



YORK REGION

FEDERATION OF AGRICULTURE

SERVING THE FARM COMMUNITY SINCE 1940

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Michael Helfinger
Intergovernmental Policy Coordination Unit
900 Bay Street, Hearst Block, 7th floor
Toronto, ON
M6H 4L1

RE: EBR Registry # 013-4293 for input on the proposed Bill 66, Restoring Ontario's Competitiveness Act, 2018

Thank you for the opportunity to submit feedback on the proposed Bill 66, Restoring Ontario's Competitiveness Act, 2018. The York Region Federation of Agriculture (YFA) represents 700 farm members in York Region, most of whom are directly impacted by the Provincial Plans that would be impacted by Schedule 10 of Bill 66.

YFA recommends that Schedule 10 be removed from Bill 66. It is critical that all Acts that protect the permanency, health, productivity, and profitability of Ontario's farmland and the agri-food sector are retained in full and without exception.

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

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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.

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 is 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. Agriculture is a **business**. This proposal presumes that agricultural land should no longer be preserved and protected 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.

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. As noted, agriculture and agri-food are Ontario's number one employer economic.

YFA appreciates the Ontario government's intention 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.

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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 have to 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 envelop 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.

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

- using 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.
- 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.
- transferring oversight of the Niagara Escarpment Plan 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.
- targeting 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 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.

Sincerely

Kim Empringham

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York Region Federation of Agriculture
12900 Kennedy Road
Stouffville, ON
L4A 4A8
york@ofa.on.ca

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