

August 1, 2023

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
17th Floor
777 Bay Street
Toronto, ON
M7A 2J3

Submitted online through the Environmental Registry of Ontario (ERO 019-6813)

Re: Review of proposed policies adapted from *A Place to Grow* and *Provincial Policy Statement* to form a new provincial planning policy instrument – Submission from Egg Farmers of Ontario

Dear Minister Clark,

On behalf of Ontario's more than 500 egg and pullet farm families, Egg Farmers of Ontario (EFO) thanks the Ontario government for listening to concerns raised during the original consultation period for *Bill 97 – Helping Homebuyers, Protecting Tenants Act, 2023* and extending the process to allow for continued dialogue. We appreciate the opportunity to provide comments on the proposed policies adapted from *A Place to Grow* and *Provincial Policy Statement* to form a new provincial planning policy instrument.

Ontario's egg farmers produce approximately 270 million dozen eggs annually from about 10 million laying hens and is home to approximately 40 per cent of Canada's egg and pullet farm families. Our annual egg farm production includes \$520 million in farm sales and contributes \$1.6 billion to the provincial economy. Protecting the "Right to Farm," as outlined in the *Farming and Food Production Protection Act, 1998* is very important to our farmers – it is vital that we collectively seek opportunities to ensure balance between the needs of the agricultural community and provincial health, safety and environmental issues and concerns.

We support and embrace the government's objective of building 1.5 million homes in the next 10 years to address a housing supply shortfall that affects all Ontarians – including our farming communities. However, we need a balanced approach to policy and proposal development to ensure the continued strength of the agri-food sector, supporting economic growth and ensuring an efficient and reliable food supply for all Ontarians.

To safeguard the continued viability of agricultural production, we support the existing *2020 Provincial Policy Statement* that requires municipalities protect their prime agricultural areas for long-term agricultural use. However, we encourage the provincial government to review the definition of prime agricultural lands. As with many of our provincial counterparts, we recommend that prime agricultural lands be defined as Class 1-6 plus specialty crop lands. Classes 4-6 support agricultural activities such as grazing livestock and growing crops, and the agriculture sector has demonstrated that the productivity of this land can be improved through activities such as tile drainage, removing stone and addition of lime, just

to name a few. With respect to specialty crop land, provincial policy should continue to protect these areas because they are scarce and unique and cannot be replenished. These lands are important economically and represent some of Ontario's highest earning agricultural lands.

In addition, we encourage the government to consider maintaining the use of a provincially-mapped Agricultural System to ensure we still have farmland to produce food for future generations of Ontarians. This will ensure prime agricultural and specialty crop lands are consistently mapped and protected throughout Ontario, supporting economic development and job creation across the entire agri-food value chain.

Land use planning in Ontario must balance opportunities for increased housing with the need to preserve our agricultural lands. Focusing growth in existing settlement areas will support local economies, build stronger communities, reduce loss of valuable farmland and land use conflicts.

Once again, on behalf of Ontario's 500 egg and pullet farm families, we thank you for your willingness to continue the dialogue to hear the concerns brought forward by the entire agriculture and agri-food sector, and your desire to work together to ensure the long-term viability of agriculture, while ensuring affordable housing is available for Ontarians.

In closing, we thank you for the opportunity to provide input for your consideration as part of the consultation process. Please do not hesitate to contact myself or our Chief Executive Officer Ryan Brown (rbrown@getcracking.ca; 519-831-1500) should you have questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Scott Helps". The signature is written in a cursive, slightly slanted style.

Scott Helps
Chair, Egg Farmers of Ontario

cc: The Hon. Lisa Thompson, Minister of Agriculture, Food and Rural Affairs