

November 27, 2023

To: greenbeltconsultation@ontario.ca

RE: ERO 019-7739 – Proposal to return lands to the Greenbelt - Greenbelt Statute Law Amendment Act, 2023

Thank you for the opportunity to comment on the proposal to return lands to the Greenbelt - Greenbelt Statute Law Amendment Act, 2023, as outlined in the Government of Ontario's Environmental Registry ERO number 019-7739, and Bill 136, on the legislation that is currently before the Standing Committee on Heritage, Infrastructure and Cultural Policy.ⁱ

The Ontario Public Health Association (OPHA) supports the proposal to return lands to the Greenbelt and urges the Government to restore full and permanent protection to these lands. These steps will reinforce the multiple health benefits that ecosystem services provide – food, clean water, air purification and climate regulation,ⁱⁱ the protection of wetlands, woodlots and wildlife habitat that is essential for ecological stability and human health (One Health)ⁱⁱⁱ, as well as the vital importance of protecting the productive farmlands that are part of the Greenbelt's agricultural system.^{iv v}

OPHA also urges the Government to maintain the integrity of all conservation protections within existing protected green spaces across Ontario and to expand the Greenbelt beyond its current area in consultation with stakeholders and by engaging with Indigenous communities. Public health agencies have long recognized the connections between healthy environments and population health, and thus the importance of healthy public policy across all sectors to strengthen health protection and reduce health inequities¹. This includes policies for the protection of natural heritage systems, the preservation of ecosystem connectivity, and the implementation of nature-based solutions for climate-resiliency including mitigation and adaptation.

As noted in OPHA's November 16th, 2022 submission to the Legislative Assembly of Ontario, Standing Committee on Heritage, Infrastructure and Cultural Policy on Bill 23, More Homes Built Faster Act, 2022, our members fully support the need for Ontario to find more affordable housing opportunities for its residents and create healthy, equitable and climate-resilient communities. Actions such as intensification^{vi} and transit-oriented development can be health and equity promoting, without compromising other vital attributes required for healthy and equitable communities, including access to, and protection provided by green spaces.

OPHA's would like to reaffirm key points from our previous submission on the Greenbelt^{vii}, urging the government to:

- maintain the integrity of conservation protections across Ontario, including the conservation of wetlands, woodlands, farmlands and other protected ecosystems;

¹ Health inequity refers to differences in health associated with structural and social disadvantages that are systemic, modifiable, avoidable and unfair. (National Collaborating Centre for the Determinants of Health). <https://nccdh.ca/learn/glossary/>

- implement smart growth policies that truly value the benefits of natural ecosystems, including strengthening of provincial land-use planning direction to protect green spaces;
- implement the Auditor General of Ontario's recommendations in the 2022 *Value-for-Money Audit: Climate Change Adaptation: Reducing Urban Flood Risk*, including recommendations to protect green space and wetlands; and
- keep to its commitment to leave the Greenbelt intact.

OPHA's position and health rationale to protect, maintain and enhance green space in all its forms, as outlined in previous ERO submissions,^{viii} remain relevant to ERO 019-7739. These points are expanded on below.

Greater consideration of population health, health equity and climate-health impacts must be incorporated into the decision-making process affecting the Greenbelt. These protected lands promote the development of healthy, equitable and complete communities, protect natural heritage, water, and agricultural systems, improve air quality, help buffer against flooding and other climate-related health risks, and promote a culture of conservation. Natural ecosystem services include regulating air and water pollution, flood protection, erosion control, carbon sequestration, provision of nutritious food and clean water, surface temperature regulation, and several cultural, recreational, physical and mental health benefits.^{ix} Greenbelt plans and legislation help the province meet its climate change targets and communities achieve their net-zero carbon goals by providing a natural carbon sink, reducing energy usage and mitigating the urban heat island effect. As pointed out in the report *The Nature of Health: Accelerating the integration of health considerations in urban nature-based solutions*,^x these nature-based solutions increase climate-resiliency and can have added benefits for vulnerable populations disproportionately impacted by climate change.

Protection of green spaces including wetlands, and realizing their human health, environmental and economic benefits, is inextricably tied to land-use planning decisions. The Auditor General of Ontario has acknowledged the risk of further loss of green spaces posed by Bill 23, in relation to the increased risk of urban flooding in surrounding communities. As noted in their November 2022 report – *Value-for-Money Audit: Climate Change Adaptation: Reducing Urban Flood Risk*,^{xi} the three main factors that contribute to an increased risk of urban flooding are: (1) development that results in the loss of green spaces and other pervious surfaces, (2) inadequate or aging stormwater infrastructure, and (3) climate change, which is resulting in more frequent and more intense rainfall events. The Auditor General goes on to state: “*Despite the critical role that green spaces play to reduce the risk of urban flooding (and provide other benefits), we found that weak provincial land-use planning direction to protect green spaces is resulting in the continued loss of such spaces in urban areas across southern Ontario.*”

As noted in the *Independent review of the 2019 flood events in Ontario*^{xii} report commissioned by the Government of Ontario the first core component of emergency management is prevention, which includes “... actions taken to prevent flood-related emergencies or disasters from occurring, and includes land use planning and regulatory restrictions to keep development out of the floodplains and other hazardous areas. While we cannot prevent flooding from occurring, keeping people and property out of flood-prone areas helps ensure naturally occurring flood events do not result in local emergencies.”

Lands within the Greenbelt Area are crucial to the protection of our drinking water resources including recharge of our groundwater to provide safe drinking water to Ontario residents. After the drinking water tragedy in 2000 in Walkerton, Justice Dennis O’Conner made 121 recommendations related to source water protection under the Clean Water Act.^{xiii} Allowing development on the protected Greenbelt would

remove many of these vital protections, impacting drinking water quality and quantity, including for residents relying on private well water in this area.

More protected natural ecosystems and connected near-urban nature is needed in the Greenbelt, not less. Expanding the Greenbelt is vital. Allowing Greenbelt removals in exchange for additions in other areas is not ecologically sound or health protective. The Southern Ontario Nature Coalition's *Technical Background Report: A Solution to Climate Change and Biodiversity Loss*^{xiv}, points out that "some of the most ecologically important areas in Canada are the natural areas and farmland in and around our cities". The report stresses that land-use policies and decisions must recognize the vital importance of greenspace and the elements of near-urban nature that "provide resilience to extreme weather, important outdoor spaces for communities and habitat for plants and animals." The report acknowledges that nature is "central to Indigenous Ways of Knowing and culture and provides local food and essential gifts from nature or "ecosystem services" to communities. These benefits will only become more important as climate change progresses."

Accounting for the value that nature provides is a fiscally sound way to plan for responsible growth. This allows for the proactive management of natural assets for climate-resiliency and the identification of nature-related risks and opportunities that specifically recognizes the positive benefits of natural-climate solutions. As noted in the Intact Centre of Climate Adaptation's 2022 Report, *Getting Nature on the Balance Sheet: Recognizing the Financial Value of Natural Assets in a Changing Climate*^{xv}: "These actions will help Canada enlist and work with nature to slow climate change, increase climate resilience and reverse biodiversity loss, ultimately benefiting the wellbeing of people in Canada and beyond."

A 2016 report commissioned by the Greenbelt Foundation – *Ontario's Good Fortune: Appreciating the Greenbelt's Natural Capital*^{xvi}, estimated the total value of carbon stored in the Greenbelt's forests, wetlands, and agriculture to be \$11.17 B, with annual carbon sequestration from forests, wetlands, and agriculture adding \$51.94 M per year. The value derived from the natural capital of the Greenbelt for recreational activities was estimated to be \$2.1 B per year with the value related to property protection by reducing flood risk estimate at \$224 M per year. The health benefit provided by air quality improvements resulting from forest cover within the Greenbelt was estimated to be \$18 M per year.

Evidence from expert authorities and provincially appointed advisory groups shows that more than enough land has already been set aside to meet the demand over the coming decade for all types of housing within existing town and city boundaries, and outside Greenbelt Areas. The 2021 *Expanding Ontario's Greenbelt* report^{xvii} sets out key requirements for expanding the greenbelt including: "no land removal; ... work towards simultaneously improving public health, local food security, water security, biodiversity conservation and economic prosperity; ... acknowledge that there is more than enough land to grow the Greenbelt and built complete communities to handle projected population growth."

The *Report of the Ontario Housing Affordability Task Force*^{xviii} lists a number of options that the government has at its disposal to help address affordability for Ontarians and achieve the target of 1.5 million new homes built in the next ten years, without developing on protected lands. These include densification, more gentle density, and more efficient use of land across Ontario including better use of existing public services and infrastructure. As pointed out in the Report: "a shortage of land isn't the cause of the problem. Land is available, both inside the existing built-up areas and on undeveloped land outside greenbelts."

OPHA urges the Government to take steps additional steps to protect the agricultural land base. Both greenspace and farmland provide ecological, economic, social and health benefits for our residents, including land for growing food, access to local food, opportunities to connect with farmers and food production. Areas of the Greenbelt are vital for local food production, that can help address climate-related food insecurity, and contribute to a healthy local economy. While the root cause of food-insecurity is inadequate income, with 18.7% of Ontario households experiencing food insecurity in 2022,^{xi} and one in ten people in the City of Toronto now relying on food banks,^{xx} healthy local food production, preserving natural resources and biodiversity, can help the Government of Ontario support a viable and sustainable food system.

Protection of agriculture land supports other provincial policy directives namely the Local Food Act, 2013, which was created to help foster successful and resilient local food economies and systems. The value of productive farmlands in these areas for local, healthy food production, for environmental protection including that of speciality crops (e.g., tender fruits and grapes) many residents rely on for their livelihood, and for our economy supports continued protection of the Greenbelt.^{xxi}

In summary, the Ontario Public Health Association supports the proposal to return lands to the Greenbelt and urges the Government to restore full and permanent protection to these lands, to maintain the integrity of all conservation protections within existing protected green spaces across Ontario and to expand the Greenbelt beyond its current area in consultation with stakeholders and by engaging with Indigenous communities. The multitude population health, health equity and climate-health resiliency benefits that ecosystem services, including the economic valuation of green space, provide strong evidence to support these actions - with co-benefits for health, the environment and the economy.

Thank you for considering our comments on the proposal to return lands to the Greenbelt - Greenbelt Statute Law Amendment Act, 2023, as outlined in the Government of Ontario's Environmental Registry ERO number 019-7739, and Bill 136.

Sincerely,



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ⁱ Bill 136, Greenbelt Statute Law Amendment Act, 2003 <https://www.ola.org/en/legislative-business/bills/parliament-43/session-1/bill-136/status>

ⁱⁱ Molnar, M., Olmstead, P., Mitchell, M., Raudsepp-Hearne, C. and Anielski, M. (2021): Ecosystem Services; Chapter 5 in *Canada in a Changing Climate: National Issues Report*, (eds.) F.J. Warren and N. Lulham; Government of Canada, Ottawa, Ontario. https://changingclimate.ca/site/assets/uploads/sites/3/2020/05/Chapter-5_Ecosystem-Services_Final_EN-1.pdf

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- iii One Health. University of Guelph. <https://onehealth.uoguelph.ca> https://cpb-ca-c1.wpmucdn.com/sites.uoguelph.ca/dist/3/28/files/2021/07/One_Health_Report_2021-FINAL.pdf
- iv The Greenbelt Foundation's Statement on the Ontario Government's Announcement of Permanent Protection for the Greenbelt. September 22, 2023. https://www.greenbelt.ca/statement_on_ontario_government_announcement
- v Ontario Farmland Trust. Farmland Loss in Ontario. <https://ontariofarmlandtrust.ca>
- vi Government of Ontario. Provincial Policy Statement, 2020. <https://www.ontario.ca/page/provincial-policy-statement-2020>
- vii Ontario Public Health Association. https://opha.on.ca/wp-content/uploads/2022/12/OPHAs-submission-to-ERO-019-6216-Proposed-Amendments-to-the-Greenbelt-Plan_Dec_2_2022.pdf?ext=pdf
- viii Ontario Public Health Association. Letters and Submissions <https://opha.on.ca/advocacy-and-policy/letters-submissions/>
- ix EcoHealth Ontario resources. <https://www.ecohealthontario.ca/resources>
- x Twigg, M. 2021. The Nature of Health: Accelerating the integration of health considerations in urban nature-based solutions. Smart Prosperity Institute. https://institute.smartprosperity.ca/sites/default/files/EN_Report_NBS_Final.pdf
- xi Office of the Auditor General of Ontario. November 2022. Value-for-Money Audit: Climate Change Adaptation: Reducing Urban Flood Risk. https://www.auditor.on.ca/en/content/annualreports/arreports/en22/ENV_CCUrbanFlooding_en22.pdf
- xii INDEPENDENT REVIEW OF THE 2019 FLOOD EVENTS IN ONTARIO
<https://www.ontario.ca/document/independent-review-2019-flood-events-ontario>
- xiii Report of the Walkerton Inquiry. 2002. The Events of May 2000 and Related Issues. The Honourable Dennis R. O'Connor, Commissioner. http://www.archives.gov.on.ca/en/e_records/walkerton/index.html
- xiv Technical Background Report: A Solution to Climate Change and Biodiversity Loss: Conserving Our Near-Urban Nature. Prepared by the Southern Ontario Nature Coalition (SONC) 2021. ISBN 978-1-927075-20-3 https://s3.ca-central-1.amazonaws.com/greenbelt.ca/Resources/GB_SONC_technical_report_E-ver.pdf
https://www.greenbelt.ca/near_urban_nature_project
- xv Eyquem, J. L., Church, B., Brooke, R. and Molnar, M. 2022. Getting Nature on the Balance Sheet: Recognizing the Financial Value of Natural Assets in a Changing Climate. Intact Centre on Climate Adaptation, University of Waterloo. https://www.intactcentreclimateadaptation.ca/wp-content/uploads/2022/10/UoW_ICCA_2022_10_Nature-on-the-Balance-Sheet.pdf
- xvi Ontario's Good Fortune: Appreciating the Greenbelt's Natural Capital. 2016. Prepared for the Friends of the Greenbelt Foundation by Green Analytics
https://www.greenbelt.ca/ontarios_good_fortune_greenbelt_natural_capital
- xvii Expanding Ontario's Greenbelt. 2021. <https://www.burlingtongreen.org/wp-content/uploads/2022/10/expanding-ontarios-greenbelt-report-feb-2021-min-1.pdf>
- xviii Report of the Ontario Housing Affordability Task Force. 2022. <https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf>
- xix Li T, Fafard St-Germain AA, Tarasuk V. (2023) Household food insecurity in Canada, 2022. Toronto: Research to identify policy options to reduce food insecurity (PROOF). Retrieved from <https://proof.utoronto.ca/>
- xx Daily Bread Food Bank and North York Harvest Food Bank have released *Who's Hungry 2023*
<https://www.dailybread.ca/research-and-advocacy/research/whos-hungry-report/>
- xxi Golden Horseshoe Food and Farming Alliance <https://foodandfarming.ca/new-reports-and-case-studies-show-impact-and-value-of-our-agri-food-sector/>