

December 16, 2020

Heer Bhatt, Project Consultant
Operational Support and Coordination Office
Ministry of Long-Term Care
99 Adesso Drive
Concord, ON
L4K 3C7

(Submitted online via Environmental Registry of Ontario)

Dear Heer Bhatt:

Re: ERO # 019-2060 - Updating the Ministry of Health's 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 Health (the Ministry). As noted in the proposal details of ERO # 019-2060, 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.

The Ministry's draft SEV states the Ministry's commitment to "contribute to a collaborative process to recognize the need for society to become a conservator of diminishing non-renewable natural resources and to reverse trends and practices whose final disposition has been harmful to the natural environment". OFA notes that society should also focus on the wise use of renewable resources, such as agricultural soils, as well. OFA believes that the highest and best use of our arable land is for agriculture. OFA has repeatedly emphasized to a succession of provincial governments that Ontario's prime agricultural lands, the lands we depend upon for locally produced food and key to underpinning our food security, have been in a steady decline for over

a quarter of a century. The continuing loss of the key resource that underpins Ontario's agriculture and agri-food sector has the potential to jeopardize the future of food production in the province. Land capable of supporting agricultural activity is a strategic resource worthy of preserving as it ensures a safe, sustainable supply of food, fibre and fuel for Ontario, Canada, and the world. OFA continues to stress the need for mandatory Agricultural Impact Assessments (AIA) for proposed projects that have the potential to affect agricultural operations.

As stated in the Ministry's draft updated SEV, the Ministry will endeavour to ensure that environmental values are integrated into strategic planning, priority setting and policy development activities. The Ministry also commits to integrating the purposes of the EBR with social, economic, and other considerations when making decisions that might significantly affect the environment. Additionally, **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,



Peggy Brekveld
President

cc: OFA Board of Directors