



December 1, 2022

Minister Steve Clark
Ministry of Municipal Affairs and Housing
Provincial Land Use Plans Branch
777 Bay Street, 13th Floor
Toronto, ON M5G 2E5
Via email: growthplanning@ontario.ca

Dear Minister Clark,

Re: ERO 019-6216 Proposed Amendment to the Greenbelt Plan; ERO 019-6217 Proposed Amendment to the Greenbelt Area boundary regulation; ERO 019-6218 Proposed Redesignation of land under the Oak Ridges Moraine Conservation Plan

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on the Ministry of Municipal Affairs and Housing's (MMAH) consultations regarding the Greenbelt Plan. BFO represents 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health & care, environment, food safety and domestic & export market development.

The provincial government's plan to address Ontario's housing crisis and prepare for the province's expected population growth over the next ten years by building approximately 1.5 million homes is ambitious and necessary, but the proposed amendments to the Greenbelt Plan raise concern for the protection of agricultural land within and outside the Greenbelt. We believe the push to build housing across the province is being conducted with little regard for our province's ability to farm and produce food for our growing population. The province's housing objectives cannot be achieved at the expense of Ontario's finite agricultural land base.

Ontario's beef producers have serious concerns with the loss of agricultural land, especially agricultural grasslands, in our province. Agriculture Census data from 2016 to 2021 shows Ontario lost 582,392 acres of farmland, totalling over 1.5 million acres of farmland lost between 2006 to 2021. Further, between 2016-2021, over 290,000 acres of tame and native grasslands were lost in Ontario. Grasslands, in the form of pasture and forage land, are primarily managed by beef producers in Ontario, and, in addition to being vital to beef production, grasslands provide a number of ecological services such as habitat for wildlife and pollinators, biodiversity, carbon sequestration and oxygen production, and water and nutrient cycling.

The ministry's Ontario Housing Affordability Task Force recognizes in its report released earlier this year that more growth is pushing past urban boundaries and turning farmland into housing. The Task Force also states that most of the solution to Ontario's housing crisis must come from densification and not by removing land from the Greenbelt. Actions must be taken to balance our province's need to increase our housing supply while protecting our farmland and food security.

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.

Our comments and recommendations on the proposed amendments to the Greenbelt Plan can be found below:

Lands Proposed to be Removed

BFO has serious concerns with the proposed removal of approximately 7,400 acres from the Greenbelt to be developed for housing. The consultation does not specify the type of lands being considered for removal and for development, but based on the maps provided, it is likely that much of the land will be agricultural land and natural heritage land. A key objective of the Greenbelt Plan is to identify where major urbanization should not occur, provide permanent protection to the agricultural land base from being lost and fragmented, and to support agriculture as the predominant land use. The changes being proposed, evidently, go against this key objective.

Based on the continued loss of agricultural land in Ontario, we maintain our position that the province should be expanding protections to preserve agricultural land across the province and not removing protections already afforded to agricultural land within the Greenbelt. We firmly believe that when the province is considering how best to prepare for Ontario's growing population, that it must recognize that access to housing and farmland protection are not mutually exclusive issues.

Lands Proposed to be Added

We maintain our position, as stated in our past submissions to *ERO 019-3136 Consultation on Growing the Size of the Greenbelt* and *ERO 019-4485 Proposed Amendment to the Greenbelt Plan - Growing the size of the Greenbelt*, that we do not support the proposal to add lands within the Paris Galt Moraine and the 13 Urban River Valleys (URVs) to the Greenbelt. We also believe the addition of URVs to the Greenbelt should not be considered as an increase in the total Greenbelt land area as a majority of URVs are already publicly owned and protected land areas. Although we see the merit in adding both land within the Paris Galt Moraine and URVs to the Greenbelt, doing so will not achieve one of the key objectives of the Greenbelt, which is to provide permanent protection to Ontario's agricultural land base. As noted, we believe the province needs to do more to preserve agricultural land from development across the province.

The proposal to add lands from the Paris Galt Moraine and Urban River Valleys, amounting to approximately 9,400 acres of land, as a means to compensate for the land being removed from the Greenbelt, none of which is designated as agricultural land, should not be considered as a replacement equal to the agricultural land being removed from the Greenbelt. It is not a fair assessment to suggest that land not suitable or capable of producing food can replace the prime agricultural lands proposed to be removed from the Greenbelt.

Strategic Removals

The consultation outlines the criteria for how the provincial government considered properties within the Greenbelt as suitable for removal and for future and near-term housing development. A component of the criteria is that "greater than 1:1 offset must be achieved to ensure overall Greenbelt expansion". As noted, we believe the proposal to replace the agricultural land removed from the Greenbelt with non-agricultural land, should not be considered a 1:1 offset.

Although we believe all agricultural land in Ontario should be protected, if the provincial government truly wants to offset the agricultural land from the Greenbelt proposed for housing development, then the government should be replacing that land with other agricultural land. BFO recommends the government consider replacing the agricultural land removed from the Greenbelt with Crown land in northern Ontario. Despite there being more than 200 million acres of land in northern Ontario that could be used for agricultural production, most is controlled by the province and is not easily accessible for food production purposes. Not only could this replace the proposed agricultural land to be removed from the Greenbelt, but opening Crown land to farmers in northern Ontario would further support the government's agricultural development goals in northern Ontario. Further, allowing access to Crown land in northern Ontario for grazing and hay production would also maintain and provide valuable ecological services and environmental benefits.

Other Recommendations

- BFO believes the path to meeting Ontario's housing development goals while ensuring Ontario's finite agricultural lands are not lost in the process, is to ensure urban boundaries are fixed and that development focuses on density in urbanized areas. Especially in urban areas where density does not exist due to exclusionary zoning rules.
- 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 for providing an opportunity for avoiding, minimizing and/or mitigating negative impacts on agriculture. We believe they should be required as part of the permit process for residential builds on Ontario's diminishing agriculturally productive land.

It is evident the preservation and protection of the existing agricultural land base is critical for the future sustainability of Ontario's food systems, the provincial economy and in the fight against climate change. 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. Long-term actions to protect agricultural lands that do not pit areas of the province against one another need to be examined. The province must find a way to balance the need for increasing our housing supply with the need to better protect our farmland.

Thank you for the opportunity to provide feedback on the current Greenbelt Plan proposals. We look forward to being included in future discussions related to the Greenbelt Plan and the preservation of Ontario agricultural lands.

Sincerely,



Jack Chaffe
President