



August 10th, 2020

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
Provincial Policy Branch
777 Bay Street, 17th Floor
Toronto, ON
M5G 2E5

RE: Minister's Zoning Orders

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.

Ontario's agri-food sector is the largest economic sector in the province, employing more than 820,000 Ontarians along the supply chain and annually contributing over \$39 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.

Recently, through changes to provincial plans such as the *Provincial Policy Statement* (PPS), and the proposed "Amendment 1" to the *Growth Plan for the Greater Golden Horseshoe*, the Province has shown a significantly expanded emphasis on the Agricultural System, which OFT would like to commend. The Agricultural System helps to protect the finite 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 that have been made to protect farmland through the expansion of the Agricultural System.

However, OFT is concerned about the recent use of Minister's Zoning Orders (MZOs) in established municipalities that may jeopardize farmland and the viability of the province's Agricultural System.



Initially, MZOs were introduced into provincial legislature to allow for the Minister to make decisions over land that had no official plan⁴, and in specific extenuating circumstances when a provincial issue was in question. MZOs are still described on the Ministry of Municipal Affairs site as rarely used in municipalities that have existing zoning by-laws⁴. However in this term of government, the Province has introduced more MZOs than the previous governments introduced in the ten years prior. Many of these MZOs expedite residential development in areas where there is complete and comprehensive municipal land use planning in place. This shows a disregard for the intended purpose of this legislative tool, and sets a dangerous precedent that MZOs may be used to forego the processes that have been put in place to protect Ontario's finite resources, including agricultural land.

OFT recognizes that MZOs are necessary in areas of the province where there is no official plan and in certain extenuating circumstances. There is a long tradition of the Province using MZOs appropriately, and we do not see the merit in expanding their use into areas where there is comprehensive municipal zoning already in place. These municipal plans are based on research about the needs of the community, and generally work to preserve the resources that are vital to the local economy, such as farmland. Additionally, these municipalities are still bound by provincial land use planning legislation and have created their local municipal plans in accordance with provincial direction. As such, these areas of the province that already have comprehensive land use planning in place do not require additional guidance from the province in the form of MZOs.

OFT believes that the use of MZOs should not be expanded from their traditional role.

Thank you for the opportunity to share our feedback on the use of Minister's Zoning Orders. 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 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
The Honourable Marie-Claude Bibeau, Minister of Agriculture and Agri-Food
MP Jennifer O'Connell
MP Mark Holland
MP Doug Shipley
MPP Peter Bethlenfalvy
MPP Rod Phillips
MPP Doug Downey
Mayor Dave Ryan
Mayor Shaun Collier
Mayor Jeff Lehman
Mayor Harry Hughes
Sarah Bakker, National Farmers Union – Ontario
Keith Currie, Ontario Federation of Agriculture
Ed Scharringa, Christian Farmers Federation of Ontario
Mary Delaney, Land Over Landings

References:

- [1] Ontario Federation of Agriculture. 2018. 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%20to%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%20to%20soils).)
- [4] Ontario Ministry of Municipal Affairs and Housing. 2020. Citizen's Guide to Land Use Planning. <https://www.ontario.ca/document/citizens-guide-land-use-planning/zoning-bylaws#section-12>