

December 22, 2022

Public Input Coordinator
MNRF - PD - Resources Planning and Development Policy Branch
300 Water Street, 6th Floor, South tower
Peterborough, ON
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Submitted online and sent via email to ecologicaloffsetting@ontario.ca

Dear Public Input Coordinator

Re: ERO 019-6161: Conserving Ontario's Natural Heritage

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses, and their communities.

Provincially, the protection of Ontario's prime agricultural areas for their long-term agricultural use must be a key objective. It is one thing to think about housing the anticipated additional two million people that will reside in Ontario over the next ten years, but it is another to think seriously about how we will feed this increased population. Ontario's agricultural community proudly produces safe, high quality and reliable sources of food, fibre, and fuel. Therefore, any proposals related to development within the province, including increasing housing supply, must be done with consideration to the needs and support of the agricultural community.

OFA welcomes the opportunity to provide comments on ERO 019-6161: Conserving Ontario's Natural Heritage. Ecological offsetting is intended to "offset" the negative impact of land use decisions on natural heritage by the intentional restoration or creation of new natural heritage features (like wetlands, woodlands, and other natural wildlife areas) to provide even greater positive environmental impacts.

OFA does not believe that new natural heritage features (such as wetlands, woodlands, and other natural wildlife areas) can be created and restored in replacement of these existing natural heritage features. We believe that duplicating the environmental benefits provided by these natural heritage features, including their ecological function (e.g., hydrologic functions, carbon storage, and biodiversity) is very difficult. Achieving a "net gain" of function will likely require large tracts of land to replace the function of a wetland or woodland that has been around for decades or even centuries. Where does this land come from?

We are concerned that if these offsets are permitted, it will result in further loss of farmland. Ontario's prime agricultural land must be reserved solely to produce food, fibre, and fuel, not only for Ontarians, but also for other Canadians as well as residents of other nations. The province

must recognize that farmland makes up less than 5% of Ontario's land base. OFA is categorically opposed to any form of non-agricultural use of our prime agricultural land.

Agricultural operations can be negatively impacted by the presence of these natural heritage features on their own lands, or even on neighbouring properties. Natural wildlife habitat, wetlands and woodlands can all bring added restrictions to agricultural operations due to the possible presence of species at risk and invasive species, and loss of productive land to setbacks and buffers, along with wildlife damage to crops and livestock. Agricultural practices are impeded when farmers face severe restrictions on possible improvements and maintenance of agricultural drainage ditches that are deemed to be fish habitat. Creating new wetlands, woodlands and other natural wildlife areas through offsetting can lead to significant difficulties for farmers.

This consultation document is light on details and leaves many unanswered questions – questions that impact the ability of farmers to continue farming. If offsetting policies were introduced, how would it be reflected in the local land use planning process? Will there be ever-changing zoning implications, and natural heritage designations and mapping? This would provide significant disruptions to farmers and impede their ability to plan long-term for their operations. The document also does not disclose at who's cost offsetting would occur. Given the limited details provided and the lack of available non-agricultural lands, we can only assume that the potential cost to farmers, their operations, and the continued production of high-quality food, fuel and fibre for Ontarian's would be held responsible for this bill - and that cost is too high.

On behalf of OFA's more than 38,000 family farm businesses, I thank you for this opportunity to express the Ontario Federation of Agriculture's perspectives on the "Conserving Ontario's Natural Heritage". We look forward to the incorporation of our recommendations and advice

Sincerely,



Peggy Brekveld
President

cc: The Honourable Graydon Smith, Minister of Natural Resources and Forestry
The Honourable Steve Clark, Minister of Municipal Affairs and Housing
The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs
OFA Board of Directors