

November 9, 2020

Sharifa Wyndham-Nguyen
Senior Program Support Coordinator (Acting)
Environmental Assessment Program Support, MECP
135 St Clair Ave West
Toronto, ON M4V 1P5

Via email: eamodernization.mecp@ontario.ca

Dear Ms. Wyndham-Nguyen

Re: ERO 019-2377: Proposed Project List for comprehensive environmental assessments under the Environmental Assessment Act

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses, and their communities.

While the agricultural community remains in favour of initiatives to reduce red tape and business modernization, OFA has concerns with several aspects of this posting. The greatest difficulty with this posting as presented is that it only describes one component of broader proposed changes. It is very difficult to provide comments for the proposed Comprehensive Environmental Project lists without knowing what will be included in the Streamlined Environmental Assessment Project List which will be released "in the coming months".

OFA continues to stress the need for mandatory Agricultural Impact Assessments (AIA) for projects that have the potential to affect agricultural operations. Where do Agricultural Impact Assessments fit with the projects in this proposal? It remains crucial that projects that have the potential to impact agricultural operations must assess what that impact is to agriculture. It is essential that a formal requirement to complete an AIA be built into the assessment of any project that has the potential to impact agriculture. This means an AIA must be included within the Environmental Assessment process, but also be required for projects that may be excluded from the *Environmental Assessment Act*.

It is very important to ensure that the “Threshold or Trigger” that defines the project requirements are very clear when creating project lists. However, we question the appropriateness of the scale proposed for the project lists for a Comprehensive Environmental Assessment. While we can appreciate the desire to minimize duplication with the Federal Environmental Assessment process, we do not feel that it is inherently appropriate to scale provincial projects to the same standard as federal projects. Also, most of these thresholds, which are defined by linear distances, do not translate well into understanding the potential environmental impact of the project. It is only the “Threshold or Trigger” for Conservation Projects that actually considers environmental considerations such as land area in number of hectares.

It remains essential that the public retains the ability to provide meaningful comment and input into project proposals based on the potential impact, and that an appeal process is also incorporated. It is imperative that decisions surrounding public input and appeals be able to include more relevant considerations than those currently listed as “Threshold or Trigger” for projects, as these do not actually reflect the potential environmental impact of a project.

Ultimately OFA recommends that the results of this consultation be considered and re-worked, and then released for consultation again with the rest of the proposed changes for the *Environmental Assessment Act* when they are released. This way interested parties can understand the full intentions of the proposed project lists and the magnitude of potential impact of this approach. It will also allow the Ministry time to factor in how any project that potentially impacts agricultural land will be required to complete an Agricultural Impact Assessment and how the impacts will be mitigated by the project proponents, whether within the *Environmental Assessment Act* or through other regulatory requirements.

Sincerely,



Keith Currie
President

cc: Honourable Ernie Hardeman, Minister of Agriculture, Food & Rural Affairs
Honourable Jeff Yurek, Minister of the Environment, Conservation and Parks
OFA Board of Directors