

March 25, 2021

Alexandra Radley  
Corporate Coordination Unit  
777 Bay Street  
Toronto, ON  
M5B2H7

Sent via email to: [Alexandra.radley@ontario.ca](mailto:Alexandra.radley@ontario.ca)  
and submitted online via Environmental Registry of Ontario

Dear Alexandra Radley,

**Re: ERO # 019-3116 – Updated Statement of Environmental Values for the Ministry of Government and Consumer Services**

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 Government and Consumer Services (MGCS). The *Environmental Bill of Rights, 1993* (EBR) 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. OFA appreciates MGCS's commitment to applying the purposes of the EBR, especially given MGCS manages one of the largest real estate portfolios in Canada.

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 MGCS's draft updated SEV, the MGCS "will take into account environmental considerations together with social, economic and scientific considerations. These considerations will be integrated with the purposes of the EBR when decisions that might significantly affect the environment need to be made. There are several business activities within MGCS that take into account other considerations including social, economic and scientific considerations".

We note that agriculture is an integral part of the environment and has social, economic and scientific components. Therefore, it is critical that the impacts on agriculture are fully considered.

Sincerely,



Peggy Brekveld  
President

cc: OFA Board of Directors