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John Turvey
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Ministry of Agriculture, Food and Rural Affairs
Policy Division
Food Safety and Environmental Policy Branch
Land Use Policy Unit
1 Stone Road
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Re: Update of Minimum Distance Separation (MDS)
Formulae & Implementation Guidelines
EBR 12-3526

The Christian Farmers Federation of Ontario (CFFO) is an accredited general farm organization operating in the province of Ontario, representing the interests of over 4,100 farm families in the province.

For many years our organization has strongly supported the concept of using the planning act and the municipal building permit system to separate livestock farmers from their urban neighbours. Being considered a good farm neighbour requires reasonable distance between residences and the odours that are a normal facet of livestock farms. The need to protect normal farming practices from nuisance complaints is another accomplishment of the MDS regulatory process. It is encouraging that the proposed updated regulations will help reinforce the original concept.

From our perspective there are several significant changes being proposed:

- The clarification of guidelines for Anaerobic Digesters is a desirable approach. The intent is to provide unique odour setbacks for these relatively new agriculture and organic waste structures. They have the potential to have a

very different odour profile than traditional livestock facilities. Having clear regulations is the appropriate approach.

- There will be a reduced footprint for smaller livestock operations thus accommodating residences closer to small or hobby style livestock farms and vice versa.
- There will be an enlarged footprint for the much larger livestock operations. Since the MDS was first envisioned, livestock facilities have become much larger and the need for well managed odour control has become more sophisticated.
- From time to time some individuals or groups try to use the MDS regulations for purposes that it was never intended to deal with. Some of the proposed minor changes should provide more protection from the people who for whatever reason are opposed to a valid farm activity. The livestock farming community will welcome these changes.

The CFFO fully supports the proposed changes to the Minimum Distance Separation Formulae.

Thank you for this opportunity to provide our comments.

A handwritten signature in black ink that reads "Lorne Small". The signature is written in a cursive, flowing style.

Lorne Small, President
Christian Farmers Federation of Ontario