

May 9, 2023

EA Modernization Project Team  
Environmental Assessment Modernization Branch  
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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 019-4219: Moving to a project list approach under the *Environmental Assessment Act***

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 appreciates the opportunity to provide our input into ERO 019-4219: Moving to a project list approach under the *Environmental Assessment Act*. This consultation is looking to “allow more projects to follow a streamlined EA (Environmental Assessment) process.” Specifically, it is looking to move “all transportation (highways and rail) and electricity transmission projects that had been proposed for a comprehensive EA to a streamlined EA process. The revised proposal also includes a new transition provision for waterfront projects.”

It remains vital to the OFA that any and all projects that have the potential to impact agricultural lands, activities, or systems, be required to complete a mandatory Agricultural Impact Assessment (AIA), regardless of the need to complete some form of environmental assessment or not. That being said, we encourage specific wording within the streamlined EA process to require proponents to complete an AIA for projects potentially impacting agriculture.

An 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

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

Furthermore, it remains essential that the public retains the ability to provide meaningful comment and input into project proposal based on the potential impact, and that an appeal process is also incorporated, and must allow relevant considerations that actually reflect the potential environmental impact of a project.

In particular, rail and transportation projects risk bisecting farm communities and their design should mitigate impacts to agriculture. Electricity transmission projects impact agricultural lands. Considering the forecasted electrification of Ontario energy loads and plans underway to accommodate decarbonization and increased grid capacity to meet higher demands, the IESO's (Independent Electricity System Operator) own reports indicate that electricity infrastructure will require 2.2 million acres of mostly rural and agricultural land - 14 times the footprint of Toronto. At a minimum, these infrastructure projects must avoid further depletion of specialty crop areas and/or Canada Land Inventory Class 1, 2, 3, and 4 lands.

The siting of energy generation and waste management facilities also must encourage the use of existing underutilized industrial lands before considering the removal of Ontario's dwindling supply of agricultural land inventory.

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