

April 20, 2022

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON
M5G 2E5

Submitted via email to: minister.mah@ontario.ca and greenbeltconsultation@ontario.ca
and submitted online via the Environmental Registry of Ontario (ERO)

Dear Minister Clark:

**RE: ERO #019-4483: Proposed Amendment to the Greenbelt Area boundary regulation
– Growing the size of the Greenbelt**

**ERO #019-4485: Proposed Amendment to the Greenbelt Plan – Growing the size of
the Greenbelt**

ERO #019-4803: Ideas for adding more Urban River Valleys

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates this opportunity to provide input to ERO #019-4483, ERO #019-4485, and #019-4803 on the second phase consultation on the proposed amendments to the Greenbelt Plan and the Greenbelt Area boundary regulation as they relate to growing the quantity and quality of the Greenbelt by adding 13 new and expanding Urban River Valleys (URVs). We understand that the Greenbelt aims to provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on the landscape.

It is essential to acknowledge that less than 5% of Ontario's land base can support agricultural production. From 2011 to 2016, the Census of Agriculture indicated that Ontario lost 319,700 acres of Ontario farmland. That's 175 acres of farmland per day. The growth pattern enabled by current provincial policies is unsustainable and needs to be resolved. If our province plans to continue to grow and prosper, we must also have a plan to protect our ability to produce food, fibre and fuel for the people of Ontario and beyond.

The current provincial framework for farmland protection and growth management results in the cumulative loss of agricultural lands, prioritizing development and growth over farmland preservation. Regardless of the size of the Greenbelt area, the areas excluded from the Greenbelt boundary are under intense development pressures.¹ These pressures are exacerbated by tools such as the Minister's Zoning Orders (MZOs) which the Minister continuously exercises with the endorsement of municipalities, contributing to an unprecedented use of MZOs leading to farmland loss in Ontario.

On June 16, 2021, the provincial government promised to add two acres of land to the Greenbelt in southern Ontario for every acre of land developed through an MZO. To date, over 2000 acres of farmland have been lost to development because of MZOs. The addition of 2325 acres as URVs should not be considered as an increase in the total land area within the Greenbelt Plan, especially as the proposed lands are already within relatively developed and urbanizing areas. These lands do not contribute to the Greenbelt Plan's objectives, vision, and goals of providing permanent protection to the Agricultural Land Base. The proposal to 'Greenbelt' URVs should not be considered an acceptable means of maintaining the Greenbelt's total land area to balance the loss of protected agricultural lands to development. These empty promises and policy tools to protect farmland are no match for the power of MZOs that prioritize development and circumvent agricultural and environmental protections.

OFA fully recognizes the value of protecting our water sources. Our families, livestock, and crops depend on readily available sources of clean water. However, OFA does not support this proposal to grow the Greenbelt in the proposed URVs incrementally. The outlined URVs are primarily contained within existing built-up and urbanizing communities, and they provide little to no benefit for agricultural land preservation. Adding only URVs to the Greenbelt would put additional development pressure on abutting farmland outside the boundary, resulting in an overall loss of farmland in Ontario.

The implications of having a URV designation on private property are unclear. Adding more URVs in the future should be limited to public and urban lands only, so that URV policies do not limit the ability of *agricultural uses* or *normal farm practices* to continue on lands owned and operated by Ontario's farmers.

Decisions on whether to grow the Greenbelt, or not, and if so, where that growth should occur, must recognize that our agricultural areas provide us not only with food, fibre and fuel, but also a broad range of environmental and ecological goods and services that benefit all residents of the Greater Golden Horseshoe and beyond. These environmental and ecological goods and services include not only water cycling (i.e., flood mitigation, groundwater recharge, purification, and retention), but also:

¹ Caldwell, Wayne, Sara Epp, Xiaoyuan Wan, Rachel Singer, Emma Drake, and Emily C. Sousa. "Farmland Preservation and Urban Expansion: Case Study of Southern Ontario, Canada." *Frontiers in Sustainable Food Systems* 6 (February 18, 2022): 777816. <https://doi.org/10.3389/fsufs.2022.777816>.

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- aesthetic space
 - air quality (oxygen production, climate regulation),
 - biodiversity,
 - carbon sequestration
 - habitats for wildlife, including pollinators and endangered species,
 - nutrient cycling, and
 - soil erosion control.

OFA argued in 2005 that the creation of the Greenbelt failed to address the leapfrogging² of development activity onto lands immediately beyond the Greenbelt and created winners and losers across boundary lines, and we still believe this to be true. To address this issue, OFA believes that the Ontario government should designate *all* lands in Ontario that are outside of current settlement area boundaries as 'Greenbelt.' Doing so would mitigate the leapfrogging of development and intense development pressures.

The outer ring municipalities have the additional provincial expectation of accommodating substantial future population, job, and infrastructure growth due to growth projections in the A Place to Grow: Growth Plan for the Greater Golden Horseshoe. Accommodating this growth means extensive pressure to consume agricultural lands. This growth will place increased demands on the remaining non-urbanized land to fulfill all of society's expectations for the provision of the full range of environmental and ecological goods and services, freshwater amongst them, and safe and affordable food, fibre, and fuel.

We urge the provincial government to implement policies that fully reflect that growth management and farmland protection are two sides of the same coin. More robust protection against development on agricultural land combined with fixed, permanent urban boundaries and mandatory compliance with urban density and intensification requirements would achieve water and farmland protection objectives for future generations. We emphasize that there is only one Ontario landscape, meaning that the full range of urban, rural, agricultural, natural heritage, cultural heritage, and mineral extraction land uses across the Greater Golden Horseshoe must coexist in the same space. Intensification of residential development within the existing urban footprint, in the context of complete and liveable communities, along with the distribution of economic development province wide addresses housing needs. Intensification will boost economic growth, create new jobs, provide new affordable housing options, support municipal infrastructure systems, ensure food security, and contribute to environmental stewardship. Deciding how and where to grow the Greenbelt must recognize that our agricultural areas provide us with food, fibre and fuel, and a broad range of environmental and ecological goods and services that benefit all residents of the Greater Golden Horseshoe and beyond.

Reiterating our comments from phase one of the consultation, the OFA recommends that this proposal to grow the Greenbelt incrementally be withdrawn. The province should take a holistic, systematic, province-wide approach that prioritizes protecting agricultural lands and identifies the most appropriate areas for growth with justifiable criteria and comprehensive analysis.

OFA appreciates the opportunity to provide our feedback on the consultation to grow the size of the Greenbelt. We look forward to discussing our proposed alternative solutions to support the Ontario government's provincial priorities and ensure our agri-food sector remains an economic powerhouse driving Ontario forward.

² Drake, Emma. "The Leap-Frog Effect in the Context of Ontario's Greenbelt: An Analysis of Farmland Loss in the Unprotected Countryside." University of Guelph, 2019. <http://hdl.handle.net/10214/15909>.

Sincerely,

A handwritten signature in black ink that reads "Peggy Brekveld". The signature is written in a cursive style with a period at the end.

Peggy Brekveld
President

cc: The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs
OFA Board of Directors