

November 19, 2021

Sally Renwick  
Ministry of Environment, Conservation and Parks  
Environmental Assessment Branch  
135 St. Clair Ave W  
Toronto, ON  
M4V 1P5

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

Dear Sally Renwick,

**RE: ERO 019-4189: Clarifying the authority to change the classes of projects to which a class environmental assessment process applies**

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates the opportunity to comment on ERO 019-4189: Clarifying the authority to change the classes of projects to which a class environmental assessment process applies. We appreciate that this consultation is proposing a minor amendment to the Environmental Assessment Act to clarify that the authority includes changing the classes (or types) of projects to which a Class EA applies.

OFA continues to stress the need for mandatory Agricultural Impact Assessments (AIA) for projects that have any potential to affect agricultural operations. For projects that have the potential to impact agricultural operations, it remains crucial that the impact to agriculture is assessed. A formal requirement to complete an AIA must be built into the assessment of any project that has the potential to impact agriculture. This means an AIA must be included within the Environmental Assessment process, and also be required for projects that may be excluded from the Environmental Assessment Act. Furthermore, the requirement for an AIA must remain, even if the the class (or type) of project is changed.

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I trust our opinions and recommendations will be given due consideration in this consultation.

Sincerely,

A handwritten signature in black ink, reading "Peggy Brekveld". The signature is written in a cursive, flowing style. To the right of the signature is a vertical line.

Peggy Brekveld  
President

cc: The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs  
OFA Board of Directors