

August 30, 2024

Expanding Protected Areas Project
Conservation Policy Section
40 St. Clair Avenue West
14th floor
Toronto, ON M4V 1M2

Submitted via email to protected.areas@ontario.ca and submitted online via Ontario's Regulatory Registry and the Environmental Registry of Ontario.

Dear Expanding Protected Areas Project Team,

RE: ERO # 019-8618: Expanding Protected Areas in Ontario – Sites Proposed to be Regulated under the Provincial Parks and Conservation Reserves Act, 2006

On behalf of the Ontario Federation of Agriculture (OFA)'s more than 38,000 farm family members, thank you for the opportunity to participate in the consultation process for ERO 019-8618 "Expanding Protected Areas in Ontario – Sites Proposed to be Regulated under the Provincial Parks and Conservation Reserves Act, 2006". 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.

OFA is committed to protecting agricultural lands in Ontario that grow food for today and for future generations. We maintain that agricultural activities make the highest value and best use of arable land, and that agriculturally managed landscapes provide environmental and ecological co-benefits for the people of Ontario when used for normal farm practices. Feeding a growing global population will depend on how well we manage this valuable, finite resource for future generations.

OFA's overarching concern with this proposal is the potential for negative impacts and new restrictions to existing agricultural lands that may be in close proximity to the expanded Protected Areas from this proposal.

OFA requests that the MECP ensures that nearby agricultural properties are protected from trespassing, respects normal farm practices, and is sensitive to the interests of farmers in areas that surround provincial parks and conservation areas.

The creation or expansion of provincial parks may lead to some remote and rural places becoming major tourist destinations as Canadians continue to show a large appetite for recreational parks and natural spaces. OFA encourages the MECP to plan recreational uses and destinations carefully such that trespassing, intentional or otherwise, into agricultural lands is not facilitated.

In contrast, some government activity associated with Provincial Parks may be beneficial to farmers and rural communities. OFA expects that the Ministry of Natural Resources (MNR) and the MECP will surveil for invasive species, poaching, and illegal plant collection to the benefit of not only the park but the greater community.

Addressing wildlife concerns, OFA advocates for our members' right to farm, as confirmed by the *Farming and Food Production Protection Act* (FFPPA) and various rights confirmed by other Acts, such as the *Fish and Wildlife Conservation Act* (FWCA). The province must ensure that the Ontario Wildlife Damage Compensation (OWDC) program is adequately funded and applied to ensure that farmers are adequately compensated for damage and losses resulting from the increased presence of wildlife around these protected areas.

Furthermore, protected areas may be selected for the preservation of endangered, threatened, and special interest species' habitats, as well as expanding protection around natural features such as wetlands. As aforementioned, nature does not respect property boundaries. Protections must be embedded to ensure that nearby agricultural operations do not face new restrictions to their normal farm practices as a result of their proximity to these protected areas. For example, buffer zones around wetlands must end at the protected area's boundary, and park initiatives must not negatively impact productive farmland or neighbouring properties.

OFA appreciates the opportunity to provide our feedback and agricultural perspectives on the proposed creation or expansion of protected areas in Ontario. We look forward to working with the provincial government and our municipal counterparts to safeguard Ontario's farmlands as well as provide communities with access to usable natural landscapes.

Sincerely,



Drew Spoelstra
President

cc: Hon. Rob Flack, Minister, Ontario Ministry of Agriculture, Food and Agribusiness
OFA Board of Directors