



April 2nd, 2021

The Honourable Jeff Yurek
Minister of Environment, Conservation and Parks
College Park 5th Floor
777 Bay Street
Toronto, ON
M7A 2J3

RE: 10-Year Review of the Lake Simcoe Protection Plan

Dear Minister Yurek,

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated agricultural, natural, and cultural features of the countryside. We protect farmland in order to ensure a safe and sustainable food supply for future generations of Ontarians. OFT achieves this through direct land securement, stewardship, policy research, and education.

Thank you for the opportunity to submit feedback during the Minister's 10-Year review of the Lake Simcoe Protection Plan. OFT is pleased to continue working with the province to improve planning practices and strengthen policy protection for farmland.

OFT would like to see strengthened support for the farmland in the Lake Simcoe Protection Plan. This will ensure that future generations have access to local farmland and food.

Ontario's farmland is a finite and non-renewable resource. It is the foundation of one of the province's largest economic sectors, the agri-food sector. The provincial agri-food sector annually contributes over \$47 billion to the GDP and employs more than 837,000 Ontarians along the supply chain¹. Farmland also provides important ecosystem services to surrounding communities as part of the natural heritage system. These services include water retention and filtration, wildlife habitat, and carbon sequestration, among others. Farmland is an integral part of the countryside, and should be valued for the natural services it provides in addition to the commercial goods it produces.

Despite its integral role in the provincial economy and its environmental benefits, farmland continues to be lost at an alarming rate. Non-agricultural development, such as urban expansion, on farmland causes 175 acres of farmland to be lost every single day in Ontario². This not only negatively impacts the long-term viability of the agri-food sector, but it also has consequences for the surrounding landscape.



When development occurs on farmland, the impacts are far-reaching. Farmland is capable of absorbing and storing rainwater, which enables it to delay the rainwater from entering into rivers and streams for a small period of time. This is beneficial because it prevents downstream erosion and flooding by slowing the speed at which water enters and runs through a watercourse. In contrast, non-agricultural development on farmland creates impermeable surfaces which prevent rain and meltwater from infiltrating the soil, instead, sending it into stormwater management systems. This puts more pressure on these systems, and does not give the soil the opportunity to filter the water of any pollutants it may have picked up. As a result, any pollutants present in the water may pass directly into the water system, which can impact the health of the body of water that receives the water. Reducing phosphorus levels in Lake Simcoe has been a focus for the Lake Simcoe Protection Plan in the past. It is worth noting that modern farming techniques actually release less phosphorus into the water than high-intensity development³, due to the permeable nature of farmland versus the impermeable nature of development. Additionally, water that falls on impermeable surfaces as such does not get the chance to recharge groundwater levels, whereas water that falls on farmland and natural habitat is able to absorb into the soil.

OFT believes that protecting farmland is crucial to the health of Lake Simcoe, and that there should be strengthened protections for farmland within the Lake Simcoe Protection Plan.

Recently, through changes to provincial plans such as the *Provincial Policy Statement* (PPS), the Province has demonstrated their dedication to Ontario's agricultural sector by expanding the emphasis on the Agricultural System, which OFT would like to commend. The Agricultural System helps to promote a contiguous agricultural land base which prevents land fragmentation and protects Ontario's finite supply of farmland. OFT recognizes the Province's ongoing commitment to Ontario's agricultural sector, and appreciates the efforts that have been made to protect farmland through such changes. OFT would like to see this commitment to the provincial agricultural system extended into the review of the Lake Simcoe Protection Plan.

Thank you for the opportunity to submit feedback during the Minister's 10-Year review of the Lake Simcoe Protection Plan. We invite discussion and welcome any questions you might have. We look forward to continuing to work with the Province to strengthen the Agricultural System and to protect the long-term viability of Ontario's agricultural sector.

Most Sincerely,

Kathryn Enders,
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Cc:

The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
Peggy Brekveld, Ontario Federation of Agriculture
Don Ciparis, National Farmers Union – Ontario
Suzanne Armstrong, Christian Farmers Federation of Ontario
Anne Bell, Ontario Nature
Tim Gray, Environmental Defence

References:

- [1] Ontario Federation of Agriculture. 2020. Agriculture Matters – A Guide for Municipal Councillors and Staff. <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [2] Statistics Canada. 2016. Census of Agriculture.
from <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3210040701&pickMembers%5B0%5D=1.1063&cubeTimeFrame.startYear=2011&cubeTimeFrame.endYear=2016&referencePeriods=20110101%2C20160101>
- [3] Hutchinson Environmental Sciences Ltd. Et al. 2012. Phosphorous Budget Tool in Support of Sustainable Development for the Lake Simcoe Watershed. <https://www.aurora.ca/en/business-and-development/resources/Environment-and-Sustainability/Phosphorus-Budget-Guidance-Verison-2-1.pdf>