



LONG-TERM THINKING FOR TODAY'S ISSUES

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Via email: sean.avery@ontario.ca;

Re: ERO 019-2768 Guideline to Address Odour Mixtures in Ontario

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

Many different land uses are competing for space, especially within the most populated areas of the province. Our most productive agricultural land is predominantly found in these highly populated regions of the province. Our agricultural production is vital to our economy and to our overall food security as a province. Ontario's farmers work hard to grow high quality food, fibre and fuel using stewardly farming practices, thus making significant contributions to both human and environmental health.

It is important that land use planning appropriately considers potential impacts of neighbouring land uses, be they agricultural, industrial, residential or other types of land uses. Agricultural uses, especially in the most populated regions of the province, will need to be effectively planned with many other types of land use in close proximity. Good planning will help to ensure the ongoing vitality of the agricultural sector in these regions of the province.

Changes in the agriculture sector come from changes in regulations, innovations in technology and techniques, or changes in market demands. As the diversity of crops and nature and methods of agricultural production continues to change and expand, it is important that agriculture continues to be respected and protected as agriculture.

The CFFO recommends that:

- Licensed cannabis production facilities with a valid FBR number be clearly defined and treated as "agricultural" and should not fall under the definition of "major facility" in either the Land Use Compatibility Guidelines, nor in the Guideline to Address Odour Mixtures in Ontario.

- New Minimum Distance Separation regulations should be developed specifically for cannabis production facilities. Once established, these Minimum Distance Separation rules should be consistently applied to these facilities wherever they are located, be it within settlement area boundaries, prime agricultural areas or rural lands.

Cannabis Production as Agriculture

The Guideline to Address Odour Mixtures in Ontario clearly states that “the tiers do not include agricultural operations” indicating that currently the guideline is not intended to apply to agriculture. However, the guideline also indicates that the definition of “major facility has the same meaning as in the Land Use Compatibility Guideline.” Currently, the Draft Land Use Compatibility Guideline includes cannabis production facilities located within settlement area boundaries in its definition of “major facility.”

Licensed cannabis production, indoors or outdoors, undertaken by a farming operation with a valid FBR number should be considered agricultural production. These operations, regardless of whether they are located within or outside a settlement area boundary, should fall under the category of “agricultural uses” and therefore should not be considered major facilities.

The CFFO has requested in our submission to ERO 019-2785 that cannabis production facilities be removed from this definition. The CFFO wants to emphasize here also that licensed cannabis production facilities with an FBR number should not fall under the Guideline to Address Odour Mixtures in Ontario as a major facility.

Minimum Distance Separation for Cannabis

The CFFO recommends that cannabis production facilities should be regulated by rules designed to govern agricultural production. Currently, Minimum Distance Separation rules are designed to apply to livestock production and anaerobic digestors only. The CFFO recommends that a set of Minimum Distance Separation guidelines and regulations should be developed specifically to apply to cannabis production facilities.


Once established, these Minimum Distance Separation rules should be consistently applied to licensed cannabis production facilities with an FBR number, wherever they are located, including within settlement area boundaries, prime agricultural areas and rural lands.

Conclusion

The CFFO recommends that licensed cannabis production facilities with a valid FBR number should be clearly defined and treated as “agricultural” and should therefore not fall under the definition of “major facility” in the application of the Guideline to Address Odour Mixtures in Ontario. The CFFO also recommends that new Minimum Distance Separation regulations should be developed specifically for cannabis production facilities. Once established, these minimum distance separation rules should be consistently applied to these facilities wherever they are located, be it within settlement area boundaries, prime agricultural areas or rural lands.

We appreciate this opportunity to provide input, and thank you for your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario