



April 25, 2022

Minister Steve Clark
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M5G 2E5
greenbeltconsultation@ontario.ca

Dear Minister Clark,

Re: ERO 019-4485 Proposed Amendment to the Greenbelt Plan - Growing the size of the Greenbelt; ERO 019 4483 Proposed Amendment to the Greenbelt Area boundary regulation - Growing the size of the Greenbelt; ERO 019 4803 Ideas for adding more Urban River Valleys

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on the Ministry of Municipal Affairs and Housing's (MMAH) consultations to expand the size of the Greenbelt. 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.

BFO submitted comments to MMAH's Consultation on Growing the Size of the Greenbelt in 2021. Our comments focused on the Greenbelt Plan priority of protecting agricultural land within the Greenbelt and we expressed our concerns around the loss of agricultural lands outside of the current and proposed Greenbelt boundaries. These concerns primarily being driven by the increased pressures to develop farmland outside the Greenbelt boundaries and, more generally, the continued urbanization of Ontario's finite agricultural land base.

Ontario's beef producers continue to have serious concerns with the loss of agricultural land, especially agricultural grasslands, in Ontario. Census data from 2006 to 2011 shows Ontario lost 636,000 acres of farmland, with pastureland lost at a much higher rate than other farmland. Census data from 2011 to 2016 shows a similar story with Ontario losing an additional 319,700 acres of farmland or 175 acres/day of farmland. These losses are unsustainable and, given the anticipated population growth in Ontario and globally, further priority and action needs to be taken on the protection of farmland in order to maintain sufficient capacity for food production.

Agriculture is the backbone of our rural communities and is important to the quality of life of all Ontarians. Beef farms and the broader beef cattle sector have a presence and economic impact in every county and district in Ontario, sustaining more than 61,000 jobs in primary production, processing and retail across the province. Ontario's beef industry is vitally important to the well-being and growth of families, businesses and communities.

The impacts of the loss of agricultural land extend beyond concerns around food production capacity and the economy. Agricultural lands are a nature-based solution to mitigate climate change and maintain and improve biodiversity. Agricultural lands, particularly agricultural grasslands, are critical for oxygen

production and carbon sequestration, maintaining and improving healthy soils, and water and nutrient cycling. These lands also play a significant role in providing and maintaining habitat for pollinators and species at risk. Research has found the decline in cattle numbers in Canada is directly linked to the decline in agricultural grasslands, which leads to a decline in habitat for grassland birds like the Bobolink and Eastern Meadowlark who rely on these lands as much as ruminant livestock do.

It is evident the preservation and protection of the existing agricultural land base is critical for 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.

BFO continues to express that land used for agriculture but not classified as prime agricultural land, or CLI Class 1-3 soils, must also be preserved to ensure 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 CLI Class 1-3 soils, such as beef production, as such land is suitable for pasture use.

BFO supports the use of agricultural impact assessments as a key tool for land use planning and believes they should be required as part of the permit process for residential builds on Ontario's diminishing agriculturally productive land. Agricultural impact assessments are important to ensuring adverse impacts to the agri-food sector are avoided or minimized.

Addition and Expansion of Urban River Valleys to the Greenbelt

The proposed addition of 13 Urban River Valleys (URVs) to the Greenbelt in an effort to connect and integrate the Greenbelt to urban settings through urban river connections has merit, but adding further URVs will not will achieve one of the key principles for expanding the Greenbelt, as stated in the consultation documents, of providing permanent protection to the agricultural land base.

For these reasons, we believe the addition of URVs to the Greenbelt should not be considered as an increase of the total Greenbelt land area. The designation of URVs does not achieve the Greenbelt Plan's goal of providing protection to agricultural lands in Ontario and does not address the on-going loss of agricultural lands.

Ideas for Future Expansion

The Greenbelt Plan has proven to be an effective policy to reduce the rates of farmland loss for land that falls within the Greenbelt boundaries and other provincial policies to regulate urban sprawl and strengthen farmland protection, such as the Provincial Policy Statement and the Growth Plan, have also helped reduce the rates of farmland loss within southern Ontario since they came into effect. However, as noted above, the loss of agricultural lands continues at an unsustainable rate in Ontario and is extremely concerning. Despite Ontario's existing policy measures to protect agricultural lands, agricultural land outside the Greenbelt continues to be lost as a result of urban boundary expansions and re-zoning for non-agricultural uses. The current levels of agricultural production, economic activity and employment cannot be maintained if the land base they depend on continues to be lost.

The Greenbelt Plan and other provincial policies have not adequately addressed leapfrogging development and the additional development pressures put on agricultural lands outside of the Greenbelt boundaries. Plans for future expansion of the Greenbelt must look beyond URVs and land use policies more broadly

need to examine how to better protect our remaining farmland. Land capable of agricultural activity for producing food must be preserved in order to ensure a safe and sustainable supply of food for the growing population of Ontario, Canada and the world.

Thank you for the opportunity to provide feedback on the current Expanding the Size of the Greenbelt proposals. We look forward to being included in future discussions related to the Greenbelt Plan.

Sincerely,

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

Jack Chaffe
President