

November 29, 2023

The Honourable Paul Calandra
Minister of Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto, Ontario M7A 2J3

Re: ERO 019-7739 Proposal to Return Lands to the Greenbelt - Greenbelt Statute Law Amendment Act, 2023

Minister Calandra,

The National Farmers Union of Ontario (NFU-O) commends the Ontario government for introducing legislation to return the 15 parcels of land slated for removal from Greenbelt protections. Protecting these lands will ensure future generations' access to local food, and will contribute to climate change mitigation efforts through the protection of sensitive ecological areas, wetlands, and agricultural lands.

The NFU-O is an accredited farm organization representing thousands of sustainable farmers in Ontario and has advocated for farmers across Ontario since 1969. Members work together to achieve agricultural policies that ensure dignity and income security for farmers, while protecting and enhancing rural environments for current and future generations.

The NFU-O encourages the Ontario government to take further steps to protect the province's farmland, including these 15 Greenbelt sites, as they are an incredible public resource with the potential to contribute to food security, public health, and rural development. Given their future value as prime farmland on the doorstep of Canada's largest urban region, we ask you to ensure that these lands are not only permanently protected, but actively used for local food production. To do so, the NFU-O recommends that the Ministry:

(1) Work with a land trust, such as the Ontario Farmland Trust, to place agricultural easements on all 15 sites returned to the Greenbelt, to guarantee their continued protection for the food security of future generations. A land trust and an agricultural easement will further the protection of these lands, so they cannot be threatened by development again. These 15 Greenbelt sites are located close to urban centres where there is the capacity to support small-scale local food production. We advocate for the management of the lands under an easement to accommodate long-term, secure leases for small-scale farmers to serve local communities and support food security initiatives.

(2) Ensure that the Greenbelt Act allows for regulatory amendments that facilitate the expansion of the Greenbelt's boundaries. We are concerned that the language provided in the ERO proposal to "eliminate the authority to add or remove lands to/ from the Greenbelt Area and

Oak Ridges Moraine Area by regulation” may make it more difficult to increase the size of the Greenbelt.

We agree that going forward, any proposed **removals** “of the Greenbelt boundary must require the approval of the Ontario Legislature through an open, public and transparent legislative process,” but we strongly believe that the legislation should continue to allow for simplified regulatory amendments to **increase** the Greenbelt’s boundaries. Farmland is a finite resource; continuously and strategically expanding the Greenbelt and implementing protections for all farmland in Ontario will guarantee that future generations have secure access to local food.

(3) Improve access to public land registry data, to ensure transparency around who currently owns farmland in the province. Ontarians cannot easily access public information about farmland ownership. Improving public access to land registry data will ensure any lobbying by farmland speculators is open, public, and transparent so that the public and Ontario’s legislators are fully informed about who is involved in lobbying for developments on agricultural and natural heritage lands.

Ontario loses 319 acres of farmland per day. We simply can’t afford to lose more, and we must protect and expand protections on the farmland that remains. Returning the 15 parcels of Greenbelt land is an important first step, but we encourage the government to work with farmers and conservation groups to expand the Greenbelt and farmland protections in the province. Together, we can ensure that local food systems and development initiatives support each other, for the benefit of all Ontarians.

Sincerely,



Max Hansgen
President, National Farmers Union - Ontario