

May 24, 2019

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Delivered via: Eamodernization.mecp@ontario.ca

Dear Sharifa Wyndham-Nguyen,

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 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.

The OFA is pleased to have this opportunity to provide comments on ERO #013-5101 and ERO #013-5102 "Modernizing Ontario's environmental assessment program – Environmental Assessment Act" and the corresponding Discussion Paper.

The OFA is in favour of eliminating duplication and finding efficiencies in government while maintaining the purpose and intent of provincial legislation/regulation. One of the core principles of environmental assessment is the fact that this process considers "**all aspects of the environment**, including natural, social, economic, cultural, and built conditions." It is critical to the OFA that this core principal is not lost in the process of amending the Environmental Assessment Act. It should also be noted that agriculture is a component of both the social and economic components and contributes to the natural and cultural aspects as well.

OFA does have concerns about the categories/groups/schedules that are being proposed to be "lowest-risk" and therefore exempted from environmental assessment requirements. Of greatest concern to us is the potential impact some of these projects may have on agricultural lands and business. If the projects proposed to be exempted from environmental assessment requirements are still deemed to be "lowest-risk projects" through this process, then the basis for allowing for a "bump-up" (requesting a higher-level of assessment) must include a request for an Agricultural Impact Assessment on the project - this is a matter of provincial importance. The potential impact on agricultural land use and business must be considered when completing any and all public sector projects.

OFA recommends that a request for an Agricultural Impact Assessment be grounds for a "bump-up" that will include the completion of this study by the project proponent.

OFA believes that Environmental Assessments must include an Agricultural Impact Assessment when a project has the potential to impact agricultural lands or activities. This requirement needs to be incorporated into the EA process. Along with consulting with the impacted agricultural community, an Agricultural Impact Assessment should also include the following:

- *Recognize agriculture as a business as well as a land capability class*
- *Include agribusiness as a category of business to be studied*
- *Require consulting teams to have/or consult with an agricultural specialist when agricultural land and Agribusinesses may be impacted.*
- *Require all draft documents/maps prepared by consultants for each public review and comment period to be revised in the form of a final report for each phase and made available to the public prior to initiating the next phase of the study.*
- *Require all mapping data used in Environmental Assessment (EA) studies to be up to date.*
- *Require all Public Information Centres (PICs) to have an open public discussion period following each consulting team presentation.*

OFA further recommends that an Agricultural Impact Assessment be required for all Environmental Assessments when the project has the potential to impact agriculture.

I trust our opinions and recommendations will be given due consideration in this consultation. OFA remains available to provide clarification regarding our concerns.

Sincerely,



Keith Currie,
President