

# GREENBELT FOUNDATION

Response to ERO # 019-7735  
New Act regarding the Duffins Rouge Agricultural Preserve  
easements and covenants

Ministry of Natural Resources and Forestry



Possibility grows here.

Date: November 30, 2023  
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[www.greenbelt.ca](http://www.greenbelt.ca)

**Response to ERO Posting: 019-7735**  
**New Act regarding the Duffins Rouge Agricultural Preserve**  
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The Greenbelt Foundation appreciates the opportunity to provide feedback in response to ERO posting #019-7735. We have been a partner to the Province for nearly 19 years in realizing the significant economic, agricultural, and environmental benefits of Ontario's Greenbelt, which is vital to the prosperity and growth of southern Ontario. We look forward to continuing our work together.

This submission is meant to be read together with the Greenbelt Foundation's submission to ERO posting #019-7739, which is on the Greenbelt Statute Law Amendment Act, 2023 (Bill 136).

The Greenbelt is an irreplaceable resource for Ontario residents, supported by 9 out of 10 Ontario residents.<sup>1</sup> It is an economic powerhouse for Ontario, which provides a source of clean drinking water and clean air for millions of Ontario residents, helps build resilience to the impacts of climate change and attracts businesses to the Greater Golden Horseshoe (GGH) region.

In addition to providing fresh air, clean water, local food sources, and outdoor recreation and tourism opportunities, the Greenbelt today provides more than \$9.6 billion in contributions to provincial GDP and directly supports 177,700 full-time jobs. The 2.1 million acres of protected lands of the Greenbelt is home to 78 species at risk and includes 721,000 acres of wetlands, grasslands and forests that provide \$3.2 billion in ecosystem services, \$224 million per year in flood protection, and offsets 71 million tonnes of carbon.<sup>2</sup> It supports nearly 5,000 farm businesses and families that earn 68 per cent more revenue per acre than the average Ontario farm. As Ontario grows, we will need even more of these benefits that the Greenbelt provides.

### *Bill 136 – Greenbelt Statute Law Amendment Act, 2023*

We support the Province's decision to strengthen the legislative protections of the Greenbelt through returning land removed, moving geographic definitions into legislation, reversing the repeal of the Duffins Rouge Agricultural Preserve Act, 2005 and restoring the protections for conservation easements and covenants on lands in the Duffins Rouge Agricultural Preserve (DRAP). If passed, these amendments will help to re-establish a sense of permanence to the protections for the Greenbelt.

The DRAP was the largest site (4,290 acres) removed from the Greenbelt in 2022 and includes significant elements of the Greenbelt's natural, agricultural and water resource systems. It is a uniquely important part of the Greenbelt, given its:

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<sup>1</sup> Data based on 2022 public polling survey commissioned by the Greenbelt Foundation.

<sup>2</sup> Green Analytics. (2016). Ontario's Good Fortune: Appreciating the Greenbelt's Natural Capital. Greenbelt Foundation. Retrieved from [https://www.greenbelt.ca/ontarios\\_good\\_fortune\\_greenbelt\\_natural\\_capital](https://www.greenbelt.ca/ontarios_good_fortune_greenbelt_natural_capital)  
Greenbelt Foundation – ERO 019-7735 Submission (Nov 30, 2023)

- Wildlife corridor matrix including federally and provincial endangered and threatened species, which maintains connectivity between the Greenbelt and the Rouge National Urban Park.<sup>3</sup> The DRAP serves as a significant ecological corridor that is critical to halting and reversing biodiversity loss in southern Ontario;
- Essential natural infrastructure protecting communities and increasing climate resiliency. Duffins and Petticoat Creek provide flood protection to the immediate surroundings and lands downstream, which are prone to floods;<sup>4</sup>
- Large-scale intact farmland and rare, fertile Class 1 soils and prime agricultural lands that support production of high-value food crops such as fruits and vegetables. Only 6.8 percent of Ontario’s land-base is made up of prime agricultural lands. Between 2000-2017, more than 29,000 hectares of prime agricultural lands were converted into non-agricultural uses in Southern Ontario.<sup>5</sup> Having this prime agricultural land located next to urban areas and in close proximity to a supporting agri-food network is rare and irreplaceable.

The continued preservation of the DRAP supports provincial goals and commitments related to growth of the agricultural sector, species-at-risk protection, halting and reversing biodiversity loss and climate resiliency.

## Recommendations

The provincial government is reversing the repeal of the Duffins Rouge Agricultural Preserve Act, 2005 (DRAPA), and reinstating the conservation easements and covenants for the DRAP, through the Greenbelt Statute Law Amendment Act. We support the Province’s commitment to protect the vital agricultural and natural heritage lands within the DRAP.

Outlined below are the Foundation’s main recommendations. For additional recommendations, see our submission to ERO Posting# 019-7739 on the Greenbelt Statute Law Amendment Act.

1. The DRAP was originally protected under the Greenbelt Plan, the DRAPA, the Central Pickering Development Plan and through conservation easements and covenants. **We recommend that Bill 136 be revised to include a new subsection in the Greenbelt Act under section 6(1) (Content of Plan) that states: “specific policies and maps for the Duffins Rouge Agricultural Preserve.”** This amendment would allow the Greenbelt Plan to set out policies for lands within the DRAP.
2. The Greenbelt Statute Law Amendment Act does not reverse the repeal of the Central Pickering Development Plan. **We recommend reversing the repeal of the Central Pickering**

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<sup>3</sup> Eco-Kare International. Wildlands League. (2023). Connectivity and Road Ecology of the Greater Rouge Watershed Featuring the Duffins Rouge Agricultural Preserve. Retrieved from <https://wildlandsleague.org/news/development-in-the-drap-threatens-rouge-national-urban-park/>

<sup>4</sup> Toronto Region Conservation Authority. (November 24, 2022). Submission re: Proposed Amendments to the Greenbelt Plan. (ERO# 109-6126). Retrieved from <https://pub-trca.escribemeetings.com/FileStream.ashx?DocumentId=14026>

<sup>5</sup> Wayne Caldwell and Sara Epp. (2021). Measuring Farmland Loss. Quantifying the Conversion of Prime Agricultural Land to Non-Farmland Uses Across Southern Ontario. Retrieved from <http://www.waynecaldwell.ca/wp-content/uploads/2021/06/volume-1-FINAL.pdf>

**Development Plan, as it provided for an integrated development vision for that area.** That Plan affected an approximate 5,000-hectare area with a vision of a sustainable urban community in Seaton, a flourishing agricultural system in the DRAP and an extensive natural heritage system. The repeal of this Plan undermined a critical part of the interconnected protections and development for the DRAP and surrounding areas including the Seaton lands.

3. **The Province should consider proposals from organizations such as Ontario Farmland Trust to become the body responsible for holding the DRAP’s conservation easements and covenants.** These easement agreements and covenants need to be more closely monitored in collaboration with all the relevant stakeholders to make sure that there is long-term protection of the DRAP and that the lands are being managed to maintain and enhance ecological health including for climate change and biodiversity preservation.
4. **Section 12(2) of the Greenbelt Act should be revised to specify that land cannot be taken out of the Greenbelt, rather than the current language under clause 1(a) that states amendments cannot reduce the total land area within the Greenbelt.**<sup>6</sup>
5. **The Greenbelt settlement area policies in the Growth Plan should be maintained in the new Provincial Policy Statement or moved into the Greenbelt Plan.** The Growth Plan contains policies (i.e., policies 2.2.1.2.b and 2.2.8.3.k) that limit growth and settlement boundary expansions within the Greenbelt, and these policies should be maintained.
6. The proposed repeal of the Growth Plan will remove the maps and policies for the Greater Golden Horseshoe’s Agricultural and Natural Heritage Systems. **We recommend that the Bill 136 should be revised to add a new subsection in the Greenbelt Act under section 6(1) (Content of Plan) that includes the following: “specific policies and maps for the Natural Heritage and Agricultural Systems of the Greater Golden Horseshoe.”**

## Conclusion

The Foundation strongly supports the government’s decision to strengthen the legislative protections of the Greenbelt through returning land removed from the Greenbelt, repealing the reversal of the Duffins Rouge Agricultural Preserve Act, and restoring the conservation easements and covenants for the DRAP. We now have a chance to further ensure the Greenbelt’s permanence by revising the proposed Greenbelt Statute Law Amendment Act to strengthen legislative protections. We look forward to working with the Province to balance the growing need for housing with the protection of farmland and natural heritage systems. We must continue to protect the permanence of the Greenbelt as a critical landscape and invest in it as an important asset for Ontario’s residents.

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<sup>6</sup> Greenbelt Act, 2005. S.O. 2005, c.1. Retrieved from <https://www.ontario.ca/laws/statute/05g01#BK11>

## About the Greenbelt Foundation

The Greenbelt Foundation stewards Ontario's Greenbelt, comprising over two million acres of protected land that provide clean air, fresh water, climate resilience, and a reliable local food source to help Ontario thrive. The Foundation is the only organization solely dedicated to ensuring the Greenbelt remains permanent, protected, and prosperous. Since 2005, we have made investments in the Greenbelt's interconnected natural and agricultural systems to ensure a thriving Greenbelt for all southern Ontario residents.