Ontario Federation of Agriculture

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EA Modernization Project Team
Environmental Assessment Modernization Branch
Ministry of the Environment, Conservation and Parks
135 St Clair Ave West, 4th Floor
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Submitted via email to EAmodernization.mecp@ontario.ca and uploaded to the Environmental Registry of Ontario

To whom it may concern,

Re: ERO- 026-0414 Streamlining Requirements For Waste Disposal Site Service Area And Fill Rate Changes

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

OFA appreciates this opportunity to provide input on ERO-026-0414, the consultation to streamline requirements for waste disposal site service area and fill rate changes.

Increasing site service areas and fill rates can directly affect farms and rural communities in the broader vicinity of disposal sites. Increasing the number of trucks and travel distances can affect farm access, road safety, and the condition of rural infrastructure. Higher volumes of waste increase issues related to odour, noise, dust, litter, leachate, and landfill gas, all of which may affect agricultural operations, residents, and the surrounding environment.

OFA recommends the province maintain meaningful environmental review, public notice, and stakeholder input when considering waste disposal site service area or fill rate increases.

For agriculture, the issue is not only environmental protection but also predictability, accountability, and confidence that local impacts will be properly assessed before decisions are made. Maintaining meaningful review, notice, and opportunities for input helps ensure that the interests of farmers and rural landowners are considered when waste disposal operations are proposed to expand or intensify.

OFA supports administrative improvements that reduce duplication or delay, but only where those changes do not weaken environmental safeguards, reduce transparency, or limit the ability of affected communities, municipalities, and stakeholders to raise concerns.

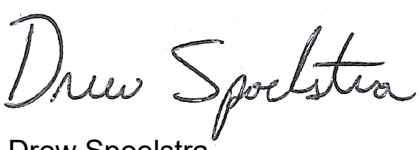
OFA recognizes that the Ontario government is maintaining safeguards to protect the environment during efforts to streamline and create efficiencies. Under the Environmental Compliance Approval (ECA) process, the proposal would still require fill rate and service area increases to notify adjacent property owners.

However, exempting service area or fill rate increases from posting to the Environmental Registry of Ontario removes an opportunity for a broader range of impacted stakeholders to participate.

OFA urges the province to retain public posting requirements, preserve opportunities for comment and appeal, and require a clear, documented assessment of site-specific impacts before service areas or fill rates are expanded.

We appreciate the opportunity to provide our feedback and perspectives on the proposal to streamline requirements for waste disposal site service area and fill rate changes. We look forward to working with the provincial government and our municipal counterparts to find policy solutions that support the agri-food sector.

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.