

January 25, 2022

EA Modernization Project Team  
Environmental Assessment Modernization Branch  
135 St Clair Ave West, 4<sup>th</sup> Floor  
Toronto, ON  
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Submitted via email: [EAmmodernization.mecp@ontario.ca](mailto:EAmmodernization.mecp@ontario.ca)  
and submitted online via Environmental Registry of Ontario (ERO)

Dear EA Modernization Project Team,

**Re: ERO # 019-4219: Moving to a project list approach under the Environmental Assessment Act, and**

**ERO #019-4428: Extending the expiry date for Environmental Assessment Act approvals for certain projects**

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.

We appreciate the opportunity to provide input to the Environmental Registry of Ontario consultations 019-4219: Moving to a project list approach under the Environmental Assessment Act and ERO 019-4428: Extending the expiry date for Environmental Assessment Act approvals for certain projects.

OFA continues to stress the need for mandatory Agricultural Impact Assessments (AIA) for projects that have any potential to impact agricultural land and/or operations, regardless of what “list” or process the project must follow - whether it requires a comprehensive, streamlined or exempted environmental assessment. The OFA also stresses the need for the requirement for a mandatory AIA for all of projects that may impact agricultural land that receive an extension to their approvals under the *Environmental Assessment Act* as proposed in ERO #019-4428.

The consultation document, Environmental Assessment Modernization - Moving to a Project List Approach under the Environmental Assessment Act, for ERO # 019-4219 states: “*The proposal includes a provision to clarify what ‘establishing’ does not include, such as planning. However, the ministry expects that an environmental assessment would still address the designing,*

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*constructing and operating of the thing being established. For some project types, the ministry will also expect that the closure/decommissioning of the facility be assessed as part of the environmental assessment, as is currently the case (e.g., landfills)."*

OFA believes that an environmental assessment should address the full lifespan of a project, including its design, construction, operation, and decommissioning (where relevant). Environmental mitigation components are instrumental at all stages of a projects duration and must be considered when evaluating the potential environmental impacts of a project.

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

Sincerely,



Peggy Brekveld  
President

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