

February 3, 2026

EA Modernization Project Team
Environmental Assessment Modernization Branch
135 St Clair Ave West
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Toronto, ON
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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 longstanding position that all proposed projects, whether subject to the new regulation or not, must be required to complete a mandatory Agricultural Impact Assessment (AIA) where there is potential to affect agricultural lands, activities, or systems. An AIA is a critical tool that is used to evaluate the potential impacts of non-agricultural development on agricultural operations and the broader agricultural system, and to identify opportunities to avoid or, if avoidance is not possible, minimize and mitigate adverse impacts. In addition, potential Source Water Protection-related impacts on agricultural properties arising from these proposed projects must also be assessed.

OFA strongly believes that notice and consultation requirements must extend beyond "adjacent landowners", to include all landowners who may be affected by a proposed project. For example, landowners with private wells drawing from the same aquifer as a proposed municipal well should be included in notice and consultation, as should any landowner who may become subject to Source Water Protection requirements as a result of the proposed project.

We are pleased to see that the revised consultation recognizes the need for proponents to appropriately address outstanding concerns through the inclusion of a "time-out" option and acknowledges that certain issues may require more time to resolve than the initially proposed 30-day timeframe.

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 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>.