

March 24, 2023

Sally Renwick, Project Manager
Environmental Assessment Modernization Branch
135 St Clair Ave West, 4th Floor
Toronto, ON M4V 1P5

Submitted via email: eamodernization.mecp@ontario.ca and
submitted online via Ontario's Regulatory Registry

Dear Sally Renwick,

**Re: ERO 019-6516 / 23-MECP004: Providing Authority to Waive or Alter the 30-day
Waiting Period for Class Environmental Assessment Projects**

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

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating nearly 750,000 jobs, and contributing over \$47 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to drive the economy forward.

We would like to take this opportunity to express our concerns with Regulatory Registry posting # 23-MECP004 / ERO # 019-6516: Providing Authority to Waive or Alter the 30-day Waiting Period for Class Environmental Assessment Projects.

We are opposed to these proposed amendments that would provide the ability to eliminate, waive or alter the 30-day waiting period following the comment period of a Class Environmental Assessment. It is essential that there is time for a proponent to review and appropriately consider the submitted comments. Allowing a proponent to proceed as soon as a comment period closes amounts to an insult to the public who work within the system to provide comments of their very real concerns regarding a project, often along with some very ingenious potential solutions. It is often through public consultation that proponents are made aware of negative unintended consequences of their projects. The 30-day waiting period provides the time for the proponent to further investigate and mitigate concerns and unintended consequences that they may have overlooked.

Public participation is a critical component of environmental decision-making. Failure to allow for meaningful participation can lead to resentment, animosity, or ambivalence. The system must allow for meaningful participation to empower all those involved, from the concerned citizen to the corporate proponent to the government (at all jurisdictions) representatives. The ability to eliminate this 30-day waiting period effectively negates any public participation in this process.

We trust our opinions and recommendations will be given due consideration during your deliberations.

Sincerely,

A handwritten signature in black ink that reads "Peggy Brekveld". The signature is written in a cursive style and is positioned to the left of a vertical line.

Peggy Brekveld
President

cc: OFA Board of Directors