



Ontario Federation of Agriculture

Ontario AgriCentre

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Ms. Karla Uliana, Senior Policy Advisor
Ministry of Agriculture, Food and Rural Affairs
Policy Division, Rural Policy Branch
1 Stone Road West, Floor 2
Guelph ON
N1G 4Y2

Dear Ms. Uliana,

Re: Farms Forever Discussion Paper

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.

Thank you for the opportunity to offer feedback on the Farms Forever Discussion Paper. The Discussion Paper proposes four policy objectives and discussion questions for moving toward an even stronger, more vibrant sector and supporting the future of farming and agri-food production in Ontario. These policy objectives tie into OFA's mission statement, Farms and Food Forever, and the Vision Statement in our 2017 draft Strategic Plan:

- Farming is a science-based, technologically-savvy industry
- Food and other farm products are produced sustainably
- Farmers are proud of their role, contributing to, and advocating with, OFA
- Consumers are knowledgeable of, and engaged with, the food system
- Food production enjoys continual productivity enhancement
- Farming works within a supportive legislative and regulatory framework
- Nutritious Ontario food is readily available to Ontarians and enjoyed around the world

Agriculture Policy Statement

Agriculture is vastly impacted by the policies developed in ministries other than the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA), notably, the Ministries of: Environment and Climate Change, Labour, Energy, Municipal Affairs (MMA), Economic Development and Growth, Ministry of Natural Resources and Forestry, and Infrastructure, to name a few. Through the Farms Forever Program, OFA recommends OMAFRA lead the development of an Ontario Agriculture Policy Statement to use for policy development across all ministries.

The Ontario Agriculture Policy Statement would differ from the format of the Next Policy Framework, which focuses on programs instead of policy directions. The Ontario Agriculture Policy Statement would have a vision, policy goal, mission statement, specific policy objectives, and thematic areas (such as those listed as the Farms Forever objectives).

OFA would support the development of an Agriculture Policy Statement initiative, and would work closely with OMAFRA to ensure that Ontario has *Farms (and Food) Forever*.

Farms Forever Discussion Paper

Prior to responding to the questions provided, OFA has some general comments about the Farms Forever Program as it is outlined.

While this discussion paper is “intended to facilitate an open discussion about the broad aim of strengthening the province’s agri-food sector”, several essential elements to a viable agri-food sector were not discussed, notably:

- **Energy** - Two-way natural gas pipelines are necessary across rural Ontario to bring a cheaper, cleaner, reliable, and uninterrupted fuel choice to farm businesses, food processing facilities, and all other business enterprises across the agri-food value chain.
- **Rural Infrastructure** – Hard infrastructure, such as roads and bridges need to be maintained to ensure farm products can be transported quickly and efficiently throughout the province and beyond. Soft infrastructure, such as schools, health care and child care are needed to ensure there is a rural community for farm businesses and the rural workforce to live and participate in the economy.
- **Technology** – Today’s modern agricultural business requires broadband internet to run effectively. Adopting new technologies are essential for agri-food productivity and environmental improvements, including precision agriculture technologies, robotic milking facilities, etc.
- **Bioeconomy** – There are countless opportunities to utilize food and crop waste as a resource for energy and/or animal feed. Strengthening the bioeconomy also has ancillary effects by enhancing environmental stewardship and mitigating climate change impacts.

OFA believes that a comprehensive Farms Forever program requires careful consideration and inclusion of these key elements in the agri-food sector.

Objective 1: Preserving the Productive Capacity of Agricultural Land Close to Major Urban Centres

OFA believes this objective is too focused on the Greater Golden Horseshoe and other urban areas. The focus should not be limited to “agricultural lands close to major urban centres”. Agricultural land losses, wherever they occur in Ontario, must be reduced. OMAFRA need to develop an overall regulatory framework that supports the agri-food sector. Too often, government policies deter innovation.

In addition, Greenbelt-level Natural Heritage protection policies unnecessarily curtail agriculture. The Coordinated Planning Review proposes to extend these unnecessarily restrictive policies to the entire Growth Plan area.

1.1 What are the best strategies to continue to support the goal of reducing the amount of farmland that is lost in Ontario? (Factors to consider include regulation, economic reform, stewardship of private and public lands, land use planning, education, supportive infrastructure and services)

One of the best strategies to reduce the amount of farmland lost in Ontario is to implement fixed, permanent urban boundaries. In addition, making intensification and greenfield densities *mandatory requirements* instead of *targets* would ensure urban expansion does not encroach on agricultural land. The provincial government should remove the Growth Plan's *opt-out provisions* for intensification and greenfield densities.

Agricultural businesses need access to agriculture-supportive infrastructure in addition to protected agricultural land (e.g. drainage, municipal water, natural gas, 3-phase power, broadband internet). Also, policies should enable easy access to agriculture-supporting businesses such as input suppliers, food processors, and other businesses along the agri-food value chain.

Policies in other ministries restrict agricultural activities and innovation (e.g. roads, bridges and traffic circles that inhibit movement of agricultural equipment from farm to farm). There should be an end to arbitrary, unilateral interpretations of the Highway Traffic Act status for new farm implements to enable innovation.

Municipal staff and politicians should be informed about the economic and social benefits derived from keeping agricultural lands in agricultural production. The public should also be informed of the role, reach, and size of Ontario's agri-food sector, as well as the environmental and economic goods and services that farming contributes for the benefit of all Ontarians.

1.2 What are the best ways to promote agriculture in urban and near-urban centres and maintain the viability of farms impacted by urban growth (E.g., by providing specialty crops and services, education and agri-tourism experiences)

While there are benefits to farming in the proximity of urban markets, urban pressures constrain farm viability. There needs to be a stronger commitment to protecting near urban agricultural lands, otherwise there will be hesitance to maintain/improve productive capability of the land.

The Natural Heritage System mapping needs to be groundtruthed, and there must be clarity that Natural Heritage features on agricultural lands are not buffers, and can continue to be in agricultural production.

OMAFRA should work with MMA to initiate an awareness and education campaign that promotes the economic and societal benefits of protecting agricultural land near urban areas. OMAFRA could also initiate an awareness and education campaign about the economic and social benefits of farming for non-farming residents living near agricultural operations.

How can knowledge in soil health research, and water and soil stewardship, best be translated to farmers and on-the-ground professionals for maximum benefit?

OMAFRA can use a variety of tools to support knowledge translation and transfer (KTT) of agricultural research to farmers. Financial incentives for adopting new practices, examples of successful case studies, developing best management practices (BMP) guides, continue to host KTT days and offer information-sharing platforms.

Information should be provided in many easy-to-understand, easily accessible formats (e.g. digital and print). The benefits must be identified and then incentives should be provided to early adopters to mitigate their risk. A promotional campaign by OMAFRA to inform the public of farmers' efforts and actions to improve soil health and water and soil stewardship would be welcomed.

Programs such as the Great Lakes Agricultural Stewardship Initiative (GLASI) need to have adequate funding given that they are generally fully subscribed and there is more demand than funds available.

Objective 2: Supporting Local Food

2.1 How can government and its partners build on the success of strategies aimed at growing domestic production and consumption?

The objective to “support the local sourcing of food” does not acknowledge the efficiencies of our current food distribution system. While “local food” can be a complementary initiative, considerable efforts should be made to support the agri-food system at a global scale. In addition, the geography of “local” is not defined in this paper, and should be explicitly stated to include all products in Ontario.

Enhancing domestic production requires affordable energy, the availability of rural broadband internet and access to innovative technologies, a skilled workforce, and more broadly, vibrant rural communities. Growing the sector domestically requires similar solutions to growing the sector on an international scale. Agriculture and food businesses will continue to enhance their productivity and identify innovative solutions if they have the capacity to do so. Government must support both the hard and soft infrastructure of rural communities to enable the agri-food sector to grow.

The Rural Economic Development (RED) program and the Local Food Investment Fund provide local solutions to local challenges, and they must continue to have adequate funding to support the vast geography of rural Ontario.

2.2 How can government and its partners better support consumer awareness and demand, such as marketing and promotion for local food?

As stated above, ensure the definition of local food encompasses all of Ontario. In addition, consumers seek healthy food, and may prefer local food; however, price is the number one factor in consumers' food purchasing decisions. A better question is, “How can government help enhance the affordability and availability of local (Ontario) food, so it is the preferred choice over imported food?”.

2.3 How can government and its partners better support the production and supply of local food?

A provincial local food procurement policy in the broader public sector would be beneficial to Ontario farmers, provided that the reporting and auditing process is not burdensome. The Ontario government should proclaim this area in the Local Food Act into force, and work with stakeholders, including farmers and farm organizations, to develop the goals and targets.

Agricultural employers require more flexibility in managing human resources than other businesses. Growing food in Ontario is seasonal, with considerable variability as to when crops are planted and harvested. Agricultural production is subject to unpredictable weather and climate conditions, with a narrow window between emergence and harvest. Products are highly perishable and are sold in a competitive marketplace with tight margins.

By adopting new technologies, some farm owner/operators can decrease their labour demands, however there is still a need in many subsectors for the gentle hand and discerning mind of a person. Therefore, with the Ministry of Labour's Changing Workplaces Review, it is essential that exemptions remain for agriculture to ensure that employers can continue to operate without costly delays or unmanageable financial conditions.

Similarly, together with our partners in the agricultural sector, we find the current ad hoc changes to the minimum wage rate very distressing. An increase to the minimum wage is essentially a legislated increase in our cost of production for which we have no mechanism to recover from the marketplace. This action can prompt a shift into less labour-intensive agricultural products or act as an incentive to shed labour costs through automation. In the worst case, farm operators faced with higher costs of production due to minimum wage may simply exit the industry. OMAFRA should work with the Ministry of Labour to ensure that their policies enable agricultural operations to remain viable in Ontario.

2.4 Acknowledging that the food processing sector is a key partner in growing Ontario's local food capacity, what further steps and supports could be introduced to support the sector?

The lack of affordable energy is a paramount issue for food processing businesses. Expanding affordable natural gas infrastructure across Ontario will enhance the competitiveness of the agri-food sector and provide more opportunities for rural communities to attract food processing businesses.

Value-added on-farm processing should also be encouraged through policies that enable innovation and additional revenue streams for farm businesses.

The proposed labour changes in Bill 148 are also concerning to other agri-food value chain stakeholders. Raising the minimum wage would put the food processing sector at a competitive disadvantage, likely resulting in increased reliance on automated systems and minimizing employment opportunities where possible.

2.5 What can government do to help locally-based efforts to process local food?

As mentioned above, economic development in rural Ontario requires affordable energy to encourage food processing businesses to start, grow, and thrive. The Next Policy Framework should support Agriculture Economic Development initiatives that focus on capacity-building and value chain initiatives at the regional level, instead of solely on market development.

The Ontario Government should continue to fund initiatives such as the Local Food Investment Fund and the RED Fund to enable value chain development and strengthened supply chains that provide solutions tailored to a community.

To provide a financial incentive to preserve farmland and to encourage farmers to reinvest and expand their businesses, the provincial government should provide a statutory exemption for on-farm structures from development charges.

Objective 3: Strengthening Ontario's Agri-Food Sector

3.1 What are the untapped opportunities that Ontario's agriculture and agri-food sector can look to expand into, including urban agriculture?

An overall regulatory framework that supports Ontario's agri-food sector should be developed (plans, policies, programs, legislation) to identify and revise any deterrents to innovation and expansion in all sectors across the agri-food value chain.

Urban Agriculture

The term "urban agriculture" can be interpreted in a variety of ways, and therefore it must be clear what initiatives would be supported. More specifically, urban agriculture that focuses on community development through: community gardens, green roofs, backyard gardening etc. are important initiatives. However, there is an increasing interest in "agritecture"; intensive, indoor/vertical farming, climate-controlled agriculture, aquaponics, hydroponics, and greenhouses. These initiatives could be classified as "urban agriculture", however, they can occur *anywhere*; their commonality is that they do not need to occur on farmland. In the development of urban agriculture or "agritecture" policies and parameters, care must be taken to ensure that conventional agricultural production is not negatively impacted.

"Agritecture" should be encouraged to utilize the excess heat or energy from agricultural buildings to power aquaponics or hydroponics facilities. In turn, the strengthened circular economy/bioeconomy will mitigate climate change and reduce the environmental footprint.

New Crops

Tools like AMI's upcoming New Crop Resource will help farmers formulate a business plan for new crops to diversify their operations. Based on a 2017 OFA survey on New Crop Opportunities, the biggest concern for farmers was the level of risk involved in undertaking a new crop and finding a market for their product. OMAFRA could provide greater supports and risk-mitigation tools for farmers looking to innovate and explore new opportunities on the farm.

Value-Added Agriculture

Farmers are continuously innovating how they process and sell their products. On-farm processing, direct farm marketing, agri-tourism and other initiatives should be promoted by:

- Reforming property tax classes to create a class between farm and commercial/industrial for small on-farm processing facilities to encourage innovation and small business development (as identified in 2015, 2016 Budgets); and
- Enabling more activities on the farm, and making the planning and permitting process less burdensome.

Precision Agriculture

Technology is already an integral part of farming in Ontario; however, more should be done to improve rural broadband infrastructure so that farmers can enhance their efficiency through new technologies.

Knowledge Translation and Transfer

Research conducted in educational institutions, government and private research facilities should be shared and commercialized so that the agri-food industry can utilize these new practices and technologies.

Bioeconomy

More should be done to support the burgeoning bioeconomy sector in Ontario through policies and programming that support the usage of crop residues and other wastes into energy and other uses.

3.2 How can Ontario take advantage of growing markets in other countries for food grown and/or processed here?

Ontario farmers will grow new products if they are aware of available market channels. The role of the Ontario government is to improve communication flow of what export products are trending and in-demand. Once identified, the government should coordinate efforts for Ontario growers to meet market needs. Funding for research should be made available to producers to explore new crops and new market opportunities.

In addition, OFA encourages OMAFRA to improve linkages between Ontario farmers and processors/food entrepreneurs who are currently importing primary products and processing them for export. Our farmers could be providing the safe, healthy, quality primary products that others in the value chain are marketing internationally. These efforts would enhance the quality and appeal of “Canadian” or “Ontario” products (i.e. 100% grown and processed in Ontario / Canada).

The Ontario government should work closer with the federal government to identify export opportunities and better coordinate the Ontario/Canadian brand (e.g. safe, nutritious, quality). The federal, provincial and territorial governments need to speak with a unified voice, instead of competing at trade shows which confuses international buyers.

3.3 What can government, industry, and other partners do to support farming and food processing in Ontario – either separately or jointly with other partners?

The Ontario government should work with industry and other partners to:

- Improve rural access to affordable natural gas and broadband internet
- Reduce regulatory burden for farmers, processors, and the entire agri-food value chain
- Improve rural infrastructure such as roads and bridges to transport agri-food products, which can be done through increased federal transfers to municipal infrastructure
- Enhance opportunities for the agri-food sector to contribute to the bioeconomy
- Enhance opportunities for adoption of precision agricultural technologies
- Improve knowledge translation and transfer from research institutions
- Reduce restrictions for value-added agriculture and on-farm diversification

- Adequately fund Business Risk Management Programs to ensure that they respond to the needs of all farm businesses in both the short- and long-term

Objective 4: Support for New and Beginning Farmers

4.1 How are the demographics of farming changing in Ontario and within your sector of agriculture?

While the average age of an Ontario farmer is 55 years old, there can be many generations living on the farm. There is a need to explore the demographics of farmers in more detail to provide programming and services that are best suited for:

- Their age
- Whether they have off-farm income (e.g. time of day programs are scheduled)
- Whether they have children (e.g. availability of child care)
- Their business interests (e.g. on-farm diversification, specialty crops, online retailing)

4.2 What new opportunities are on the horizon that new and beginning farmers can take advantage of?

Innovation is occurring on farms every day in Ontario. New and beginning farmers are poised to try new crops, diversify operations and initiate on-farm value-added activities. There are many barriers to these opportunities that the Ontario government can address through: reducing risk through business supports, improving the availability of capital, enhancing rural infrastructure (including soft infrastructure such as rural schools, child care, and community services).

Agriculture and food incubators/food hubs are cropping up across Ontario to support agri-food entrepreneurs and fill infrastructure gaps for cold storage, processing, distribution, and mentorship opportunities. The Ontario government should recognize the value that these facilities bring to the agri-food sector to support innovation and entrepreneurship, and it should be promoted to new and beginning farmers.

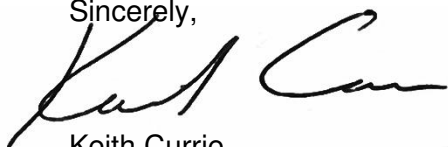
4.3 How can potential new entrants be encouraged to consider agri-food as a future career?

There are many opportunities for careers in agri-food, but they are not limited to agricultural degrees. Ontario needs skilled tradespeople, students educated in science, technology, engineering and mathematics (STEM) fields, culinary expertise, and other fields not typically associated with agriculture. There needs to be a concerted effort to promote the agri-food sector within other fields of study, and a recognition that there are high-skilled, well-paying careers in the agri-food sector.

OFA appreciates this opportunity to comment on the Farms Forever Discussion Paper. We believe the time is ripe for an Ontario Agricultural Policy Statement to be developed.

We look forward to continuing to work with OMAFRA to develop a Farms Forever program that moves us toward an even stronger, more vibrant agri-food sector and supports the future of farming and agri-food production in Ontario.

Sincerely,



Keith Currie
President