

April 22, 2022

Ministry of Municipal Affairs and Housing  
Provincial Planning Policy Branch  
777 Bay Street, 13th Floor  
Toronto, ON M5G 2E5

**RE: ERO #019-4485 Proposed Amendment to the Greenbelt Plan, Proposed Amendment to the Greenbelt Area boundary Regulation O. Reg. 59/05, ERO #019-4483; and Ideas for Adding or Expanding Urban River Valleys, ERO #019-4803**

The National Farmers Union - Ontario (NFU-O) is an accredited farm organization representing thousands of sustainable family farms and local food advocates. The NFU-O believes that the family farm should be the primary unit of food production in Ontario. Members work together to achieve agricultural policies that ensure dignity and income security for farm families, while protecting and enhancing rural environments for current and future generations. The NFU-O collaborates locally, nationally and internationally to research, educate, and share effective solutions that lead to a better world for farm families and their communities.

We appreciated the opportunity to comment on the Growing the Greenbelt proposal in the Phase I consultations. As reported, our farm membership highlighted the following key recommendations:

- The Paris Gault Moraine, Waterloo Moraine and Grand River Watershed were specifically identified for protection in their entirety.
- Partial protection of water systems is not adequate protection. Entire ecosystem building blocks must be protected.
  - Selective protection fails to acknowledge the interconnectedness of ecosystems. Protected areas will still be vulnerable to the impact of surrounding land use.
- Further sustainability studies must be completed before Greenbelt Boundaries may be determined, during which time land should remain in agricultural use or natural preservation.
  - Active and ongoing consultation with Indigenous groups, farmers and additional land stewards should occur throughout the process of defining boundaries.

We are extremely disappointed to see that this crucial farmer input was almost entirely ignored in the Proposed Amendment to the Greenbelt Plan.

Farmland in Ontario is a diminishing resource at the centre of our \$39 billion agri-food sector, the largest economic sector in the province. The economic impact of the past two years has taught us the importance of investing in resilient localized supply chains that will keep food on the shelves in our province. The loss of farmland directly undermines the ability of Ontario farmers to grow food, and threatens the province's food security and economy.

The NFU-O firmly asserts the importance of protecting agricultural lands within the Greenbelt, and expanding the Greenbelt to include all prime agricultural land and the full protection of waterways and Urban River Valleys that impact those protected agricultural lands. Further, the NFU-O believes that Minister Clark should be held accountable to his pledge to add two acres of farmland to the Greenbelt for every acre removed by the use of MZOs.

Highway 413, the Bradford Bypass and the Highway 404 extension through the Greenbelt will deplete hundreds of hectares from the Greenbelt alone and compromise even larger swaths of land through resulting ecosystem destruction. These projects coupled with the over abundant use of MZOs puts farmland under constant threat. Currently, 175 acres of farmland is lost to development every day in Ontario. The proposed Greenbelt Expansion plan will add roughly 2,300 acres of non-farmable land to the Greenbelt and includes no provisions to add arable land that could be used to grow food. This 2,300-acre inclusion does not even begin to account for farmland lost on a daily basis let alone the additional Greenbelt land that will be lost to planned roadway construction projects.

During the Phase I consultations the NFU-O membership communicated the importance of protecting URVs in their entirety from development and aggregate extraction. However, while protection of URVs is vital to the health of ecosystems and agricultural lands, URVs themselves are not viable lands for agricultural protection. As such, the Proposed Amendment includes no expansion of the Greenbelt that would include land that could be used for food production and does not address the loss of agricultural land that would result from proposed highway construction projects or the use of the 80 MZOs issued by the current government.

Additionally, the proposal only offers partial protection of the 13 outlined URVs by failing to expand protection to privately held land. The proposal only calls for the inclusion of publicly held lands along URVs which are generally held as parks, open space, recreation, conservation and/or environmental protection areas and are not actively threatened land. It is imperative that protection of URVs includes privately held land as this land is the most susceptible to development, land and waterway contamination. As stated in the Phase I consultation, selective protection does not offer adequate protection as protected areas continue to be vulnerable to the impact of surrounding land uses.

As it stands, this proposal to protect non-threatened public URVs while ignoring the need to protect at risk privately held land, is at best redundant and at worst represents an attempt to mislead the public by creating false optics of environmental protection.

The NFU-O is especially disappointed by the lack of recognition of the Paris Galt Moraine in the Proposed Amendment, as this was a major focus of the Phase I consultation. An overwhelming majority of respondents identified that the entirety of the Paris Galt Moraine should be included in the expanded Greenbelt boundary. Respondents additionally identified the Waterloo Moraine, one of 21 URVs missing from the list of only 13 URVs in the Proposed Amendment, as important to protect. It is critical that the Ministry consider this Phase I input to protect The Paris Galt Moraine and the Waterloo Moraine, which are especially susceptible to aggregate extraction. Continuing to ignore this overwhelming input gathered across the Phase I consultations paints a clear picture that the current government is allowing influence from developers and aggregate extractors to overpower public consultation.

Farmers contribute food production and land stewardship that is essential to the larger economic and environmental goals of the Greenbelt plan. The input of farmers and other land stewards is vital to Greenbelt expansion. It is repeated often by the government that no single priority outweighs the other. However, economic growth, viable communities, and the health of natural resources, such as water, will not exist if farmland and ecosystems are not prioritized for protection.

In summary, the NFU-O views the Proposed Amendment to the Greenbelt Plan as significantly deficient in meeting the goals outlined in the Phase I consultations. Focus for Greenbelt expansion must include privately held lands in URVs that are susceptible to development, aggregate extraction and contamination. Further, it is imperative that the Greenbelt Plan accommodate for land lost to proposed highway development and urban sprawl, through the consistent use of MZO's by the current government.

Sincerely,



Max Hansgen  
President, National Farmers Union - Ontario