

April 11, 2023

Sandy Dobbyn
Niagara Escarpment Commission - Georgetown Office
232 Guelph Street
Georgetown, ON
L7G 4B1

Sent via email to sandy.dobbyn@ontario.ca

Dear Sandy Dobbyn,

Re: ERO # 019-6425 - Approval of an amendment to the Niagara Escarpment Plan

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

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating nearly 750,000 jobs, and contributing over \$47 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to drive the economy forward. Strong Canadian competition policy can help provide the resiliency required in the agri-food sector to maximize the sector's economic potential.

OFA appreciates the opportunity to comment on ERO # 019-6425 - Approval of an amendment to the Niagara Escarpment Plan (NEP). We thank the Niagara Escarpment Commission (NEC) for the proposed amendment. OFA fully supports this amendment.

As stated in our November 15, 2021 letter to the NEC Chair Rob Nicholson, OFA together with our local federations of agriculture in Halton Region, Niagara, Hamilton-Wentworth, Dufferin, Peel, Simcoe, Grey and Bruce, requested that the NEC give consideration to amending the policies in section 1.4 Escarpment Protection Area of the NEP in order to permit of on-farm diversified uses (OFDUs) and agricultural-related uses (ARUs) within the Escarpment Protection Area Rural areas so that these types of uses are not unduly restricted to Prime Agricultural Areas.

The NEP amendment proposes to allow the opportunity for the development of on-farm diversified uses and agricultural-related uses outside of prime agricultural areas by amending the Escarpment Protection Area Permitted Use in Part 1.4.3.2. It also proposes to amend the NEP Part 2.7 policies respecting development affecting natural heritage, recognizing that certain agricultural uses may be compatible in key natural heritage features, under certain conditions. The proposal also includes a housekeeping-related amendment to Part 1 Escarpment Natural Area Permitted Uses to better align Ontario Regulation 828/90 exemption respecting a specific agricultural use with the Permitted Uses of the NEP.

As you know, OFA is a strong advocate for the protection of Ontario's farmlands for their long-term ability to produce food, fibre and fuel, not only for Ontario's growing population, but also for consumers beyond our borders.

OFA believes that farming to produce food, fibre and fuel is the best use for farmland. Ontario's limited supply of farmland is a scarce resource, making up less than five percent of all the land in the province. It's vital that Ontario has a strong, viable and sustainable supply of food products grown, harvested and processed right here at home. Ontario's shrinking agricultural land base is alarming. The current rate of loss is measured at 319 acres per day in our province, according to the 2021 Census of Agriculture. These losses are not sustainable.

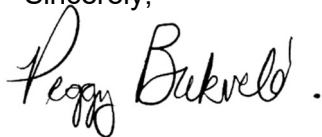
We also wish to emphasize that there is only one Ontario landscape. The full range of urban, rural, agricultural, natural heritage, cultural heritage, and mineral extraction land uses must coexist across this landscape.

With respect to these proposed NEP amendments, the NEC staff report, dated November 16, 2022, acknowledged that these proposals "do not reflect or address the full extent of the agricultural policy amendments that key agricultural stakeholders are seeking. While the proposals presented do address significant targeted concerns (i.e., Part 1.4.3.2 policy respecting OFDUs and ARUs in prime agricultural areas), additional areas of interest remain with agricultural stakeholders respecting viable agriculture and agri-tourism in the NEP Area."

The report further states that: "Staff provides that these additional topic areas will continue to be discussed and given appropriate consideration, including with ministry partners and a broader range of agriculture stakeholders. Staff considers the current amendment proposals as 'Phase 1' and advancing the current amendment proposal would not preclude subsequent amendments from being considered."

OFA agrees with this phased approach. We look forward to continuing discussions to ensure a viable Agriculture System in the NEP Area.

Sincerely,



Peggy Brekveld
President

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