

March 15, 2024

EA Modernization Project Team
Environmental Assessment Modernization Branch
135 St Clair Ave West, 4th Floor
Toronto, ON M4V 1P5

Sent via email to: EAmmodernization.mecp@ontario.ca and submitted online through the Environmental Registry of Ontario

Dear EA Modernization Project Team,

RE: ERO 019-7891: New regulation to focus municipal environmental assessment requirements

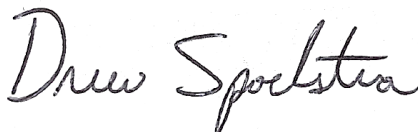
On behalf of the Ontario Federation of Agriculture (OFA)'s more than 38,000 farm family members, thank you for the opportunity to participate in the consultation process for "New Regulation to focus municipal environmental assessment requirements".

OFA has concerns regarding the proposed changes to the municipal environmental assessment requirements. We maintain our previous position that all of the proposed projects, whether subject to the new regulation or not, must be required to complete a mandatory Agricultural Impact Assessment (AIA) if the project has the potential to impact agricultural lands, activities, or systems. An Agricultural Impact Assessment (AIA) is a critical tool that is used to evaluate the potential impacts of non-agricultural development on agricultural operations and the agricultural system, and recommends ways to avoid or, if avoidance is not possible, minimize and mitigate adverse impacts.

OFA also believes that there must be opportunities for potentially impacted landowners to raise their concerns and a requirement for the project proponents to respond to these concerns. These impacted landowners must not be limited to only adjacent property owners – negatively impacted landowners may be live upstream or downstream of the project, or utilize the same aquifer, for example.

We appreciate the opportunity to provide our feedback and agricultural perspectives on the proposed "New regulation to focus environmental assessment requirements". We look forward to working with the provincial government to protect Ontario's farmlands as well as support infrastructure development and help protect human health and the environment.

Sincerely,



Drew Spoelstra
President

cc: OFA Board of Directors