

October 7, 2020

Maria Yannelis
Ministry of Heritage, Sport, Tourism
And Culture Industries
Strategic Corporate Policy Unit
400 University Avenue
Toronto, ON
M7A2R9
(Submitted online via Environmental Registry of Ontario)

Dear Ms. Yannelis:

**Re: ERO # 019-2396 - Update to the Ministry of Heritage, Sport, Tourism and
Culture Industries' Statement of Environmental Values**

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA is pleased to provide comments on the proposed updated Statement of Environmental Values (SEV) for the Ministry of Heritage, Sport, Tourism and Culture Industries (the Ministry). As noted in the proposal details of ERO # 19-2396, the *Environmental Bill of Rights, 1993* requires that each ministry prescribed under the Act develop and publish a SEV specific to the work of that ministry. A SEV is a ministry's statement of environmental principles and a guidance document directing the minister and ministry staff as they make decisions regarding policies, acts, regulations, and instruments that might affect the environment.

Certain proposals may result in an impact on agricultural activities. For example, the safe movement of agricultural machinery on roadways could be impeded by erecting cycling lane barriers along roads.

OFA appreciates the Ministry's continued collaboration efforts on initiatives to ensure stakeholder concerns are properly addressed. OFA welcomed the opportunity to engage with respect to the development of Ontario's Trails Strategy. We are pleased that respecting private land, including agricultural lands, was outlined as a core value in this Strategy.

As stated in the Ministry's draft updated SEV, the Ministry commits to provide opportunities for an open and consultative process when making environmentally significant decisions. The Ministry also commits to integrating the purposes of the EBR with other considerations including social, economic, and scientific considerations when making decisions that might significantly affect the natural environment. In addition to the proposed considerations, **OFA recommends that the Ministry's updated SEV also include the Ministry's commitment "to consider all aspects of the environment, including natural, social, economic, cultural and built conditions"**. This addition would ensure the Ministry's updated SEV is aligned with a core principle of Ontario's environmental assessment program, as noted in the Ministry of the Environment, Conservation and Parks' Modernizing Ontario's Environmental Assessment Program discussion paper (ERO # 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. Therefore, it is critical to agriculture that all aspects of the environment are considered.

Sincerely,



Keith Currie
President

cc: The Honourable Lisa MacLeod; Minister of Heritage, Sport, Tourism and Culture Industries
The Honourable Ernie Hardeman; Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors