actively farmed lands rather than only prime agricultural classifications; recognition that a fenced, walled, level-crossing-free corridor is a more permanent and significant impact than a highway or transmission line; and the four associations' shared call for a project pause to allow proper assessment.

The National Farmers Union's position differs from the others in being structural rather than property-level. Its three concerns — the absence of a fully-costed plan; the public-private-partnership delivery model; and the absence of complementary public transportation infrastructure — are not addressed in ALTO's published acquisition framework. They are not addressable through that framework, because they concern the project as a whole.

The 500-farm figure changes how this comparison reads. Until May 2, ALTO had been able to characterize agricultural concerns as premature pending corridor selection. ALTO's chief executive has now estimated approximately 500 farm properties on the Ottawa–Montreal first segment alone, with comparable figures for the remainder of the corridor still to be disclosed. The agricultural impact is no longer hypothetical at the level of national-scale numbers; only at the level of which 500 farms — and how many more across the rest of the network.

Two contextual findings frame the demand-by-demand comparison that follows. The High-Speed Rail Network Act, enacted as Division 1 of Part 5 of Bill C-15 and given royal assent on March 26, 2026, modifies the standard federal expropriation regime for these acquisitions in four specific ways. And the most-cited academic survey of public support for the project — the Transportation Research at McGill corridorwide study (Zhang, Negm, El-Geneidy, 2025) — did not sample the rural communities along the corridor whose land would be acquired. The detail is set out in the next section.

The Footprint: What 500 Farms Means

The May 2, 2026 disclosure is the first public quantification of the project's agricultural footprint by ALTO itself, given in an interview with Andrew Pinsent published on Substack and aired on News Talk 580 CFRA. Three days later, Radio-Canada's Mathieu Berger reported the same figures with a clarification on geographic scope: the 1,700 properties / 500 farms estimate applies specifically to the Ottawa–Montreal first segment, not to the full 1,000 km Toronto–Quebec City corridor. The Pinsent interview also confirmed that land acquisition on this first segment will begin in late 2026 or early 2027, ahead of the 2029 construction start. ALTO's chief executive directly confirmed that some expropriation will be required. ALTO has not yet disclosed comparable property or farm counts for the remainder of the corridor (Ottawa–Peterborough–Toronto, and

Montreal–Trois-Rivières–Quebec City); the agricultural footprint of the full network is therefore expected to be substantially larger than the figures above.

What the figure means in operational terms

Five hundred farms on the Ottawa–Montreal first segment alone is not a small number for the affected agricultural communities. The Ontario Federation of Agriculture represents 38,000 farm families across Ontario; l'Union des producteurs agricoles represents 42,000 producers and 163,000 forest landowners in Quebec; the Canadian Federation of Agriculture represents the federated provincial federations across Canada; the Beef Farmers of Ontario, the National Farmers Union, and other commodity and policy organizations each represent specific membership constituencies. As a percentage of the national or provincial farm population, 500 properties is a small share. As a count of farms in the specific geographic clusters along the proposed first segment, it is substantial — concentrated along the Ottawa–Montreal route through eastern Ontario and the agricultural regions of Quebec immediately east of the Ottawa River. The agricultural footprint of subsequent segments — Ottawa–Peterborough–Toronto, and Montreal–Trois-Rivières–Quebec City — has not been publicly quantified by ALTO; the cumulative total will be substantially larger than five hundred farms once the full network is mapped.

Five hundred farm properties also represents a structural footprint at the landscape scale. With a 60-metre fenced right-of-way between three-metre security walls, no level crossings, and the engineering requirement that any tens-of-metres alignment adjustment requires approximately seven kilometres of straightening to recover, the corridor's geometry is highly constrained. Five hundred farms means roughly five hundred site-specific severance, access, and drainage problems to solve, each of them shaped by the local topography, the layout of the existing farm operation, and the position of the rail alignment relative to active fields, laneways, water sources, and farm buildings.

Acquisition timeline

ALTO's published acquisition timeline now compresses what is operationally possible between corridor narrowing and acquisition. The corridor for the Ottawa–Montreal segment is to be narrowed from approximately ten kilometres wide to approximately sixty metres in autumn 2026. Formal letters to property owners affected by the narrowed corridor will be sent before the narrowed corridor is publicly disclosed. Land acquisition begins in late 2026 or early 2027. Construction begins in 2029. By the time agricultural impact assessment, mitigation framework development, and binding farm-access guarantees would have to be in place to meaningfully precede acquisition, the corridor will already be selected. Substantive change to the alignment will, by ALTO's own engineering disclosure, no longer be possible at the metre or property scale once that selection is made.

The Procedural Context: A Different Regime Applies to These 500 Farms

The 500 farm properties on the Ottawa–Montreal first segment do not sit within the standard federal expropriation regime that applies to other federal land acquisitions. On March 26, 2026 — 29 days before the ALTO consultation deadline of April 24, 2026 — the Budget Implementation Act, 2025, No. 1 (Bill C-15) received royal assent. Division 1 of Part 5 of that Act enacts the High-Speed Rail Network Act (HSRN Act), which establishes a project-specific statutory framework for the Toronto–Quebec City corridor and substantially modifies the procedural rights of affected landowners.

What the HSRN Act changes for these 500 farms

Four operative provisions of the HSRN Act materially differ from the standard Expropriation Act regime that would otherwise apply:

- **Section 17(2) — No required attempt to purchase.** Under section 4.1 of the standard Expropriation Act, the Crown must generally attempt to negotiate a purchase before resorting to expropriation. The HSRN Act removes this precondition for any “interest or right required for the high-speed rail network.” The Crown may proceed directly to expropriation without first attempting to buy the land.
- **Section 17(3) — Ministerial discretion foreclosed.** The appropriate Minister “is deemed to be of the opinion” that the land is required for a public work, and “must” expropriate. The standard public-purpose determination is statutorily presumed rather than weighed on the facts.
- **Sections 18(1) and 18(2) — Public hearing process removed.** Sections 8, 9, 10 and 11 of the Expropriation Act do not apply. The right to a public hearing before a hearing officer when an objection to expropriation is filed is removed. Affected owners retain a 30-day window to file a written objection under section 21 of the HSRN Act, but no hearing — no oral testimony, no cross-examination of the Crown’s evidence, no public record of the objection process.
- **Section 23 — Market value exclusion.** Increases in value resulting from work undertaken after a prohibition-on-work notice has been registered are excluded from compensation. Owners who improve their land between notice and expropriation cannot recover the value of those improvements.

The Standing Senate Committee on Transport and Communications, in its February 12, 2026 report on the relevant divisions of Bill C-15, recorded that “some witnesses highlighted the significant expropriation powers granted to the federal government as part of the HSR project, in particular emphasizing the removal of the public hearing process set out in the Expropriation Act.”

The combined effect is that the 500 farms on the Ottawa–Montreal first segment will be expropriated under a more constrained procedural regime than would apply to any other federal land acquisition outside the HSR corridor. The framework ALTO has published — and against which this brief measures the agricultural associations’ demands — operates within this statutory context. The associations’ calls for independent assessment and meaningful consultation are made by communities whose standard procedural rights have already been narrowed by federal statute.

The empirical gap

The most-cited academic study of public support for the project — High-Speed Rail in Canada: Insights from a corridorwide survey and a financial analysis, published by Transportation Research at McGill (Zhang, Negm, El-Geneidy, 2025) — provides the headline finding that nearly 90 per cent of respondents perceive substantial benefits for Canada’s economy, international image, tourism, environment, and home regions’ growth. The figure has been cited as evidence of broad public support for the project.

The McGill survey did not, however, sample the corridor landowners whose property would be acquired. Recruitment was conducted in October 2025 via paid advertisements on Facebook and Instagram targeting users within six Census Metropolitan Areas: Toronto, Montréal, Ottawa-Gatineau, Québec City, Trois-Rivières, and Peterborough. The survey did not sample the rural and small-town communities between these metropolitan areas — including the communities on the Ottawa–Montreal first segment where ALTO has now estimated 500 farms will be acquired. The 89 per cent benefits perception is a metropolitan-area finding; it does not speak for the people whose land would be taken.

The same study records that even among its metropolitan-area respondents, around 30 per cent were moderately or extremely concerned about land acquisition and impacts on natural habitats. That concern figure, in turn, is generated from a sample that excludes the populations most directly exposed to those impacts.

The combined picture

The 500 farms on the Ottawa–Montreal first segment face a statutory regime that strips standard procedural protections, and an academic public-opinion record that was built without consulting them. The agricultural associations’ demands documented in the sections that follow — for independent impact assessment, binding crossing specifications, broader land-classification scope, and a project pause — are made in this context. They are demands made on behalf of communities that have been legislatively expedited and empirically unrepresented.

ALTO's Published Agricultural Framework

ALTO has now published, in two pages, the framework it intends to use for engagement with affected agricultural property owners. The Property Acquisition Process page sets out a four-step process that applies to all property acquisitions: identification of required properties, direct communication with property owners, negotiations, and completion of the transaction. The Agricultural Land page sets out the elements specific to working with the agricultural community.

The published commitments worth recording are these. On compensation: independent professional appraisals at the time of negotiation, with appraisal values explicitly excluding any reduction or appreciation in value caused by the project itself or by prior announcement of the project; market value plus agricultural and business losses; relocation costs where required; reasonable third-party costs covered by ALTO, including independent appraisal and legal fees. On infrastructure: pre-construction inspection of existing tile drainage systems with documentation of pre-construction conditions, repair or replacement of damage caused during construction, restoration of drainage function to pre-construction conditions, and replacement infrastructure at ALTO's cost where changes are required. Topsoil to be stripped, stored, and replaced separately from subsoil, with practices informed by agricultural stakeholders and required in construction contracts. Three-metre security fencing along the future tracks, both temporary during construction (for livestock containment) and permanent before construction completion. On crossings: grade-separated overpasses and underpasses for people, vehicles, animals, and equipment, plus a parallel access road shareable with farmers; the long-term maintenance approach for grade-separated crossing structures is, in ALTO's own words, still being developed. On governance: an agricultural land trust under consideration as one approach to community benefits; collaboration agreements with associations under exploration.

These commitments represent a meaningful procedural advance for ALTO. Before the consultation closed, the project had no written, public-facing acquisition framework. Owners and stakeholders had no document to point to. The framework now exists. The question this brief examines is whether the framework, as published, addresses what the major farm associations have publicly asked for.

Comparison: Ontario Federation of Agriculture and Union des producteurs agricoles

On February 27, 2026, the Ontario Federation of Agriculture and l'Union des producteurs agricoles issued a joint press release calling for an immediate suspension of the ALTO project. The release identified five operational demands directed to provincial and federal governments and to ALTO. OFA represents 38,000 farm families across Ontario; UPA represents 42,000 agricultural producers and 163,000 forest landowners across Quebec. Together they represent the agricultural producer community of the corridor's two provinces.

THE ASSOCIATION'S DEMAND	ALTO'S PUBLISHED COMMITMENT
<p>1. Stay out of prime agricultural areas. OFA describes Ontario's farmland as a strategic provincial and national asset whose highest and best use is agriculture; the agriculture and agri-food sector contributes \$51 billion annually to the Ontario economy and employs about ten per cent of the provincial work force. The proposed alignment is currently planned through some of the most productive farmland in Ontario and Quebec.</p>	<p>ALTO's published framework contains no commitment to stay out of prime agricultural areas. ALTO's chief executive's May 2 estimate of approximately 500 farm properties on the Ottawa–Montreal first segment alone confirms that the alignment crosses substantial agricultural land. The framework references following existing property limits where possible, but this is described as a goal rather than a binding commitment, and the engineering constraints (60-metre right-of-way, 320 km/h alignment geometry, 7-km straightening recovery) limit how much this goal can be honoured in practice.</p>
<p>STATUS: NOT MET</p>	
<p>2. Avoid breaking farms into smaller pieces; keep fields and farm operations whole. Severance — the bisection of a farm by the rail corridor with parts of the operation on each side — creates operational, drainage, access, and biosecurity problems that compound over the life of the farm.</p>	<p>Aspirational language only. ALTO's chief executive has stated publicly that ALTO will try to follow the existing limits of properties. There is no binding commitment to keep farm operations whole, no guarantee that severance will be avoided, and no compensation mechanism specific to severance impacts beyond the general agricultural-loss provision. The 60-metre fenced corridor with three-metre walls and no level crossings makes whole-farm preservation extremely difficult to deliver wherever the alignment crosses contiguous farm parcels.</p>
<p>STATUS: NOT MEANINGFULLY MET</p>	
<p>3. Protect farm drainage systems essential for crop production. Tile drainage represents a significant long-term investment for farms; disruption affects both immediate productivity and long-term land value.</p>	<p>Substantively addressed in the published framework. ALTO commits to pre-construction inspection of existing drainage systems with documentation of pre-construction conditions, repair of any damage caused during construction, restoration of drainage function to pre-construction conditions, and installation of replacement infrastructure at ALTO's cost where changes are required. Temporary measures or compensation may apply during construction if drainage is affected. This is the closest match between an OFA / UPA demand and an ALTO</p>

THE ASSOCIATION'S DEMAND	ALTO'S PUBLISHED COMMITMENT
	<p>commitment in the published framework. Enforcement during construction remains the operational test.</p>
<p>STATUS: SUBSTANTIVELY ADDRESSED</p>	
<p>4. Address farmers' concerns about construction impacts and ongoing costs. Includes fencing, and the building, upgrading, and long-term maintenance of safe farm crossings for equipment and livestock.</p>	<p>Partially addressed; the binding-specification demands are not met. On fencing: ALTO commits to install and maintain three-metre security fencing along the future tracks; temporary fencing during construction; permanent fencing before construction completion. On crossings: ALTO references grade-separated overpasses and underpasses for people, vehicles, animals, and equipment, plus a parallel access road shareable with farmers. ALTO has not committed to crossing spacing standards, minimum dimensions, or any binding-specification requirement on crossings. The long-term maintenance approach for grade-separated crossing structures is, in ALTO's own published words, still being developed.</p>
<p>STATUS: PARTIALLY ADDRESSED</p>	
<p>5. Ensure agricultural impact assessments are independent, thorough, and publicly available. Without independent assessment, the operational implications of the corridor for agricultural production cannot be evaluated by farmers, by regulators, or by the public.</p>	<p>No commitment in the published framework. ALTO's published sequence is route first (corridor narrowed in autumn 2026), then letters to identified owners, then negotiations. There is no commitment to commission, complete, or publish independent agricultural impact assessments before the corridor is narrowed. There is no specification of who would conduct any agricultural impact assessment, what standards it would apply, or how its findings would feed into route refinement decisions. The federal Impact Assessment Act process will provide one set of environmental and social assessments, but agricultural-specific independent impact assessment is not committed in the framework.</p>
<p>STATUS: NOT MET</p>	

Comparison: Canadian Federation of Agriculture

On February 25, 2026, the Canadian Federation of Agriculture passed a resolution at its Annual General Meeting urging the federal government to immediately halt the ALTO project to allow for a thorough economic, social, and environmental impact assessment and meaningful consultation with affected agricultural, forestry, and rural communities. The resolution was put forward by UPA President General Martin Caron and seconded by OFA President Drew Spoelstra. CFA is the federation of federations representing Canadian agriculture at the national level.

The resolution sets out three operative requirements:

THE ASSOCIATION'S DEMAND	ALTO'S PUBLISHED COMMITMENT
<p>1. Halt the project to allow for a thorough economic, social, and environmental impact assessment and meaningful consultation. The resolution conditions any subsequent agricultural protections on the prior assessment of whether the project itself should proceed in the proposed form.</p>	<p>Not met. The project is proceeding to corridor narrowing in autumn 2026, with land acquisition on the Ottawa–Montreal segment to begin in late 2026 or early 2027. The published \$60–90 billion cost figure has been characterized by ALTO's chief executive (May 2 interview) as a working assumption rather than a cost estimate, with reliable cost estimates expected only in 2027 or 2028 after detailed engineering follows alignment selection. The federal Impact Assessment Act process will produce one set of environmental assessments, but the project is not being halted for that work to be completed before route selection.</p>
STATUS: NOT MET	
<p>2. If the project ultimately proceeds, properly sized agricultural and forestry crossings of minimum 10 metres. The 10-metre figure is specified in the resolution as the minimum that allows modern agricultural equipment, livestock, and forestry vehicles to cross safely with appropriate clearances.</p>	<p>Not met as a binding specification. ALTO's published framework references grade-separated overpasses and underpasses for people, vehicles, animals, and equipment, but does not commit to a minimum crossing dimension. The 10-metre minimum from the CFA resolution is not present in the framework. The long-term maintenance approach for grade-separated crossing structures is, in ALTO's own words, still being developed.</p>
STATUS: NOT MET	
<p>3. Fair, proportional compensation reflecting the permanent and more significant impact of</p>	<p>Partially addressed; the comparative recognition is absent. ALTO commits to</p>

THE ASSOCIATION'S DEMAND	ALTO'S PUBLISHED COMMITMENT
<p>the rail corridor compared to highways or transmission lines. The recognition that HSR's impact is permanent and more significant than other linear infrastructure is the analytical foundation for the proportionality demand. The corridor will be fenced on both sides with three-metre walls, with no level crossings, in perpetuity.</p>	<p>compensation including market value, agricultural losses, business losses, relocation costs, and third-party costs. The recognition that HSR's permanent impact is more significant than highways or transmission lines is not present in the framework. ALTO's chief executive has compared the project to historical highway construction (May 2 interview), explicitly invoking the framing the CFA resolution rejects. Compensation is structured as for major linear infrastructure, not as for a more permanent or significant category of impact.</p>
<p>STATUS: PARTIALLY ADDRESSED</p>	

Comparison: Beef Farmers of Ontario

On March 3, 2026, the Beef Farmers of Ontario formally endorsed the OFA / UPA position and called on the federal government and the Minister of Transport to immediately halt the ALTO project. BFO members voted strongly in favour of a resolution at the BFO Annual General Meeting on February 19, 2026 calling on BFO to formally oppose the project. The BFO statement adopts the OFA / UPA five-point demand list and adds one specific BFO requirement.

THE ASSOCIATION'S DEMAND	ALTO'S PUBLISHED COMMITMENT
<p>BFO's additional demand: Protect all actively farmed lands, not only prime agricultural classifications. BFO writes that no lands currently in agricultural production should be impacted by the project — including marginal lands essential to livestock and forage production — unless comprehensive mitigation strategies, properly designed agricultural accommodations, and compensation that fully reflects both immediate and long-term operational impacts are secured in advance. Beef operations require contiguous land bases including pasture, hay ground, and grazing lands. Marginal lands by official classification often play essential operational roles in livestock and forage production.</p>	<p>Not addressed. ALTO's published framework does not differentiate between land classifications when describing acquisition. The 500-farm figure represents total agricultural property acquisitions, not categorized by classification. There is no commitment to broaden protection beyond prime agricultural land, no mechanism to recognize marginal-classification lands as operationally essential to livestock or forage production, and no guarantee that compensation will reflect the operational role of such lands rather than their tax or zoning classification.</p>

THE ASSOCIATION'S DEMAND	ALTO'S PUBLISHED COMMITMENT
STATUS: NOT MET	

BFO's additional demand sharpens the OFA / UPA list by requiring that protections apply to all actively farmed lands — pasture, hay ground, and grazing lands — and not only to lands meeting the formal prime agricultural classification standards. For livestock-based operations in particular, this distinction is operational rather than rhetorical: marginal-classification lands often carry the forage and pasture function that makes the rest of the operation viable. The framework's silence on this distinction means that BFO members cannot evaluate whether their operations would be protected by the published commitments.

Comparison: National Farmers Union

The National Farmers Union has issued multiple statements on the ALTO project, including a national media release titled “Alto High Speed Rail: The Wrong Project, in the Wrong Way, at the Wrong Time” and an NFU-Ontario policy position dated March 2026. NFU's position differs from those of OFA, UPA, CFA, and BFO in being structural rather than property-level. NFU does not focus on the operational details of acquisition, severance, or crossings; instead, it raises three concerns about the project as a whole. National Farmers Union vice-president of policy Phil Mount has additionally been quoted in The Globe and Mail (May 1, 2026) characterizing ALTO's compensation framework as empty reassurances aimed at urban constituents seeking assurance that affected farmers will be treated right.

THE ASSOCIATION'S DEMAND	ALTO'S PUBLISHED COMMITMENT
<p>1. Transparency of the project's underlying business case. NFU writes that ALTO has wrapped up its consultation process without releasing a feasibility study or business plan, and characterizes ALTO's 2025 Explanatory Document as a marketing brochure rather than a substantive document. NFU notes that fully costed plans for HSR projects in 1995 and 2011 were rejected by parliamentarians once the numbers were published.</p>	<p>The published framework does not address this concern, and the May 2 disclosure compounds it. ALTO has not released a feasibility study or business plan. ALTO's chief executive has now publicly characterized the published \$60–90 billion cost figure as a working assumption rather than a cost estimate, with reliable cost estimates to follow detailed engineering in 2027 or 2028 — that is, after the corridor is selected. The federal benefit claims that depend on a cost figure (notably \$35 billion in GDP impact and 51,000 construction jobs) inherit the working-assumption status.</p>
STATUS: NOT ADDRESSED	

THE ASSOCIATION'S DEMAND	ALTO'S PUBLISHED COMMITMENT
<p>2. The public-private-partnership delivery model. NFU characterizes the partnership between ALTO (a Crown corporation) and Cadence (a multinational consortium including AtkinsRéalis, formerly SNC-Lavalin) as a delivery structure that severely limits public oversight and that, in the event of cost overruns, places taxpayers as the only party held accountable. NFU contrasts this with discrete private contracts for specific pieces of work with clearly-defined timelines and budgets.</p>	<p>Not addressed. The acquisition framework does not speak to the project's overall delivery model. Whether the framework itself can be enforced as committed depends on contractual mechanisms and oversight structures that are outside the scope of the framework's published text.</p>
<p>STATUS: NOT ADDRESSED</p>	
<p>3. The absence of complementary public transportation infrastructure. NFU argues that successful HSR networks in other jurisdictions rely on a strong foundation of pre-existing complementary public transportation. Canada lacks that foundation: VIA ridership at approximately four million annually compared with the 1920s peak of fifty-one million; commuter mode share dominated by private vehicles in Toronto, Montreal, and Ottawa; underdeveloped urban transit at the corridor's endpoints. NFU concludes that without that foundation, the projected ridership and emissions reductions will not materialize.</p>	<p>Not addressable through the acquisition framework. The published framework concerns property acquisition and engagement with agricultural producers. It does not speak to the broader transit-policy questions NFU raises. These are project-level rather than acquisition-level questions, and the framework neither answers nor purports to answer them.</p>
<p>STATUS: NOT ADDRESSED</p>	

NFU's structural objections occupy a different analytical register from the OFA / UPA / CFA / BFO operational demands. NFU does not say that ALTO's compensation should be higher or that crossings should be wider; it says that the project as currently scoped should not proceed. ALTO's published acquisition framework is therefore not the right document against which to measure the NFU position. The NFU position is, in its own terms, a position on the project itself — one that the May 2 working-assumption disclosure substantially reinforces.

Cross-Cutting Findings

Across the four associations whose demands are operational rather than structural — OFA, UPA, CFA, and BFO — five patterns emerge.

One area of substantive alignment

Tile drainage is the only demand on which ALTO's published framework substantively meets what the associations have asked for. Pre-construction inspection, repair-or-replace during construction, restoration to pre-construction conditions, and replacement infrastructure at ALTO's cost where changes are required — these commitments respond directly and operationally to the OFA / UPA / CFA / BFO concern that drainage protection be guaranteed. The remaining test is enforcement during construction, but the published commitment is real.

The binding-specification gap

On the questions where the associations have asked for binding specifications — minimum 10-metre crossings (CFA), spacing standards, defined long-term maintenance commitments — ALTO's published framework speaks in qualitative terms (grade-separated overpasses and underpasses, parallel access road shareable with farmers) without quantification. Imbleau's May 2 acknowledgement that the long-term maintenance approach for grade-separated crossing structures is still being developed confirms the gap. Specifications that have not been committed at the framework stage will be very difficult to introduce after corridor selection, given the engineering constraint that alignment cannot be meaningfully moved at fine scales after that decision.

The independent-assessment absence

OFA and UPA's fifth demand — that agricultural impact assessments be independent, thorough, and publicly available — is shared by CFA's halt-for-assessment resolution, by BFO's endorsement, and by the broader agricultural-protection literature. ALTO's framework contains no commitment on independent agricultural impact assessment. The federal Impact Assessment Act process will produce environmental assessments, but agricultural-specific independent assessment with the methodology, scope, and timeline the associations have asked for is not committed. The route-first sequence forecloses the possibility of an independent assessment informing corridor selection.

The highway-comparison framing

The CFA resolution's compensation language calls for fair, proportional compensation reflecting the permanent and more significant impact of the rail corridor compared to highways or transmission lines. ALTO's chief executive has, on the public record, invoked exactly the comparison the resolution rejects: the framing that the project must proceed in the same way large highways have been built in the past (May 2 interview). The comparison is not merely rhetorical: a fenced 60-metre right-of-way with three-metre security walls and no level crossings creates a more permanent severance than a highway of comparable width, where level crossings remain possible and where the right-of-way edge is not fenced as an absolute barrier. The CFA's compensation framing rests on this distinction. ALTO's framing rejects it.

The pause demand

OFA and UPA's joint release calls for an immediate suspension of the project. CFA's resolution urges the government to immediately halt the project. BFO calls on the federal government and the Minister of Transport to immediately halt the project. The four associations whose operational demands this brief examines are unanimous on the threshold question of whether the project should proceed in its current form ahead of the assessments they have asked for. ALTO's framework is silent on this question because it is not within ALTO's authority to answer; the Minister of Transport's response to date has been to confirm the project's timeline rather than to address the request for a pause.

Implications for the Autumn 2026 Corridor Decision

ALTO's chief executive has confirmed the project's working timeline: corridor narrowing in autumn 2026, formal letters to property owners affected by the narrowed Ottawa–Montreal corridor sent before public disclosure of that corridor, land acquisition beginning in late 2026 or early 2027, construction beginning in 2029. Within that timeline, the items the associations have asked for cluster into two categories.

Items that can still be delivered before corridor narrowing

Independent agricultural impact assessment (OFA / UPA / CFA / BFO): commissioning, completion, and publication of independent agricultural impact assessments before the corridor is narrowed in autumn 2026 is operationally possible if begun immediately. The methodology, scope, and timeline would have to be specified now to allow completion within five months.

Binding crossing specifications (CFA): adopting a minimum 10-metre standard, plus a published spacing requirement, as a project commitment that will inform corridor narrowing rather than follow it. This is a single decision rather than a study; it could be made now.

Land-classification scope (BFO): a commitment that protections apply to all actively farmed lands, not only prime agricultural classifications. This is a definitional decision; it could be made now.

Compensation recognition (CFA): a published commitment that compensation will reflect the permanent and more significant impact of HSR compared to highways or transmission lines, with the methodology specified. This is a framework-level decision; it could be made now.

Items that depend on the project-level pause demand

The four associations' shared call for a halt to allow proper assessment is, by its own terms, conditional on the federal government's willingness to pause the timeline. ALTO's framework cannot deliver this because it is not within ALTO's authority to deliver. The Minister of Transport's response to date is the relevant indicator: as of May 2026, the project is proceeding on the published timeline.

The NFU's three structural concerns — transparency of the business case; the public-private-partnership delivery model; the absence of complementary public transportation infrastructure — are similarly outside the scope of what an acquisition framework can address. They are concerns about the project itself, and the May 2 working-assumption disclosure substantially reinforces the first of them. Whether these concerns are addressed depends on decisions at the federal cabinet level, not at the level of ALTO's published commitments.

Where Things Stand as of May 2026

In summary, against the public demands of the major Canadian farm associations:

- Tile drainage protection (OFA / UPA / CFA / BFO): substantively addressed in ALTO's published framework. Enforcement during construction remains the operational test.
- Independent professional appraisals at appraisal-date neutrality (overlaps with the spirit of the OFA / UPA / CFA / BFO compensation demands): substantively addressed in ALTO's published framework.
- ALTO covers owners' independent appraisal and legal costs (overlaps with the spirit of the compensation demands): substantively addressed.
- Crossings — qualitative reference to grade-separated overpasses and underpasses (OFA / UPA item 4; CFA item 2): partially addressed; no minimum dimensions, no spacing standard, long-term maintenance approach still being developed.
- Compensation — market value plus agricultural and business losses, relocation costs, third-party costs (CFA item 3): partially addressed; the recognition that HSR's permanent impact is more significant than highways or transmission lines is absent.
- Stay out of prime agricultural areas (OFA / UPA item 1): not met.
- Avoid breaking farms into smaller pieces; keep operations whole (OFA / UPA item 2): not meaningfully met.
- Independent agricultural impact assessment, public, before route selection (OFA / UPA item 5): not met.
- Halt for thorough assessment (CFA item 1; OFA / UPA pause demand; BFO endorsement): not met.
- Minimum 10-metre agricultural crossings (CFA item 2): not met as a binding specification.
- Protection of all actively farmed lands, not only prime agricultural classifications (BFO additional demand): not met.
- NFU structural concerns (transparency of business case; public-private-partnership delivery model; complementary public transportation infrastructure): not addressed by an acquisition framework, and substantially reinforced by ALTO's May 2 working-assumption disclosure.

ALTO's chief executive has put the operational scale of the agricultural impact on the Ottawa–Montreal first segment at approximately 500 farms; comparable figures for the remainder of the corridor have not been disclosed. The public demands of the associations representing the farmers on those 500 farms — and on the farms across the rest of the corridor still to be quantified — are not, in the main, met by the framework ALTO has published. The associations are not asking for revisions to a framework whose existence they accept; they are, with the partial exception of NFU's structural framing, asking for assessments that have not been done and protections that have not been committed.

This brief is offered as a reference document for federal decision-makers, the farm associations themselves, rural Eastern Ontario MPs, and constituents tracking the agricultural file. It is intended to make clear, in plain comparative form, what has been asked for and what has been committed to as of May 2026.

Sources

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