

December 2, 2022

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, ON  
M5G 2E5

Submitted via email to: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca) and [greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca)  
and submitted online via the Environmental Registry of Ontario (ERO)

Dear Minister Clark:

**RE: ERO #019-6216: Proposed Amendments to the Greenbelt Plan**  
**ERO #019-6217: Proposed Amendments to the Greenbelt Area Boundary Regulation**  
**ERO #019-6218: Proposed Redesignation of land under the Oak Ridges Moraine Conservation Plan**

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

OFA appreciates this opportunity to provide input to ERO #019-6216, ERO #019-6217, and #019-6218 as proposals to remove and redesignate 15 areas of land and add lands in the Paris Galt Moraine area to help the government achieve its goal of building 1.5 million homes over the next ten years.

OFA is opposed to the proposals to remove lands from the Greenbelt's Protected Countryside for development and urges the provincial government to withdraw these proposals altogether. OFA maintains its current stance and recommends the province should take a holistic, systematic, province-wide approach that prioritizes protecting agricultural lands and identifies the most appropriate areas for growth with justifiable criteria and comprehensive analysis.

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Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 750,000 jobs and contributing over \$47 billion to Ontario's annual GDP. Agriculture and agri-food businesses must be able to invest in their operations and diversify their products with confidence that farmlands will be available. Ontario farmers cannot do so if provincial legislation is continuously used to pave over farmlands. Their ability to feed our province and economy relies on knowing that encroaching development will be limited and not hinder their ability to farm and remain viable into the future. Decision-makers must never lose sight of this reality when making decisions about the future agricultural land loss to development for housing, population, and employment growth.

We must acknowledge that over half (52%) of Canada's prime soils are in Ontario and that farmland makes up less than 5% of Ontario's land base. Yet, from 2016 to 2021, the Census of Agriculture indicated that Ontario lost the equivalent of 319 acres a day. Further, between 2000 – 2017, southern Ontario lost more than 72,000 acres of prime agricultural land to Official Plan Amendments approved for urban development.<sup>1</sup> Recent decisions over the last few weeks from the Ministry of Municipal Affairs and Housing to expand the urban boundaries in municipal Official Plans (i.e., Halton, Hamilton, Niagara, and Ottawa) by over 14,500 acres show that the reported numbers of acres lost are an underestimation.

The proposal to remove 7,400 acres of land from the Greenbelt would further accelerate this rate of farmland loss. While the province's proposal argues that the removal of 7,400 acres and the addition of 9,400 acres would add 2,000 net acres to the total area of the Greenbelt, these newly added lands will not protect the agricultural land base. Most of these proposed lands to be added in (except for lands in Erin) are Urban River Valleys (URVs) – these lands are mostly already under public ownership and are located within flood plains. This proposed land swap presumes that all land has equal value and is substitutable, which is false. The proposal also undermines the permanence, strength, and vision of the Greenbelt Plan, which is to provide a *“broad band of permanently protected land which protects against the loss and fragmentation of the agricultural land base and supports agriculture as the predominant land use.”*<sup>2</sup>

OFA notes that the Housing Affordability Task Force has implored the provincial government to protect the Greenbelt, and that “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.”<sup>3</sup> OFA encourages the provincial government to listen to their experts and explore other avenues to address housing supply which do not sacrifice farmland or the Agricultural System.

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<sup>1</sup> Caldwell, Wayne, Sara Epp, Xiaoyuan Wan, Rachel Singer, Emma Drake, and Emily C. Sousa. “Farmland Preservation and Urban Expansion: Case Study of Southern Ontario, Canada.” *Frontiers in Sustainable Food Systems* 6 (February 18, 2022): 777816. <https://doi.org/10.3389/fsufs.2022.777816>.

<sup>2</sup> Greenbelt Plan (2017). <https://files.ontario.ca/greenbelt-plan-2017-en.pdf>

<sup>3</sup> Housing Affordability Task Force, and Ministry of Municipal Affairs and Housing. “Report of the Ontario Housing Affordability Task Force.” Queen's Printer for Ontario, February 8, 2022. <https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf>.

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OFA argued in 2005 that the creation of the Greenbelt failed to address the leapfrogging<sup>4</sup> of development activity onto lands immediately beyond the Greenbelt and created winners and losers across boundary lines, and we still believe this to be true. To address this issue, OFA believes that the Ontario government should designate *all* farmlands in Ontario that are outside of current settlement area boundaries as 'Greenbelt' and afford them permanent protections from the threat of urban development. Doing so would mitigate the leapfrogging of development and intense development pressures.

OFA fully recognizes the value of protecting our water sources. Our families, livestock, and crops depend on readily available clean water sources. However, OFA does not support this proposal to grow the Greenbelt by incrementally adding the proposed areas of URVs. The proposal to 'Greenbelt' URVs should not be considered an acceptable means of maintaining the Greenbelt's total land area to balance the loss of protected agricultural lands to development.

When agricultural land is developed, it is lost forever. Ontario is losing some of its most productive agricultural land to pressures for urbanization and growth enabled by provincial policies and tools. If our province plans to continue to grow and prosper, we must also have the plan to protect Ontario's position to produce food, fibre and fuel for the people of this province and beyond.

*Grow Ontario: a provincial agri-food strategy* was recently announced by the provincial government with the aim to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsive food supply for Ontarians. The proposed changes to the Greenbelt directly undermine the ability of our agri-food sector to continue to be the 'cornerstone of our thriving economy' as identified in the *Grow Ontario* agri-food strategy. Ontario's goal to increase the production of food grown and prepared in Ontario by 30% will be threatened by decisions to pave over farmland. If the provincial government wishes to 'ensure that consumers have access to safe, nutritious, homegrown food, now and in the future, and to ensure long-term, sustainable economic development of the agri-food sector,'<sup>5</sup> we need to make sound and firm decisions now to protect agricultural land from urbanization.

OFA urges the provincial government to implement changes to build more homes faster that reflect that growth management to meet housing demand and farmland protection are two sides of the same coin. More robust protection against development on agricultural land combined with fixed, permanent urban boundaries and mandatory compliance with urban density and intensification requirements will achieve community development and farmland protection objectives.

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<sup>4</sup> Drake, Emma. "The Leap-Frog Effect in the Context of Ontario's Greenbelt: An Analysis of Farmland Loss in the Unprotected Countryside." University of Guelph, 2019. <http://hdl.handle.net/10214/15909>.

<sup>5</sup> *Grow Ontario: a provincial agri-food strategy* (2022). <https://www.ontario.ca/page/grow-ontario-provincial-agri-food-strategy>.

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We emphasize that there is only one Ontario landscape. The full range of urban, rural, agricultural, natural heritage, cultural heritage, and mineral extraction land uses must coexist across this landscape. Intensification of residential development within the existing urban footprint, in the context of complete, dense, transit-supportive communities, along with the distribution of economic development province-wide, addresses housing needs. Intensification will boost economic growth, create new jobs, provide new affordable housing options, support municipal infrastructure systems, ensure food security, and contribute to environmental stewardship. These opportunities will reduce red tape, satisfy our need for sustainably and efficiently built housing that is both affordable and attainable, and attract economic investment.

OFA appreciates the opportunity to provide our feedback on the proposal to amend the Greenbelt Plan. We look forward to working with the provincial government and our municipal counterparts to sustain our province's housing supply and communities while protecting our agricultural land base and supporting our agri-food sector as an economic powerhouse.

Sincerely,



Peggy Brekveld  
President

cc: The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs  
OFA Board of Directors