



October 2, 2017

Helma Geerts, Policy Advisor
Ministry of Agriculture, Food and Rural Affairs, Policy Division
Food Safety and Environmental Policy Branch
1 Stone Road West, Floor 2
Guelph, Ontario
N1G 4Y2

Dear Ms. Geerts:

RE: Release of draft Agricultural System mapping and Implementation Procedures for consultation EBR Registry # 013-0968

Thank you for the opportunity to submit feedback on the draft agricultural land base mapping, agri-food network, and “Implementation Procedures for the Agricultural System in Ontario’s Greater Golden Horseshoe” (GGH). 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. OFT achieves this through direct land securement, stewardship, policy research and education to benefit all Ontarians.

OFT appreciates the Ontario Ministry of Agriculture, Food and Rural Affairs’ (OMAFRA) dedication to supporting agricultural viability and protection in Ontario. OFT has played an active stakeholder role within the Coordinated Land Use Planning Review consultation process since 2015 and is pleased to continue to work with the Province to strengthen the Agricultural System’s products, implementation, and supportive tools as they are developed.

OFT applauds OMAFRA’s work developing the three draft Agricultural System products: (1) *Draft Implementation Procedures for the Agricultural System in Ontario’s Greater Golden Horseshoe*, (2) *Draft Agricultural Systems Portal*, and (3) *Draft Agricultural Land Base Map*. These products will play an important role in supporting municipalities as they refine and implement the Agricultural System by clarifying policy methodology and intent, as well as providing information on supportive implementation tools. These tools will also help to support and inform OFT’s work in providing permanent farmland protection through farmland easement agreements.

Although the draft Agricultural System offers promising protection for the GGH’s agricultural lands and agri-food sector, OFT has the following recommendations to strengthen the Agricultural System products and provide more robust protections for

agricultural lands. These recommendations fall under three broad themes, the need for firm agricultural system boundaries, LEAR methodology, and additional support for municipal decision makers:

Firm Agricultural System Boundaries

- It is the intent of the Agricultural Land Base to create a long-term and continuous system of protected prime agricultural areas, rural lands, and specialty crop areas across the GGH as identified within the *Draft Implementation Procedures* in **sections 1.6, 3.1.3, 3.1.1.1, 3.1.1.2**. **Section 3.1.1** allows for minor refinements of lands designated as prime agricultural areas.

1) OFT recommends the Province provide further clarification on ‘minor refinements’ within prime agricultural areas to ensure that the Agricultural System remains continuous across the GGH in the long-term.

- Firm boundaries provide the certainty farmers need to make informed long-term decisions about investments in their operations. As land values rise and urban expansion occurs, access to rental lands and the future of agricultural land becomes less certain. This is consistent with the information provided by agricultural stakeholders in *Draft Implementation Procedure sections 1.4, 1.6* and in **section 3.2.2.2** regarding Regional Agri-Food Strategies. Great success has been seen in areas, such as the Region of Waterloo, where firm urban boundaries are established and farmers on the "fringe" are able to continue to farm with certainty.

2) OFT recommends that the Province ensures the Agricultural Land Base boundaries are firm to prevent uncertainty and allow the Agricultural Land Base and the businesses and culture therein to thrive.

LEAR Methodology

- OMAFRA must consider many different factors that make agricultural land viable to successfully implement a robust agricultural systems approach. Low LEAR scoring areas within the land base may have a high level of agricultural potential that municipal LEARs could miss as land may have gone out of production in recent years but remains potentially valuable. Including the potential of agricultural land that is currently not in production as a factor in municipal LEARs could be encouraged by the Province. This could be measured through the historical use of agricultural land. OMAFRA should also consider encouraging the use of cultural factors in municipal LEARs. Maintaining rural communities’ culture is an important step in preserving Ontario’s Agricultural System. Culture could be included as a factor to consider within local municipal LEARs during the refinement process (**section 3.1.1** *Draft Implementation Procedures*). Measurements of culture could include a cultural

community profile or the community's agricultural heritage. These considerations are important as low LEAR scores put viable agricultural land at risk for loss.

- 3) **OFT recommends that OMAFRA encourages municipalities conducting local LEARs to consider agricultural potential as a factor within the refinement process.**
- 4) **OFT recommends that OMAFRA encourages municipalities conducting local LEARs to consider culture as a factor during the refinement process.**

Additional Municipal Support

- The *Draft Implementation Procedures* **section 3.1.1 Municipal Refinement of the Agricultural Land Base** speaks to the potential municipal refinement of the Agricultural Land Base and implementation of the land base in municipal official plans. These refinements will be important to the overall scope of the land base and will give insight into local considerations of important agricultural areas in each municipality and region. OMAFRA must support municipalities by providing technical studies, criteria, and methods of evaluation.
- 5) **OFT calls on OMAFRA to ensure that LEAR methodology be reviewed and updated when necessary to address the direction of provincial policies and that these updates be released to municipalities to ensure they make informed land protection decisions.**
- Within the Agricultural System for the GGH, OMAFRA has developed an interactive Agricultural System Portal and an Agricultural Land Base Map. These tools are important for municipalities developing their own official plans for growth that consider the agri-food system and maintain the vital areas and lands that make up the Agricultural System. The Agricultural System Portal will also be used to inform municipal decisions on investments, expansion, infrastructure, and *Agricultural Impact Assessments* across the GGH (**section 3.2.1** of the *Draft Implementation Procedures*). Up to date and accurate information is critical to the decision-making process.
- 6) **Therefore, OFT recommends that the Province update the Agricultural System Portal on a timely basis.**
 - 7) **OFT recommends that data sets used to inform the portal are made accessible to single, upper, and lower tier municipalities to ensure they are able to implement this system into current planning practices.**
 - 8) **OFT recommends that the online portal focus on a provincial scale to ensure that changes are consistent and municipalities can use the data when considering planning decisions that cross multiple municipal and regional boundaries.**

OFT would like to applaud the decision of the Province to include the following within its Agricultural System:

- **Consultation and Providing Implementation Tools**

OFT appreciates OMAFRA's consultation efforts and its provision of implementation documents and tools. Providing additional consultation webinars to ensure that farmers were given the opportunity to provide feedback was an important step in providing a meaningful consultation process. Stakeholder engagement from a variety of sources during the consultation process is critical in developing a structured and consistent agricultural system and associated implementation tools. OFT applauds OMAFRA's reference to using agricultural easements and land trusts to protect farmland in *Draft Implementation Procedures* **section 3.2.4**. Farmland easement agreements are an important tool in supporting the long-term viability of the Agricultural System.

- **Agricultural Systems Approach**

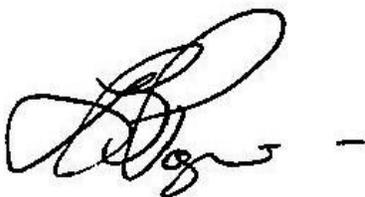
OFT commends the province for moving towards a holistic approach and appreciates that the Agricultural System considers the agricultural land, economic, environmental, and cultural components of the GGH and how they are interconnected (*Draft Implementation Procedures* **sections 1.2, 2.1, and 2.1.2.4**).

- **Extent of Land Base**

OFT appreciates the extent of the Agricultural System within the GGH and its inclusion of a wide range of land types within its borders, rather than solely focusing on prime agricultural land. OFT applauds OMAFRA's commitment to a continuous land base with consistent nomenclature.

Thank you for the opportunity to share our recommendations and feedback on the proposed amendments to EBR Registry # 013-0968. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with you further to strengthen the protection of agricultural land resources and provide a secure future for our vibrant farming communities in the GGH.

Most Sincerely,

A handwritten signature in black ink, appearing to read 'Bernard Pope', followed by a horizontal line.

Bernard Pope, Chair