



February 8, 2021

Sara Peckford  
Food Safety and Environmental Policy Branch  
Ontario Ministry of Agriculture, Food and Rural Affairs  
1 Stone Road West  
Ontario Government Building, 2nd floor Southwest  
Guelph, ON N1G 4Y2

Dear Sara,

*Re: ERO 019-2814 Drainage Act Regulatory Proposal*

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Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on *ERO 019-2814 Drainage Act Regulatory Proposal*. BFO represents 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

Government efforts to reduce red tape and streamline processes are always welcome changes. BFO has reviewed the proposed *Drainage Act* changes and their impact on agriculture and we would like to express our support for the changes. The following proposed amendments to the *Act* aim to simplify and streamline current processes, as well ensure uniformity across the province:

- Provide a simplified process for minor improvements to municipal drains;
- Simplify the process for approving updates to engineer's reports for changes to the design made during construction; and
- Adopt the *Drainage Act* and *Conservation Authorities Act* Protocol (DART Protocol) by reference.

BFO supports the simplified process for minor improvements to municipal drains provided the minor improvement is deemed to have no impact on drainage capacity. We believe that the simplified process will allow for more flexibility for drainage projects and that the pre-approved engineer designs for minor improvement projects will reduce the amount of time required to complete such projects. BFO understands that it will take time to develop the pre-approved designs, but encourages OMAFRA to develop the pre-approved designs for minor improvements as soon as possible as this will reduce the minor improvement engineering costs.

The proposed changes to simplify the process for approving updates to engineer reports due to unforeseen changes to the design made during construction and the associated eligibility criteria are also viewed as positive. These changes will contribute to further streamlined processes for drainage projects.

We would also like to express our support for the DART protocol process and adopting the protocol provincewide. Reconstituting the groups that collaborated on the original DART protocol to review the issues and/or conflicting policies that cause delays or additional expenses to approve and install new or maintain existing drains under the *Drainage Act* would also be valuable.

Thank you for the opportunity to provide feedback on the proposed amendments to the *Drainage Act*. We believe that the proposed changes listed above are positive and will effectively streamline drainage processes. We look forward to future discussions related to the *Drainage Act*.

Sincerely,

A handwritten signature in black ink that reads "Rob Lipsett". The signature is written in a cursive style with a large initial "R".

Rob Lipsett  
President