



June 18, 2015

Helma Geerts  
Food Safety and Environmental Policy Branch  
Ontario Ministry of Agriculture, Food and Rural Affairs  
1 Stone Rd. West, 3rd Floor  
Guelph, Ontario N1G 4Y2

Dear Ms. Geerts,

*Re: Draft Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas*

Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments on the Ontario Ministry of Agriculture, Food and Rural Affairs' draft document, *Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas*. BFO represents the 19,000 beef producers in Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development.

BFO is encouraged by the proposed guidelines on permitted uses and their focus on balancing protection of prime agricultural land with enabling farmers to make business decisions related to how they use their farm property (i.e. for agricultural uses, agriculture-related uses or on-farm diversified uses.) The means to long-term protection of agricultural land should include policies that support agriculture as the main land use in designated prime agricultural areas. However, land that is used for agriculture but not classified as prime agricultural land Class 1-3 must also be protected to ensure that future capacity for the production of food exists throughout the province and across commodity sectors. This is particularly important for agricultural uses that do not depend on Class 1-3 land, e.g. production of beef, lamb, etc.

It is critical, therefore, that Class 4-6 land is recognized as being vitally important for agriculture. Within the beef industry specifically, agricultural land beyond Class 1-3 is highly valued and in-demand for pasture grazing. Protection of this land is necessary if industry expansion goals are to be realized and for the long-term sustainability of Ontario's beef sector and broader food production industry.

BFO appreciates the leadership that the government has taken on defining permitted uses in prime agricultural areas, as well as designating and protecting agricultural land across Ontario in a consistent manner. Guidelines, policies and regulations that aim to protect agricultural land should be applied and enforced consistently in municipalities across the province, and the requirement of all municipalities to designate prime agricultural areas in their official plans is welcomed.

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In addition, BFO would like to take this opportunity to suggest the development of a feedback or information-gathering mechanism between OMAFRA, Ministry of Municipal Affairs and Housing, municipalities and industry, to monitor issues related to permitted uses. This is due to potential conflicts and issues that could arise in the designation of land by municipalities, especially with the new, proposed categories based on uses and the 2% limitation for on-farm diversified uses. It would be beneficial to have information gathered by government on emerging conflicts or issues shared with industry stakeholders, in order to ensure consistency across municipalities and to monitor and resolve problems on a go-forward basis.

BFO would like to thank OMAFRA for the opportunity to provide feedback on the draft guidelines and we look forward to participating in consultations on land use planning policies in the future.

Sincerely,



Bob Gordanier  
President

cc: BFO Board of Directors

