



May 15, 2025

The Honourable Stephen Lecce  
Minister of Energy and Mines  
10th Floor  
77 Grenville St.  
Toronto, ON M7A 2C1

**RE: ERO #025-0416, Bill 5 – Protect Ontario by Unleashing Our Economy Act, 2025**

Dear Minister Lecce,

On behalf of the Ontario Farmland Trust (OFT), thank you for the opportunity to comment on Bill 5, the *Protect Ontario by Unleashing Our Economy Act, 2025*. We appreciate the province's desire to streamline processes and enable economic development. However, we are deeply concerned about the implications this legislation will have on the long-term viability of Ontario's agricultural sector and the protection of the province's finite, non-renewable farmland resource.

OFT is a not-for-profit organization dedicated to protecting and preserving Ontario's farmlands and associated agricultural, natural, and cultural landscapes. We do this through direct land securement, stewardship, research, and policy advocacy. Farmland comprises less than 5% of Ontario's land base, yet supports the agri-food sector employing over 870,000 Ontarians and contributing more than \$50 billion annually to the province's GDP.

Farmland is a non-renewable resource. Ontario is currently losing 319 acres of farmland each day. This rate of loss is unsustainable and threatens our province's food security, climate resilience, rural economies, and long-term planning goals. We urge the province to reconsider the provisions of Bill 5 that undermine farmland protection, bypass land use planning frameworks, and weaken environmental and species-at-risk safeguards.

**Summary of Key Concerns**

**1. Land Use Planning and Development**

***Relevant Section: Schedule 9 – Special Economic Zones Act***

Bill 5 introduces a new legislative framework for Special Economic Zones (SEZs), giving Cabinet the authority to exempt developments within these zones from any provincial or



municipal law, regulation, or policy, including those under the Planning Act, the Provincial Planning Statement (PPS), and municipal official plans.

This unprecedented concentration of authority undermines the planning tools that currently protect farmland from urban sprawl and incompatible development. Municipalities and conservation authorities will be unable to apply Agricultural Impact Assessments (AIAs), zoning regulations, or land use planning frameworks to SEZ projects. As a result, farmland is at heightened risk of conversion.

**Recommendation:** The Special Economic Zones framework must be amended to explicitly prohibit SEZ designation on lands identified as Prime Agricultural Areas or as part of the Agricultural System under the PPS. Agricultural Impact Assessments and local planning processes should be mandatory for any development that could affect farmland.

## **2. Species and Habitat Protection**

### ***Relevant Section: Schedule 2 – Species Conservation Act, 2025***

Schedule 2 repeals the Endangered Species Act, 2007 and replaces it with a new Species Conservation Act, 2025, which includes a narrower definition of habitat, eliminates mandatory recovery strategies, and transfers listing decisions from the Committee on the Status of Species at Risk in Ontario (COSSARO) to the Lieutenant Governor in Council.

Farmland provides critical habitat for many species at risk, such as Bobolink and Barn Swallow. The changes remove key tools for identifying and protecting habitat adjacent to or within agricultural lands, and shift species protection decisions away from science-based processes. This may lead to the degradation of edge habitats and ecosystem services that support both biodiversity and agricultural productivity.

**Recommendation:** The Province should reinstate the science-based role of COSSARO, restore the broader habitat definition that includes ecological functions, and require recovery strategies and response statements to guide development in or near at-risk species habitat.

## **3. Governance and Oversight**

### ***Relevant Sections: Schedule 9 – Special Economic Zones Act; Schedule 2***

Bill 5 centralizes decision-making authority in Cabinet, allowing it to override scientific recommendations, exempt developments from any provincial or municipal law, and remove standard public consultation and appeal mechanisms.



The removal of checks and balances undermines transparency, accountability, and the democratic process. Farmers, rural landowners, Indigenous communities, and municipalities will have limited, if any, ability to influence land use decisions even when farmland or culturally significant landscapes are directly affected.

**Recommendation:** OFT strongly urges the government to maintain the requirement for public consultation and ensure planning authorities retain jurisdiction over approvals for non-agricultural uses in agricultural areas. Agricultural stakeholders must be able to participate in decisions that affect the future of Ontario's farmland.

#### **4. Cumulative Effects on Farmland**

##### ***Bill-wide concern***

Taken together, the provisions in Bill 5 represent a substantial weakening of the land use and environmental policy framework that safeguards Ontario's farmland.

At a time when Ontario is already losing 319 acres of farmland each day, Bill 5 removes the very procedures that help manage land use sustainably, including comprehensive planning, agricultural impact assessments, and environmental assessment. Without these checks, land speculation may intensify and farmland prices could increase further, making access even more difficult for new and young farmers.

**Recommendation:** OFT recommends the Province conduct a cumulative impact assessment on farmland loss resulting from Bill 5 before finalizing the legislation. Future economic growth must be aligned with the goals of farmland preservation, food security, and climate resilience.

#### **Summary of Final Recommendations**

To ensure the long-term protection of Ontario's farmland and food security and food sovereignty, the Ontario Farmland Trust recommends that the Province:

1. Explicitly exclude Prime Agricultural Areas from SEZs and project exemptions.
2. Reinstate full protections for species-at-risk and habitat areas under a science-based system.
3. Maintain the role of municipalities in planning decisions that impact farmland.



4. Ensure full Environmental Assessments and Agricultural Impact Assessments for any development on or adjacent to agricultural land.
5. Reaffirm the Agricultural System as a foundation of Ontario's long-term land use and economic planning.

### **Conclusion**

OFT supports the Province's goal of enhancing economic prosperity but strongly believes that this cannot come at the expense of Ontario's finite agricultural land base. Farmland is foundational to the province's economy, food security, and rural way of life. The Province has a responsibility to ensure that any new legislative tools, such as SEZs, are applied in ways that uphold, not undermine, Ontario's long-term agricultural viability, food security, and sustainability.

We respectfully request that the government amend Bill 5 to safeguard agricultural lands and uphold planning and environmental frameworks essential to their protection.

We thank you for the opportunity to provide this feedback and remain available for further discussion.

Sincerely,

Martin Straathof  
Executive Director  
Ontario Farmland Trust