

May 25, 2020

Alessya D'Anna
Policy Advisor (Acting)
Deputy Ministers Office
Ministry of Infrastructure
5th Floor, Rm 5S308
777 Bay St
Toronto, ON
M7A 2J3

Submitted online through the Env. Registry

Dear A. D'Anna,

RE: EBR posting # 019-1536 Proposing a new Statement of Environmental Values for the Ministry of Infrastructure

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

Ontario's agricultural and agri-food sector is among the most diverse agriculture sectors in North America. Well over 200 different agricultural commodities are grown and raised here; more than any other Canadian province and most US states. That diversity leads to differing building forms to house livestock or poultry, to store different crops, or the machinery used to grow and raise these different agricultural commodities.

OFA supports the Ministry's commitment to "take into account social, economic and other considerations and integrate these with the purposes of the EBR when making decisions that might significantly affect the environment".

This commitment will ensure that the Statement of Environmental Values (SEV) is aligned with a core principle of Ontario's environmental assessment program that all aspects of the environment, including natural, social, economic, cultural and build conditions are considered, as noted in the Ministry of the Environment, Conservation and Parks' Modernizing Ontario's Environmental Assessment Program discussion paper (EBR# 013-5101).

Agriculture is an integral part of the environment and has both social and economic components, in addition to contributing to the natural and cultural aspects. Therefore, it is critical to agriculture that all aspects of the environment are considered.

OFA requests that the Ministry of Infrastructure further commit in its SEV to requiring an Agricultural Impact Assessment (AIA) to be conducted for all Environmental Assessments.

OFA trusts that its recommendation will be given due consideration in this consultation.

Sincerely,



Keith Currie
President

cc: The Honourable Laurie Scott, Minister of Infrastructure
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors