



January 18, 2019

Michael Helfinger  
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Toronto ON M6H 4L1  
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**Re: Bill 66, Restoring Ontario's Competitiveness Act, 2018, Schedule 10**

Dear Mr. Helfinger,

We are writing on behalf of the Ontario Fruit and Vegetable Growers' Association (OFVGA) to comment on the amendments proposed to the Planning Act within Schedule 10 of Bill 66, Restoring Ontario's Competitiveness Act, 2018. To note, OFVGA is also submitting separate comments with respect to other aspects of Bill 66, including proposed amendments to the Agricultural Employees Protection Act.

With respect to the proposed amendments to the Planning Act, the OFVGA urges the government to be cautious in how it proceeds as there are many risks to the proposal, including the erosion of Ontario's largest economic driver, agriculture. As representatives of fruit and vegetable farmers in Ontario, we respect and support the Ontario government's commitment to encourage economic growth in the province. A healthy provincial economy benefits our sector too.

The OFVGA wishes to emphasise that fruit and vegetable production in the province is a business like any other with significant economic spin-offs. For example, the 30,000 jobs that are supported directly on-farm create an additional 66,000 jobs further along the supply chain. Our sector generates over \$4.2 billion in economic activity annually, and an estimated \$600 million in combined tax revenues for all levels of government. Ontario fruit and vegetable farmers compete with global producers for domestic and export markets that demand low cost quality produce and currently exports over \$1.5 billion worth of fruits and vegetables.

In short, the OFVGA is concerned that allowing development without the proper checks and balances will impede on the sector's ability to continue its current economic contributions, and reduce opportunities for the sector to grow.

Fruit and vegetable farms require access to sufficient resources, including quality land, energy and water. Roads, natural gas, power lines, water and waste water infrastructure are needed to support access to those resources. Allowing uncontrolled development by municipalities could reduce the resources and strain access to infrastructure available for fruit and vegetable farms, in favour of new developments. Creating gaps in the agricultural landscape could impede farm economies of scale and potentially create barriers within existing agricultural systems that have been developed and benefit rural and urban areas alike. The net effect of these complications is the reduction in the competitiveness of Ontario's farmers.



In addition to the potential economic impacts, the OFVGA is concerned about the potential environmental implications of the proposed changes in Schedule 10. By allowing municipalities to sidestep certain environmental regulations puts resources that farmers rely on for food production at risk. For example, farmers rely on greater access to clean and sufficient water resources for irrigation and washing freshly picked produce in preparation for market. While we support smarter environmental regulations, the OFVGA is concerned about the impact of allowing municipal development to be exempt from environmental controls.

An alternate solution that the OFVGA encourages the Ontario government to explore is to incentivise municipalities to develop brownfield sites and vacant land within their existing borders. Ontario is home to thousands of acres of brownfield sites, many of which are located within the greater Toronto and Hamilton areas. Brownfield developments will encourage the use of unutilized land, improve the environment, and create an economy around revitalizing these properties, in addition to long term job creation. This approach could potentially reduce the pressure on the prime agricultural land needed by fruit and vegetable farmers.

Thank you for the opportunity to provide comments on the changes proposed in Schedule 10 of Bill 66. Should you have any questions or would like to meet to discuss OFVGA's comments, don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Jan VanderHout".

Jan VanderHout  
Chair, OFVGA Board

A handwritten signature in black ink, appearing to read "Brian H. Gilroy".

Brian Gilroy  
Chair, OFVGA Energy, Property & Infrastructure Section

A handwritten signature in black ink, appearing to read "Mike Chromczak".

Mike Chromczak  
Chair, OFVGA Environment and Conservation Section

**About the OFVGA:**

The OFVGA is the leading voice for Ontario's fruit, vegetable and greenhouse vegetable farmers. Our sector includes more than 3,500 family run farms that generate more than \$2.3 billion in farm gate sales annually.