



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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Ms. Michele Doncaster, Policy Advisor  
Ministry of Agriculture, Food and Rural Affairs  
Policy Division  
Food Safety and Environmental Policy Branch  
Land Use Policy Unit  
1 Stone Road West, 3<sup>rd</sup> Floor  
Guelph, ON  
N1G 4Y2

Dear Ms. Doncaster;

**RE: EBR Registry No. 013-2454 Agricultural Impact Assessment Guidance Document**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 37,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

OFA welcomes the use of Agricultural Impact Assessments (AIAs) within the area covered by the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan, and to a lesser extent within the area subject to the Niagara Escarpment Plan and the complementary guidance document to mitigate impacts of development on agriculture. OFA provides the below comments for consideration into the final version of the AIA Guidance Document.

**Section 1.4 When is an AIA required? (page 5)**

OFA fully supports the requirements that an Agricultural Impact Assessment (AIA) is required for urban settlement boundary expansions, infrastructure and aggregate applications within the area covered by the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan, and to a lesser extent within the area subject to the Niagara Escarpment Plan. OFA welcomes the use of AIAs to guide urban settlement boundary expansions, infrastructure and aggregate license applications. We anticipate better outcomes for agriculture from these non-agricultural development activities, guided by AIAs.

Since the requirements to complete an AIA are new and the users of this Guidance Document may not be fully aware that agricultural operations **are not** required to complete an AIA for **any** activities related to agricultural uses, agriculture-related uses or on-farm diversified uses, OFA requests that a clear and unequivocal statement be added to Section 1.4 emphasizing that agricultural uses, agriculture-related uses or on-farm diversified uses, including associated buildings and structures, are fully exempt from completing an AIA, as these land uses and any associated buildings or structures are completely outside the scope of an AIA.

**Table 1 Policy Direction for AIAs: (pages 6-7)**

The table column heading on pages 6 and 7 reads; “Other Non-Agricultural Uses”. What are some examples of other “non-agricultural uses” that would require an AIA? Would an AIA be required to establish a new cemetery, recreational facility, etc. in the area covered by the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan, and the Niagara Escarpment Plan? OFA requests the Guidance Document list all the non-agricultural uses that would require completion of an AIA as part of their approval.

**Section 1.6 AIA Approvals, Roles and Responsibilities: (page 9)**

The paragraph on urban settlement area boundary expansions speaks to the completed AIA being submitted to the province, but it does not mention to which Ministry or Ministries the document would be submitted. For the sake of clarity, OFA suggests that the Guidance Document note the Ministry or Ministries who will receive the completed AIA.

**Section 1.8 Qualified Professional(s) / Practitioner(s) (QPs): (pages 10-11)**

We concur with the list of knowledge competencies for QPs. From OFA’s perspective however, prior training and knowledge in on-farm biosecurity practices and protocols is missing. Since specific sections in the Guidance Document speak to “Field Investigations” and “Access to Farmland” by QPs, OFA strongly recommends that QP qualifications include prior training, knowledge and experience in on-farm biosecurity practices and protocols.

Additionally, QPs should be offered training by OMAFRA on their Agricultural System Portal. Training will improve use of the Agricultural System Portal to ensure its adoption and incorporation into the AIA.

**Section 2.2.1 AIA Study Components (Introduction): (pages 12-15)**

Under “Description and Location” OFA finds the phrase, “confirm if the Agricultural System has been implemented” confusing. We understand that the policies of the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan, and the Niagara Escarpment Plan came into effect on the effective date for each plan. Policies in the four plans require an AIA for lands within the Agricultural System. OFA requests clarification of this statement.

Regarding aggregate applications, in addition to information on the proposed type of aggregate operation, the AIA should also be required to collect water well data on all wells, private and public, within a predetermined distance from the site. This data would address water quality and water quantity for all wells; those for human use as well as for livestock and irrigation. With respect to mineral aggregates, OFA believes that expansions of existing sites are treated as a new application under the Aggregate Resources Act.

Regarding Infrastructure (page 14), linear corridors; (e.g. controlled access highways and rail lines) have significantly greater impacts on Agricultural Systems and individual farm operations arising from restrictions on cross-corridor movement and the permanent loss of agricultural land than do buried pipelines or electric transmission lines. The study area for controlled access highways and rail line needs to be much wider to capture the full area of their effect/influence. Additionally, AIAs for certain infrastructure projects should also be required to fulfil the same water well data requirements noted above, i.e. water well quality and quantity. OFA recommends that AIAs for freeways and rail lines be required to include their full area of effect/influence.

Municipal drains, constructed under the Drainage Act, are critical agricultural and rural infrastructure. They are initiated through a petition to Council, by agricultural and rural landowners. The costs to construct a drain, and its future maintenance, are borne by the agricultural and rural landowners whose lands contribute runoff water to the drain. The Draft Guidance Document is silent on the possibility of municipalities requiring an AIA for a municipal drain. We note that under the Provincial Policy Statement, works subject to the Drainage Act are deemed to be outside the scope of “development”. Similar exemption language is found in the Greenbelt Plan and the Growth Plan for the Greater Golden Horseshoe. The potential for a drainage project to be delayed, sidelined or to even add the cost of an AIA onto the assessments paid by the benefitting agricultural and rural landowners poses an unnecessary burden. The drain is agricultural and rural infrastructure. The benefitting landowners accept a drain’s impacts, but they also recognize it will improve crop yields and farm productivity. OFA firmly believes that municipal drains constructed under the Drainage Act should be exempt from any AIA requirements. We strongly recommend that the final version of the Guidance Document clearly and unequivocally exempt municipal drains constructed under the Drainage Act from any AIA requirements.

On page 15, it states that municipalities are “encouraged” to add AIAs to their list of required reports. Does this refer to AIA outside of the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan, and the Niagara Escarpment Plan, or to non-agricultural activities beyond settlement boundary expansions, aggregates or infrastructure? If not, stronger language is then warranted on the requirements for an AIA in the areas subject to the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan, and the Niagara Escarpment Plan.

### **Section 2.2.2 AIA Process: (pages 15-16)**

The Guidance Document does not suggest reaching out to the agricultural community at this point. However, farmers will require adequate advance notice to prepare information for the AIA process. OFA suggests the Guidance Document recommend mailing out a notice to the affected agricultural community well in advance of any agriculture-specific meetings, workshops or information-gathering sessions. Furthermore, QPs must recognize that many farming activities are highly time sensitive, and therefore any agriculture-specific meetings, workshops or information-gathering sessions must be scheduled around these activities.

The AIA Guidelines should include a template for the agricultural community to prepare information that will be requested for an AIA. Providing a template will increase clarity of expectations and improve trust between QPs conducting the AIA and farmers. Encouraging the agricultural community to prepare this information ahead of time will reduce stress and uncertainty during the AIA process, and improve timing and efficiency.

It should be mandatory that those conducting AIAs engage with the farm community. QPs will face considerable challenges conducting on-site tests and gathering information to fully inform an AIA without farmer support. Those conducting AIAs should connect with the farm community early in the process to obtain buy-in and build trust.

Lastly, OFA recommends OMAFRA staff be involved in pre-consultation with the local farm community.

**Section 2.2.3 Study Areas: (pages 16-19)**

Study areas should be broad enough to capture **all** lands used by farmers in their individual farm operations, both farmer-owned and farmer-rented, in addition to **all** the elements of the Agricultural System that they utilize. Ideally, the initial study area will be larger than the final project area/route to ensure that all the final project area or route was fully studied, and no property owner finds their land is included after the public meetings, consultations and workshops are done.

In their response to MTO's Highway 7 & 8 Corridor Planning and Class Environmental Assessment from Stratford to New Hamburg, the Agriculture Business Community of Perth East, Perth South and Wilmot demonstrated the multiple links between farm properties on opposite sides of the proposed highway. Their work in mapping the links between the "home farm" and other non-contiguous farm properties illustrated the complex linkages associated with transporting only forages and manure. Corn, wheat and soybean fields would add additional links. The agricultural impacts of linear corridors fall not only on the individual farm property bisected by a linear corridor but are also felt further afield. OFA recommends that the Guidance Document reflect the differing impacts on farms and the Agricultural System from different AIA triggers, and mandate an appropriately-sized study area for each.

**Primary Study Area (page 17):**

The permanent loss of agricultural land is only one result. The proponent must also look at the loss of connectivity; connectivity to elements of the Agricultural System and to individual farm parcels that may be some distance from the "home farm" but nevertheless are key to the overall farm operation. OFA requests that the Guidance Document emphasize this.

**Secondary Study Area (page 18):**

Mineral aggregate applications should differentiate between above water table applications and below water table applications. While above the water table operations **can** be rehabilitated to an agricultural end use, the same cannot be said for below the water table operations. OFA recommends that the paragraphs dealing with mineral aggregate application clearly distinguish between above the water table operations versus below the water table operations.

With respect to infrastructure, the paragraph should add language reflecting the broader impacts of certain forms of linear infrastructure, e.g. High-Speed Rail (HSR) or controlled access freeways on the agricultural system and individual farm operations. Not all forms of infrastructure have the same negative impacts on the Agricultural System and individual farm operations; the distinctions merit acknowledgement.

**2.2.4 Study Methodology Identification (Background Data Collections and Review): (pages 19-23)**

The 4<sup>th</sup> bullet refers to MOECC's Excess Soil Management Policy Framework and Regulatory Proposal. Public comments on this regulatory proposal closed on June 15<sup>th</sup>. OFA recommends adding a reference to the Excess Soil Management Plan itself and the "in force" dates for the proposed regulation in the Guidance Document.

The 12<sup>th</sup> bullet speaks to "crop type and yield information (as available)". Activities requiring an AIA will impact agricultural activities well beyond cropping. OFA requests the Guidance Document add "livestock and poultry type, numbers, manure management system, presence of a Nutrient Management Plan (NMP), and, if available, any expansion or farm change plans (e.g. from cropping to livestock) for farms within the study area.

The 14<sup>th</sup> bullet speaks to “parcel mapping and related assessment class information...”. This does not go far enough. OFA recommends that the Guidance Document add information on parcel linkages based on information sourced from local farmers; i.e. where are all the individual parcels they farm, both owned and rented, and which routes are used to access them.

### **Data and Information for the Land Use Survey (page 21):**

Today’s farms are a combination of farmer-owned and farmer-rented lands that together make up a single farm operation. The Land Use Survey must note not only the location for each individual parcel that contributes to a farm operation, but also how the parcels are used (i.e. crop or pasture) and the roads used to link these parcels to the “home farm”.

### **Local Knowledge and Input (page 22):**

The role of **both** farmer-owned and farmer-rented land to each farm operation, including the special role of these lands with respect to livestock and poultry operations, and Nutrient Management Plans (NMPs) should be added to the 4<sup>th</sup> bullet point on page 22. As previously noted, the location for each individual parcel, as well as how the parcels are used (i.e. crop or pasture) and the roads used to link these parcels to the “home farm” must be identified and included in the AIA.

The AIA Guidance Document should include a template for the agricultural community to use to assemble the information that an AIA will request. Providing a template will increase clarity of expectations and improve trust between those conducting the AIA (e.g. Qualified Professionals - QPs) and farmers. Encouraging the agricultural community to prepare this information ahead of time will reduce stress and uncertainty during the AIA process, and improve timing, efficiency and consistency.

The Guidance Document should be strongly recommended that QPs conducting AIAs engage directly with the farm community. QPs will face considerable challenges conducting on-site tests without farmer support. Those conducting AIAs should connect personally with the farm community early to obtain buy-in and to build trust.

For the soil survey, the Guidance Document should reiterate that permission for access to farmlands **must** be negotiated with landowner before-hand, and individual farm biosecurity protocols are respected.

### **Land Use Characteristics (pages 26-27):**

The first bullet points under “Information on infrastructure and land improvements” should include information on the housing capacity of vacant, but structurally sound livestock and poultry barns, as set out in OMAFRA’s Minimum Distance Separation (MDS) Document (Publication 853, 2016). In the absence of including this information, viable livestock and poultry barns could be rendered unusable. OFA recommends adding information on the housing capacity of vacant, but structurally sound livestock and poultry barns here.

### **Economic and Community Benefits of Agriculture (pages 27-28):**

The opening paragraph of this section suggests that only settlement area boundary expansions or non-agricultural uses would be assessed. We cannot assume that infrastructure corridors, e.g. highways, rail lines, or aggregate license applications are also included. OFA recommends adding infrastructure and aggregate license applications to this section of the Guidance Document.

## 2.2.6 Assessment of Impacts (pages 28-30):

OMAFRA should provide a sample AIA as a best practice guide. The example would note where data was found (e.g., where to find for Census of Agriculture data it OMAFRA's website). The section that follows on assessing impacts is too subjective and qualitative in nature, with limited tools and resources identified to support an objective, quantitative analysis. Both quantitative and qualitative research tools should be provided.

OFA recommends that the following changes should be made to the bullet points on page 29;

- the 4<sup>TH</sup> bullet should read, “the loss of **agricultural** infrastructure ...”, and
- the last bullet, in relation to “changes in road design”, should add; traffic circles, narrow bridges, bicycle lanes and 90° curbs as examples, individually and collectively, of road design features that are unable to accommodate wide farm equipment.

OFA further recommends adding an additional bullet point that speaks to the loss of connections with farm parcels that are part of an overall farm operation but are located some distance from the “home farm”.

OMAFRA should provide a recommendation for how to measure the impact that loss of farmland will have, either through an existing tool or rough calculation. For example, a calculation of how X loss of farmland equates to Y loss of ecological goods and services and Z loss of GDP. Although a rough calculation, this would help provide a quantitative analysis in conjunction with the qualitative analysis of perceived impacts.

### **Economic and Community Impacts (page 30):**

The draft Guidance Document must address fragmentation of parcel network. A linear corridor will create land-locked parcels. The AIA must set out the proven, realistic methods that the proponent will use to address land-locked parcels.

An impact calculation could also be adopted for other services. For example, perhaps there is a way to use OMAFRA's Analyst Input-Output model to identify direct, indirect and induced impacts of the loss of services or reduced output of supplementary services. More needs to be done in the Impacts section to provide tools, resources, reports, etc. that QPs can use. Otherwise, the lack of tools may result in anecdotal reporting and not accurately convey the potential adverse impacts on agriculture.

It is important to note that for AIAs, QPs will need to understand both economic analysis and environmental analysis. The Guidelines should explicitly state that those tasked with undertaking an AIA must ensure that their QP(s) are able to proficiently execute **all** facets of the AIA.

The phrase “consider if the farm operation is a critical economic generator in the area” should be defined explicitly. In its current form, it is open to subjective interpretation. Examples of data should be provided which could be used to determine whether it is a “critical economic generator”, and what threshold to use (e.g. Census of Agriculture County Profiles).

Is the question, “examine if any agricultural losses can be replaced” hypothetical in nature or would the QP conducting the AIA then be bound to provide opportunities for it to be replaced?

“Consider community benefits such as agri-tourism, products for the retail market/local food or educational benefits that are being lost and the impact this will have on the community” This point should include the culture, heritage, identity, or social fabric of a community. There may be an authentic place-based identity through the farm community that would be tarnished by this new development, for both residents and tourists alike.

### 2.2.7 Mitigation Measures (page 31):

Section 3.0 suggests avoid, minimize and mitigate are a hierarchy. If this is indeed the case, the guidance document should clearly state that.

#### Table 2: Avoiding Impacts (page 34):

As part of the license application, aggregate operations should be required to conduct baseline studies of **every** water well (both domestic and animal use) for water quantity and water quality, within a prescribed radius around the proposed aggregate site.

#### Table 3: Minimizing and Mitigating Impacts (pages 36-39):

In the table under “Minimize impacts on farmland and agricultural operations, it proposes “a zone on both sides of the boundary” between remaining agricultural uses and abutting non-agricultural uses. This is a nonstarter for OFA. Agricultural land and individual farm operations should never be expected to share the burden of new non-agricultural uses. OFA strongly recommends that this mitigation measure be dropped.

Is the objective missing, or carried over from the previous page? If carried over, perhaps it should be repeated on a new page.

The reference to municipal drains (page 38) needs to consider the role of municipal drains as fish habitat and include the Department of Fisheries and Oceans (DFO) and local Conservation Authorities. The Ministry of Natural Resources and Forestry’s (MNR) with respect to habitat for threatened and endangered species should also be addressed.

Avoid the use of the term “educate” which may be perceived as condescending. It would be best to provide farmers with resources on how to co-exist with non-farming neighbours. OMAFRA should identify potential topics of conflict and provide solutions on how to mitigate these issues on both sides of the property line.

#### Table 3: Agricultural System (page 36):

Under Edge Planning as a mitigation measure we note the statement, “create a zone along both sides of the boundary where mitigation measures can be implemented...”. OFA interprets this to meaning mitigation measures on the agricultural side as well as on the non-agricultural side. If this is the intent, this is utterly unacceptable. A constraint is imposed by some non-agricultural development on the abutting agricultural operations and the agricultural operations are expected to assist in mitigating the impacts by relinquishing their land to minimize and mitigate its impacts. This statement seems to conflict with statement on page 65, “where mitigation is required, measures should be incorporated **as part of the non-agricultural uses** (emphasis added), as appropriate, within the area being developed”. OFA opposes any suggestion that both the non-agricultural development on the abutting agricultural operations share in mitigating the impacts. OFA strongly requests that this section be rewritten to remove all suggestion that both sides share in the mitigation, and that all necessary mitigation measures be located solely on the non-agriculture side of the boundary.

#### Table 4: Avoiding, Minimizing and Mitigating Impacts on the Agricultural System (page40):

For the “Plan and support the agri-food network” objective, include in the description section the following statement as a bullet point, “To better support agri-food businesses, encourage regular

communication between planners and economic developers to align land use and economic development initiatives”.

### **3.4 Description of Mitigation Measures (page 41):**

With reference to the statement, “applied for urban and agricultural users alike” in the paragraph on Edge Planning, as noted in our earlier comments on Table 3, page 36, we oppose any form of shared mitigation between agricultural uses and abutting non-agricultural development. Edge planning techniques must be borne solely by the urban side; settlement boundary expansions are intruding into an agricultural area and the burden to mitigate them should be solely borne by the urban development. Furthermore, this statement seems to conflict with statement on page 65, “where mitigation is required, measures should be incorporated **as part of the non-agricultural uses** (emphasis added), as appropriate, within the area being developed”.

### **Secondary Planning and Subdivision Design (Page 41-42):**

Storm water management ponds should be added after “sewer and water lines”.

The section proposes a suite of design elements to buffer a settlement expansion area from abutting agricultural uses. OFA agrees with the suggested design elements but recommends adding one that proposes the location of storm water management ponds and parks along the urban/agriculture boundary as one more potential design element.

### **Education and Outreach (page 43):**

OFA is highly skeptical of the effectiveness of “warnings on title”. Past advice has been that they “might” limit the actions of the very first buyer but have little to no impact on limiting the actions of subsequent buyers.

“Local farm operations can help to educate the public by hosting on-farm education days – activities including open houses and educational talks for non-farm neighbours can highlight farm business operations.” While farm visits by the public can be an educational tool, not all farms should give farm tours, and many would have concerns around biosecurity and liability. If this Education and Outreach recommendation is for municipalities, it should state to work with your local farm community to plan farm tours or other experiential learning opportunities to highlight farm business operations.

### **Road Safety Education (page 43):**

OFA recommends this be changed to a road safety awareness campaign.

### **Road Design (page 43):**

Farm equipment on Ontario’s roads must obey the Highway Traffic Act. This would include the Act’s 40 km/h maximum speed limit (25 MPH) for farm vehicles. In addition, SMV signs must not be placed on fixed objects (gate posts, mail box posts, etc.) visible from the road, an all-too-common sight across rural and agricultural Ontario.

### **Noise (page 44):**

In addition to addressing the impact on livestock and agri-tourism, the AIA should also address the noise impacts on adjacent residents.



**Rehabilitation (page 45):**

OFA questions the statement, “where required, rehabilitating ...”, as we understand that rehabilitation is a license condition for all pits and quarries licensed under the Aggregate Resources Act.

**3.5 Rehabilitation – Mineral Aggregate Resources Extraction within Prime Agricultural Areas:(page 45):**

This section does not refer to the Aggregate Resources Act, its regulations, operating standards or policies.

It appears that several the steps set out in this section reflect existing requirements under the Aggregate Resources Act, its regulations, operating standards or policies. We specifically identify Steps 2 to 4 and 6 to 9. Rather than reiterate existing requirements, OFA believes that the emphasis on rehabilitation guidance in the Guidance Document should accentuate actions which improve the agricultural rehabilitation outcome to be the best possible. It should also note that future changes to regulations, operating standards or policies will mandate rehabilitation requirements that will further improve rehabilitation outcomes, from the perspective of an agricultural end use.

With reference to the 6<sup>th</sup> bullet under Step 3: Strip and Handle Soil Resources Separately (page 46), OFA believes that there will be soil degradation and loss of soil structure for top soils stored in a berm or pile. It is unavoidable over time; the reality of licensed aggregate operations which often exist for decades. While cited in the PPS, etc. as an “interim use”, aggregate operations can carry on for decades, rendering the phrase “interim use” disingenuous.

**Step 5: Create an Appropriate Post Extraction Landform (page 47)**

The 9<sup>th</sup> bullet point is a specific license condition. Pits and quarry licenses clearly indicate if the operation is an above the water table or a below the water table one. The QP drafting the AIA should know before starting if the application is an above the water table or a below the water table operation.

Furthermore, Step 5 should add language on the beneficial reuse of excess soils under MOECC’s regulations to achieve the best possible agricultural rehabilitation outcomes. The import and use of excess soil can be used to create side slopes conducive to a range of agricultural uses, and to reduce surface elevation changes across the landscape.

OFA recommends that section 3.5 of the Guidance Document be rewritten to reference the Aggregate Resources Act, its regulations, operating standards or policies, to propose rehabilitation actions that go beyond the minimum requirements under the Aggregate Resources Act, such as the beneficial reuse of excess soils under MOECC’s proposed Excess Soil Management Regulation, to achieve the best possible agricultural rehabilitation outcomes.

**4.0 Background for AIA Technical Guidelines (page 49):****PPS (page 54):**

While we accept that there are no specific requirements for an AIA in the PPS, OFA recommends that the wording be “strongly recommend the use of AIAs for areas where the PPS guides municipal Official Plans”.

**4.4 Background: Infrastructure (page 58):**

OFA recommends that rail lines be added to the first paragraph, after “highways and transitways”.

**4.6 Other Provincial Requirements (page 68):**

Should the reference to April 2017 for the Excess Soil Policy Framework and Regulatory Proposal not read April 2018?

**Appendix B: Rehabilitation Information and Resources (pages 74-110) - Monitoring Program (page 95):**

The initial AIA Report should include a checklist on which evaluation is based with rankings (e.g. good/moderate/poor, in-progress/completed). The Checklist could then be used as a quick reference to determine how the project is progressing and reflect on benchmarks and current progress. Performance measurement is essential to an effective AIA; ensuring that the project is accountable to the AIA throughout the process and it is easily referenced whether the project is on track for incorporating AIA recommendations.

The Ontario Federation of Agriculture welcomes this opportunity to provide its perspective on the Agricultural Impact Assessment Guidance Document. Ensuring that the impacts of settlement boundary expansions, infrastructure and aggregate license applications on the Agricultural System and agricultural lands are avoided, minimized or mitigated is paramount. We look forward to the incorporation of our recommendations and suggestions into the final version.

OFA also notes its desire to see AIAs required province-wide for settlement boundary expansions, infrastructure and aggregate license applications through the next review of the Provincial Policy Statement.

Sincerely,



Keith Currie  
President

KC/pj

cc: OFA Board of Directors