

May 7, 2021

Cheryl Davis  
Ministry of Transportation - Environmental Policy Office  
777 Bay Street, Suite 700  
Toronto, ON, M7A 2J8  
Sent via email to: [Cheryl.davis@ontario.ca](mailto:Cheryl.davis@ontario.ca)  
and submitted online via Environmental Registry of Ontario

Dear Cheryl Davis,

**Re: ERO # 019-3422 – Update to the MTO’s Statement of Environmental Values**

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.

OFA has reviewed the proposed updated Statement of Environmental Values (SEV) for the Ministry of Transportation (MTO). OFA strongly recommends that the MTO’s SEV also state the importance of considering the impacts on agriculture in the MTO’s decision making.

OFA submitted comments earlier on [ERO # 019-1883: Proposal to exempt various Ministry of Transportation projects from the requirements of the Environmental Assessment Act](#). OFA called for the widespread use of Agricultural Impact Assessments (AIAs) to ensure that any negative impacts of proposed developments are first avoided, then minimized and lastly mitigated. OFA strongly recommended that despite the desire to streamline environmental assessments or exempt various Ministry of Transportation projects from environmental assessments, that Agricultural Impact Assessments be an integral part of project planning, design, and construction.

OFA believes that the highest and best use of our arable land is for agriculture. OFA has repeatedly emphasized to a succession of provincial governments that Ontario’s prime agricultural lands, the lands we depend upon for locally produced food and key to underpinning our food security, have been in a steady decline for over a quarter of a century. The continuing loss of the key resource that underpins Ontario’s agriculture and agri-food sector has the potential

---

to jeopardize the future of food production in the province. Land capable of supporting agricultural activity is a strategic resource worthy of preserving as it ensures a safe, sustainable supply of food, fibre and fuel for Ontario, Canada, and the world. OFA continues to stress the need for mandatory AIAs for proposed projects that have the potential to affect agricultural operations.

The *Environmental Bill of Rights, 1993* (EBR) requires that each ministry prescribed under the Act develop and publish a SEV specific to the work of that ministry. A SEV is a ministry's statement of environmental principles and a guidance document directing the minister and ministry staff as they make decisions regarding policies, acts, regulations, and instruments that might affect the environment.

OFA supports the MTO's intention to "promote the integration of transportation, land use and environmental planning in decision making". OFA also appreciates the MTO's commitment to "strive to create working relationships with professional, community, and advocacy groups to ensure that transportation decisions incorporate a wide level of community involvement and benefit from a range of environmental information and expertise" and to "seek to achieve a planning process that is open to comment by the public, stakeholders and transportation partners".

As stated in the MTO's draft updated SEV, the MTO "will apply and integrate the purposes of the EBR along with social, economic, scientific, and other considerations when conducting its business activities. These considerations will be integrated with the Ministry's environmental values and measures as a foundation for transportation decision making."

We note that agriculture is an integral part of the environment and has social, economic, and scientific components. Therefore, it is critical that the impacts on agriculture are fully considered.

Sincerely,



Peggy Brekveld  
President

cc: The Honourable Caroline Mulroney, Minister of Transportation  
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors