

June 5, 2026

Privy Council Office  
85 Sparks Street  
Room 1000  
Ottawa, Ontario K1A 0A3

Submitted via [engagement@pco-bcp.gc.ca](mailto:engagement@pco-bcp.gc.ca)

To whom it may concern,

**Re: Getting Major Projects Built in Canada – Discussion Paper on Proposed Legislative, Regulatory, and Policy Reforms**

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA is dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with on issues, legislation and regulations that would impact the sustainability and growth of our farm businesses. Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating over 860,000 jobs, and contributing over \$51.43 billion to Ontario's annual GDP.

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

OFA supports the objectives of this consultation, including the development of a simpler, more coordinated approach to federal decisions regarding major projects. We recognize that some of these projects may provide benefits to the agricultural sector. However, it is essential that the decision-making process for these projects be fully informed and include appropriate safeguards to prevent unintended consequences for agriculture.

OFA's position is that all proposed projects with the potential to impact agricultural lands, activities, or systems must be required to complete a mandatory Agricultural Impact Assessment (AIA). AIAs are a critical tool used to evaluate the potential impacts of non-agricultural development on agricultural operations and the broader agricultural system, while identifying measures to avoid, minimize or mitigate adverse impacts where avoidance is not possible. We expect that the requirements of an AIA will also be included in projects related to Federal Economic Zones.

In addition, development projects can alter hydrological or hydrogeological conditions that affect water quality and quantity, as well as drainage patterns and runoff. It is essential that the federal permitting process ensures that such projects do not adversely affect the water supplies used for drinking, irrigation, livestock watering, wash water processes, or other agricultural and agriculture-related purposes, and that they do not result in improper drainage onto neighbouring agricultural properties. Further, the permitting process must respect and remain in compliance with relevant and applicable provincial legislation, such as Ontario's *Drainage Act*.

---

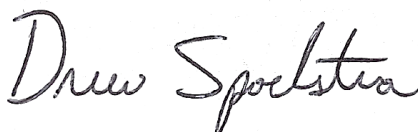
This discussion paper also proposes that:

*The Minister of Environment, Climate Change, and Nature (ECCN) would still determine whether any negative federal effects of a project are considered significant. If they are, a joint decision would be made with another Minister responsible for the relevant sector.*

It is important to recognize that agriculture is uniquely interconnected with a broad range of sectors and federal ministries beyond Agriculture and Agri-Food Canada (AAFC), including environment, transportation, employment, global affairs, innovation, science and economic development, etcetera. As a result, where agricultural lands or agricultural systems may be affected by a project, the Minister of Agriculture and Agri-Food must be included in decision-making alongside ECCN and any other relevant ministers.

OFA supports efforts to improve the efficiency and coordination of federal project review and permitting processes; however, these changes must not come at the expense of informed decision-making or the long-term viability of Canada's agricultural sector. Agricultural lands and systems are essential strategic and valuable national resources that support food security, economic growth, and rural communities. As the federal government considers reforms to major project approvals and Federal Economic Zones, it is critical that agricultural impacts be thoroughly assessed, that appropriate mitigation measures be required, and that agriculture be meaningfully represented in decision-making processes. OFA encourages the federal government to ensure that any new framework maintains strong protections for agricultural lands, water resources, and farm operations, while respecting applicable provincial legislation and the realities of agricultural production across Canada.

Sincerely,



Drew Spoelstra  
President

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

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