

January 18, 2019

The Honourable Todd Smith
Minister of Economic Development, Job Creation and Trade
College Park, 18th Floor
777 Bay Street
Toronto, Ontario
M7A 1S5

Dear Minister Smith;

RE: Schedule 10, Bill 66, the *Restoring Ontario's Competitiveness Act, 2018*

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

Schedule 10 of Bill 66 is a direct attack on the family farm businesses, farm input supply businesses and food processing businesses located throughout Ontario. On-farm production of food underpins a broad spectrum of rural and urban businesses. Farm input supply businesses provide the goods and services farm businesses depend upon; seed, feed and fertilizer, farm equipment dealerships, building supply retailers, not to mention veterinarians, banking, insurance, etc. There are numerous food processing businesses located throughout Ontario, but concentrated in the Greater Toronto/Hamilton area, dependent on the fruits, vegetables, grains, oil seeds, livestock, poultry and fish grown and raised by Ontario farm businesses.

In 2017, Ontario's family farm and food processing businesses contributed \$39.5 billion in GDP and supported 822,483 jobs. Agriculture and agri-food processors are the number 1 economic contributor to Ontario's overall economy. Jeopardizing these stable, recession resistant businesses and jobs runs counter of an "open-for-business" mindset.

Before addressing the proposed amendments to the Planning Act in Schedule 10 of Bill 66, we emphasize that Ontario only has one landscape. That means that the **full range** of landforms and land uses found across Ontario; agricultural, industrial, rural, residential, natural heritage, commercial, cultural heritage, mineral extraction, etc. must share that landscape. Ontario's agricultural areas not only provide us with food, fibre and fuel, but also a broad range of environmental and ecological goods and services that benefit all Ontarians. To fulfil their role and function for all Ontarians, Ontario's prime agricultural lands **must** be separated from non-compatible land uses. To do otherwise, as Schedule 10 of Bill 66 proposes, will be "death by a thousand cuts" for the family farm businesses, farm input supply businesses and food processing businesses located throughout Ontario.

Agriculture is Southern Ontario's principle resource-based land use. Protecting Ontario's prime agricultural areas for their long-term agricultural use is a key provincial policy objective, noted not only in the Planning Act [section 2.(b)], but also in the Provincial Policy Statement, the Greenbelt Plan, the Growth Plan for the Greater Golden Horseshoe, the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan. Retaining our finite and shrinking agricultural lands for the production of food, fibre and fuel is critical, and supportive of Ontario's family farm businesses, farm input supply businesses and food processing businesses.

We also face the additional expectation, at least from the Ontario Government, that Southern Ontario in general and the Greater Golden Horseshoe will accommodate substantial future population growth, along with the jobs and infrastructure necessary to support this projected growth. OFA recommends that the proposed Local Planning Appeal Tribunal's decisions be viewed through the lens of protecting Ontario's finite and shrinking agricultural lands from non-agricultural uses.

Agriculture is a **business**. This proposal suggests that agricultural land should no longer be used for agriculture to make way for commercial and industrial businesses. By putting Schedule 10 forward, the Ontario government is suggesting that agricultural businesses should be shut down and paved over to make way for industrial development.

The agri-food sector is the economic powerhouse of Ontario; employing 822,000 Ontarians and generating nearly \$40 billion in GDP. In addition, agri-food was identified as a key sector in Canada with untapped potential for growth and expansion. If we lose agricultural land to development, it is gone forever. This means a loss of rural businesses in our communities; a lost opportunity to produce more products through innovation and technological advancements; a loss of employment from on-farm food processing and agritourism; and a loss for rural communities that the Ontario Government promised to support.

While Bill 66 claims to "give businesses more flexibility to create jobs right here at home", Schedule 10 forgets and abandons the businesses that are already here – in our agri-food sector. Agri-food is the number one employer in Ontario and drives our economy forward.

OFA appreciates the Ontario government's initiative to cut red tape and be "Open for Business". However, there is another way that does not compromise our agricultural businesses, our clean water, and strategic land use protection. Agri-food is the recession-resilient answer to economic growth in this province.

OFA urges the provincial government to enhance agri-food growth in Ontario by showing farmers and food businesses that we are "Open for Business":

- Use the Provincial Policy Statement definitions and language in all Four Provincial Plans. A lack of consistency across the Plans leads to confusion for businesses and subjective interpretation by the many stakeholders involved.
- Support the Agricultural System to consistently protect farmland across the Greater Golden Horseshoe and support the prosperity of the agri-food sector. OFA supports the provincial mapping of the Agricultural Land Base, including identification of Candidate Areas for inclusion in the Agricultural Land Base. OFA also supports the implementation of the agri-food network. For agriculture to prosper, smart land use planning that protects farmland needs to align with economic development to support agriculture-related businesses along the supply chain.

- Adhere to the designated greenfield density targets of “not less than 80 residents and jobs combined per hectare” and implement this requirement as soon as possible. In addition, OFA would welcome the adoption of fixed, permanent urban boundaries to contain urban sprawl.
- Oversight of the Niagara Escarpment Plan should be moved from the Ministry of Natural Resources and Forestry (MNRF) to the Ministry of Municipal Affairs and Housing (MMAH). Businesses should not need to contact multiple ministries and multiple governing bodies for similar provincial plans.
- Target smaller communities for infrastructure and economic investments to distribute economic development, reduce congestion and growth pressures in the GTA. The growth pressures will continue to make life unaffordable and challenging for the average resident, not to mention the pressure of developing agricultural land; Ontario’s most important resource.

The current pattern of growth in the Greater Toronto/Hamilton Area is unsustainable. The Province’s priorities to increase housing supply and affordability, create jobs, reduce red tape, attract new investments, and build strategic partnerships align exceptionally well with our Producing Prosperity plan, and OFA has solutions that will mutually achieve our objectives.

The primary principle behind land use planning is to group compatible uses together, while at the same time separate non-compatible land uses. The widespread practice of dedicating large, contiguous tracts of agricultural land solely for agricultural uses is to facilitate their viability, and to ensure that non-compatible uses, which are detrimental to agricultural viability, are located elsewhere. Agriculture in the 21st century needs large, contiguous tracts of agricultural land reserved for agricultural uses. It minimizes complaints from non-farm neighbours over agricultural odours, noises, dusts, etc. While none of these “nuisances” pose a threat to public health or safety, they nevertheless do present a temporary inconvenience; manure odours, dusts from planting, tilling or harvesting, noises from livestock or farm equipment operating at odd hours to avoid impending adverse weather.

Locating industrial facilities outside of urban settlement areas benefits no sector of the economy. Municipalities will be faced with the need to service scattered sites located at some distance from fully serviced settlement areas. Neighbouring farm businesses must contend with incompatible uses adjacent to them (industrial odours, noises, dusts, etc.). Facilitating scattered industrial sites also facilitates the fragmentation of a finite and shrinking resource, Ontario’s prime agricultural land, which provides Ontario’s agri-food processors, retailers and restaurants with safe, affordable, locally produced (greenhouse gas benefits) and close to market food. A mere 5% of Ontario’s land base is currently capable of supporting agricultural production. Between 2011 and 2016, Ontario lost 319,700 acres of agricultural land, or the equivalent of 175 acres/day over that 5-year period. Going back to the 1996 census, Ontario has lost 1.5 million acres of agricultural land.

Agricultural land not only provides us with safe, affordable food, but also provides a range of ecological and environmental services that benefit all Ontarians. In alphabetical order, these services include aesthetic and recreational space, air quality (carbon sequestration, climate regulation, oxygen production), biodiversity, nutrient cycling, pollination services, soil erosion control and water cycling (flood mitigation, groundwater recharge, purification, retention).

Facilities located outside the urban envelope will face a lack of services, or higher costs to service their site, plus longer distances for inputs and outputs; distances to shipping points, etc. Furthermore, employees will live at some distance from these remote and scattered facilities,

leading to longer commute times and reliance on private vehicles as these new sites will not be served by public transit.

The Ontario Federation of Agriculture believes that the provisions set out in Schedule 10 of the *Restoring Ontario's Competitiveness Act, 2018* are utterly unnecessary, detrimental to the integrity of our well-established system of land use planning and an attack on Ontario's farm and agri-food businesses. Therefore, we strongly recommend that Schedule 10 be removed from the *Restoring Ontario's Competitiveness Act, 2018*.

Sincerely,



Keith Currie
President

KC/pj

cc: The Honourable Doug Ford; Premier of Ontario
The Honourable Ernie Hardeman; Minister of Agriculture, Food and Rural Affairs
The Honourable Monte McNaughton; Minister of Infrastructure
The Honourable Steve Clark; Minister of Municipal Affairs and Housing
OFA Board of Directors