

July 10, 2026

Municipal Services Office
Central Ontario (Priority Projects)
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Submitted online and via email to: mmahzoningorders@ontario.ca

Re: ERO # 026-0562, Request for a Minister's Zoning Order to restrict sensitive land uses around Cargill Sarnia Export Grain Terminal in the City of Sarnia

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation for ERO # 026-0562 by providing comment on the proposed *minister's zoning order* (MZO) to protect the continued operation of the Sarnia Cargill Grain Terminal ("the Terminal"). 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.

Now in its 99th year of operations, the Terminal is a strategically significant *agri-food network* asset that ensures Ontario farm products reach their destinations both domestically and abroad. OFA is proud to support the Terminal's long-term operation, which contributes to the vitality of Ontario's *agricultural systems*. In summary of OFA's position:

- **Protecting the Terminal is in the public interest and must be recognized as a priority for the Province of Ontario:**
- Approximately 35% of Ontario's grain export capacity is handled by the Terminal, which also ensures farmers have access to vital goods like fertilizer inputs;
- A multimodal hub, the Terminal enables freight transport to switch between waterways, railways, and highways, moving goods between domestic and international markets;
- The Terminal is a *major facility* and critical *agri-food network* asset that supports the vitality of farms across the province and contributes to the employment of thousands of Ontarians;
- Negative impacts on the Terminal's operations would be felt throughout the province and abroad, affecting primary producers through to consumers;
- **OFA therefore supports the proposed MZO as a land use conflict remedy** and recommends that the environmental planning guidelines be revised and updated to prevent future land use conflicts between *major facilities* and *sensitive land uses*.

By connecting farms, distributors, and consumers through marine, railway, and highway transport services, the Terminal serves as a multimodal hub that moves grain and fertilizer between the 30 ships, many trains, and 20,000 trucks that visit the Terminal every year. This activity contributes broadly and significantly from an economic and employment perspective and allows Ontario farmers to stay competitive in global markets while providing food security at home. By handling approximately 35% of Ontario's export grain capacity, which amounts to millions of tonnes of grain destined for domestic and international markets, and receiving critical fertilizer shipments essential for growing crops across nearly 400,000 acres of farmland, the Terminal contributes to our provincial agri-food sector that employs 1 in 9 Ontarians and produces \$51 billion in gross domestic product.

Thus, OFA asks all governments to protect this *major facility* through appropriate land use planning measures. The *Provincial Planning Statement* (PPS, 2024), requires sensitive development “to avoid” *major facilities* and “minimize and mitigate” *adverse effects* if avoidance is not possible, in accordance with provincial guidelines. The PPS further requires an *agricultural system* approach that protects agricultural lands and “foster[s] the long-term economic prosperity and productive capacity of the *agri-food network*.” In practical terms, neighbourhoods and sensitive land uses that develop near *major facilities* can be exposed to noise, vibrations, dust, lights, smells, and heavy traffic; the resulting land use conflicts and complaints can reduce or halt facility operations. Therefore, the province issues guidance on maintaining land use compatibility.

OFA strongly encourages planning authorities to apply provincial guidance and to take into account the concerns of Ontario's diverse publics, including heavy industries, the agri-food sector, family neighbourhoods, and so on. In most circumstances, *official plans* and *zoning by-laws* are appropriate and sufficient tools to ensure compatibility, but the importance of the Terminal and nearby residential encroachment now call for provincial intervention.

Therefore, OFA supports the MZO request, which is consistent with the PPS's vision of a “strong and competitive economy” including a “vibrant agricultural sector,” and the policies for *major facilities* and the *agricultural system*. OFA continues to advocate for multilateral agreement between planning authorities and affected residents, businesses, and interest groups to resolve land use conflicts before Ministerial involvement becomes necessary.

OFA further recommends that the *Environmental Land Use Planning Guides* (1995, also known as the “D-Series”), and the *Environmental Noise Guideline* (2013) where necessary, be reviewed and revised to help municipalities promote land use compatibility between *major facilities* and *sensitive land uses*, without resorting to MZOs that would override local planning options. Updated guides may also help with the successful implementation of *mixed-use areas* and related designations.

Relatedly, OFA looks forward to the release of the *Agricultural Systems Approach Guidelines*, as those guidelines in part discuss the overlap of industrial and agricultural businesses through *agri-food network* elements.

Thank you for your consideration of this important matter. OFA respectfully encourages the Ministry to support the requested *minister's zoning order*. OFA strongly supports the protection of the Sarnia

Cargill Grain Terminal's continued operation and celebrates its 99 years of contributions to the agri-food sector. Ensuring the long-term viability of the Terminal serves the public interest by promoting affordable products and supporting the vitality of Ontario's \$51 billion agri-food sector.

Sincerely,



Drew Spoelstra, President

cc: Hon. Rob Flack, Minister of Municipal Affairs and Housing
Hon. Vic Fedeli, Minister of Economic Development, Job Creation and Trade
Hon. Trevor Jones, Minister of Agriculture, Food, and Agribusiness
Hon. Lisa M. Thompson, Minister of Rural Affairs
Jennifer Marchand, AVP & Government & Industry Relations Leader, Cargill Limited
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>