September 29, 2017

Helma Geerts, Policy Advisor
Ministry of Agriculture, Food and Rural Affairs
Policy Division, Food Safety and Environmental Policy Branch
1 Stone Road West, Floor 2
Guelph ON
N1G 4Y2

Dear Ms. Geerts,

Re: EBR Registry 013-0968 Release of draft Agricultural System mapping and Implementation Procedures for consultation

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

OFA values all preceding opportunities to engage with OMAFRA on the proposed Agricultural System in the Greater Golden Horseshoe and appreciates that OMAFRA has incorporated OFA's feedback into the proposed materials to date.

We welcome this opportunity to comment on the three draft products that address the recommendations by the Advisory Panel on the Coordinated Land Use Planning Review, chaired by David Crombie to implement an Agricultural System approach in the Greater Golden Horseshoe.

Draft Implementation Procedures

The Implementation Procedures document will be a useful tool for municipalities and other organizations to understand and implement Agricultural System policies in their communities. OFA has the following suggestions to improve the clarity and usefulness of the draft Implementation Procedures.

General Suggestions
- p.i "This tool may be used by municipalities and others to advance opportunities for the agri-food sector and to *enable negative impacts on the Agricultural System to be assessed and avoided from new development*" the italicized section should be reworded for clarity, as it reads 'enable negative impacts' in its current iteration.
- p.2 footnote 2 "…plus the value chain agriculture depends on". OFA questions this definition of agri-food. What if it is not what agriculture *depends* on, but it could strengthen

the sector? e.g. innovative processes, new market channels? Does it include research? OFA would recommend more clarity in this definition to encompass opportunities to strengthen and enhance the sector.

- p.59 Please include OFA's *Guide and Checklist to Support Agricultural Growth in Your Municipality* in the list of references.

Agri-Food Network

Definition provided on p.23:

> [8]*While the agri-food network is intended to capture the value chain of agricultural commodities, for the purposes of this Agricultural System work, it stops at primary processing (e.g. granary, dairy, abattoir, winery) and does not extend to secondary processing further down the value chain (e.g. bakeries, frozen meal plants, beer and liquor stores, restaurants). While secondary processing is important to the value chain, it is beyond the scope of this Agricultural System work.*

There are some confusing elements of the definition of the Agri-Food Network. While in some definitions it only extends to primary processing, the Agricultural System Portal includes Farmers' Markets, Breweries, Cideries, etc. In the example on page 26, the caption for Figure 4 is: **"**Example of an Agri-Food Value Chain from Growing the Crops to Primary Processing". However, this image shows the value chain from growing the product to consumers accessing the final product at the neighbourhood pub in Northumberland County.

OFA recommends acknowledging that the Agri-Food Network extends beyond primary processing, however, for mapping purposes there are limitations to mapping these assets in an effective and impactful layout. For example, mapping all food retailers in an urban area may not assist in deciding where to locate an abattoir in a community, but it does not diminish the impact that local food retail outlets have on the agricultural system overall. In the hops-to-beer example in Northumberland County, the proximity to urban markets for consumers to purchase the beer certainly supports the hops industry, the processors, and the distributors along the chain. It could be made more explicit here that implementing the Agricultural System concept requires a holistic view, not exclusively inputs to primary processing.

Agricultural System Portal

The Agricultural System Portal will be an effective tool to identify existing agri-food assets and clusters for economic development purposes. The maps will also inform Agricultural Impact Assessments and how impacts of non-agricultural uses can be avoided.

OFA has some suggestions for improving the functionality of the Portal:

- Reword the data set titles to a user-friendly format (e.g. *Livestock Assets and Services – Meat Distribution 41111, 41313, 41314, 41316, 44521, 44522 (GHFFA))*
- Instead of the brackets identifying the data source, it would be more useful and provide clarity to identify the geography that the data set covers (e.g. GGH, Ontario, Canada) The source of the data set could be provided in the Legend or when you hover over it

- Assist users by providing suggested data set combinations to map (e.g. Beef Sector: Beef Farm Density, Abattoirs, Meat Distribution); it could even pre-select for the user based on the industry the user is investigating
- *GreenbeltFresh.ca* data points should be broken down further into their layers (e.g. farmers' markets, pick-your-owns). There are too many data types in one data set to be used in a meaningful way
- Need a "Clear All" (deselect) button
- When you have *Administrative – Boundary of the Greater Golden Horseshoe (MMAH)* selected, it says *BRANT COUNTY* for the detailed data point, which may confuse users
- For the data set: *7.6 Crop Production - Spatial Density of Canola (AAFC),* the only shade on the map is blue, '*Least Dense*'. It is hard to use this data in any meaningful way. Is it possible to quantify the density? Similar for *Wheat Density* data set.
- Data set *7.0 Crop Production – Land Under Agricultural Cover* does not seem to load any data
- OMAFRA should provide tutorials: self-help tools, webinars, YouTube videos, case studies to assist users in utilizing this tool in a meaningful way

OFA has some important questions for consideration moving forward:

- How will OMAFRA ensure the data sets remain up-to-date?
- Will there be an opportunity for individuals and organizations to load their data or suggest additional data sets? What will the process be?
- Will the data sets be downloadable?
- Are data sets available for more specific sub-sectors (e.g. currently "Vegetable", "Fruit")?
- Are there data sets for ornamentals, equine, niche crops (e.g. hops, ginseng)?
- How will OMAFRA provide ongoing assistance to municipalities and other organizations while using these tools to ensure that they are able to use them effectively?

OFA would like to work with OMAFRA to develop a public database of Agriculture Economic Development Initiatives capturing best practices and case studies across Ontario for utilization by municipalities and organizations. This database would be complementary to the process-driven Agriculture Economic Development resource in development by OMAFRA's Regional Economic Development Branch.

Overall, OFA is pleased with the Agricultural System Portal. OMAFRA's support and continued refinement will ensure that the Portal hosts accurate data that is easy utilized by communities across the Greater Golden Horseshoe.

Draft Provincial Mapping of the Agricultural Land Base

OFA supports the provincial mapping of the Agricultural Land Base, including identification of Candidate Areas for inclusion in the Agricultural Land Base. OFA supports the Land Evaluation Area Review (LEAR) methodology identifying land capability (60%), farm production (30%) and fragmentation (10%) as important factors for identification of prime agricultural areas. In addition, OFA supports the utilization of Canada Land Inventory (CLI) mapping for land capability, as it also places value of agricultural lands in Class 4 to 6.

OFA's greatest concern lies in the concurrent consultation by the Ministry of Natural Resource and Forestry (MNRF) to identify and map the Natural Hertiage System (NHS). We strongly oppose

any policy that unduly affects agricultural uses within the identified linkages and corridors. OFA encourages OMAFRA to work closely with MNRF to ensure the full range of agricultural uses are available to those who farm or participate in agriculture-related and on-farm diversified uses in the proposed NHS. OMAFRA should work with MNRF to produce a single publicly-available map with both the Agricultural System and NHS as map layers. OMAFRA should also encourage MNRF to include groundtruthing of natural heritage features as part of the mapping process.

OFA looks forward to seeing our recommendations reflected in the final versions of the Agricultural System mapping and Implementation Procedures, and to continued consultation with OMAFRA as the Agricultural System is implemented across the Greater Golden Horseshoe.

Sincerely,

Keith Currie
President