

April 19, 2021

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

RE: ERO Registry #019-3136 Consultation on Growing the Size of the Greenbelt

The National Farmers Union – Ontario (NFU-O) is an accredited farm organization representing thousands of sustainable family farms and local food eaters. In principle, our organization's values are in alignment with the Greenbelt Plan.

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.*

We appreciate the opportunity to comment on the Greenbelt proposal, and are grateful for the support we have received from the Greenbelt Foundation to actively consult with our members. After conducting an online survey, which received 100 responses, hosting two virtual member consultations, and performing in-depth research, we have addressed the discussion questions put forth by the government below, with strong support from our membership.

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

The current study area presented for discussion does not encompass a large enough area. As previously stated in our 2018 submission to the Greenbelt, 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.

We would like to see the current proposed boundary expanded to include the entirety of the Paris Galt Moraine. In addition, the Waterloo Moraine should be included and proper study on the impacts of aggregate extraction must take place as it is a prime location for aggregate extraction.¹ The NFU-O recommends bringing forward Bill 71, the Paris Galt Moraine Conservation Act, 2019 to provide protection for this important area and allow expansion of the Greenbelt westward.

¹ "Expanding Ontario's Greenbelt: Getting it Right." Feb. 2021. https://d36rd3gki5z3d3.cloudfront.net/wp-content/uploads/2021/02/ExpandingOntariosGreenbelt_FinalFeb2021.pdf

Question 2: What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?

An overwhelming 95% of our survey respondents say that there should be further consultations with farmers on the impacts to farmland that are associated with the extraction of non-renewable resources, such as gravel, before further extraction is permitted.

"Consultation should be with all farming organizations working collectively through municipal multi-sectoral citizen-based committees ... considering that indicators of 'supply and demand' for aggregate and other non-renewable resources will impact the sustainability of our food systems as we meet the commitment Canada made to the UN Sustainable Development Goals for 2030." -NFU-O member

Active and ongoing consultation with Indigenous groups, farmers and additional land stewards should occur throughout the process of defining boundaries. Further communication must take place with landowners actively farming their land regarding what it means to be a part of the Greenbelt, as they will feel the impacts most acutely.

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

A full 95% of survey respondents support further study and believe that complete water systems must be included. Specific recommendations were made to include the Grand River watershed in Brant County and the land east of Brantford – land that is contiguous with the existing boundary of the Greenbelt – as well as Wellington and Waterloo counties that include the middle of the Grand River.

"Rivers don't recognize human-created boundaries or sections. Development, road-building and quarries (that negatively replace farmland) continually threaten rivers, water quality, and wildlife with ever-increasing salination, waste water treatment that releases unremovable toxins, and corruption of aquifers by mining below the water table." -NFU-O member

While the premise of protecting Urban River Valleys to connect them to larger Greenbelt areas is agreeable, we cannot advocate only for partial and selective protection of water systems that are highly connected.

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

A decisive majority, 84% of survey respondents, would like to see all farmland be protected for agricultural use or nature preservation until sustainability studies have been completed and selective use can be determined. Members are concerned that selectively protecting farmland throughout the province will push extractive industry outward. Many municipalities are already experiencing increased pressure by developers who have “leapfrogged” over protected areas, such as the Greenbelt.

Keeping farmland within the hands of farmers and land stewards is crucial to the long term sustainability of our food systems, as is keeping land prices accessible to the next generation of farmers.² The more farmland lost to speculation and developers, the less is available to existing and potentially new farmers. One of the major impediments to new farmers wanting to enter the business is the cost of land. Farming must be a viable career option for the next generation if Ontario hopes to have our own food system to support our population.

Question 5: How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities mentioned above?

It is crucial to understand that the province's goals will not be achieved if farmland continues to disappear. We must work with urgency to protect what is left of our agricultural resources.

Prioritizing farmland and nature preservation through Greenbelt expansion will support a number of federal and provincial mandates:

- Ontario's Climate Change Strategy 2015
- Ontario Local Foods Act 2013
- UN Sustainable Development Goals 2030
- A Place to Grow: GGH
- Provincial Policy Statement (PPS)

A vision for long-term sustainability is demonstrated in a detailed report by the NFU-O called “Imagine If,”³ which illustrates how high quality farming practices can create economically strong and environmentally healthy communities.

² NFU- O's Response to Bill 66. *Emery Huszka, NFU-O President*, 16 Jan. 2019
<https://nfuontario.ca/new/nfu-os-response-to-bill-66/>

³ Imagine If... A Vision of a Near-Zero-Emission Farm and Food System for Canada. *National Farmers Union (NFU)*, 18 Mar. 2021, <https://www.nfu.ca/publications/imagine-if-a-vision-of-a-near-zero-emission-farm/>

While there are concerns of how to manage Ontario's growing population, the NFU-O encourages the government to consider the facts outlined in the report backed by 90 organizations, titled, "Expanding Ontario's Greenbelt: Getting It Right."⁴

- As of Dec 2016 upwards of 125,000 ha of land in the GGH (308,000 acres) have been approved for urban use to accommodate projected growth to 2031.
- As of Dec 2016 ... only 20 per cent has been used – despite being 40 per cent (10 years) through the Growth Plan's 25 year planning horizon – reflecting drastically lower land consumption trends than in prior decades (e.g. from 1991-2001 the urban footprint expanded by about 26 per cent to accommodate 1.1 million people whereas between 2001-2011 it only expanded about 9 per cent to accommodate 1 million people).

According to existing numbers, and further research within the report, there is currently little justification for extensive land consumption in order to accommodate Ontario's growing population. Aggregate land use, leapfrog sprawl, and unnecessary developments such as the proposed 413 toll highway will have a permanent negative impact on Ontario's ability to reach its full potential and stated goals.⁵

Question 6: Are there other priorities that should be considered?

Moving forward the NFU-O suggests considering the following three priorities to improve the quality of the Greenbelt.


1. Canada's commitment to reconciliation with Indigenous peoples, along with the province's legal "duty to consult" First Nations peoples, must be carried out with meaningful consultations as a top provincial priority when expanding the Greenbelt.
2. Develop local targets and indicators for food security and link with national and global United Nation Sustainable Development Goals that Canada committed to for 2030.
3. Determine local capacities and resources needed to ensure sustainability Strengthen inter-sectoral data sharing and planning e.g. sustainable and healthy communities committees at municipal levels that include agriculture, water, health and environment, etc.⁶

The NFU-O strongly advocates for a strong and vibrant sustainable food system to support the needs of communities throughout Ontario.

⁴ "Expanding Ontario's Greenbelt: Getting it Right."

⁵ Submission re. Amendments to Regulation 244/97 and Provincial Standards under the Aggregate Resources Act. *Sarah Bakker on behalf of NFU-O*, Feb. 2020 nfuontario.ca/new/submission-re-amendments-to-regulation-244-97-and-provincial-standards-under-the-aggregate-resources-act/)

⁶ Sustainable Food Systems: Risks with Aggregate Extraction on Prime Farmland: *Partnership Project between McMaster University, NFU and Gravel Watch*. NFU- AGM (ON) Presentation Feb. 26, 2021.



"As our population in South Western Ontario increases, the societal value of green infrastructure and food security will grow astronomically." -NFU-O member

Without the protection of farmland, and the natural areas upon which it depends, we will not be able to sustainably feed a growing urban population. All provincial priorities must respect this basic fact of life, and as a recent NFU-O panel was titled, "You can't eat Asphalt."

Thank you for the opportunity to voice our support for the expansion of the Greenbelt. We look forward to ongoing discussions with the Province on how we can continue to strengthen Ontario's Agricultural System and work together to support healthy and sustainable communities.