



LONG-TERM THINKING FOR TODAY'S ISSUES

January 28, 2019

The Honourable Rod Phillips,
Ministry of Environment, Conservation and Parks
11th Floor, Ferguson Block
77 Wellesley St. W.
Toronto, ON
M7A 2T5
Delivered via email: minister.mecp@ontario.ca

Re: Preserving and Protecting our Environment for Future Generations: A Made-in-Ontario Environment Plan (the Plan)

Dear Minister Phillips,

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.

The actions listed in the Plan regarding the government's duty of care to ensure environmental sustainability are in line with our own priorities for sustainable use of the land's resources and responsible stewardship of all resources. We are in agreement with your intentions to take the following specific actions, which we see as the ones most likely to affect farmers and their decisions:

Water Quality and Source Water Protection:

Continue work to restore and protect our Great Lakes (page 12 of the Plan)
Continue to protect and identify vulnerable waterways and inland waters (page 13)
Ensure sustainable water use and water security for future generations (page 14)
Help people conserve water and save money (page 15)

Climate Change and Air Pollution – Knowledge, Improving Resilience and Reduction Actions:

Reduce emissions from heavy duty vehicles (page 10)
Improve our understanding of how climate change will impact Ontario (page 19)
Help Ontarians understand the impacts of climate change (page 19)
Update government policies and build partnerships to improve local climate resilience (page 20)
Reduce Ontario's emissions by 30% below 2005 levels by 2030 (page 21)
Implement emissions performance standards for large emitters (page 26)

Improved Natural Resource Management:

Reduce and divert food and organic waste from households and businesses (page 41)

Make producers responsible for the waste generated from their products and packaging (page 43)
Create clear rules for compostable products and packaging (page 43)
Make it easier and safer to reuse excess soil (page 45)
Improve the resilience of natural ecosystems (page 47)
Secure support for conservation and environmental planning (page 48)
Ensure sustainable forest management (page 50)

Since the details of how these actions will be implemented are not yet available, it is not possible to provide specific advice on implementation; however, we can recommend that any new initiatives, including regulations, while not involving undue red tape should also provide as much economic freedom as possible in line with the ultimate goal of balancing social, economic and environmental pathways. For example, reducing phosphorus intrusion to Lake Erie requires effective initiatives for both optimally reducing phosphorus loading while minimizing costs to farmers of implementing the on-farm actions to achieve the reductions. Working with farmers to achieve efficacy in this regard is essential.

CFFO would like to volunteer to be involved in the design and focus of each of the specific actions that affect farmers and the agriculture sector more generally. We are in a position to provide advice about how farmers can best be involved in implementing the actions you have listed and in achieving real outcomes and ultimate impact. Furthermore, we encourage government to ensure that **any** other future plans [e.g., Proposed Modifications to O. Reg. 525/97 (Exemption from Approval – Official Plan Amendments) made under the Planning Act to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017; Proposed Framework for Provincially Significant Employment Zones; Proposed Modifications to O. Reg. 311/06 (Transitional Matters - Growth Plans) made under the Places to Grow Act, 2005 to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017; Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017] honour this Made-in-Ontario Environment Plan's stated intentions for safeguarding environmental sustainability for the ongoing wellbeing of Ontarians now and into the future.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario
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CC: Hon. Doug Ford, MPP, Premier of Ontario
Hon. Ernie Hardeman, MPP, Minister of Agriculture, Food and Rural Affairs
Hon. Steve Clark, MPP, Minister of Municipal Affairs and Housing
Hon. John Yakabuski, MPP, Minister of Natural Resources and Forestry
Hon. Todd Smith, MPP, Minister of Economic Development, Job Creation and Trade
Hon. Caroline Mulroney, MPP, Attorney General
Dr. Dianne Saxe, Environmental Commissioner of Ontario