



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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March 10, 2017

Ms. Cassandra Carter  
Climate Change Intern  
Strategic and Indigenous Policy Branch  
Ministry of Natural Resources and Forestry  
300 Water Street  
Peterborough, ON  
K9J 8M5

Dear Ms. Carter;

**RE: EBR Registry Number 012-9499 Naturally Resilient: MNR's Natural Resource Climate Adaptation Strategy (2017-2021)**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

Before addressing the proposed Climate Adaptation Strategy, OFA reiterates its view that there is only one Ontario landscape. By that we mean that the full range of landforms and land uses found across Ontario; natural heritage, rural, agricultural, urban, cultural heritage, aggregate extraction, etc. must share this one landscape. Inherent in this is the recognition that Ontario's agricultural areas not only provide us with high quality, affordable food, fibre and fuel, but agricultural areas also a broad range of environmental and ecological goods and services that benefit all Ontarians. These environmental and ecological goods and services, in alphabetical order, include;

- aesthetic and recreational space,
- air quality, including oxygen production,
- biodiversity,
- carbon sequestration,
- climate change mitigation,
- nutrient cycling,
- pollination services,
- soil erosion control,
- water cycling (purification, retention, flood mitigation, groundwater recharge), and
- wildlife and endangered species habitat.

Agriculture is the principle resource-based land use in Southern Ontario. Through the Provincial 2014 Policy Statement (PPS), the protection of Ontario's prime agricultural areas for their long-term agricultural use is a key priority. Ontario farmers have been challenged by the Premier to double their annual growth and add 120,000 additional jobs by 2020. To achieve these goals, the Ontario government must adopt policies and programs that compliment and facilitate this goal, rather than hinder it. Protection of our finite, scare and non-renewable agricultural land base from all non-agricultural uses is critical.

Ontario's agricultural land is finite, scare and non-renewable. Based on data from the 2006 and 2011 censuses, the total area of Ontario farms declined dramatically by almost 260,000 ha (636,000 acres) between 2006 and 2011; from 5.4 Million ha (13.3 Million acres) to 5.1 Million ha (12.6 Million acres). Put in perhaps an easier to visualize form, that's 350 acres/day, equivalent to 173 CFL football fields, each and every day! Maintaining our agricultural lands for the production of food, fibre and fuel is critical. Ontario's legislation, regulations, policies and programs need to be developed through this lens. Census of Agriculture data is due to be released in May; we anticipate it will show a continued decline in the area of Ontario farms, i.e. the area of Ontario dedicated to the production of food, fibre and fuel in 2016, will be less than 2011.

The Ontario Government also has an additional expectation that Southern Ontario, particularly the Greater Golden Horseshoe, will, over time, accommodate substantial population growth as well as the jobs and infrastructure necessary to support this projected growth.

On page 6 in the Climate Adaptation Strategy there is a reference to the Ministry "developing a land use carbon inventory to assess emissions and reductions from agriculture, forestry and other land cover types". We have no objections to the Ministry's pursuit of this. We do, however, recommend that this be accomplished in collaboration with the Ministry of Agriculture, Food and Rural Affairs and farm organizations.

#### **GOAL 1: MAINSTREAM ADAPTATION**

We support the actions under Goal 1. We reiterate that Ontario agriculture is the preferred source for locally-grown, safe and affordable food. Locally-grown avoids the climate-change consequences of importing food from far-flung jurisdictions. Furthermore, as noted, Ontario's agricultural lands also provide us with a broad range of environmental and ecological goods and services that benefit all Ontarians. Further climate change adaptation may include the expansion of agricultural production into areas such as the Great Clay Belt.

#### **GOAL 2: BUILD RESILIENCY AND BIODIVERSITY**

OFA is an active member of the Ontario Biodiversity Council.

OFA has also been actively engaged in MNR's Wetland Conservation Strategy, as well as the Co-ordinated Land Use Planning Review and the Conservation Authorities Act Review. All of these have included climate adaptation/mitigation/resiliency as key pillars.

We support the principles of ecosystem, landscape and species resilience. However we are opposed to any conversion of our finite, scarce and non-renewable agricultural lands into any non-agricultural land uses, including conversion to natural heritage features and areas. Less than 5% of Ontario's land area is capable of supporting agricultural activities. OFA believe that these lands should be reserved for the production of food, fibre and fuel. -reference to 50 Million Trees,

Grasslands Stewardship and Wetlands Conservation Strategy (the compensation aspect of its mitigation hierarchy)

Ontario's agricultural lands also provide us with a range of environmental and ecological goods and services, thereby supporting the goal of building resiliency and biodiversity.

Action 2.2 speaks to landscape resilience. One means to achieve landscape resilience is through Ontario's Agricultural Soil Health and Conservation Strategy, which aims to maximize long-term carbon storage in soils, while also protecting their long-term productivity. Both are goals that Ontario farmers share. Farmers rely upon productive soils as the basis of their food-producing activities. Agriculture's long-term history in Ontario testifies to the capability of generations of Ontario farm family's stewardship of the soil on their farms.

Improved soil health not only benefits our farm families through higher crop yields, but also serves to achieve Ontario's climate adaptation goals.

**GOAL 3: INCREASE SCIENCE, RESEARCH AND KNOWLEDGE**

OFA is supportive of enhancing our science, research and knowledge. We offer no specific comments on this goal.

**GOAL 4: INCREASE AWARENESS AND MOTIVATION**

OFA offers no comments on this goal.

**GOAL 5: OPTIMIZE SERVICES AND RESPONSE**

With reference to Action 5.2 (Interjurisdictional Cooperation) OFA strongly recommends that this Action should also include cooperation across Ontario's ministries. Ontario's individual ministries must first align their goals and objectives with Ontario's Climate Adaptation Strategy. Broader interjurisdictional cooperation is the logical extension of effective cross ministry cooperation.

OFA looks forward to actively collaborating with the Ministry of Natural Resources and Forestry on development and implementation of Naturally Resilient: MNRF's Natural Resource Climate Adaptation Strategy (2017-2021).

Sincerely,



Keith Currie  
President

cc: Hon. Kathryn McGarry; Minister of Natural Resources and Forestry  
Hon. Jeff Leal; Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors