



November 4, 2016

Anda Kalvins, Project Manager
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division - Strategic Policy Branch
77 Wellesley Street West
Floor 11, Ferguson Block
Toronto, Ontario M7A 2T5

Dear Ms. Kalvins,

Re: EBR Registry Number 012-8002: Review of Environmental Bill of Rights - A Provincial Dialogue

The Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments as part of the Ministry of the Environment and Climate Change (MOECC) review of the Environmental Bill of Rights (EBR) and the right to a healthy environment. BFO represents the 19,000 beef producers across Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development.

Agricultural and environmental policy and regulation in Ontario have become increasingly interconnected over time. As a result, beef producers are becoming even more engaged in various environmental regulations and aware of the impact on their farm operations.

BFO strongly supports inclusive consultation models that actively involve the agriculture and agri-food sector early in the regulatory development process, in order to provide an opportunity for the details of any proposed environmental policy to be tabled, discussed and evaluated on a cost-benefit basis that incorporates environmental, social and economic factors. BFO recommends that the introduction of any new or revised policies or regulations align with the commitments made under the *Ontario Open for Business Agriculture and Agri-Food Sector Strategy*, and that they be reflective of modern farming practices and based on sound, science-based evidence.

The Environmental Registry, established through the EBR, plays an important role in how the agriculture and agri-food sector engages with government on environmental issues. The two examples of recent high-traffic Environmental Registry postings identified in MOECC's discussion guide – proposals regarding neonicotinoid-treated seed and the spring bear hunt – are both relevant to agriculture. While we support the function of the registry as a consultative tool for stakeholders and the broader public, the current 30-day minimum comment period does not provide a sufficient amount of time to thoughtfully respond to government proposals and reviews. The sheer number of postings on the Environmental Registry more than justifies an increase in the minimum comment period from 30 days to 60 days.

Furthermore, BFO recommends that improvements be made to the registry posting process to ensure a similar level of detail and consistency in format are provided. This would improve user-friendliness, and



should include a consistent standard for what contact information must be provided with every posting. For example, some postings provide a staff contact while others do not. In addition, the Environmental Registry would benefit from enhancements that allow stakeholders and the broader public to more easily search and access new and old registry postings. The current functionality of the registry has access and ease-of-use issues that make navigation a challenge.

While BFO is supportive of the EBR and the commitment to environmental stewardship, we are concerned that an aggressive strengthening of environmental rights and protections, made without equal consideration of social and economic factors, will only further burden farmers and create additional barriers to growth and expansion. Ontario agriculture plays an important role contributing to the global food supply, and BFO is engaged in helping to meet the Premier's Agri-Food Growth Challenge targets. However, Ontario farmers must compete with other jurisdictions that import food into our province and that often don't meet the same environmental protection standards. The cost of compliance to environmental regulation should not place Ontario farms at a competitive disadvantage, and regulatory standards and financial assistance programs must be assessed in the context of competing jurisdictions.

MOECC has also asked for input on the right to a healthy environment and the movement in Canada to enshrine this right in a legislative framework. This brings up the question of how the right to a healthy environment interacts with other rights and priorities, such as avoiding an over-regulated environment so businesses can be competitive and contribute to Ontario's economy. BFO recommends that, when considering the potential reach of Ontarians' right to a healthy environment, the limitations of this right also be defined. The right to a healthy environment should not impede the implementation of commitments from the Red Tape Challenge or Open for Business, which we view as extremely important to the continued economic viability of Ontario's farms. BFO urges the government to take a cautious approach to legislating the right to a healthy environment, to ensure a better-measured balance between environmental protection and social and economic prosperity.

Farmers should be considered an ally in environmental protection and sustainability, as they work with the environment closely and on a daily basis. Grasslands that are managed by Ontario beef farmers do more than produce beef – they support ecosystem services such as wildlife habitat, biodiversity conservation, carbon storage, moderating of nutrient run-off, and preservation of wetlands that otherwise may be subject to cultivation. Ontario's beef farmers are motivated to be more efficient, and they work to reduce their use of expensive land, feed, energy and water resources, and to reduce greenhouse gas emissions and overall environmental degradation. Improved production efficiencies have economic, social and environmental benefits for farmers and all Ontarians.

The Beef Farmers of Ontario would like to thank the Ministry of the Environment and Climate Change for the opportunity to provide comments as part of its review of the EBR. We would be pleased to answer any questions on the comments contained in this document, and we look forward to participating in further consultations on this important issue.

Sincerely,



Matt Bowman
President

cc: BFO Board of Directors

