

November 21, 2024

Reema Kureishy  
Environmental Policy Branch  
Ministry of Environment, Conservation and Parks  
40 St Clair Avenue West, 10th Floor  
Toronto, ON  
M4V 1M2

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

Dear Reema Kureishy,

**RE: ERO 019-9196 – Enabling greater beneficial reuse of excess soil**

The Ontario Federation of Agriculture (OFA) is pleased to comment on the proposal *enabling greater beneficial reuse of excess soil*. The 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.

OFA fully supports the overarching principle of beneficial reuse of excess soils in Ontario. We support setting clear rules and procedures to direct the appropriate reuse of excess soils, as well as consistent enforcement when those rules are not followed. Our primary concern is to ensure that agricultural lands remain productive and free from contaminants that could threaten our local food safety and supply. Eliminating the risk of contamination to agricultural lands is paramount. While we understand that these amendments are intended to encourage greater reuse of excess soil in the province by streamlining processes, we remain concerned with any potential easing of the regulation related to the quality of excess soils reused on agricultural lands.

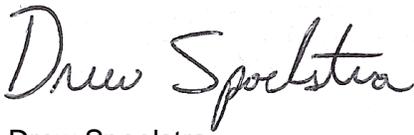
OFA is encouraged to see the consideration of a regional mapping approach identifying areas with naturally occurring background concentrations that exceed excess soil standards as a basis for enabling greater reuse of excess soil. However, where that site with natural exceedances is agricultural land, OFA cannot support addition of parameters harmful to agricultural production, such as heavy metals, through beneficial reuse of excess soil. To do so would cause significant, lasting damage to agricultural land, and ultimately to our food supply.

Further, OFA believes that such a mapping approach should be provincially-lead and not downloaded to municipalities. Regional studies could contribute to this effort, helping to build baseline mapping. MECP should also consider connecting with soil mapping initiatives currently under way through the Ontario Ministry of Agriculture, Food and Agribusiness to realize efficiencies in provincial mapping exercises. A multi-sector stakeholder working group could also help to inform this mapping initiative.

OFA is committed to protecting the agricultural lands in Ontario that grow food for today and for future generations. We maintain that agricultural activities make the highest and best use of arable land, and that agriculturally managed landscapes provide environmental and ecological co-benefits for the people of Ontario in the process of normal farm practices. Healthy and productive agricultural soil is a non-renewable resource vital to food production and human well-being. Our soils are the foundation of terrestrial life and worthy of our respect and careful stewardship. Feeding a growing global population will depend on how well we manage this valuable, finite resource for future generations.

We appreciate the opportunity to provide our feedback and agricultural perspectives on these proposed regulatory amendments to enable greater beneficial reuse of excess soil. We look forward to working with the provincial government to protect Ontario's farmlands as well as support infrastructure development and help protect human health and the environment.

Sincerely,



Drew Spoelstra  
President

cc: Hon. Rob Flack, Minister, Ontario Ministry of Agriculture, Food and Agribusiness  
Hon. Lisa Thompson, Minister, Ontario Ministry of Rural Affairs  
Hon. Andrea Khanjin, Minister, Ontario Ministry of Environment, Conservation and Parks  
Hon. Todd McCarthy, Minister, Ontario Ministry of Environment, Conservation and Parks  
(acting)  
OFA Board of Directors