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Environment and Climate Change Canada  
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To Whom It May Concern,

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to Environment and Climate Change Canada (ECCC) regarding the Federal Sustainable Development Strategy (FSDS). 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. Our topline feedback is summarized as follows:

- **Economic viability:** Environmental sustainability in agriculture depends on farm profitability and competitiveness.
- **Climate and economic resilience:** The FSDS should prioritize climate resilience and sustainable growth, recognizing that profitable farms are essential to managing risks from climate change, market volatility, and supply chain disruptions.
- **Policy approach:** Greater emphasis should be placed on voluntary, incentive-based programs with stable funding rather than rigid regulatory approaches.
- **Stable funding:** Long-term, predictable funding is critical to enable effective planning, implementation, and sustained impact of sustainability programs.
- **Canadian identity and food:** There is an opportunity to strengthen Canadian identity by promoting the quality, diversity, and cultural importance of Canadian food and agriculture.
- **Rural connectivity:** Strong national targets for rural broadband and mobile coverage are needed, supported by coordinated action to enable precision agriculture and sustainable development.
- **Farmland protection:** Federal decision-making should include agricultural impact assessments and stronger measures to safeguard farmland.
- **Energy infrastructure:** Increased investment in rural electricity capacity, storage, and grid modernization is needed to support electrification.
- **Transportation and clean technology:** Transportation planning should minimize impacts on farmland and rural communities, while supporting alternative-fuel farm equipment and the infrastructure needed to deploy it.

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- **Biodiversity and farmland balance:** Conservation and species-at-risk policies should protect biodiversity while maintaining farm viability and preserving agricultural land.
  - **Food procurement:** Federal procurement should prioritize Canadian food to support domestic production and strengthen food security.
  - **Waste systems:** Producer responsibility frameworks should include fair, regionally appropriate targets that reflect rural realities.

OFA is committed to promoting sustainability in the agricultural sector. Our Mission Statement, “Farms and Food Forever” reflects this commitment. Our advocacy work consistently champions the three interactive components of sustainability - economic profitability, environmental stewardship, and social responsibility - for all farmers of Ontario regardless of size, commodity, or production system.

In general, OFA supports the targets and implementation strategies identified in the FSDS. Bringing together existing policy in a more strategic and cohesive manner allows us to value what we have and provides a means of investigating and addressing policy gaps to further advance a strong, healthy and sustainable Canada.

The agricultural sector remains a primary industry dependent on relatively stable and predictable water and temperature cycles. While farmers are inherently adaptable and familiar with adjusting their practices to respond to cyclical variability in water and temperature regimes, climate change introduces isolated extremes to this variability that pose significant challenges and risks to production. We appreciate that *Goal 2.2: Strengthen the Resilience and Sustainability of Canadian Agriculture* recognizes these challenges to sustainable development in Canadian agriculture and seeks to ensure that our farms remain financially healthy.

Canada has great potential to be a global leader in producing sustainable agri-food products for Canadians and consumers worldwide, even in the face of an increasingly unpredictable climate. Ensuring resilience to climate change and supporting sustainable economic and productivity growth must be central to the FSDS. To be environmentally sustainable, a farm must be economically viable. Resiliency in the agricultural sector should not only pursue increased readiness to the potential impacts of climate change but also incorporate resilience in the face of supply chain disruptions, geopolitical pressures, and market volatility. The FSDS's goals must acknowledge the critical role that farm profitability and competitiveness play in enabling investments in further sustainability.

### **Guiding Principles**

OFA recognizes the role of legislation in establishing baseline standards; however, we would like to highlight the importance of voluntary programs to achieve sustainability targets in the

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agricultural sector. A voluntary approach offers a flexible, collaborative path, often delivering results more quickly and with greater buy-in than legislative approaches. By allowing businesses and individuals to adopt practices that fit their specific operations, these programs encourage innovation and practical problem-solving rather than a one-size-fits-all solution. Participants are more likely to take ownership of outcomes leading to longer-lasting commitments to sustainable practices. This flexibility is especially valuable in sectors like agriculture, where differences in farm structure, operation, and commodity can make rigid regulations difficult to implement effectively.

Voluntary approaches also tend to foster partnership rather than compliance-based relationships. Government, agricultural organizations, and farmers can work together to share knowledge, pilot new ideas, and scale successful initiatives without the delays often associated with regulatory development and enforcement. These partnerships can also reduce administrative burden and costs, freeing up resources to invest directly in sustainability improvements. While legislation plays an important role in setting minimum standards, voluntary programs can go beyond compliance, encouraging leaders to exceed baseline requirements and drive continuous improvement across sectors.

Adequate, reliable funding is essential for the success of sustainability programs, as it provides the stability needed to plan, implement, and scale meaningful initiatives over the long term. Without consistent financial support, even well-designed programs can struggle to maintain momentum, retain skilled staff, or invest in the tools and technologies required to drive real impact. Predictable funding also builds trust among participants and partners, signaling that commitments will be sustained beyond short-term cycles or shifting priorities. This stability enables organizations to focus on continuous improvement, measure outcomes effectively, and adapt strategies as needed, ultimately leading to more durable and credible sustainability outcomes

## **Opportunities to Enhance the Draft 2026-2029 FSDS**

### ***Goal 1.2: Reinforce Canadian Culture and Identity***

OFA sees an opportunity for the FSDS to strengthen culture and identity by rallying behind the high quality, safety and abundance of Canadian food. Food has a powerful role in uniting Canada by creating shared experiences that reflect both our common ground and our diversity. From coast to coast, Canadian cuisine tells a story shaped by Indigenous traditions, regional landscapes, and the many cultures that have made this country home. By valuing multicultural influences alongside locally grown ingredients and homegrown agricultural excellence, we reinforce a national identity that is inclusive, resilient, and rooted in place. Building pride in Canadian food and agriculture means celebrating not only the quality and safety of what we produce, but also the people and cultures behind it.

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Locally produced food is a key component to reinforcing Canadian culture and identity. OFA provided input to Public Services and Procurement Canada (PSPC) as part of the consultation process for the Buy Canadian Policy Framework. OFA urged PSPC to explicitly recognize food and agri-food as a strategic priority within the federal Buy Canadian Policy Framework, emphasizing that federal food procurement is a significant and recurring purchasing stream that supports national security, supply-chain resilience, and domestic economic stability. Key recommendations included updating the National Food and Beverage Procurement Strategy to prioritize Canadian food; embedding Canadian content requirements and reporting into procurement processes; conducting food origin audits; improving outreach and accessibility for small and medium-sized agri-food businesses; and appointing a Local Food Champion for Procurement. OFA also encouraged alignment with provincial initiatives such as Ontario's *Buy Ontario Act* and *Local Food Act* and supports the launch of the Small and Medium Business Procurement Program in spring 2026.<sup>1</sup>

**Goal 2.2: Strengthen the Resilience and Sustainability of Canadian Agriculture**

OFA sees an opportunity to strengthen Goal 2.2 and FSDS overall by setting robust targets for rural broadband internet and mobile communications coverage across Canada. Implementation of sustainable development goals are challenged when communications are not reliable and sufficient to implement strategies, take advantage of market opportunities and remain a global innovation leader.

OFA provided comments to Innovation, Science and Economic Development Canada as part of the Rural Development Action Plan consultation, recommending that the Plan be embedded in long-term, growth-oriented policy that strengthens rural Canada's competitiveness, resilience, and economic sustainability.<sup>2</sup>

Digital and precision agriculture technologies are already changing the way Canadian farmers do business, turning farms into smart, data-driven operations. Access to reliable broadband internet is a key component in the adoption of these technologies that can help our farmers produce more with less inputs, better respond to impacts of climate change, and maintain strong domestic and international food systems.

Connection speeds and bandwidth have improved in rural areas over the last decade thanks to funding and resources from the federal and provincial government for rural broadband expansion; however, the demand for speed and bandwidth continues to outpace supply. Multi-year surveys of OFA members show connection speeds still remain below demand and can be frequently

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<sup>1</sup> <https://ofa.on.ca/resources/ofa-submission-regarding-the-buy-canadian-policy-framework/>

<sup>2</sup> <https://ofa.on.ca/resources/ofa-submission-regarding-canadas-rural-development-action-plan/>

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unreliable, slow, or spotty. This deficiency is having significant negative impacts on normal farm business activities and productivity, leading to decreased resiliency and missed business opportunities.

In 2018, the United States Congress passed the H.R.4881 – *Precision Agriculture Connectivity Act*. This action demonstrates an excellent example of inter-agency cooperation and recognition of how broadband availability facilitates modern, digital agricultural production. This Act requires the Federal Communications Commission (FCC) to establish a task force to identify and measure gaps in broadband internet access and service on agricultural land in collaboration with the United States Department of Agriculture (USDA), with the goal of achieving reliable capabilities on 95% of U.S. agricultural land by 2025. Building on the success of H.R.4881, Congress passed H.R.1618 - *Precision Agriculture Satellite Connectivity Act* in 2025 which requires the FCC to conduct a review and recommend changes to its satellite rules to advance broadband internet on underserved agricultural land and help facilitate the adoption of precision agriculture technologies.

Reliable broadband internet and mobile communications is the backbone of sustainable development. OFA urges the federal government to recognize the vital role of rural broadband to achieve sustainable development targets in the FSDS. OFA further recommends Agriculture & Agri-food Canada (AAFC) and the Canadian Radio and Television Commission (CRTC) work collaboratively to ensure reliable and robust connectivity across agricultural lands with the specific goal of facilitating the adoption and use of digital and precision technologies.

Agricultural land is essential not only for food security but also for climate resilience, biodiversity, and rural economies. Federal decisions that convert or degrade farmland have long-term, irreversible consequences. Currently, while environmental assessments are required under the *Impact Assessment Act*, agricultural impacts are not required nor systematically evaluated.

OFA recommends the federal government mandate the requirement for agriculture impact assessments to be completed for all federal infrastructure projects, including federal land claim decisions and defence-related projects that may affect the quality or availability of agricultural land in Canada.

#### **Goal 2.4: Promote Energy Efficiency**

Ontario has entered a period of increased procurement of industrial scale generation and storage in rural areas and upgrading transmission systems to deliver electricity to industrial and urban areas.

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To ensure rural areas are able to transition to higher electrification, OFA recommends that decisionmakers invest in improving electricity distribution level storage and capacity, reducing the number of terminal lines and increasing access to three-phase power.

Ontario's Save On Energy program is an efficiency and conservation program to encourage the use of higher efficiency equipment (fans, lights, motors) for new builds and retrofits. Save On Energy includes dedicated agricultural sector funding that would benefit from federal support to expand the types of loads that could be included, such as specific light spectrum LEDs that increase agricultural yields.

### ***Goal 2.5: Expand Access to Sustainable Transportation***

Traffic congestion is a growing issue in small and medium-sized communities, harming local economies.

OFA recommends decisionmakers consider the impact of expanding transportation infrastructure into rural regions meant to ease urban constraints. As congestion increases in rural areas, safe driver education and awareness about driving near large farm equipment has not increased.

OFA recommends decisionmakers consider the impact of bisecting rural communities and farmland when building transportation infrastructure. We recommend using Agricultural Impact Assessments to best inform where to site projects in a manner that helps sustain farming by reducing adverse impacts to farm areas.

Related to clean fuel use, OFA has previously recommended investments to pilot alternative fueled farm machinery such as hydrogen cell and lithium battery tractors during all weather conditions and work tasks. In addition, OFA recommended investments to improve rural electricity assets needed to ensure equipment can be efficiently recharged.

### ***Goal 3.3: Protect and Restore Canada's Ecosystems and Biodiversity***

OFA supports efforts to conserve and restore ecosystems and biodiversity, recognizing their importance to environmental health and long-term sustainability. However, these efforts must be carefully balanced with the need to protect Canada's finite supply of arable agricultural land, which is a non-renewable resource essential to national food security and economic stability. Canadian agricultural lands play a critical role in producing food, fibre, fuel, and flowers, but also in supporting jobs, maintaining wildlife habitats, and contributing to positive environmental outcomes.

Similarly, while the protection and recovery of species at risk is an important objective, related policies and measures must be designed in a way that does not unduly restrict or undermine the

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viability of agricultural operations. Conservation approaches should recognize the role that working agricultural landscapes already play in providing habitat and should prioritize practical, collaborative solutions that support both species protection and continued farm productivity.

Overall, biodiversity and species at risk strategies must be balanced and integrated, ensuring that conservation efforts do not come at the expense of farmland or Canada's ability to produce food now and into the future. Targets, strategies, and action plans need to instead work alongside agriculture as part of a sustainable and resilient landscape.

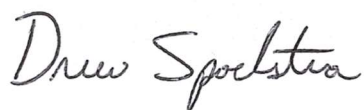
**Goal 3.5: Reduce and Manage Waste**

Ontario has transitioned to the Producer Responsibility model from the previous municipal financed and managed model for waste management. Producer Responsibility Organizations (PROs) are paid by regulated companies to manage volumes of waste that represent their manufactured packaging. This model encourages packaging manufacturers to use easier to recycle materials. However, financial constraints motivate companies to lobby government to lower waste and recycling targets and to extend regulated timelines established to reach targets.

OFA recommends regulations to ensure that a Producer Responsibility framework includes reasonable targets for less densely populated regions, rather than encouraging PROs to focus their waste management efforts in urban areas at the expense of rural and remote communities.

OFA appreciates the opportunity to comment on the Draft 2026-2029 Federal Sustainable Development Strategy. We encourage the federal government to ensure that the FSDS reflects the realities of Canadian agriculture by supporting flexible, well-funded, and collaborative approaches to sustainability. Strengthening rural connectivity, maintaining farm competitiveness, and balancing environmental and agricultural priorities will be critical to achieving long-term success.

Sincerely,



Drew Spoelstra  
President

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cc: The Honourable Julie Aviva Dabrusin, Minister of the Environment, Climate Change and Nature  
The Honourable Heath MacDonald, Minister of Agriculture and Agri-Food Canada  
Keith Currie, President, Canadian Federation of Agriculture  
OFA Board of Directors