



January 15, 2019

Ken Petersen
Provincial Planning Policy Branch
777 Bay Street, 13th Floor
Toronto, ON
M5G 2E5

RE: EBR Registry # 013-4239 for input on the proposed New Regulation for the Open-for-Business Planning Tool.

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.

Thank you for the opportunity to submit feedback on the proposed New Regulation for the Open-for-Business Planning Tool. OFT has played an active stakeholder role in the development of policies that support a prosperous, sustainable and permanent agricultural sector, including those contained in the Growth Plan, Greenbelt Plan, and Oak Ridges Moraine Conservation Plan. In an effort to continue working with the Province to develop responsible planning policies that support the agri-food sector, OFT has detailed its concerns regarding the proposed New Regulation for the Open-for-Business Zoning By-Law in the following document.

Ontario's agri-food sector is a major economic engine for the province. In terms of job creation and economic growth, a 2018 report confirmed that the agri-food sector contributes over \$39 billion to Ontario's GDP and employs more than 820,000 Ontarians in the supply chain [1]. This contribution is overwhelmingly significant in rural areas, where roughly 12% of the GDP and 10% of rural jobs are attributed to the farm sector [2]. Ontario is also positioned favourably to attract agricultural and manufacturing investment because it is a global leader in the agri-food industry and houses one of the largest agri-food hubs in North America. This, in turn, generates growth in employment and GDP.

OFT believes that the proposed Open-for-Business Zoning By-Law (OFB-ZBL) places the agri-food sector and its substantial economic benefits at an unacceptable level of risk. Furthermore, the proposed New Regulation provides few details on when an OFB-ZBL is appropriate and states a seemingly arbitrary threshold for job creation that undermines the value of farmland as rural employment land and its spin-off employment effects. As such, **OFT recommends that the proposed Open-For-Business Planning Tool and related New Regulation be rejected.**



The following section outlines some of the proposed OFB-ZBL's threats to the farm sector and suggests alternative actions to improve the province's business environment while attracting agri-food investment.

Threats to the Farm Sector

The proposed Open-For-Business Zoning By-Law could open up for development farmland that is either currently protected (e.g. through the Greenbelt Plan) or is outside of projected municipal growth areas. This negatively impacts the farm sector in a number of ways.

The proposed OFB-ZBL:

- **Threatens to pave over and permanently destroy productive farmland.** Protecting Ontario's farmland is absolutely critical for the success of the farm and agri-food sectors. The loss of this land to non-agricultural uses is irreversible and negatively impacts Ontario's economy, food security, and agri-food investment potential.
- **Risks farmland fragmentation and the dismantling of the agricultural system.** A successful agri-food sector relies on a healthy farm sector, which requires access to a contiguous agricultural land base with a system of supportive infrastructure, agricultural services, distributors, and processors. Ongoing municipal-level processes to implement the Agricultural System for the Greater Golden Horseshoe are working to protect this requirement. Both farmland and the agricultural system could be fragmented by OFB-ZBL facilitated development approvals that are not congruent with municipal or provincial planning and policies.
- **Will dramatically inflate farmland prices as speculation and land banking increases and further reduce affordability for farmers.** Reducing farmland affordability and ownership by farmers will damage the agri-food sector because there is no long-term land-use certainty for farmers to invest in their business.
- **Introduces conflicting land uses adjacent to land used for agricultural purposes.** This disadvantages both producers and those on adjacent properties and ultimately makes it more difficult for farmers to continue running financially sustainable farm businesses, can interrupt normal farm practices, and can create conflict with neighbors.
- **Re-introduces uncertainty around the permanent protection of land for agriculture and agribusiness.** Uncertainty about the ongoing protection of land for agriculture discourages investment in agriculture and leads to a deterioration in the resource and the agricultural community associated with it. This will weaken the agri-food sector.
- **Increases the agricultural sector's vulnerability to the adverse effects of climate change.** The agricultural and natural lands threatened by the proposed OFB-ZBL help to offset adverse effects by providing services including carbon storage and flood management. Destroying these lands increases farmers' vulnerability.



- **Places water quality at an unacceptable level of risk.** Agricultural properties rely on clean ground water for drinking, livestock, and irrigation water. Bypassing water protection policies using the OFB-ZBL endangers the safety of rural Ontarians with potentially significant health and economic impacts.

Actions to Improve Ontario's Business Environment

While the OFT is opposed to the proposed Open-for-Business Zoning By-Law we acknowledge that there are other actions that can be taken to improve the business environment in the province and attract investment in the agri-food sector, including:

- Coordinating the actions of provincial ministries so they work as a team to facilitate appropriate development
- Adopting an online 'single portal' approach to planning applications, approvals, and communications between government agencies and applicants
- Providing greater recognition and promotion of the agri-food sector as an economic engine in the province
- Promoting job creation and investment opportunities that recognize and support agricultural business potential in rural areas. Farmland is rural employment land and employment in one sector should not place jobs at risk in another, which is the current reality of the OFB-ZBL and Schedule 10 of the proposed Bill 66, *Restoring Ontario's Competitiveness Act, 2018* given the risks they will create for agricultural viability.
- Creating land-use certainty by using existing planning or policy tools to permanently protect critical sector resources including farmland and the agricultural system.

The OFT is eager to work with the provincial government to achieve this vision.

Thank you for this opportunity to share our recommendations and feedback on the proposed New Regulation for the new Open-for-Business Planning Tool. We believe that Ontario has an opportunity to position itself as a national and global leader in strategies that blend environmental/farmland protection and economic growth and is capable of setting an example of how economic prosperity need not be at the expense of the environment. We invite discussion and welcome any questions you might have regarding our submission.

Most Sincerely,

Kathryn Enders
Executive Director
Ontario Farmland Trust



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/>