

May 20, 2026

EA Modernization Project Team
Environmental Assessment Modernization Branch
135 St Clair Ave West, 4th Floor
Toronto, ON
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Submitted via website and EAmodernization.mecp@ontario.ca

Dear EA Modernization Project Team

Re: ERO 026-0415 - Proposed Environmental Assessment Act amendments to improve the comprehensive environmental assessment process

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.

We appreciate the opportunity to respond to the above-noted proposal.

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.

We maintain our previously stated position that **all proposed projects must 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 broader agricultural system, and recommends measures to avoid or, if avoidance is not possible, minimize and mitigate adverse impacts. In the province’s 2025 Fall Economic Statement, the government stressed the importance of the agri-food sector and that protecting Ontario’s local agriculture and food industry is essential to ensuring a strong, self-sufficient food supply chain. The use of AIAs is an important tool for supporting this objective.

1. ***Ministry Review:*** The proposal is to remove the requirement to prepare, publish and consult on the Ministry Review, as well as related provisions.

Public participation is a critical component of environmental decision-making. Failure to allow for meaningful participation can lead to resentment, animosity, or ambivalence. **OFA believes that there must be multiple opportunities for potentially impacted landowners to raise their concerns and a requirement for the project proponents to respond to these concerns.** The system must allow for meaningful participation to empower all those involved or impacted. The Ministry of Environment, Conservation and Parks (MECP) Review includes discussion on compliance with Terms of Reference and how concerns from the public are being addressed. The public deserves an opportunity to comment on both the proponent's approach to addressing concerns and the government's assessment. As such, **we are opposed to the removal of the requirement to prepare, publish, and consult on the Ministry Review, as well as related provisions.**

2. Requests for a hearing - If the proposed amendments are made, the provisions for a person to make a request to the Minister for an application to be referred to the Tribunal would be removed.

OFA is opposed to the removal of the ability of a person to request a referral to the Tribunal. This consultation document states that these requests have been rare which indicates that this is a process that has not been abused but obviously retains value.

3. Cabinet concurrence – This consultation proposes removing the requirement for Cabinet Approval to help speed up the process. The Minister would hold approval authority.

OFA also opposes the removal of Cabinet Approval for environmental assessments. Given the unique nature of agriculture and the limited understanding of the industry's realities, the agricultural community is often left managing the unintended consequences of these decisions. Maintaining cabinet approval, alongside public input, provides an additional safeguard to help minimize these negative impacts.

4. Other EAA amendments -

- *providing that only one proponent needs to apply for approval* - **OFA would be amenable to this proposed change only if all proponents remain subject to the same requirements for consultation, responsiveness to public input, and liability should issues arise at a later date.**
- *providing discretion for the Minister to change the deadline for deciding an application or referring an application to Cabinet or the Tribunal for a decision* – **OFA believes that public consultation timelines must not be reduced.**
- *providing that a streamlined EA can be limited to specified environmental impacts, such as impacts on archaeological resources* – **As stated above, all proposed projects with the potential to impact agricultural lands, activities or systems must be required to complete a mandatory Agricultural Impact Assessment (AIA). We are amenable to this proposal as long as AIAs are mandatory.**

OFA appreciates the opportunity to provide our feedback and perspectives. We look forward to continuing working with the government as this process continues.

Sincerely,

Drew Spoelstra

Drew Spoelstra
President

cc: Honourable Trevor Jones, Minister of Agriculture, Food and Agribusiness
OFA Board of Directors

This submission has been approved by OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.