



December 1, 2021

The Honourable David Piccini
Minister of Environment, Conservation & Parks
777 Bay St., 5th Floor
Toronto, ON
MZA 1Z8

RE: Bradford Bypass Project

Dear Minister Piccini,

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

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 contributes over \$47 billion to the GDP and employs more than 837,000 Ontarians along the supply chain¹. About half of the entire country's Class 1 soil is found in Ontario and 42% of this Class 1 soil is located within the Greater Golden Horseshoe (GGH)². Additionally, the GGH is home to specialty crop areas with microclimates that allow for the production of crops that can not be grown elsewhere. As such, it is crucial to protect Ontario's agricultural lands from non-agricultural development for the long-term viability of the province's agri-food sector.

In the most recent *Provincial Policy Statement* (PPS), and "Amendment 1" to the *Growth Plan for the Greater Golden Horseshoe*, the Province showed a significantly expanded emphasis on the agricultural system, which OFT would like to commend. The agricultural system helps to protect the limited amount of prime agricultural land in the province by preventing this land base from fragmentation as a result of non-agricultural development. OFT recognizes the Province's ongoing commitment to Ontario's agricultural sector and appreciates the efforts to protect farmland through the expansion of the agricultural system.

However, OFT is concerned about the recent decision on October 7, 2021, to exempt the Bradford Bypass from Ontario's *Environmental Assessment Act*. While OFT acknowledges the transportation needs of our growing population, those needs should not come at the expense of compromising the farmland that will nourish and sustain these same residents.

By cutting through an established farming area, the construction of this highway will result in thousands of acres of prime and specialty farmland being taken out of production. The protections provided by the Greenbelt were put in place to help preserve the regional agricultural system by preventing fragmentation of the agricultural land base that results from non-agricultural development on farmland.



The Province's decision to proceed with a project that will result in farmland loss and fragmentation to the agricultural land base in the GGH contradicts the dedication to the agricultural system that the Province has previously shown.

In addition to the thousands of acres of farmland that would be directly lost due to the Bradford Bypass, history has shown that the construction of this highway will increase development pressure on the adjacent lands, leading to the further loss of farmland in the area. Transportation corridors attract urban development by increasing commutable distance to employment centres, thus increasing development pressures in new ways. In addition to pressures for residential growth, large, land extensive uses such as distribution centres are attracted to these corridors increasing pressure on established agricultural operations.

The recent COVID-19 pandemic has strongly underscored the need to build stronger communities and maintain a resilient local food system. With a rapidly growing population, it is important now more than ever to ensure food security is a top priority.

We urge you to reconsider your decision to exempt the Bradford Bypass from the *Environmental Assessment Act*. Engaging in a comprehensive process to consider the impacts and alternatives to the current plans is essential to protecting and managing the non-renewable, provincial agricultural resource.

Thank you for the opportunity to share our feedback. 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 to protect the viability of the agricultural sector.

Most Sincerely,

Kathryn Gold
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kathryn@ontariofarmlandtrust.ca



Cc:

The Honourable Doug Ford, Premier of Ontario

The Honourable Caroline Mulroney, Minister of Transportation

The Honourable Marie-Claude Bibeau, Minister of Agriculture and Agri-food

The Honourable Lisa Thompson, Minister of Agriculture, Food and Rural Affairs

The Honourable Steve Clark, Minister of Municipal Affairs and Housing

The Honourable Kinga Surma, Minister of Infrastructure

The Honourable Norman Sterling, Chair of Greenbelt Council

Anne Bell, Director of Conservation and Education, Ontario Nature

Tim Gray, Executive Director, Environmental Defence

Krista Long, Executive Director, National Farmers Union Ontario

Paul Maurice, Director Zone 13 (Peel, Simcoe and York), Ontario Federation of Agriculture

Suzanne Armstrong, Director of Policy & Research, Christian Farmers Federation of Ontario

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] Environment Canada. 1976. Canada Land Inventory: Land Capability for Agriculture.

[https://atrium.lib.uoguelph.ca/xmlui/bitstream/handle/10214/15222/LUPSD_land_capability_agr%20ic_rep10_1976.pdf?sequence=1&isAllowed=y#:~:text=6.,Class%20to%203%20soils\)](https://atrium.lib.uoguelph.ca/xmlui/bitstream/handle/10214/15222/LUPSD_land_capability_agr%20ic_rep10_1976.pdf?sequence=1&isAllowed=y#:~:text=6.,Class%20to%203%20soils)