

February 3, 2026

Permissions Modernization Team
Client Services and Permissions Branch
135 St. Clair Avenue West, Floor 1
Toronto, ON
M4V 1P5

Sent via email, to: permissions.modernization@ontario.ca and submitted online through the Environmental Registry of Ontario

Dear Permissions Modernization Team

RE: ERO 025-1361 - Exempting low-risk activities from requiring environmental permissions

The Ontario Federation of Agriculture 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. OFA appreciates this opportunity to provide input on this consultation *ERO 025-1361 - Exempting low-risk activities from requiring environmental permissions*.

Farmers are significant contributors to Ontario's economy and are deeply invested in ensuring consistency, reducing costs and enabling the timely construction and maintenance of critical infrastructure in their communities. As stewards of the land, air and water, reliant upon the natural environment, farmers are also invested in safeguarding the environment.

We support the intent of streamlining and improving the efficiency of environmental permissions processes and are generally supportive of this proposal. However, we believe that additional safeguards are necessary to ensure that other landowners are not negatively affected.

Specifically, we recommend that both sewage works and stormwater works - including temporary works related to construction projects, be subject to verification by a qualified professional. This requirement would provide an important level of protection to other landowners and help prevent unintended impacts.

Our primary concern with the proposal is the exemption of foundation drainage systems from a Permit to Take Water (PTTW) for takings of less than 379,000 litres per day, without any corresponding oversight mechanism. There are documented examples of construction dewatering causing significant interference with agricultural properties, including impacts to wells and water supplies. We are concerned that exempting foundation drainage systems from a PTTW

framework may exacerbate these issues. In addition, we recommend that stronger and clearer recourse mechanisms be established for landowners who experience negative impacts resulting from construction dewatering or foundation drains systems.

We are particularly pleased that the ministry has recognized the burden of the current system relative to the limited risk relating to root vegetable washing facilities that treat 100,000 litres of water per day, with appropriate treatment and conditions. The exemption from requiring an Environmental Compliance Approval (ECA) is valued.

We appreciate the opportunity to provide our feedback and agricultural perspectives on the proposed “Exempting low-risk activities from requiring environmental permissions”. We look forward to continuing to work with the provincial government to protect Ontario’s farmland, support necessary infrastructure development and help protect human health and the environment.

Sincerely,



Drew Spoelstra
President

cc: 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>.