

December 19, 2025

Public Input Coordinator | Public Lands
MNR-CFLPB-Crown Lands Policy Section
300 Water Street, 5th Floor, North Tower
Peterborough, ON
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Submitted online and via email to Public.Lands@ontario.ca

Dear Public Input Coordinator,

**Re: ERO #025-1141 – Natural Resources Regulatory and Permit Reform Initiative:
Unlocking Ontario’s Economic Potential**

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation process for ERO #025-1141 – Natural Resources Regulatory and Permit Reform Initiative: Unlocking Ontario’s Economic Potential. OFA is pleased to see that the Ministry of Natural Resources is capitalizing on the opportunity to invest in Northern Ontario’s economic growth potential through regulatory modernizations, particularly in the administration of Crown Land through the Public Lands Act. While the proposal focuses primarily on resource and infrastructure sectors, changes to Crown Land administration has significant implications for the agricultural community, particularly in Northern Ontario where Crown Land constitutes majority of the land base and where agricultural expansion depends on fair, transparent access.

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 encourages the Ministry to ensure that regulatory modernization efforts explicitly address agricultural uses of Crown land and create fair, predictable, and transparent pathways that reflect the scale and realities of farm businesses. While the proposal addresses some of the following concerns, OFA puts forward the following recommendations to put an agriculture-specific focus on regulatory modernization of Crown Land administration:

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- Establish a clear, transparent, province-wide framework for agricultural use of Crown Land. This will provide clarity on eligible lands for agricultural disposition, tenure terms and whether purchasing is an option.
 - Align processes with the scale and capacity of family farm businesses. The current system mirrors regulatory expectations of mining, forestry or infrastructure development. It is not feasible for farmers to complete lengthy and capital-intensive studies required for applications.
 - Strengthen coordination between the Ministry of Natural Resources and the Ministry of Agriculture, Food and Agribusiness for agriculture-specific application reviews.
 - Standardize lease rates, terms and conditions across Northern Ontario to promote equitable and transparent access to Crown Land for agriculture.
 - Enable both leasing and purchasing pathways for agriculture businesses to allow new entrants and established farms to develop predictable business plans.
 - Expedite the approval process for agriculture dispositions on patented land, given the land has been reverted from private to Crown Land in the past.

Agricultural Crown Land access in Northern Ontario remains one of the greatest barriers to farm expansion and new entrant opportunities in the region. OFA members consistently describe the current system as unclear, inconsistent and lacking predictability. In consultation with members, OFA has found the following challenges with the current system in accessing Crown land:

- Application timelines can take up to a decade, making business expansion plans untenable.
- Applicants must undertake extensive studies with large costs to complete their application, which is unrealistic for family-farm operations.
- Inconsistent decision-making across regional offices causes confusion and lacks transparency.

These challenges undermine the province's northern economic development goals and limit the agricultural potential of regions such as the Clay Belt, where significant tracts of Class 2–4 soils remain under Crown ownership.

Stewardship of the land is a responsibility that Ontario's farmers take seriously and any agricultural development on Crown Land would reflect farmers' deep commitment to implementing practices that promote the sustainable use of these lands.

OFA appreciates the opportunity to provide our feedback and perspectives ERO #025-1141 – Natural Resources Regulatory and Permit Reform Initiative: Unlocking Ontario's Economic Potential. We look forward to working with the provincial government to find policy solutions that support the agri-food sector.

Sincerely,

Drew Spoelstra

Drew Spoelstra
President

cc: Hon. Mike Harris, Minister of Natural Resources
Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness
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>.