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Ms. Barbara Konyi
Manager
Ministry of Municipal Affairs and Housing
Local Government and Planning Policy Division
Provincial Planning Policy Branch
777 Bay Street, 14th Floor
Toronto, Ontario M5G 2E5

April 30, 2008

Dear Ms. Konyi,

Re: EBR Registry Number 010-2866 Criteria for assessing requests to expand the Greenbelt

The Ontario Farmland Trust is dedicated to raising awareness and education about the unique value of preserving Ontario's farmland and we welcome this opportunity to comment on the proposed criteria for assessing municipal requests to expand the Greenbelt.

From the Ontario Farmland Trust's perspective, there are three main conditions that must be met if the Greenbelt is going to be a place for agriculture to flourish. Criteria for assessing applications to grow the Greenbelt must take into consideration these three points and incorporate significant measures to achieve these conditions. In addition to this initiative to grow the Greenbelt, the Province must take the lead to protect lands that are recognized for having the highest soil and climate capabilities in the province, especially those lands that fall outside of protection afforded by the Greenbelt. It is not enough to allow municipalities to continue make what are often short-sighted land use decisions fuelled by the demand for housing, which impact the availability of one of our most valuable and finite natural resources – our farmland.

Condition#1: Any Greenbelt expansion must clearly recognize the farm economy of the Greenbelt and surrounding areas, including related infrastructural requirements.

If agriculture in the GTA Greenbelt is to remain viable, the processes of innovation and change need to be understood in the context of on-farm business decisions. The infrastructural requirements needed for small processing plants, value-added activities and farm lot sizes needs to be understood in relation to the regulatory obstacles that can lie in the way of those farmers bold enough to plan for change. Knowing and addressing the policies that can help or hinder near-urban farm businesses from flourishing or faltering is essential for the future success of the Greenbelt.

Planning policy for agricultural viability in the GTA Greenbelt needs to identify and address the knowledge gaps in why there may be lack of investment in making changes for a farm business. Statistics show many farms have not developed a new business plan in several years; farmers may feel hesitant to plan too far into the future. One of the major sources of this hesitation may be the changing land uses in the area, especially in areas around the GTA. Understanding the relationship between land ownership vs. rental land, and the perception amongst farmers of the trends in their community will be important factors in adjusting policies toward agricultural viability in the Greenbelt. In those areas that are currently on the outside of the Greenbelt, focused studies of farm business management dynamics, including marketing plans and what crops and products are being grown, as well as general business operations require special attention.

An important part of recognizing the farm economy of the Greenbelt is responding to the potential negative financial impacts of expanding the Greenbelt. The Province and the public must acknowledge that most farm business owners currently rely on their real estate as their only retirement plan. This is not because farm entrepreneurs have not been savvy about their business planning; it is because, due to global factors and market forces beyond the farmer's control, the business of farming has not been profitable enough in recent years to allow farmers to save for a comfortable retirement. Moreover, OMAFRA and financial institutions have encouraged farmers to use their land as an asset, against which they have been allowed to borrow to grow their businesses. When the value of their most important business asset is unexpectedly cut in half (or more) by a government initiative that is in the public interest, we have a responsibility to ensure that we acknowledge and respond to the needs of farmers who are being forced to make huge sacrifices for the greater good.

It is right to take bold action to protect our best farmland for farming, but it is also our duty to protect the farmer by ensuring they have some reasonable option that allows them to retire and for the next generation of farmers to be able to farm their land. Non-profit land trusts do not have the financial base to provide farmers with funds that will allow them to retire. We need the Province to intervene now to provide farmers with retirement and business succession options that do not force farmers to have to fight to sell their most important asset to the highest bidder.

One of the main reasons of ongoing encroachment and pressure on valuable farmlands in southern Ontario and in the GTA in particular is our emphasis on urban economic development. Many of the farmlands that have already been lost to farming have been converted into residential, commercial or industrial development - a form of 'development' that is proving to be increasingly costly on energy demands, municipal infrastructure and services, and, arguably, on our cultural values. The Province should initiate 'cost of community services studies' to help municipalities understand the true draw of urbanizing farmland on the municipal tax base.

Agricultural production and farming, and the businesses that drive this sector are a significant type of 'development' as well. Agricultural production is development that produces food for our consumption, security, health and quality of life. Agricultural development also provides the potential for healthy ecosystems, maintenance of beautiful landscapes and rural tourism. Arguably, agricultural development, from an environmental accounting perspective, will also have different demands on maintaining healthy ecosystems than would be the costs of regulating industries and industrial pollutants on the same landscape.

In this spirit, the OFT emphasizes consideration of two important elements in any Greenbelt expansion. Agricultural production *is* development. Farmlands are not vacant lands; they are part of the infrastructure that supports our second largest industry in Ontario. Especially in the midst of the current global food crisis, we should see agriculture as a critical economic driver, as well as the number one industry that has the capacity to sustain our health and environment into the future. The Greenbelt is not only a protected green space that has innate ecological significance within a major urban region; the Greenbelt is a living and breathing economy, with many private landholders operating farm businesses.

The Greenbelt needs to be recognized for its economy as well as its ecology. Any expansion of Ontario's Greenbelt for the GGH will need to consider what these new regulations and restrictions will mean for existing and potentially new farm businesses. New farmland protection must move in line with farm business development and evolution. New programs to assist existing and potentially new farmers, in developing innovations in agriculture should be supported. This includes all infrastructure, regulatory and business development changes and adaptations. Greenbelt and Greater Golden Horseshoe programs and legal and policy processes must understand this to allow for a vibrant, sustainable and *farm business friendly* environment in the existing and potentially expanded parts of the Greenbelt.

Condition#2: Payments for Ecological Goods and Services will supplement Greenbelt area farm incomes, allowing Greenbelt farmers to meet growing societal demands for healthy agro-ecosystems and complement farmland preservation for food production as part of an overall robust rural economy.

Financial programs that provide rural landowners and farmers with incentives for maintaining and enhancing ecological services on marginal farmlands must be established, with provision to include reinvestment in local food production in these programs as well. Coordination between the Provincial government, the Friends of the Greenbelt Foundation, Conservation Ontario, municipalities in the Greater Golden Horseshoe, as well as food and agriculture organizations should be encouraged in order to establish such a program of payments for ecological goods and services. Funds that are currently being used to maintain unsustainable production subsidies should be redirected to pay farmers for the ecological goods and services they work hard to provide, which benefit us all. A special program for the provision of payments for ecological goods and services in the Greenbelt is one means of supporting farmers who have been financially impacted by the Greenbelt legislation.

Condition#3: Address the need for farm succession planning support in the Greenbelt.

Organized and coordinated efforts between farmers and landowners approaching retirement age and those 'next generation' farmers wishing to enter farming in some capacity should be introduced. Emphasis can be placed on the opportunities for coordinating and linking established farmers with those interested in entering farming as an occupation.

To support this we need solid examples of alternate land-holding arrangements such as long term leases and partnerships, and agricultural easements. This should include an 'agricultural gifts' program for preserving farmland parallel to the current Ecological Gifts Program for preserving natural areas. We also need specific financial and extension programs to support new farmers, whether they are the next generation of today's farmers, new young farmers, second career farmers, or new immigrants from Toronto's ethnically diverse community.

Conclusion:

From the Ontario Farmland Trust's perspective, criteria to consider applications to expand the Greenbelt must pay careful attention to the farm economy. In addition, there is an urgent need to address the issue of leapfrog development in concert with considering applications to grow the Greenbelt. The criteria that requests to expand the Greenbelt must come from municipalities is particularly problematic in addressing the problem of leapfrog development. This problem requires a wider lens and Provincial leadership to ensure a fair solution that ensures landowners are treated equally across the province.

Some of the most significant, richest and most capable farmlands in Canada are near, but not within the Greenbelt. These lands are in many cases not permanently protected and will be subject to future urban development pressure. Particular effort and focus on preserving these lands should be given priority. Specific knowledge and evidence of leapfrog development should be revealed and examined publicly. As a policy direction, organizations and various levels of government in Ontario should consider the relevance and experience from the British Columbia Agricultural Land Reserve, as well as the actions taken in Quebec over several decades to protect and preserve farmland in these two provinces. The Ontario Farmland Trust is calling for the creation of an Agricultural Priority Region for all of the best (Class 1, 2 and 3) farmland in southern Ontario, where farming would always have priority over urbanization.

We need to take bold steps to protect our finite supply of productive farmland, just as we have to protect our precious natural heritage lands like the Niagara Escarpment and Oak Ridges Moraine, for our farmland is truly the land that sustains us. Funds such as an earmarked land transfer tax and financial incentives such as a federal Agricultural Gifts Program (like the Ecological Gifts Program) need to be made available to secure threatened agricultural lands, not just natural heritage sites.

This combination of actions and concerns are what motivate the Ontario Farmland Trust regarding any considerations of Greenbelt expansion.

Sincerely,

Stew Hilts
Chair, Ontario Farmland Trust