July 23, 2019

Andrea Pastori
Strategic Policy and Analytics Branch
77 Grenville Street, 6th floor
Toronto, ON
M7A 2C1

Dear Ms. Andrea Pastori,

RE: ERO # 019-0256 - Updating the Ministry of Energy, Northern Development and Mines' Statement of Environmental Values

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 the Ministry of Energy, Northern Development and Mines (ENDM)' proposed Statement of Environmental Values (SEV). We note that the proposed SEV will replace the former Ministry of Energy and former Ministry of Northern Development and Mines SEVs.

The proposed SEV states that ENDM is committed to applying the purposes of the Ontario Environmental Bill of Rights (EBR) when decisions that might significantly affect the environment need to be made by the Ministry. The proposed SEV further states that as the Ministry develops acts, regulations, policies, and instruments the Ministry will:

1. Consider the effects of decisions on current and future generations of Ontarians, consistent with principles of sustainable development;
2. Consider the opportunities and threats from climate change to Ontario's environment, and people's health, safety, and prosperity, and evaluate opportunities to reduce greenhouse gas emissions and/or enhance Ontario's resilience to a changing climate;
3. Consider and evaluate environmental costs, benefits, and risks when planning future initiatives and ensure that cost-effective environmental protections are incorporated, when required. Where appropriate, this may include:

   a. Energy
      i. Comparing the differing environmental impacts, opportunities and costs of energy sources and other technologies, including their associated environmental impacts and greenhouse gas emissions; and
      ii. Promoting conservation and the efficient use of energy to ensure consumers can make informed decisions.

OFA

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    b. Northern Development
      i. Promoting sustainable development in Northern Ontario, while protecting natural heritage and biological features of provincial significance;
    c. Mines
      i. Recognizing that achieving the environmentally sustainable development of Ontario's mineral resources and the continuing availability of mineral resources for the long-term benefit of the people of Ontario requires:
- an understanding of the ecological, physical, social, cultural, and economic impacts of development on a project-by-project basis; and
- sound environmental planning that recognizes mining as a temporary land use, replaced in the long-term with alternative natural, recreational or commercial land use.

In addition to the above considerations, OFA recommends that the ENDM's SEV also include:

- Consider all aspects of the environment, including natural, social, economic, cultural, and built conditions.

This addition would ensure the ENDM's SEV is aligned with a core principal of Ontario's environmental assessment program, as noted in the Ministry of the Environment, Conservation and Park's Modernizing Ontario's Environmental Assessment Program discussion paper (EBR # 013-5101).

Agriculture is an integral part of the environment and has both social and economic components, in addition to contributing to the natural and cultural aspects as well. Therefore, it is critical to agriculture that all aspects of the environment are considered.

I trust that our recommendation will be given due consideration in this consultation.

Sincerely,

Keith Currie
President

cc: The Honourable Jeff Yurek, Minister of the Environment, Conservation and Parks
       The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
       OFA Board of Directors