



December 30, 2022

Public Input Coordinator
MNRF – PD – Resources Planning and Development Policy Branch
300 Water Street, 2nd Floor, South tower
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To whom it may concern,

Re: ERO 019 6161 Conserving Ontario's Natural Heritage

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on the Ministry of Natural Resources and Forestry (MECP) consultation on *Conserving Ontario's Natural Heritage*. BFO represents 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

The provincial government's plan to address Ontario's housing crisis and prepare for the province's expected population growth over the next ten years by building approximately 1.5 million homes is ambitious and necessary, but advancing housing development throughout Ontario cannot be done at the expense of our province's finite agricultural lands.

Farmland in Ontario continues to be lost to urbanization or non-agriculture uses at an alarming rate. The most recent Agriculture Census data for 2016 to 2021 shows Ontario lost 582,392 acres of farmland. This adds up to over 1.5 million acres of farmland lost to development or non-agriculture uses between 2006 to 2021. Further, between 2016-2021, over 290,000 acres of tame and native grasslands were removed from the Ontario landscape. Agriculture lands, especially agricultural grasslands, not only provide a means to produce food and support our rural communities economically, but they provide a number of invaluable ecological services such as habitat for wildlife and pollinators, including a number of species at risk, carbon sequestration and oxygen production, and water and nutrient cycling. The role beef farmers and grazing cattle have in sustaining and enhancing Ontario's grasslands is often overlooked, but the ecological goods and services provided by Ontario's beef farmers who maintain and manage grasslands is a testament to the preservation of natural habitats on farms.

We believe Ontario's natural heritage features also provide important ecological goods and services; however, we have concerns with the proposed ecological offsetting policy that is being put forward by the Ministry. We are concerned agricultural lands will be viewed as suitable land for recreating and replacing lost natural heritage features as a result of development, which will only exacerbate existing pressures to take agricultural lands out of production. We firmly believe a policy to address the loss of natural heritage features to development cannot then result in the loss of agricultural lands to natural heritage features.

Ecological Offsetting Approach

The proposal states the objective of the offsetting approach is stopping the net loss of natural heritage in Ontario and reversing the trend by focusing on restoration and net gain. As noted, we have concerns this objective will also result in furthering the loss of Ontario's agricultural lands. We support the 'avoidance first' principle that offsetting should be the last step after other options to avoid and mitigate any impacts on natural heritage are considered. Offsetting should be a last resort and permission to develop via the use of offsetting should not be guaranteed.

The proposal also outlines 'limits to offsets' as a key principle for developing an offsetting policy and identifying areas ineligible for offsetting. In addition to the areas proposed to be ineligible for offsetting, we recommend this also include agricultural lands to ensure that an Ontario natural heritage offsetting policy does not contribute to the continued loss of agricultural lands in Ontario.

Implementation

BFO has concerns with the proposal for determining a baseline assessment and offset ratio to be used to determine a compensation amount that would be paid to a fund that could be used to implement an offset, including construction, monitoring and adaptive management. The proposal outlines this fund could enable opportunities to pool funds to support large, strategic projects rather than re-creating small, isolated projects. We believe the concept of paying into a fund in lieu of actually completing a recreation and replacement of a natural heritage project, will simply allow developers to pay their way out of completing an on the ground offsetting project.

It is evident the preservation and protection of the existing agricultural land base is critical for the future sustainability of Ontario's food systems, the provincial economy and in the fight against climate change. Land use policy has a significant influence on competing interests for Ontario's farmland, which is one of Ontario's most valuable and at-risk resources. The current unsustainable loss of agricultural lands needs to be seriously addressed. Long-term actions to protect agricultural lands that do not pit areas of the province against one another need to be examined. The province must find a way to balance the need for increasing our housing supply with the need to better protect our farmland.

Thank you for the opportunity to provide feedback on the *Conserving Ontario's Natural Heritage* proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Chaffe". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Jack Chaffe
President