

June 11, 2025

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Submitted via email to mto.ero@ontario.ca, chetan.kania@ontario.ca and to [ERO # 025-0450](#), [ERO # 025-0504](#), and [ORR # 25-MTO005](#).

To the Ministry of Transportation, Ministry of Infrastructure, and Chetan Kania,

**Re: ERO # 025-0450: Bill 17: *Protect Ontario by Building Faster and Smarter Act, 2025* – Amendment to the *Building Transit Faster Act, 2020*;
ERO # 025-0504: Bill 17- *Protect Ontario by Building Faster and Smarter Act, 2025* - Accelerating Delivery of *Transit-Oriented Communities*;
ORR # 25-MTO005: Amending the *Building Transit Faster Act, 2020* to expand the definition of *Priority Transit Projects* to all *Provincial Transit Projects*;**

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation process for ERO # 025-0450, ERO # 025-0504, and ORR # 25-MTO005, each addressing a part of Bill 17- *Protect Ontario by Building Faster and Smarter Act*. OFA and Ontario farmers have a vested interest in transit solutions in urban areas. In summary, OFA would highlight the following comments for the Ministry of Transportation and the Ministry of Infrastructure:

- Fast, frequent, and efficient public transit solutions promote desirable intensification and densification in Ontario's urban *settlement areas*, in turn helping to reduce farmland loss;
- Metrolinx and other railway companies must fulfill their obligations under the *Drainage Act* and respect our farmers' rights to enjoy the use of their land, including farming, by ensuring that crossings are built and maintained at the railway company's expense;
- Farmers must be consulted in the event that transit projects are proposed in the countryside, as farming relies on unimpeded access to the land with good and

predictable drainage characteristics, and farmers rely on their properties' on-site services for drinking water and sewage disposal;

- Railway companies, like Metrolinx, must work with farmers to ensure that any site visits avoid causing accidental harm to farming operations, and that planned infrastructure does not impede farming operations ability to continue and grow; and
- Ontario has an enormous opportunity to invest in itself, but it will only be sustainable if farmland is shielded from re-development into urban spaces and infrastructure.

The Ontario Federation of Agriculture 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 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 understands that Bill 17 proposes amendments to the *Building Transit Faster Act* that would enable Metrolinx and its divisions to conduct priority transit projects. That Act includes various powers to expedite the development of transit. Amendments are also proposed for the *Transit-Oriented Communities Act* under the motivation of streamlining the development of corridor land under the Act.

Farmers might not be the most common public transit commuter, but the agricultural community has a vested interest in public transit solutions in urban areas. Buses, urban rail, and other transit systems are necessary for the intensification and densification of Ontario's metropolitan and urban areas. Without these transit options in place, commute times become untenable as municipalities respond to development pressure by expanding settlement area boundaries into the countryside. Settlement area expansion and designation is the greatest contributor to farmland loss.

Between 1996 and 2021, Ontario lost over 2.1 million acres of farmland, much of it within the Greater Golden Horseshoe around the western shores of Lake Ontario, home to some of the highest quality agricultural soils in our country. The millions of acres of farmland lost over the last 29 years are now irrecoverable, as excavation, compaction, and construction permanently remove the qualities that make soil arable, and therefor remove affected areas from the *agricultural land base*. If farmland loss trends are not stopped, Ontario could lose another 2.5 million acres of farmland by 2051, more than 21 per cent of today's total farmland area.

Farmland loss, while not reversible, is preventable; Ontario needs the courage to invest in transit, permit higher urban densities and mixed-use zoning, and end policies that incentivize sprawl. **OFA supports the use of urban transit as part of the solution to traffic congestion and urban sprawl.** Frequent bus and rail services within urban areas would mean that compatible residential and commercial uses could be built in proximity, making urban areas more financially productive and economical to maintain without congesting roads.

Not all railways and transit infrastructure are located within urban built-up areas. **The Government of Ontario and Metrolinx should be careful to consult with farmers and rural residents when and if infrastructure projects are considered in the countryside.** Linear infrastructure, like railways and roads, can be disruptive to farmers and residents by changing the drainage characteristics of the land, impacting the quality and quantity of available water in private

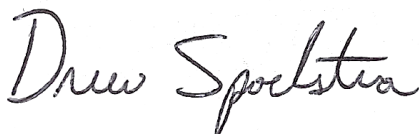
drinking water systems, and preventing farmers from accessing lands within the interior farm parcel. **Farmers have the right to enjoy the use of their lands.** Rail lines and other linear infrastructure projects must not divide farm parcels unless consent is granted by the farmer and a safe crossing for their use is constructed and maintained in perpetuity at the expense of Metrolinx or any other railway company. In addition to being safely accessible, farmland requires drainage infrastructure to keep soils productive. Farm equipment cannot traverse waterlogged fields and crops cannot grow in flooded areas. **Farmers should not bear the cost of private crossings or drainage infrastructure built to uphold their rights when it is an outsider's interest that disrupts those rights.**

Representatives of the government and Metrolinx must also communicate clearly with farmers regarding when and where they access farm properties in pursuit of their duties under the Act: Many farms require strict biosecurity controls and have a deep connection to the food sovereignty rights they practice; it additionally might not be obvious where crops have been planted or an agricultural treatment applied. The inadvertent introduction of pathogens, trampling of crops, and human exposure to pesticides and other agricultural products are serious concerns for farmers. Furthermore, in the event that any project affects farmland, OFA expects that fencing will be used to control for trespassing and property access rights will be respected.

Ontario has an enormous opportunity to build a roaring economic engine in both our existing urban centres and agricultural areas. Ontario's agricultural and food sectors already contribute \$50 billion to the provincial economy every year and employ 10% of the province's workforce—more than 750,000 people—and is positioned to grow even more. But our province's growth can only be made sustainable through pro-density development policies, public transportation projects, and stable agriculture in the countryside that produces affordable and reliably available food, fiber, fuel, and flowers for Ontarians to enjoy and thrive on.

OFA appreciates the opportunity to provide our feedback and perspectives on ERO # 025-0450, ERO # 025-0504, and ORR # 25-MTO005, each addressing a part of Bill 17- *Protect Ontario by Building Faster and Smarter Act*. We look forward to future opportunities to work with the Government of Ontario to protect our province's agricultural sector and support our province's collective future.

Sincerely,



Drew Spoelstra
President

cc: Hon. Prabmeet Singh Sarkaria, Minister of Transportation;
Hon. Kinga Surma, Minister of Infrastructure;
Hon. Rob Flack, Minister of Municipal Affairs and Housing;
Hon. Lisa M. Thompson, Minister of Rural Affairs;
OFA Board of Directors

This submission has been approved by OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.