

August 10, 2020

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street
17th Floor
Toronto, ON
M5G 1B3

Dear Minister Clark:

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 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.

Based on census data from the 2011 and 2016, Ontario's agricultural land declined from 12.6 million acres in 2011 to 12.3 million acres in 2016, a rate of loss equal to 175 acres per day. Ontario agricultural lands occupy less than 5% of the province's overall land area and our agricultural lands are a finite and shrinking resource that all Ontarians benefit from, not only for the ability of these lands to provide us with a secure supply of safe, affordable and environmentally sustainable food, fibre and fuel but also for the concurrent environmental and ecological goods and services that all Ontarians derive from our agricultural lands, 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.

Despite occupying less than 5% of Ontario's overall area, agriculture and agri-food processing are Ontario's number one economic drivers. In 2019, Ontario's agriculture and agri-food sector, from field to fork, contributed \$47.28 billion to Ontario's economy and supported 860,494 jobs. Decision makers must never lose sight of this reality when making decisions about future agricultural land loss to development for population and employment growth.

We fully recognize the need for Ministerial authority to issue Municipal Zoning Orders (MZOs) for municipalities without municipal organization and therefore without Official Plans and Zoning By-laws. For these municipalities, MZOs serve the purpose in facilitating orderly growth and development – a use of Municipal Zoning Orders we support.

However, OFA expresses its deep-seated concerns with the recent proliferation of Municipal Zoning Orders (MZOs) issued for municipalities with robust planning systems, Official Plans and Zoning By-laws. We are seeing MZOs issued for municipalities with robust planning systems at a frequency never-before seen. This frequent use undermines Ontario's long-established system of land use planning under the Planning Act, Provincial Policy Statement (PPS) and municipal Official Plans and Zoning By-laws. Ontario has a well-established system for amending municipal

Official Plans and Zoning By-laws to accommodate population and employment growth, including a system for appeals. The recent issuance of multiple MZOs short circuits our long-established planning principles and policies is short sighted. It deprives citizens impacted by these MZOs the ability to be consulted on proposed amendments to municipal Official Plans and Zoning By-laws.

From OFA's perspective, while MZOs are written to enable certain specified uses on the subject lands, they seem to ignore the application of key Provincial Policy Statement criteria for settlement expansions, such as how will Ontario's Minimum Distance Separation (MDS) formulae and guidelines be applied to MZO-facilitated developments that are adjacent to ongoing, active livestock/poultry farm operations? MDS is utilized to separate livestock/poultry operations from adjacent non-farm developments to minimize odour complaints and to enable livestock/poultry operations to expand. In a settlement area boundary expansion, section 1.1.3.8 of the PPS dictates it occur during a municipal comprehensive review and when specified criteria have been addressed, including the proposed growth that cannot be accommodated through intensification, redevelopment and designated growth areas, the existing suitable infrastructure, that for prime agricultural lands alternative locations have been considered, that there are no reasonable alternatives to the proposed expansion, that the expansion complies with MDS and that the potential impacts of settlement expansion on agricultural operations are mitigated.

Agricultural Impact Assessments (AIAs) are referenced in A Place to Grow: Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Provincial Policy Statement as studies *"that evaluate the potential impacts on non-agricultural development on agricultural operations and the Agricultural System and recommends ways to avoid, or if avoidance is not possible, minimize and mitigate adverse effects"*. OFA firmly believes in the widespread use of AIAs to ensure that any negative impacts of proposed developments are first avoided, then minimized and lastly mitigated. Proposed MZOs are not evaluated based on Agricultural Impact Assessments, a shortcoming that further underscores the deficiencies in using them in municipalities with robust, Ministry-approved Official Plans and Zoning By-laws.

OFA is looking for your support, Minister Clark in deterring the use of Ministerial Zoning Orders for municipalities with well-developed, Ministry-approved Official Plans and Zoning By-laws. We would appreciate the opportunity to speak with you further about this at your convenience.

Sincerely,



Keith Currie
President

KC/pj

cc: The Honourable Doug Ford, Premier
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
County of Perth
Township of Perth South
City of Stratford
OFA Board of Directors
OFA County Federations
OFA Member Service Representatives