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ERO-013-4208 Proposed Actions in Preserving and Protecting our Environment for Future Generations, A Made-in-Ontario Environment Plan

Dear Mister Aguda,

We appreciate this opportunity to provide comments related to the Made-in-Ontario Environment Plan, and we look forward to reviewing the provincial government's next steps in moving a collaborative proposal forward.

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. Agriculture and agri-food businesses are leading economic drivers for the province, contributing nearly \$40 billion in GDP and employing over 822,000 Ontarians. These farm businesses form the backbone of our robust food systems and rural communities, with the potential to drive our economies forward.

Preamble

We only have one landscape. The full range of landforms and land uses found across Ontario, including agricultural, commercial, industrial, residential, rural, urban, natural and cultural heritage, and mineral extraction, share that landscape. Ontario's agricultural areas not only provide us with food, fibre and fuel, but also a series of environmental and ecological goods and services that benefit all Ontarians. To fulfil these roles, Ontario's prime agricultural lands must remain separate from non-compatible land use. To do otherwise, will slowly but steadily bring an end to the family farm businesses, farm input supply businesses and food processing businesses located throughout Ontario.

Ontario's land use planning policies, provincial plans and laws recognize the climate change mitigation and resilience role played by natural features, namely woodlands, grasslands and wetlands. However, these same policies, plans and laws ignore the contributions of our finite and shrinking agricultural lands towards climate resilience. Ontario's productive agricultural

lands are critical to preserving a broad range of environmental and ecological goods and services that benefit all Ontarians, such as:

- Aesthetic and recreational space,
- Air quality (carbon sequestration, climate regulation, oxygen production),
- Biodiversity,
- Nutrient cycling,
- Pollination services,
- Soil erosion control, and
- Water cycling (flood mitigation, groundwater recharge, purification, retention).

The Ontario Federation of Agriculture believes that the role and contribution of agricultural land to climate resilience needs to be recognized and acknowledged in any changes to Ontario's land use planning policies, provincial plans and laws. Government should also recognize and support agriculture's contributions to the broader environmental and ecological goods and services provided to the full biosphere.

Guiding principles of the Environmental Plan address the most serious environmental challenges in a responsible, effective, measurable and balanced way.

- **Clear Rules and Strong Enforcement:** Hold polluters accountable and reduce the regulatory burden for responsible businesses.
- **Trust and Transparency:** Provide information and tools with real-time monitoring to better understand environmental challenges and impact on individuals, businesses and communities.
- **Resilient Communities and Local Solutions:** Environmental impacts faced by communities across Ontario may be very different. Work with these communities using best scientific practices and evidence-based methods to develop unique solutions to their challenges.

OFA supports a provincial commitment to work with rural communities to find solutions and adopt sensible regulations that reflect the unique challenges these regions experience. We support guiding principals that will prioritize vital infrastructure – broadband, clean affordable energy options, investments in aged and missing infrastructure such as roads, bridges and schools – we need to attract business activity to maintain rural communities and economies. Without them, we cannot hope to develop the unique solutions we need to withstand climate change impacts or remain resilient under extreme weather events. It is essential for government to recognize the distinct needs of rural Ontario and bring support to address climate change, protect our air, watersheds and land, and help bring resiliency to rural communities.

Many of these rural barriers and challenges are exacerbated as you look to northern and remote communities with smaller populations more thinly dispersed over larger areas. Some areas struggle to address declining infrastructure without adequate investment options, community isolation, poor water quality, constrained energy options using polluting fuels, and a scarcity of waste management options.

Section 1

Protecting our Air, Lakes and Rivers: Clean Air

Develop and expand online reporting platforms

The Ontario Federation of Agriculture supports making it easier for people to report pollution, however we strongly recommend that the government ensures the compliance system conducts scientifically sound investigations to remove the spectre of harassment or abuse through false reporting. It will also be important that enforcement outcomes be, and are seen to be, equitable and proportionate across all sectors in the economy. OFA recommends any system changes are informed by input from the agriculture sector to ensure appropriateness of changes.

Improve air quality in communities by creating unique solutions to their challenges

Farmers have repeatedly noted a decline in the number of Heavy Duty Drive Clean Program test centers since the program's inception, forcing owners of heavy-duty vehicles to travel further to obtain required tests. The negative impact of this decline has been borne primarily by vehicle owners who live and operate their businesses at some distance from larger urban centres, namely farmers and rural residents. As part of the Heavy-Duty Program redesign, OFA requests the provincial government address the decline in heavy-duty test facilities, particularly across Ontario's rural and agricultural municipalities.

Redesign the emissions testing program for heavy-duty vehicles and strengthen on-road enforcement of emissions standards

OFA supports increased reliance on vehicle on-board diagnostic (OBD) computer-based emissions controls. Still, the Ontario government needs to recognize that older heavy-duty vehicles without OBD systems remain in use across Ontario, often in farming where they see limited, seasonal on-road use to transport grains and other farm products. The Made-in-Ontario Environment Plan must provide alternate testing methods for vehicles without OBD systems.

Heavy-duty vehicles that remain in the original owner's possession only begin to require a Drive Clean test after year seven. However, prior to reselling a heavy-duty vehicle that is more than one year old, a new Drive Clean test pass is required. We see no reason to continue this practice. We believe that vehicles resold within that same seven-year time frame deserve equivalent treatment. OFA recommends that the first test for any heavy-duty vehicle should only be required once it is over seven years old.

We also propose that the revised Heavy-Duty Program exempt gasoline powered commercial vehicles, many of which are $\frac{3}{4}$ and 1-ton pickups. These vehicles do not warrant the same degree of emissions testing and have a lower rate of emissions device tampering as with diesel-fuelled vehicles.

Increase numbers of road-side monitoring of traffic pollution and expand beyond the GTA to other heavily urbanized communities

OFA supports the provincial government's plans to improve on-road enforcement of vehicle emission's standards and performance for both light and heavy-duty vehicles. Enforcement

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should focus on processes to identify the small percentage of vehicles and fleets that contain compromised emissions controls.

Strengthen collaboration to address air pollution that comes from outside our borders

The Ontario Federation of Agriculture supports engaging the federal government and neighboring state governments to address and reduce airborne contaminants especially from Michigan and the Ohio Valley. Without intergovernmental dialogue aimed to reduce airborne particulates, agricultural lands in Ontario will continue to be exposed to elevated carbon levels coming from these regions that negatively impact crops and our ability to sequester carbon.

Protecting our Air, Lakes and Rivers: Clean Water

Continue work to restore and protect our Great Lakes

OFA is encouraged to see the intent to continue with existing programs and collaborations such as those made under the Canada-Ontario Lake Erie Action Plan. Having a strong review system in place is critical to ensure that plan actions have the desired effect without unintended consequences, and to provide the opportunity to include new knowledge or modifications that may impact a dynamic natural environment. In reviewing the Great Lakes Strategy, it will be important to ensure that proposed changes made under the Made-in-Ontario Environment Plan do not conflict with recent initiatives such as the Canada-Ontario Lake Erie Action Plan.

Continue to protect and identify vulnerable waterways and inland waters

Ensure sustainable water use and water security for future generations

We recommend a review of Water Taking policies and programs done in continued consultation with the agricultural sector. A review of drought condition preparations and response must also continue under consultation with the agricultural sector.

While not the largest water user, the agriculture sector holds the largest number of Ontario Permits to Take Water (PTTW). Therefore government must ensure that the PTTW review process makes sense in an agricultural context. For example, efficient non-agricultural water taking aims to maximize return flow; however, for crop irrigation, the most efficient water use would minimize return flow. As part of the PTTW review process, OFA continues to advocate for a simplified, streamlined process for agricultural permit renewals in situations where there have not been any material changes on the farm with respect to the permit.

We are concerned with the roll out of the PTTW online permit application process. Some farms may be unable to apply online, and OFA requests that the paper-based application process continue until an effective online application process for agricultural permits is available.

Help people conserve water and save money

OFA supports highlighting the work farm stewards undertake as leaders in this area. OFA recommends government continue to encourage targeted investment and innovation in managing and curtailing wastewater overflows into our lakes and rivers.

Section 2 Addressing Climate Change

Preamble

The Ontario Federation of Agriculture recognizes that climate change is advancing. As global temperatures rise, we experience more frequent extreme weather events and patterns. This as a global challenge requiring action and investment from governments, communities, businesses, and individuals.

Policies, programs, and research initiatives must be developed by government and society to reduce the causes of climate change, while also enabling farmers to resiliently adapt and respond to adverse climate effects. We believe that climate change policies should not impact the ability of Ontario farmers to compete in domestic or international markets.

Climate Change is a crucial concern for agriculture. Around the world, climate change has the potential to significantly and adversely affect farm production through fluctuations in: average temperatures; regional precipitation; climate extremes; and changes in the varieties of pests and diseases. These climate changes culminate in inconsistent growing seasons and changes to crop yields, quality, and harvestability.

In Ontario, our farm members are concerned about the potential effects of climate change on the agricultural sector. We know we must take definite action to combat climate change, but it is critical that we take into consideration the economic and social consequences of those actions jointly with the environmental ones.

Water and soil management also greatly concern our members: too little water (drought) and crops will fail; too much and fields are inaccessible for planting or harvest, or crops can simply drown. As precipitation becomes extreme and erratic, flooding will erode soils and limit opportunities to execute Nutrient Management Plans.

In general, OFA supports the provincial government direction towards addressing climate change. This will be a challenging task requiring sacrifices from everyone to mitigate future impacts; however, we agree with the Ontario Government commitment to balance emission reductions and economic growth.

We support the government's central principle, that Ontarians have already made significant contributions and sacrifices to mitigate climate change, and we welcome a different approach to reducing provincial greenhouse gas emissions. An approach that seeks to reduce and simplify the regulatory barriers that stifle climate change solutions, using transparent data and regional solutions, will facilitate innovation and drive real long-term results.

Ontario agriculture has made and will continue to make significant inroads to reducing greenhouse gas emissions. The nature of agricultural production and its position as price-taker in global markets requires farmers to continuously strive towards greater efficiencies to manage production input costs. These efficiencies predictably come with associated reductions in greenhouse gas emissions. Farmers will continue to do their part to address climate change.

Building Resilience: Helping Families and Communities Prepare **Improve our understanding of how climate change will impact Ontario**

Impact and Vulnerability Assessments

The Ontario Federation of Agriculture agrees that Ontario needs to do more to prepare families, communities and businesses to become more resilient to potential impacts of a changing climate. The best way to move forward in the process of building resilience is to have a good understanding of where we stand. We support conducting a comprehensive provincial climate change impact and vulnerability assessment of Ontario communities, critical infrastructure, and key industry sectors.

Ontario agriculture, and the agri-food sector are complex systems vital to our economy and deserve special consideration. Agricultural production is seasonal activity, and with over 200 commodities grown in Ontario, there is a high variability around ideal crop planting and harvesting times. The challenge of growing biological organisms subject to unpredictable weather conditions creates high risk and vulnerability for farmers. This is especially challenging when considering most of our products are marketed in a domestic or international marketplace where competition is strong, margins are very tight, and the returns on investment are not dictated by the producer. In addition to seasonality, climate exposure and marketplace constraints, the agriculture sector markets highly perishable products. Many of the good things grown in Ontario have narrow windows for emergence, harvest and sale; all of which create unique challenges towards climate change resiliency.

OFA believes this impact and vulnerability assessment is a high priority and must include input and advice from the entire agri-food value chain to provide accurate and timely evidence to government of the threats to agricultural sustainability and food security in Ontario. We welcome the opportunity to participate in the impact assessment to develop the most practical and appropriate actions towards building agricultural climate change resiliency.

Helping Ontarians understand the impacts of climate change

Tools, Models, Demonstrations

We support the commitment from the Made-in-Ontario Environment Plan to continue on-farm soil and water quality programming and to improve the adoption of agricultural best management practices. Healthy soils are a priority for farmers and crucial to the sustainability of Ontario agriculture. OFA strongly supports actions to build a strategic approach to managing the health and sustainability of Ontario's agricultural soil resources. The Provincial Soil Strategy has captured the importance of agricultural soils to the lives and livelihoods of Ontarians, and the necessity to promote soil health and encourage conservation efforts. OFA was pleased to be part of the working group that developed the Provincial Soil Strategy and helped ensure the voices of farmers and stakeholders were heard during consultations.

Early in the Soil Strategy development process we recognized how outcomes could satisfy other environmental stewardship goals, strengthen the resiliency of farming to climate change impacts and improve farm efficiency and profitability. Properly implemented, we believe the Soil Strategy can pay substantial dividends for Ontario farmers into the future. Our farmers are now looking forward to the next steps in this process.

Update government policies and build partnerships to improve local climate resilience

With the wind-down of the Cap and Trade Program, and the suspension of program funding directed by the former Climate Change Action Plan, the Ontario Federation of Agriculture recommends that the provincial government commit to funding implementation of the Ontario Agricultural Soil Health and Conservation Strategy. We believe this will deliver a critical first step in making the agriculture and agri-food sector more resilient to climate change impacts.

We recommend FTP governments analyse of insurance to identify climate change implications on the delivery of Production Insurance and other business risk management programs.

Continuing to Do Our Share: Achieving the Paris Agreement Target Ontario will reduce Emissions by 30% below 2005 levels by 2030

We agree with the provincial government principles for climate change action; that greenhouse gas reduction targets must be responsible, effective, measurable and balanced. Reduction targets must also directly link to Made-in-Ontario Environment Plan goals.

Ontario's farmers have a long history of implementing environmentally beneficial management practices. Through the Environmental Farm Plan, Ontario farmers make excellent progress towards reducing environmental impacts of farm activities while producing increasing yields.

Ontario agricultural activities make the highest and best use of arable land, and agriculturally managed landscapes provide environmental and ecological co-benefits in the process of normal farm practices. Many of the environmental and ecological co-benefits that come from agriculturally managed lands produce the added effect of mitigating the causes of climate change and the potential impacts felt by all Ontarians. These co-benefits include improved air and water quality, temperature regulation, biodiversity and habitat creation, flood management and erosion control, and carbon sequestration.

Make Polluters Accountable

Implement emission performance standards for large emitters

OFA supports the principle that polluters should be responsible for their emissions. Also, a system that is fair, cost-effective, and flexible has the greatest chance to reduce emissions without sacrificing jobs and economic growth. Under the previous government's emissions reduction program, Ontario's agriculture sector was burdened with increasing business costs that cannot be recovered from the marketplace. Some agricultural commodities and production systems were hurt more than others, and some suffered significant economic hardship.

Ontario farmers compete in a global market with little to no control over prices they receive for their products. While some details of the new polluter-pay system are yet to be determined, we expect that the agricultural sector will have an across-the-board exemption from the system given the proven trade-exposure, threats to competitiveness, and threats to food security.

An Output-based Performance Standards (OBPS) system for greenhouse gas emissions is a suitable approach to regulating emissions in Ontario. This reasonable approach of balancing emissions reductions with economic growth, should consider regionality and the surrounding conditions of specific sectors, industries and facilities.

The Ontario Federation of Agriculture is encouraged that the OBPS system may include offset credits as a compliance mechanism for regulated emitters. We have long supported the development of an Ontario-made offset system as a win-win for farmers and emissions reductions. Our original acceptance of a cap and trade mechanism to put a price on greenhouse gases was largely predicated on the ability of Ontario's agricultural sector to engage in the creation, development, and marketing of carbon offset credits to help compensate farmers for higher prices on associated inputs. OFA was disappointed that little progress had been made in developing the offset credit system under the previous Cap and Trade Program.

Farmers should be recognized for their efforts to manage and enhance these co-benefits for the public good. Carbon offset credit systems can provide an effective mechanism to recognize and incentivize an enhanced level of environmental and ecological co-benefits from agricultural lands. We urge the Ontario government to pursue a diverse, made-in-Ontario carbon offset credit system that is practical and flexible enough to facilitate farm-based credits which are eligible to satisfy the compliance needs of large industrial emitters.

Activate the private sector

Launch the Carbon Trust and Reverse Auction process to encourage private investment in cleantech solutions

We support a reverse auction process to advance cleantech as a cost-effective way to help establish new and emerging made-in-Ontario solutions to reduce greenhouse gas emissions.

While cleantech must have long-term business plans to operate independent of public funding, we recognize that some commercially viable solutions require start-up capital. We cautiously applaud the creation of the Ontario Carbon Trust. However, the failure of the previous government to move quickly to create offset credit benchmarks was significant. The Ontario government should move quickly to gain consensus on relevant, transparent measures needed to prove Ontario Carbon Trust investments achieve more carbon sequestration over time.

We believe an effective approach for agriculture to achieve further greenhouse gas reductions also includes: promoting agricultural best management practices (BMPs); programming that recognises the environmental and ecological co-benefits provided by agricultural BMPs; and investing in precision agricultural technology adapted to various farm scales.

We strongly recommend farmers and farm organizations be able to participate in the Ontario Carbon Trust to support cleantech needed to reduce greenhouse gas emissions. The agricultural sector must have the ability to voluntarily aggregate sequestration results at individual, small business or commodity group levels.

OFA is encouraged that the provincial government seeks to engage federal counterparts to unlock more private dollars for Ontario Carbon Trust low-carbon solutions. However, it is also important that any potential Canada-Ontario engagement reveal timely, bankable clarity about the delivery of Canada's Low Carbon Economy Leadership Fund in Ontario - whether funds are administered through Queen's Park or through Ottawa directly to the private sector.

Enhance corporate disclosure and information sharing

The Ontario Federation of Agriculture supports the Ontario government's plans to work with the financial sector to launch climate-related financial disclosures. However, we caution that any data storage or data sharing needed to create these climate-disclosure benchmarks must be aggregated at high enough levels to ensure individual company or sector-level proprietary information remains protected. For example, the previous government established workable parameters for Large Building Energy and Water Reporting criteria that identified and protected unique sectors while permitting IC&I data collection. OFA recommends that the provincial government work with multi-unit residential building and IC&I sector stakeholders to adopt these measures and build a model to value low carbon and carbon sequestration achievements for financial disclosures.

Encourage PPP investment in cleantech and green infrastructure

Ontario has a vibrant bio-economic focus that the provincial government should continue to support, including helping higher education research groups partner with the clean bio-tech industry. The government should also support clean bio-fuel power opportunities, where there is demonstrable demand, to maximize agricultural waste feedstock opportunities.

While the provincial government supports natural gas distribution companies adopt a voluntary target for an RNG component in pipeline gas, the province should work with energy stakeholders to explore a regulated RNG component for pipeline natural gas. Establishing even a small regulated RNG component will send a positive and clear signal to green energy investors. Utilities, feedstock and biogas producers (including municipal and agricultural businesses), organic and inorganic waste resource managers are looking for the Ontario government to provide bankable assurances that we are Open for Business in Ontario.

Use Energy wisely

Conserve home and building energy to cut costs and reduce emissions

We support Ontario improving the quality and availability of energy and water consumption data using the Green Button standardized data access. Ontario's plan to review the Building Code using an energy efficiency lens will help lower Ontario's carbon footprint. However, common sense code solutions should not add undue financial burdens to small and medium sized businesses already overwhelmed by increased costs of pricing carbon.

OFA supports the provincial government pledge to work with the Ontario Energy Board and natural gas utilities to increase the cost-effective conservation of natural gas aimed at reducing emissions and lowering energy bills.

We also support the Ontario government commitment to achieving the highest of energy-efficiency standards for appliances and equipment. To reach this target, Ontario industry and commercial businesses need unfettered access to the most efficient equipment available. OFA recommends Ontario and federal governments establish reciprocal safety standard agreements with appropriate similar international trading partners for equipment designed and built to CSA standards, yet too specialized (limited marketability in Canada) to justify the expense needed for the manufacturer adopt the CSA approval standard.

Increase access to clean and affordable energy for families

Ontario governments have grappled for decades with the challenge of supporting the fair and cost-efficient development of energy infrastructure throughout Ontario. While Ontarians and governments of the day embraced the concept that electricity transmission and distribution access should be the right of all residents and enterprises in Ontario (and similarly telephone access), achieving these lofty goals took generations.

If we believed that it was fair and reasonable that all Ontarians would share the cost to bring telephone and electricity lines down rural roads throughout the province, it is counter to those beliefs to expect individuals to bear the full brunt of bringing this more expensive energy infrastructure down those same roads. It will benefit all of Ontario to ensure rural residents and remote communities are safe from energy poverty. And it will benefit all Ontario to ensure industries and small businesses throughout Ontario have access to clean, affordable and reliable energy for their operations. The ongoing annual energy cost savings that result will be reinvested in these smaller communities for the benefit of the larger provincial economy.

Over the past ten years, Ontario governments have tried to find solutions to bring natural gas infrastructure to rural, northern and remote Ontario communities. This government and the previous provincial government looked to energy stakeholders, municipalities, Indigenous communities and the Ontario Energy Board to provide solutions. OFA recommends the provincial government continue to open regulations to enable this expansion.

The Ontario Federation of Agriculture believes – more importantly than whether funding support is tax based, rate class based, or combined with private public partnerships – the provincial government plan for expansion must be a long-term commitment for smart development of this infrastructure. There are over 600,000 potential customers and businesses outside of Ontario’s urban centres that could benefit from natural gas infrastructure solutions, including pipelines, compressed and liquid gas. This means a multi-year commitment, using smart plan decision-making to solve capacity constraints and optimal routing will achieve the best network results.

OFA recommends the provincial government establish a stakeholder working group to inform this development, including, utility, regulatory, industrial, regional municipal, Indigenous, agricultural and social development expertise.

Doing our part: Government leadership

Make climate change a cross-government priority

OFA recommends Ontario and federal government work to establish common cross-government priorities. For example, Finance Canada proposed regulations under the GHG Pollution Pricing Act, confirm that the federal fuel charge will begin on April 1, 2019 in Ontario. Finance Canada indicated: exemptions for greenhouse operators; targeted relief for farmers, rural and remote communities; and some supports to municipalities, institutions, Indigenous communities, and small to medium-sized businesses that incur an additional cost as a result of pricing carbon pollution. OFA recommends both levels of government continue to recognize rural, agricultural, northern and remote communities will incur additional costs because of carbon pricing and our commitment to carbon sequestration targets.

Section 3 Reducing Litter and Waste in Communities & Keeping Land and Soil Clean

Over 60% of Ontario food and organic waste is sent to landfills, left to break down to create greenhouse gases that contribute to climate change. Ontario Federation of Agriculture supports Made-in-Ontario Environment Plan pledges that the provincial government will continue to work with partners on ways to make it easier to reduce and repurpose food and organic waste or reuse it for beneficial purposes such as compost production.

Agriculture is integral to the beginning of the food and organic waste resource circuit and continues to strive towards 100% of on-farm organic waste diverted to higher consumption or reinvested to farm processes. For example, Ontario farms directly support foodbanks, and where practicable, many allow additional in-field production gleaning for food banks to distribute, or to market in support of other food poverty initiatives.

In the middle section of the waste resource circuit, hotels, restaurants, groceries, processors, institutions— the IC&I sector, vast quantities of food, organic and inorganic waste accumulate.

Agriculture is also integral to the end of the food and organic waste resource circuit, as an important partner in the distribution of composts and post-digestate materials. we recommend the Ontario government continue engagement strategies the previous government led, to increase the amount of waste diverted from landfill to higher value processing streams.

Large-scale solutions for municipal and IC&I sector organic waste streams include composting and anaerobic digestion that will ultimately augment organic material in agricultural soils. OFA recommends the Ontario government continue to engage agricultural sector stakeholder and OMAFRA expertise to advise government on the best management practices needed to produce safe materials and cost-effective handling methods.

Reduce Litter and Waste: Plastic Waste

Ontario's agricultural sector produces some of the finest stewards of farmland, forests and watersheds. Ontario farmers also handle huge amounts of plastic waste, generated from seed, fertilizer and other input packaging, and plastics used to store farm grown production, farm tools and equipment. Even more plastics are used to ship products, package food and beverages, and get them through wholesale and retail to the end consumers.

OFA and county federations throughout all regions of Ontario have invested time and money to address the challenges of managing farm plastics. With waste resource data compiled at local, regional sector and provincial levels, the agricultural community would benefit from provincial government support to establish some pilot programs to address agricultural plastic waste resource management. Many solutions are low-tech such as: increase number of waste facility containers made available for farm plastics; analysis of best solutions to address transfer station logistics problems; on-farm compaction, plastics product stewardship options.

Other challenges facing agricultural plastic waste resource management include limited reuse options and constrained business solutions for reprocessing farm plastics. OFA recommends the Ontario government engage Ontario municipal associations and agricultural sector stakeholders to explore opportunities and barriers to the development of reprocessed plastic markets with focus geared to regional solutions.

After diversion and reuse streams, as a final option for some plastics, the Ontario Federation of Agriculture recommends the provincial government engage and support local rural communities and municipal associations in creating business models for pyrolysis and other thermal or chemical processes to transform these inorganic waste resources into marketable bio-solids or local green energy solutions.

Reduce litter in our neighbourhoods and parks

OFA supports the Ontario government pledge to work with municipal partners to act against those who illegally dump waste in our neighbourhoods, parks and coastal areas. Addressing illegal dumping is a positive step. Farmers also regularly find garbage (construction waste, garbage, appliances, etc.) illegally dumped on their land. However, once waste is illegally dumped, the onus for removal falls to the land owner. These land owners should not be penalized twice when this happens; first, when they find materials illegally dumped on their land and second, when they are deemed financially responsible for the necessary clean up and removal. We recommend that the provincial government prioritize and ensure removal of illegally dumped waste from private property is not a responsibility cost borne by land owners.

Increase prospects for Ontarians to participate in waste reduction efforts

We recommend the provincial government work with municipal associations and waste management stakeholders to provide more consistency across the province regarding what can and cannot be accepted in the Blue Box program. We also recommend support for educational materials aimed at improving IC&I sector opportunities to reduce and recycle waste in Ontario businesses and institutions.

Make producers responsible for the waste generated from their products and packaging

OFA supports moving some existing waste diversion programs to the producer responsibility model. This may reduce municipal costs and can make producers of packaging and products more efficient by better connecting them with the markets that recycle what they produce. However, we continue to caution that, while these types of initiatives can empower positive recycling habits, because of the nature of agricultural production sales markets, waste producer pay models will unfairly cost farmers and may become unmanageable in rural and more northern regions. We also recommend the provincial government explore ways to influence producers of packaging and products to produce more compostable packaging.

Explore opportunities to recover the value of resources in waste

OFA is encouraged that Ontario is interested in exploring waste resource recovery business models. After our best efforts at reduction, reuse and recycling, chemical and thermal processes are among our best value options to make sure these resources are diverted from landfills to produce bio-solids, bio-chars or green district energy.

The provincial government should work with AMO, ROMA and NOMA to explore options that will help smaller and more rural or remote communities establish private public partnership arrangements best suited to own and operate these new clean biotech facilities. OFA also recommends the province work with municipal associations to encourage recycling and new projects to recover the value of waste (such as hard to recycle materials) in rural Ontario where

there are already constraints on existing waste management infrastructure. Not-for-profits like CleanFarms are good examples of full spectrum collaborations that should be encouraged, for the benefit of both farming and municipalities.

Provide clear rules for compostable products and packaging

The Ontario government should ensure new compostable packaging materials in Ontario are accepted by existing and emerging recycling programs across the province, by working with municipalities and private composting facilities to build a consensus around requirements for emerging compostable materials.

The Ontario government should engage with urban, rural and remote municipal associations to explore the benefits and drawbacks of Producer Responsibility, Stewardship Model, and Retailer Responsibility Programs to determine the best solutions for Ontario to regionally address end of life management of packaging and packing products.

Support competitive and sustainable end-markets for Ontario's waste

The Ontario Federation of Agriculture supports the Ontario government interest in reducing red tape and modernizing environmental approvals to support sustainable end markets for waste and new waste processing infrastructure. OFA believes rural Ontario needs an integrated waste management system that incorporates strong diversion, reuse, and recycling components. In recognition of the unique challenges rural, northern and remote areas endure to manage waste resources, OFA supports recovery targets that consider community size, density, and geographic distribution. OFA recommends expanding rural recycling programs to accept pesticides and fertilizer containers, plastic bale wrap, bags and other items used on the farm.

We also strongly support municipalities and the communities they represent be given decision-making input for landfill siting approvals. Agricultural lands share similar physical characteristics with ideal land fill site characteristics. OFA recommends provincial and municipal governments seek agricultural sector expertise to ensure that proposals for new and expanded landfills are subject to rigorous assessment processes for design, siting, operation, closure, post-closure care requirements and financial assurance.

OFA also calls for government commitments for biogas-to-renewable natural gas refinement infrastructure, two-way natural gas pipeline infrastructure, and the adoption of a renewable natural gas fuel standard.

Clean Soil: Make it easier and safer to reuse excess soil

Excess soil is often a resource that can be reused. OFA recommends the Ontario government set clear rules to allow industry to reduce construction costs, limit soil being sent to landfill and reduce greenhouse gas emissions from trucking by supporting beneficial reuses of safe soils. We also Ontario and municipal government work with conservation authorities and stakeholders to increase enforcement on illegal dumping of excess soil.

OFA actively participants in ongoing consultations and dialogue on excess soils. We support the beneficial reuse of clean excess soils (see Plan Table 1). We suggest that clean excess soils can be used to improve the quality of rehabilitation of worked-out aggregate sites for an agricultural end use. OFA recommends that the excess soils regulatory proposal be implemented no later than January 1, 2020.

Section 4 Conserving Land and Greenspace: Improve resilience of natural systems

Collaborate with partners to conserve and restore natural ecosystems and ensure that climate change impacts are considered when developing protection plans

Strengthen and expand grassland habitats by implementing the Grassland Stewardship Initiative that supports on-farm conservation activities to benefit grassland birds at risk

Work with leaders in land and water conservation to preserve areas of significant environmental and ecological importance

OFA supports the protection of natural ecosystems, such as wetlands, woodlands and grasslands. Prime agricultural lands are not a class of industrial land or placeholders awaiting development for urban uses. Ontario's prime agricultural lands provide safe, affordable, locally produced food, fibre and fuel, but also contribute towards climate change resilience and ecosystem services. Several years ago, the Middlesex Federation of Agriculture posted the following message on a billboard. We believe it is worthwhile reflecting on its message;

Man, despite all his accomplishments, owes his entire existence to six inches of topsoil and the fact that it rains.

While Ontario covers a vast and diverse area, over 1 million km² of distinctly different geographic regions, we must not lose sight of the fact that less than 5% of Ontario's land base can support any agricultural production. Of that 5%, only a very small proportion contains our best growing soils; Class 1, 2 or 3 lands.

There are almost 7.7 billion people in the world. The United Nations projects the global population to rise to over 9.8 billion by 2050, just 31 years from now. Feeding ourselves and contributing to feeding the world on an ever-reducing supply of productive agricultural land is a formidable challenge. Ontario must maintain as much of its limited arable land as possible in agricultural production. Ontarians must ensure that our actions and policies do not jeopardize our ability to produce food, fibre and fuel, in perpetuity, from this limited agricultural land base. We cannot continue to use our best agricultural land for urban uses.

Data from the 2016 census showed a decline in the area being farmed since 2011. Ontario farms encompass 12.3 million acres, down 319,700 acres over the previous census. Regardless the reason for this decline, urban expansion, or aggregate extraction, or both, Ontario cannot continue to sustain average annual losses of 64,000 acres while maintaining our ability to produce a higher volume food, fibre and fuel.

As stewards of highly productive agricultural land, Ontario farmers have a keen interest in ensuring public policy does not jeopardize or destroy that resource. Ontario's farmers require and deserve the assurance that urban growth and development adjacent to farms will not be the end of those farms. Furthermore, we demand that future urban growth and development be achieved inside fixed, permanent urban boundaries, not through greenfield development.

Unfortunately, experience clearly demonstrates that prime agricultural land is routinely sacrificed for many of society's wants including urban uses, aggregates, recreation and natural heritage.

Support conservation and environmental planning

Collaborate with municipalities and stakeholders to ensure CAs focus and deliver on their core mandate to protect people and property and conserving natural resources

Modernize Ontario's environmental assessment process to address duplication, streamline processes, improve service standards to reduce delays

Protect vulnerable of sensitive natural areas, such as wetlands and other important habitats through good policy, strong science, stewardship and partnerships

Improve the coordination of land use planning and environmental approval processes by updating ministry guidelines to help municipalities avoid conflicting land use impacts

The Ontario Federation of Agriculture supported amendments to the Conservation Authorities Act contained in the Building Better Communities and Conserving Watersheds Act, 2017. We endorsed changes that would see conservation authorities focus and deliver on their core mandate of protecting people and property from flooding and other natural hazards and conserving natural resources. We also sought changes to several key definitions in the Conservation Authorities Act, meant to improve consistency and clarity. We continue to recommend the Ontario government develop new regulations for wetlands, watercourses and hazardous lands.

OFA endorses modernizing Ontario's environmental assessment process. For far too long, that process has ignored the impacts of infrastructure expansions and urban settlement boundary expansions on individual farm operations. Environmental assessments have focussed solely on natural heritage feature and area impacts to the detriment of agriculture.

The Co-ordinated Land Use Planning Review included requirements that Agricultural Impact Assessments be required for proposed non-agricultural development impacting agricultural operations and the Agricultural System, within areas subject to the Growth Plan for the Greater Golden Horseshoe. Consultations on an Agricultural Impact Assessment Guidance Document concluded last summer. To date, the Guidance Document has yet to be finalized and published.

OFA strongly recommends that the Agricultural Impact Assessment Guidance Document be finalized and published as an integral part of modernizing Ontario's environmental assessment process.

Ontario farmers are conservationists and environmentalists. They employ environmentally sustainable practices, as demonstrated by over 200 years of continuous agricultural production. We further emphasize the widespread acceptance of the Environmental Farm Plan by Ontario's farmers as further evidence of farmers' commitment to environmental conservation and sustainability.

Promote park and recreational opportunities: Support creating new trails across Ontario

The Ontario Federation of Agriculture believes that, inherent in any expansion of Ontario's recreation trails system, there must be recognition that much of agricultural and rural Southern Ontario is privately owned, and new trails require prior landowner approval.

Share the responsibility of conserving Ontario’s protected lands by continuing to partner with municipalities, conservation authorities, Indigenous communities, conservation organizations and other community groups, such as trail groups.

OFA cautions the provincial government to not undervalue the role of Ontario’s farmer and landowner investments in environmental stewardship activities towards achieving this objective. And FPT agricultural programs provide critical support for on-farm soil and water quality activities and collaboration with partners to increase adoption of best management practices that improve the agriculture and food sector’s resiliency to climate change risks, such as droughts, flooding, extreme weather, and new pests and diseases.

We also recommend the Ontario government continue to support climate-related research connected to priorities such as: adaptation, soil health, water quality, pollinator health, resilient municipal infrastructure, and reducing greenhouse gas emissions to address challenges facing our agri-food sector and rural communities.

Protect species at risk and respond to invasive species

The Environment Plan reaffirms our commitment to; protect species at risk and habitats, legislate stringent protections, work with stakeholders to improve program effectiveness.

Protect our natural environment from invasive species by working with partners and other governments and using tools to prevent, detect and respond to invasions.

Determination of which plant or animal species should be added to the Species at Risk in Ontario (SARO) list is the sole responsibility of the Committee on the Status of Species at Risk in Ontario (COSSARO). COSSARO conveys listing decisions to the Minister of Natural Resources and Forestry. Within ninety days, species listed in one of 5 categories are added to the SARO list. There is no ministerial discretion. Once added to the SARO list as threatened or endangered, members of the species and member habitats receive automatic protection. The OFA recommends that COSSARO status decisions be changed from automatic to Minister discretion, considering socio-economic results of additions to the Ontario Species at Risk list.

The listing of the Algonquin wolf combined with affording protection to coyotes is one example that demonstrates the need for Ministerial oversight. COSSARO’s report considered five factors in its assessment,

1. a decline in the total number of mature individuals,
2. a small distribution range,
3. a small and declining number of mature individuals,
4. a very small or restricted population and
5. a quantitative analysis.

Four of the factors either did not apply or there was insufficient data on which to base a decision. Only the very small or restricted population factor (#4) held, and it was tempered by acknowledgement that the population of Algonquin wolves has “almost certainly led to an underestimation” of its numbers. Combine this with the reality that both wolves and coyotes are highly territorial animals, broadly spread across the Ontario landscape, making expectations that this hunting and trapping ban, or any other management action, will positively impact

expansion of their current range, is utterly unrealistic. This unrealistic expectation, combined with the inclusion of coyotes, Ontario's dominant predator on livestock, underscores the inherent problem of a lack of government oversight of COSSARO's decisions.

The Endangered Species Act, 2007 requires a five-year status review for species on the SARO list. This requirement places a significant resource burden on the provincial government. The Ontario Federation of Agriculture proposes that the current five-year status review for species on the SARO list be replaced with a ten-year status review.

We have been supportive of provincial efforts to develop a legislative and regulatory framework to respond to threats from invasive species. Our concerns with Ontario's Invasive Species Act centre on the limited application of the Act regarding restricted invasive species. Prohibitions related to restricted invasive species only apply in conservation reserves and provincial parks. We acknowledge that different invasive species pose differing threats to our ecosystems and biodiversity. Nevertheless, limiting the response to the presence of a restricted invasive species is short-sighted. If Ontario does not address invasive species province-wide, then there is too great a likelihood that they become so firmly established that no eradication efforts will succeed. OFA recommends that actions to control invasive species apply equally and province-wide to both prohibited invasive species and restricted invasive species.

Section 5 Next Steps Implementing the Plan

Establish an advisory panel on climate change

OFA feels that it is crucial that the agricultural sector be represented on any climate change advisory panel established to provide advice to the Minister on implementation and further development of actions and activities. OFA looks forward to engaging government and other stakeholders as Ontario moves to develop economy-wide carbon intensity targets.

Closing Remarks

Ontario agricultural activities make the highest and best use of arable land, and agriculturally managed landscapes provide environmental and ecological co-benefits in the process of normal farm practices. Many of these agriculturally managed lands co-benefits also mitigate the causes of climate change and the potential impacts felt by all Ontarians. These co-benefits include improved air and water purification, temperature regulation, biodiversity and habitat creation, flood management and erosion control, and carbon sequestration. Agriculture is a key sector of Ontario's economy that has the great potential to provide solutions to climate change and greenhouse gas mitigation. We look forward to engaging with the Province regarding the implementation of the Made-in-Ontario Environment Plan.

Sincerely,



Keith Currie
President