

November 21, 2025

The Honourable Rob Flack  
Minister of Municipal Affairs and Housing  
777 Bay Street, 17th Floor  
Toronto, ON  
M7A 2J3

Submitted online and sent via email to [MFPB@ontario.ca](mailto:MFPB@ontario.ca)

Dear Minister Flack,

**Re: Ontario Regulatory Registry Proposals:**

**#25-MMAH018 - Changes to the Development Charges Act, 1997 to Enhance Standardization and Streamlining of the Development Charge (DC) Framework**

**#25-MMAH030 - Implementing Reforms to the Development Charges Framework**

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

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 867,000 jobs and contributing over \$51.4 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses, and their communities.

OFA is grateful to provide our perspective on proposals #25-MMAH018 and #25-MMAH030, which propose legislative changes to the Development Charges Act, 1997 to enhance standardization and streamlining of Ontario's Development Charges framework.

OFA supports measures that increase clarity and transparency in the development charges system. However, we wish to emphasize a critical omission in the province's DC framework – the need for a consistent statutory exemption for farm buildings and structures.

OFA firmly supports the principle that growth should pay for growth so that the cost of new infrastructure is not unfairly shifted onto existing property taxpayers. At the same time, it must be recognized that agricultural structures – such as barns, silos, grain bins, greenhouses, livestock

barns, and similar farm buildings – do not generate increased demand for municipal services in the way other types of development do. These farm buildings support ongoing agricultural production and help ensure farmland remains viable and productive, rather than driving population growth or new service needs. That is why OFA has long advocated for an exemption from development charges for farm buildings and structures, and we strongly reiterate that position in this submission.

New farm residences, with an MPAC unit classification of residential unit (RU) or farm residential unit (FRU) should be treated the same as other new residences with regards to development charges. Growth-related capital needs can be attributed to all new residences. The construction of new farm buildings/structures, however, does not generate growth-related capital costs. Therefore, development charges should not apply to farm buildings/structures. If they do, farmers are bearing more than their share of the municipality's additional capital expenditures.

**To achieve province-wide fairness and consistency, OFA urges the government to amend the Development Charges Act, 1997 to establish a clear statutory exemption for farm buildings.**

To further ensure clarity and consistency in applying this exemption, we recommend that any exemption clearly apply to all types of farm buildings, regardless of production practices or commodities produced.

This call for a statutory exemption is not without precedent or support. Ontario's municipalities have already shown broad recognition that farm structures should not bear development charges. According to OFA's analysis of municipal by-laws across the province approximately 72% of municipal Development Charge bylaws include an exemption for agricultural buildings.

This widespread adoption of farm building exemptions at the local level demonstrates a clear consensus that applying DCs to agricultural structures is both inappropriate and counterproductive. Yet without a province-wide exemption, a patchwork persists as the absence of a statutory exemption in the Development Charges Act creates regional inequities and unnecessary administrative complexity, and farmers in the minority of municipalities without exemptions end up facing higher costs that discourage investment in farm infrastructure.

Beyond matters of fairness, exempting farm buildings from development charges will yield tangible benefits for Ontario's agriculture sector and rural communities. Ontario farmers already face mounting financial pressures, from rising input costs and debt servicing costs to increasing property taxes, which strain farm businesses across Ontario.

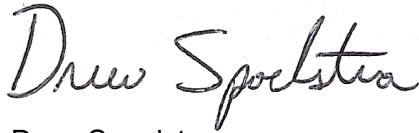
Imposing additional development charges on necessary farm structures only exacerbates these challenges, effectively penalizing farmers for reinvesting in their business. By removing DCs on agricultural buildings, the province can alleviate an undue financial burden on farmers, encouraging them to reinvest in their operations. We know that when farmers can keep more of their money, they reinvest and drive economic growth. For every dollar increase in farmers' revenue, there is a \$0.84 increase in provincial GDP.

OFA respectfully requests the Ministry to include a statutory exemption for farm buildings in the legislative changes. We believe this measure is a natural extension of the current efforts to streamline and standardize the DC framework, and it would ensure that Ontario's growth-related infrastructure charges are fairly applied across sectors.

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Thank you for the opportunity to provide input. OFA remains committed to working closely with the provincial government to ensure that Ontario's development charges framework supports the sustainability and growth of our agri-food sector and rural communities. We are grateful for your consideration of our recommendations.

Sincerely,



Drew Spoelstra  
President

cc: OFA Board of Directors  
The Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness

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