



January 29th, 2021

Ministry of Municipal Affairs and Housing
Provincial Planning Policy Branch
777 Bay St., 13th Floor
Toronto, ON
M5G 2E5

RE: ERO Registry #019-2811 for input on Proposed implementation of provisions in the Planning Act that provide the Minister enhanced authority to address certain matters as part of a zoning order

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 on the implementation of new provisions in the Planning Act passed through Bill 197 the *COVID-19 Economic Recovery Act, 2020* regarding Minister's Zoning Orders (MZOs). OFT has played an active stakeholder role in other provincial land use planning policy reviews and is pleased to continue working with the Province to strengthen policy direction in Ontario.

Ontario's agri-food sector is the largest economic sector in the province, employing more than 837,000 Ontarians along the supply chain and annually contributing over \$47 billion to the province's GDP¹. In rural areas, the agri-food sector is even more important, as roughly 12% of the GDP and 10% of rural jobs are associated with agriculture². Agricultural land is the base of the agri-food sector, and it is a finite resource. Only 0.5% of Canada's agricultural soil is classified as Class 1, and about half of the entire country's Class 1 soil is found in Ontario³. In order to preserve the viability of Ontario's agri-food sector, it is crucial that the province's finite supply of agricultural land is protected.

OFT would like to acknowledge the commitment the Province has shown to the Agricultural Systems planning approach through recent policy amendments. This planning approach works to protect farmland and the related network of infrastructure that the agricultural sector relies on. Planning using this approach helps to protect the long-term viability of Ontario's agricultural industry by preventing non-agricultural development from fragmenting the province's agricultural land base. OFT would like to commend the commitment to Ontario's agricultural sector that the Province has shown through the ongoing policy developments that implement the Agricultural System and provide direction to municipal land use planners.

However, OFT is concerned that the changes to the Planning Act that enhance the Minister's ability to issue MZOs throughout the province may jeopardize farmland and negatively impact the intent of the provincial Agricultural System.



Historically, MZOs were introduced into provincial legislature to allow the Minister to make land use planning decisions over land that had no official plan, and in rare extenuating circumstances where there was provincially significant impact. OFT recognizes that MZOs are necessary in some rare instances that have a major provincial benefit; however we do not see the merit in expanding their use into areas where there is comprehensive municipal zoning already in place. In order to ensure that MZOs are being used appropriately and responsibly, OFT would like to suggest that the Province defines what reasonable provincial interests may warrant the use of an MZO.

The global COVID-19 pandemic has reinforced the importance of local food sources and a strong food supply chain. Even though many grocery stores saw empty shelves at the beginning of the pandemic, Ontario's agri-food sector proved itself to be resilient and durable. The province's agricultural sector has been crucial in the province's economic recovery from the pandemic thus far, and OFT believes that the only way for Ontario's agricultural sector to remain secure in the future is to protect the province's agricultural land base. OFT feels that the use of MZOs to convert farmland into non-agricultural uses prioritizes other economic sectors over agriculture in the province's COVID-19 recovery plan, and would like to sincerely caution against this practice that will ultimately damage the viability of Ontario's agricultural sector.

OFT believes that MZOs should not be expanded from their traditional role of providing guidance to municipalities lacking comprehensive land use planning, as local governments already have sufficient land use planning guidance from the Province. OFT suggests that the enhanced authority on this issue as provided in Bill 197 should be repealed, and that measurable standards regarding the provincial significance of a project are introduced into the MZO approval process.

Thank you for this opportunity to share our recommendations and feedback on the implementation of new provisions in the Planning Act passed through Bill 197 the *COVID-19 Economic Recovery Act, 2020* regarding Minister's Zoning Orders (MZOs). We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with the Province further.

Most Sincerely,

Kathryn Enders
Executive Director
Ontario Farmland Trust



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] Ontario Federation of Agriculture. 2013. Economic Contribution of the Ontario Farm Sector 2013. <https://ofa.on.ca/resources/economic-contribution-ontario-farm-sector-2013/>
- [3] Environment Canada. 1976. Canada Land Inventory: Land Capability for Agriculture. [https://atrium.lib.uoguelph.ca/xmlui/bitstream/handle/10214/15222/LUPSD_land_capability_agric_rep10_1976.pdf?sequence=1&isAllowed=y#:~:text=6.,Class%201%20to%203%20soils\).](https://atrium.lib.uoguelph.ca/xmlui/bitstream/handle/10214/15222/LUPSD_land_capability_agric_rep10_1976.pdf?sequence=1&isAllowed=y#:~:text=6.,Class%201%20to%203%20soils).)