



April 19th, 2021

Minister Steve Clark
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5

Dear Minister Clark,

Re: ERO 019-3136 Consultation on Growing the Size of the Greenbelt

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on *ERO 019-3136 Consultation on Growing the Size of the Greenbelt*, and the study areas of the Paris Galt Moraine and Urban River Valleys. BFO represents 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

The Greenbelt Plan aims to support farmland preservation by ensuring urbanization in certain areas does not occur within designated parts of the Greenbelt, and provides stronger protection from incompatible land uses on agricultural lands. The Plan requires municipalities to follow the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas as well.

We are pleased to see the protection of Ontario's agricultural land base as a key priority for the province. Nonetheless, BFO continues to have serious concerns with the loss of agricultural land, especially pastureland, in Ontario. Census data from 2006 to 2011 shows Ontario lost 636,000 acres of farmland, with pastureland lost at a much higher rate than other farmland. Census data from 2011 to 2016 shows a similar story with Ontario losing an additional 319,700 acres of farmland or 175 acres/day of farmland. These losses are unsustainable and, given the anticipated population growth in Ontario and globally, further priority and action needs to be taken on the protection of farmland in order to maintain sufficient capacity for food production.

The impacts of the loss of agricultural land extends beyond concerns around food production capacity. Agricultural lands play a significant role in providing and maintaining habitat for pollinators and species at risk. Research has found the decline in cattle numbers in Canada is directly linked to the decline in agricultural grasslands, which leads to a decline in habitat for grassland birds like the Bobolink and Eastern Meadowlark who rely on these lands as much as ruminant livestock do. Agricultural lands are also critical for oxygen production and carbon sequestration, maintaining and improving soil health, water cycling and biodiversity.

Agriculture is the backbone of our rural communities and is important to the quality of life of all Ontarians. Beef farms and the broader beef cattle sector have a presence and economic impact in every county and district in Ontario, sustaining more than 61,000 jobs in primary production, processing and retail across the province. Ontario's beef industry is vitally important to the well-being and growth of families, businesses and communities.

Before delving into the discussion questions, land use policy has a significant influence on competing interests for Ontario's farmland, which is one of Ontario's most valuable and at-risk resources. The current unsustainable loss of agricultural lands needs to be seriously addressed and incremental measures have not been successful at protecting Ontario's agricultural lands. Long-term actions to protect agricultural lands that do not pit areas of the province against one another need to be examined.

BFO continues to express that land used for agriculture but not classified as prime agricultural land, or CLI Class 1-3 soils, must also be preserved to ensure future capacity for the production of food exists throughout the province and across commodity sectors. This is particularly important for agricultural uses that do not depend on CLI Class 1-3 soils, such as beef production, as such land is suitable for pasture use.

BFO supports the use of agricultural impact assessments as a key tool for land use planning and believes they should be required as part of the permit process for residential builds on Ontario's diminishing agriculturally productive land. Agricultural impact assessments are important to ensuring adverse impacts to the agri-food sector are avoided or minimized.

Discussion Questions

1. What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?

Based on the information provided through this consultation, BFO does not support the Paris Galt Moraine Study Area. Our initial questions on the Study Area of the Paris Galt Moraine are why does this area deserve to be included within the Greenbelt over others? And why just this area? Aside from broadly explaining the structure and features of the Moraine, the consultation does not provide an explanation as to why this area is being considered over others. A piecemeal approach to expanding the Greenbelt creates winners and losers for both those inside and outside the Greenbelt boundary.

Establishing the Paris Galt Moraine for the purposes of protecting water, we believe, is unnecessary. BFO sees no evidence the existing legislation, regulations, plans and policies do not already provide excellent protection for Ontario's water resources. At least eight Ontario statutes address water protection: the Clean Water Act, the Conservation Authorities Act, the Environmental Protection Act, the Great Lakes Protection Act, the Lake Simcoe Protection Act, the Nutrient Management Act, the Oak Ridges Moraine Conservation Act, and the Ontario Water Resources Act.

2. What are the considerations in moving from a Study Area to a moraine defined boundary of the Paris Galt Moraine?

As noted above, BFO does not support the inclusion of the Paris Galt Moraine based on the information provided in the consultation; therefore, providing comments on the boundary of the Paris Galt Moraine is unnecessary.

3. What are your thoughts on the initial focus area of adding, expanding and further protecting Urban River Valleys?

BFO does not support adding further Urban River Valleys to the Greenbelt over other areas. Again, the consultation does not explain designating Urban River Valleys as part of the Greenbelt over other areas. Further, the consultation does not substantiate how adding Urban River Valleys to the Greenbelt will further protect groundwater resources.

We believe the addition of Urban River Valleys to the Greenbelt should not be considered as an increase of the total Greenbelt land area. The designation of Urban River Valleys does not achieve the Greenbelt Plan's goal of providing protection to agricultural lands in Ontario and does not address the on-going loss of agricultural lands.

4. Do you have suggestions for other potential areas to grow the Greenbelt?

As discussed above, BFO has serious concerns about the loss of agricultural land, especially pastureland, in Ontario. The data is clear. More needs to be done to protect Ontario's agricultural land base. Land capable of agricultural activity for producing food must be preserved in order to ensure a safe and sustainable supply of food for the growing population of Ontario, Canada and the world. The Greenbelt Plan has failed to address leapfrogging development outside of the Greenbelt and has put additional development pressures on agricultural lands outside of the Greenbelt. Adding only the Paris Galt Moraine and Urban River Valleys to the Greenbelt would put additional development pressures on farmland outside Greenbelt boundaries and would do nothing to address leapfrogging development.

5. How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities?

BFO is pleased to see agriculture as a key priority for the province, but, as highlighted above, from 2006 to 2011 Census data indicated Ontario lost 636,000 acres of farmland, and from 2011 to 2016 lost another 319,700 acres of farmland. It is evident current development and growth policies are unsustainable for Ontario's agricultural lands. If the protection of agriculture lands in Ontario is truly a priority for the province, then further action is needed to protect farmland in order to maintain sufficient capacity to produce food for the growing population. The current levels of agricultural production, economic activity and employment cannot be maintained if the land base they depend on continues to be lost to non-agricultural uses.

Despite agricultural lands receiving protection within the Greenbelt, the areas outside of the Greenbelt are under further development pressures, which is further exacerbated by the use of Ministerial Zoning Orders (MZOs). Tools to protect farmland such as the Agricultural System and Agricultural Impact Assessments serve no purpose when MZOs are used to prioritize development and override agricultural and environmental protections.

6. Are there other priorities that should be considered?

BFO is supportive of the priorities listed in the consultation: agriculture, growth management, natural heritage and water resource systems, and infrastructure. However, as discussed above, current policies and government priorities have not done enough to balance these priorities and sustain Ontario's agricultural lands, and have prioritized growth over other priorities.

Thank you for the opportunity to provide feedback on the proposed amendments to *ERO 019-3136 Consultation on Growing the Size of the Greenbelt*. We look forward to being included in future discussions related to the Greenbelt Plan.

Sincerely,



Rob Lipsett
President