



February 15, 2023

The Honourable Steven Guilbeault
Environment and Climate Change Canada
House of Commons
Ottawa, ON K1A 0A6

**RE: Duffins Rouge Agricultural Preserve –
Federal Action Needed to Protect the Integrity of Rouge National Park Ecology & Agriculture**

Dear Minister Guilbeault,

I am writing today to urge you to take immediate action to intervene and prevent the Province of Ontario from removing protections from the Duffins Rouge Agricultural Preserve (DRAP). Ontario Farmland Trust (OFT) is very concerned that if this area is not protected, the agricultural and natural heritage systems of Ontario will sustain irreversible damage.

DRAP is a unique feature within Ontario's landscape. Protected first with conservation easements in 2003, and then added to the Greenbelt in 2005, the prime agricultural lands within DRAP are a valuable resource that local farmers and community members thought they could rely on in perpetuity. These lands, combined with those in Rouge National Urban Park, provide key ecosystem services for the surrounding communities and sustain a thriving local agricultural system.

Ontario contains over half of all of Canada's prime agricultural soils, despite the fact that farmland makes up less than 5% of the province's land base. Prime agricultural soils are some of the most productive farmlands, and they are a precious and finite resource that needs to be protected for the benefit of future generations. Despite this, the latest Census of Agriculture indicates that Ontario is losing 319 acres of farmland every day¹. At this rate, **Ontario's farmland in production today will be entirely lost within 100 years**, increasing food insecurity, economic losses, and environmental damage that will undermine the resiliency of future generations.

The majority of the lands protected within the DRAP are prime agricultural lands. It is likely that the Province's recent, regrettable, decision to repeal the preserve and remove DRAP lands from the protected countryside of the Greenbelt will result in these irreplaceable soils being developed and lost to agriculture forever.

The Province's decision to remove DRAP protections and alter the Greenbelt boundaries will have a negative impact on the Rouge National Urban Park. Their decision to proceed without consultation with Parks Canada goes against the Memorandum of Agreement between Parks Canada and Ontario. This agreement stated that any changes to applicable provincial policies, such as the Greenbelt Plan, would require consultation with Parks Canada to ensure the long-term viability of the Park. DRAP and Rouge National Urban Park together make up a large mass of permanently protected farmland in Ontario that is capable of sustaining a viable agricultural system in the middle of urban development. Without DRAP, the viability of farming in the Park becomes increasingly difficult. As such, the continued protection of these lands is essential for the long-term viability of the Park, the regional agricultural system, and the surrounding community.

The loss of DRAP will also have significant ecological consequences. Natural heritage designations cover more than half DRAP². These natural lands combined with the extensive agricultural lands, provide crucial ecosystem services for the surrounding landscape. As we continue to try to mitigate the effects of climate change and make a difference for our next generations, ecosystem services that these lands provide, such as carbon sequestration and flood mitigation, will become even more important. Urban development, like that which will occur on DRAP lands if they are not protected, is not capable of providing these services. The DRAP lands also contribute to the connectivity of the provincial natural heritage system, providing habitats



and a key corridor between the Oak Ridges Moraine and Lake Ontario. DRAP also provides habitats to a number of species at risk such as the Barn Swallow, Eastern Meadowlark, the Monarch, and more, making them even more important to protect. In order for Canada to meet our conservation and biodiversity goals by 2030 it is critical that these lands remain protected.

The Province has stated that removing protections from DRAP lands is necessary to address the housing crisis in Ontario. However, planners and the Ontario government own panel of experts have already confirmed that Durham Region and the GTHA have ample lands designated for development. There are currently 130,000 acres of farmland across the GTHA that have already been approved for development, and that have and not yet been built upon³. On its own, the land that has already been designated exceeds the amount of land that would be needed to accommodate the population growth that has been forecasted until 2051 in *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*³. The repeal of the protections for DRAP will not make a significant difference for housing in the Ontario, but it will have drastic consequences on the viability of the local agricultural system and the health of the local natural heritage system.

OFT urges the Government of Canada to take immediate action and use every tool available to protect the unique agricultural and ecological features of DRAP and prevent these lands from being developed. This may include the following:

1. Ensure that the Province upholds the consultation obligations of the Memorandum of Agreement

Meetings between the Province and Parks Canada regarding the impacts that removing protections from DRAP will have on Rouge National Urban Park are required to ensure that the Memorandum of Agreement is being upheld and that Rouge National Urban Park will not be negatively impacted by the changes. It is crucial that the integrity of the Rouge National Urban Park is upheld. Said consultations will help to ensure this. The federal and provincial governments must work together to prevent negative impacts to the agricultural and natural heritage systems.

2. Initiate a federal impact assessment for potential development on DRAP lands

The development of lands within DRAP could have significant impacts on federal species-at-risk and migratory birds, which justifies the need for a federal environmental impact assessment. The Rouge River, Duffins Creek, Petticoat Creek, and Townline Swamp Wetland Complex will also be impacted negatively if DRAP lands are developed, which Additionally, a federal impact assessment would provide an important opportunity for input from local and affected First Nations communities, whose Traditional Knowledge and expertise will provide valuable insight into the impacts.

3. Reinstate protections for the Duffins Rouge Agricultural Preserve

With a groundswell of public interest in preserving DRAP and the Greenbelt, other options for protecting DRAP should be explored. For example, the boundaries of Rouge National Urban Park could be expanded to encompass DRAP lands; the federal government could work with the City of Pickering to introduce strong local land use planning policy that prioritizes conservation of DRAP lands; or community partnerships with the Ontario Farmland Trust could be explored to transfer the conservation easement holding on the privately-owned land to ensure their protection in perpetuity and help re-establish an agricultural preserve in this region.

4. Leverage the federally-owned Pickering Lands to protect more lands for conservation

The Government of Canada currently holds 8,700 acres of 'surplus' Class 1 agricultural lands located immediately north of DRAP on the Federal Pickering Lands site which is managed by Transport Canada. Fifty years after expropriating these lands for a potential airport, studies demonstrate that an airport is not expected to be required in the Region for the foreseeable future⁴. These lands could be returned to agricultural, and conservation uses in perpetuity to help protect the local agricultural system. This could be achieved by transferring them to Parks Canada for inclusion in the Rouge National Urban Park, or by partnering with the Ontario Farmland Trust to manage the lands or permanently protect these lands through conservation easements to ensure they remain in agriculture.



The concerns we have presented here echo those of Parks Canada, the Ontario Federation of Agriculture, the National Farmers Union, Environmental Defence, Ontario land trusts, local municipal leaders, and the community at large, who all agree that the Greenbelt should be kept intact, and that DRAP should remain protected for the viability of food production and ecosystem health within this region.

Time is of the essence, and we ask that you take immediate action today on this important issue to help preserve farmland across the region, in Duffins Rouge Agricultural Preserve, the Federal Pickering Lands and the Rouge National Urban Park for future generations.

Thank you sincerely for your leadership and dedication to protecting Canada's finite supply of farmland. Most Sincerely,

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The Ontario Farmland Trust

Our vision is for a future where Ontario's farmland is highly valued, where diverse farming communities prosper, and where the permanent protection of farmland supports a strong and sustainable food production system that is recognized as the foundation for a thriving economy.

Our mission is to protect and preserve Ontario farmland and associated agricultural, natural, and cultural features of the countryside.



Cc:

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

The Honourable Francis Scarpaleggia, Chair, Standing Committee on Environment & Sustainable Development

The Honourable Paul J. Massicotte, Chair, Senate Standing Committee on Energy, Environment & Natural Resources

The Honourable Kody Blois, Chair, Standing Committee on Agriculture & Agri-Food

The Honourable Rob Black, Chair, Senate Standing Committee on Agriculture & Forestry

The Honourable Jennifer O'Connell, Member of Parliament, Pickering-Uxbridge

The Honourable Helena Jaczek, Member of Parliament, Markham-Stouffville

Jennifer Duquette, Field Unit Superintendent, Rouge National Urban Park, Parks Canada,

Ed Beach, President, Durham Region Federation of Agriculture

Tim Gray, Executive Director, Environmental Defence

Liz Calvin, President, Green Durham Association

Mary Delaney, Chair, Land Over Landings

Stop Sprawl Durham

References:

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[2] Crombie, D. (2023). Ottawa has an obligation to protect the Greenbelt. *The Toronto Star*. Retrieved from <https://www.thestar.com/opinion/contributors/2023/01/30/ottawa-has-an-obligation-to-protect-the-greenbelt.html>

[3] Doyle, V. (2023). The truth about the Greenbelt protection deal the Ford government is breaking. *The Toronto Star*. Retrieved from <https://www.thestar.com/opinion/contributors/2023/01/10/the-truth-about-the-greenbelt-protection-deal-the-ford-government-is-breaking.html>

[4] Transport Canada. (2016). Supply and Demand Report – Pickering Lands Aviation Sector Analysis. *Government of Canada*. Retrieved from <https://tc.canada.ca/en/aviation/operating-airports-aerodromes/airport-zoning-regulations/pickering-lands/supply-demand-report-pickering-lands-aviation-sector-analysis>