

November 14, 2025

Alicia MacFadden
Ministry of Labour, Immigration, Training and Skills Development
15th Floor, 400 University Avenue
Toronto, ON M7A 1T7

Submitted online and to Alicia.MacFadden2@ontario.ca

To Alicia MacFadden,

Re: [ERO # 025-1159](#), Amendments to the Planning Act and City of Toronto Act, 2006 / Reducing Red Tape and Burden to Build Training Centres; AND [25-MLITSD015](#), Proposed amendments to the Planning Act and the City of Toronto Act (Working for Workers Seven Act, 2025)

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation process for ERO # 025-1159 by providing input on the consultation on amendments to the *Planning Act*. OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA is dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with on issues, legislation and regulations that would impact the sustainability and growth of our farm businesses.

Ontario's land use planning framework protects our agricultural systems, and with good reason: The agri-food sector is a cornerstone of the provincial economy, contributing more than \$51.4 billion in annual economic activity, \$26.2 billion in agri-food exports, and employing 11% of Ontario's workforce by supporting more than 867,000 jobs. This economic engine is based on farmland and hard work in the field, where crops are grown and livestock is raised by skilled workers.

Investments into education, and particularly the skilled trades, are important to maintain the agri-food sector's level of productivity, as the province has a diverse and complex agricultural sector that produces hundreds of commodities. However, the location of training facilities must be strategic such that campus grounds do not take valuable arable lands out of production, and that training centre commuters do not compete with slow-moving farm equipment on the road.

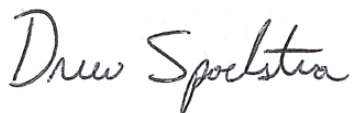
OFA supports and appreciates that Bill 30 will not exempt training centres from the *Planning Act* within the Greenbelt, but the Greenbelt is not the only area of the province that is farmed. Exemptions to the *Planning Act* should not be extended to the construction of training centres proposed within prime agricultural areas or agriculturally productive lands. Less than 5% of Ontario's land mass qualifies as prime agricultural land, which is seldom remediated to an arable state following the construction of buildings and infrastructure. While the farmed area of the province may appear large, it is vulnerable, and has been eroded parcel by parcel over decades. Over 2.1 million acres of farmland have been lost since 1996—an area greater than that of Algonquin Park. Ontario must prioritize the protection of farmland, which is as fragile as it is critical to the province.

We should reflect upon the duality that both training centres and agricultural operations are needed to keep Ontario's economy agile and responsive in uncertain economic times.

Developments must be planned strategically to avoid, minimize, and mitigate impacts on the agricultural system and critical farm operations that produce food, fibre, fuel, and flowers for Ontario. This is why Ontario updated the *Provincial Planning Statement* to require agricultural impact assessments for new non-agricultural uses throughout the province's prime agricultural areas, and is why OFA continues to support that change.

OFA appreciates the opportunity to provide our feedback and perspectives on exempting training centres from the *Planning Act* outside of the Greenbelt. We look forward to working with the provincial government to find policy solutions that support the agri-food sector.

Sincerely,



Drew Spoelstra
President

cc: Hon. David Piccini, Minister of Labour, Immigration, Training and Skills Development;
Hon. Rob Flack; Minister of Municipal Affairs and Housing;
Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness;
Hon. Lisa M. Thompson, Minister of Rural Affairs; and
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>.