



November 16, 2022

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

RE: ERO Registry #019-6161 for input on Conserving Ontario's Natural Heritage

Dear Minister Clark,

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated ecological lands through direct land securement, stewardship, policy research, and public education. Our goal is to ensure a safe and sustainable food supply for future generations in this province by protecting farmland in perpetuity.

With growing food insecurity in the province and the world, it is more important than ever before that we protect the finite and non-renewable resource that is our agricultural soil. Ontario's farmland directly supports the agri-food sector, which is the largest economic sector in the province, employing more than 860,000 Ontarians along the supply chain and annually contributing over \$47 billion to the province's GDP¹. 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.

In the past, OFT has commended the Province's commitment to the policies that strengthen agriculture in Ontario. We recognize the need to address issues of housing availability and affordability, however, OFT would like to encourage the Province to continue showing a strong commitment to Ontario's agri-food sector by making policy decisions that protect agricultural systems, agricultural land and food security and support the continued production of local food.

The housing crisis facing Ontario is a real and wide-spread problem, however, OFT is concerned that the provincial policy changes in Bill 23 will not provide an effective solution. If this crisis is not addressed effectively, it will only exacerbate the other challenges Ontarians have to face, such as rising food insecurity, rising land prices, and the destruction of the agricultural system in Ontario.

OFT does not believe that an offsetting policy should be implemented, but rather that original protections for farmland and natural habitat should be maintained and strengthened.

While many places around the world have offsetting policies to try and mitigate the effects of development on natural ecosystems, the efficacy of these policies and programs is highly debated.

Studies show that in order for mitigation to be effective, significant and thorough, policies and regulations need to be set up *prior* to the offsetting policies being implemented². The International Union for Conservation of Nature (IUCN) states that offsetting policies need to be "measurable and appropriately implemented, monitored, evaluated and enforced, and take full account of direct, indirect and cumulative



impacts, geographically and over time”, and that offsetting should only be used as a “last resort”³. Based on the discussion paper provided, OFT does not feel that the appropriate time and considerations have been dedicated to this concept of offsetting and all of the implications it will have for Ontarians.

OFT is also concerned that wetland offsetting will disproportionately affect farmland. As it is generally already cleared due to the farming activity, farmland may be seen as the ideal place for wetlands to be created, due to the ease of construction. This approach will only add to the development pressures currently facing farmland, and put more farmland at risk.

Ontario needs an increased housing supply, but what is proposed in Bill 23 is not an effective solution. Ontarians need affordable, high-density housing solutions that provide residents with easy, walkable, access to public transit and amenities⁴. New development built upon annexed farmland and natural areas are not an equitable solution to the housing crisis, and will only serve to magnify both the climate crisis and food insecurity.

Thank you for this opportunity to share our recommendations and feedback on ERO 019-6161. We sincerely hope you take our suggestions into consideration when reviewing the feedback you receive. If you have any questions or would like to speak further on these issues, please do not hesitate to get in touch. We look forward to continuing to work with the Province to strengthen the agricultural system and protect the viability of the agricultural sector.

Most Sincerely,

Martin Straathof
Executive Director
Ontario Farmland Trust

Bernard Pope
Chair, Board of Directors
Ontario Farmland Trust

Margaret Walton
Chair, Policy and Education Committee
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] Levrel et al. (2017). Should we be wary of mitigation banking? Evidence regarding the risks associated with this wetland offset arrangement in Florida. *Ecological Economics*. 135:1336-149.
- [3] *International Union for Conservation of Nature (IUCN)*. (2016). Issues Brief: Biodiversity Offsets. Retrieved from <https://www.iucn.org/resources/issues-brief/biodiversity-offsets>
- [4] Jacobus, R. (2019). Inclusionary housing: Creating and maintaining equitable communities. *Lincoln Institute of Land Policy*. <https://www.jstor.org/stable/pdf/resrep22075.pdf>