

May 9, 2023

EA Modernization Project Team  
Environmental Assessment Modernization Branch  
135 St Clair Ave West, 4<sup>th</sup> Floor  
Toronto, ON M4V 1P5

Sent via email to: [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 019-6693: Evaluating municipal class environmental assessment requirements for infrastructure 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 administered by all levels of government. OFA is 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.

OFA is opposed to the proposal to revoke Municipal Class Environmental Assessments (EA) and are further opposed to the proposal that “similar projects in municipalities led by other proponents would have no EA requirements; the related regulation would be revoked.” We believe that the reduction of environmental oversight to municipal road, water and wastewater projects is significant. The core principle of environmental assessments is that they are a process that considers “all aspects of the environment, including natural, social, economic, cultural, and built conditions.” It is critical to the OFA that these core principles are not lost when completing municipal road, water, and wastewater projects.

It remains vital to the OFA that any of these projects, whether subject to the requirements of a Municipal Class EA or not, be required to complete a mandatory Agricultural Impact Assessment (AIA) if the project has the potential to impact agricultural lands, activities, or systems.

An Agricultural Impact Assessment (AIA) is a critical tool that is used to evaluate the potential impacts of non-agricultural development on agricultural operations and the agricultural system, and recommends ways to avoid or, if avoidance is not possible, minimize and mitigate adverse impacts.

OFA believes that farming to produce food, fibre, fuel, flowers, and nursery stock is the best use for farmland. Ontario’s limited supply of farmland is a scarce resource, making up less than five percent of all the land in the province. It’s vital that Ontario has a strong, viable and sustainable supply of food products grown, harvested, and processed right here at home. Ontario’s shrinking agricultural land base is alarming. The current rate of loss is measured at 319 acres per day in

---

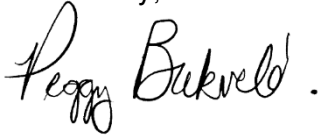
our province, according to the 2021 Census of Agriculture. These losses are not sustainable. When agricultural land is developed, it is lost forever.

Ontario plans to modernize waste management to ensure we have the infrastructure to reuse and recycle more waste. Ontario is also preparing to expand the footprint of electricity generation and storage through 2050. OFA recommends new or untested industrial-scaled technology (such as lithium-ion battery) must be sited where there are sufficient supports in place to manage system failures. In addition to a requirement for municipal government support resolution, these projects should require environmental assessments.

If our province plans to continue to grow and prosper, we must also have a plan to protect Ontario's position to produce food, fibre, fuel, flowers, and nursery stock for the people of Ontario and beyond. This includes supporting initiatives that will protect our farmland.

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

Sincerely,



Peggy Brekveld  
President

cc: OFA Board of Directors