



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3  
Tel: (519) 821-8883 • Fax: (519) 821-8810 • [www.ofa.on.ca](http://www.ofa.on.ca)

October 26, 2016

Greg Jenish  
Program Support Coordinator  
Ministry of the Environment and Climate Change  
Operations Division  
Environmental Approvals Access and Service Integration Branch  
135 St. Clair Avenue West, Floor 1  
Toronto, ON M4V1P5

Dear Mr. Jenish,

**RE: OFA Comments on the MOECC's Draft Guidance Document for the Consideration of Climate Change in the Environmental Assessment Process in Ontario (EBR - 012-5806)**

The Ontario Federation of Agriculture (OFA) is pleased to provide comments draft guidance document for the Consideration of Climate Change in Environmental Assessment (EA) in Ontario. The OFA is Canada's largest voluntary general farm organization, representing over 36,000 farm families across the province. These farm businesses form the backbone of a robust food system; helping to drive the Ontario economy forward.

OFA is strongly in favour of preparing our rural infrastructure for the potential negative impacts of Climate Change. We believe that including language and consideration of Climate Change impacts into the EA process as it relates to water and transportation projects will go a long way towards achieving this goal.

Climate Change has the potential to significantly impact the effectiveness and lifespan of (an already degraded) infrastructure in rural Ontario. Transportation and water management infrastructure are particularly vulnerable to the impacts of Climate Change and extreme weather events. Existing infrastructure may suffer increased damage because it was built to the specifications of a different climate reality and we support the proposal to consider the resiliency of future undertakings and projects to changes in climate.

Ontario's energy and water infrastructure will face numerous future challenges from increased demand of a growing population, as well as damage caused by extreme weather events, which are anticipated to occur more frequently. While we respect the need to consider a project's greenhouse gas emissions and potential effects on Climate Change, there is a critical backlog of necessary rural infrastructure projects and repairs and we express concern that these efforts may impose additional delay towards implementation as a result of satisfying new EA requirements. Furthermore, given the nature of rural municipalities and capacities to cover the costs of new or updated infrastructure projects, we insist that considerations of the effect on climate must not

impose significant additional costs to project proponents. Our priority is that rural infrastructure projects are completed and that they are completed in a way that takes the potential negative impacts of Climate Change into consideration.

We appreciate the opportunity to provide comments to the Ministry of Environment and Climate Change regarding the proposed inclusion of Climate Change considerations in to the EA process. We support the initiative but do not want to see any additional delay or costs to rural infrastructure projects as a result. We anticipate that considerations of Climate Change and associated impacts will likely be incorporated into more legislation in the future and we look forward to working with the MOECC to develop mutually agreeable solutions to this issue.

Sincerely,



Don McCabe  
President