



September 7, 2023

Dave Perry  
President and Advisory Councillor, Beef Farmers of Frontenac

Dear Dave,

The following resolution was passed at the Beef Farmers of Ontario (BFO) annual general meeting in February and was recently discussed by the BFO Board of Directors:

**WHEREAS**, Ontario has been a leader in the Local Food Movement over the past number of years and

**WHEREAS**, there is a requirement to use fertile land/soil to produce food in a profitable manner, and

**WHEREAS**, Ontario provincial government has vowed to have a large portion of the Greenbelt developed/destroyed

**THEREFORE, BE IT RESOLVED THAT BFO** take a strong stand against this destruction of prime agricultural land.

A key BFO lobby priority we regularly communicate with the provincial government is to commit to preserving farmland through sound provincial land use policy that sees agricultural lands, including marginal lands used for livestock grazing and carbon sequestration, protected as the highest and best use of our province's arable land. Increasing protections for Ontario's agricultural land base is also identified within BFO's new Strategic Plan.

BFO has long highlighted the ongoing trend of agricultural land loss in Ontario with the government, especially the loss of land used for pasture and hay production. Approximately seven per cent of Canada's land base is used for agricultural purposes and it is widely known that with Canada's growing population and expanding urbanized communities, agricultural lands continue to be converted to other uses. In fact, from 1941 to 2016 agricultural land in Ontario decreased by approximately 50 per cent, according to Statistics Canada Census of Agriculture. The latest Census of Agriculture data showed from 2016 to 2021 another 582,392 acres of farmland were lost in Ontario.

Ontario adopted its first land use guidelines for protecting agricultural lands in 1975. In 2005, the Ontario government established a framework of land use policies many of us are familiar with today, such as the Provincial Policy Statement, the Greenbelt Plan, and the A Place to Grow Growth Plan. In regards to protecting agricultural lands, these policies outline various protections for prime agricultural areas or limitations for using prime agricultural lands for non-agricultural purposes. These policies establish what municipalities can and cannot do and/or provide guidance for municipalities to interpret and apply the policies with some flexibility. Despite the existence of Ontario's land use legislation, policies and on-going commitments from government to protect

Ontario's agricultural land, the continued erosion of Ontario's agricultural land base raises questions about the quality and effectiveness of our land use policies.

Over the past year, there has been growing attention and concern around Ontario's land use policies and protections, or lack thereof, for agricultural lands. The growing attention and concern were largely a result of two pieces of legislation the government put forward to increase housing development in Ontario and meet the government's goal of building 1.5 million houses by 2031.

In October 2022, the provincial government introduced *Bill 23, More Homes Built Faster Act*. The Act received Royal Assent on November 28 and, in an effort to increase opportunities to build more houses, made changes to the *Planning Act*, the *Conservation Authorities Act*, natural heritage policies, and examined the possibility of combining the Provincial Policy Statement and the A Place to Grow Growth Plan, which are currently the province's two main land use policies. At the same time, the government released its proposal to remove lands from the Greenbelt following two previous public consultations held in 2021 and earlier in 2022. During this time, BFO worked closely with our industry partners to better understand the impacts of the proposed changes and in further raising our concerns to the government. BFO's detailed comments to a number of the public consultations associated with Bill 23 and the changes to the Greenbelt can be found on the BFO website.

Following Bill 23, the provincial government introduced *Bill 97, Helping Homebuyers, Protecting Tenants Act, 2023* on April 6 and the Act received Royal Assent on June 6. This bill made amendments to the *Planning Act*, *Municipal Act*, *City of Toronto Act*, and *Development Charges Act*. In addition, the government released for public consultation its proposed land use planning policy titled the Provincial Planning Statement (PPS), which integrated the Provincial Policy Statement and the A Place to Grow Growth Plan into a single policy. The government stated the purpose of creating a single province-wide planning document was to create a framework that was housing-supportive and aided in the implementation of the province's 1.5 million new homes target by 2031.

The proposed PPS outlined a number of fundamental changes in regards to land use policies related to agricultural lands. Some of the changes included:

- Allowing up to three severances per farm parcel on prime agricultural lands.
- Making it easier for municipalities to create new settlement areas and expand urban boundaries, and to more easily include prime agricultural areas within expanded boundaries.
- Changes to allow for more housing development on rural lands.
- Removing the provincially mapped "Agricultural System", which included a provincial map of prime agricultural areas and lands.
- Allowing up to two additional residential units in prime agricultural areas.

Many of the proposed changes within the PPS were extremely concerning and BFO continued to collaborate with our industry partners to raise our concerns with the government. Of particular concern was the proposal to allow up to three severances per farm parcel in prime agricultural areas, as this was a fundamental shift from the current lot creation restrictions on prime agricultural lands and would have numerous negative consequences for the agriculture sector in Ontario. Some of these short and long-term consequences include the constraining of livestock farmers' ability to establish new operations and/or grow their operations (barns, manure storage, etc.); exacerbate the already unsustainable loss of Ontario's agricultural lands; risk inflating

farmland prices; increase infrastructure service demands on municipalities; create water quantity and quality concerns as a result of increased residences in agricultural areas; create increased fragmentation of our agricultural land base; and lead to more farmland being purchased for investment and speculative purposes, making farming even more unattainable for the next generation.

Shortly after the release of the proposed PPS, BFO met with the Minister of Municipal Affairs and Housing to raise our concerns and recommendations. Subsequently, a joint letter was published by Ontario's general farm organizations along with a number of Ontario's commodity organizations signing off, including BFO, Ontario Pork, Ontario Sheep Farmers, Veal Farmers of Ontario, Egg Farmers of Ontario, Chicken Farmers of Ontario, etc. The letter outlined our concerns with Bill 97 and the proposed PPS, with an emphasis on the change to allow severances on prime agricultural lands, and on the need for the government to balance its housing goals with the need to protect our agricultural lands. The joint letter was effective at raising the profile of the issue and received media attention from CTV, CBC, Toronto Sun, Toronto Star and a number of farm media outlets.

In addition, Ontario's three general farm organizations led a letter writing campaign whereby farmers and the general public could easily express their concerns with their local Members of Provincial Parliament. BFO and other commodity groups assisted in sharing this campaign with our members.

Following these efforts, BFO and other farm organization leaders met with the Premier, the Minister of Agriculture, Food and Rural Affairs, and ministry staff to discuss our concerns. Ultimately, at the end of May, the government committed to rolling back its proposal to allow up to three severances on prime agricultural lands and extended the consultation period for the proposed PPS to allow for further discussion with the agriculture sector. The government also committed to work with the agriculture sector to support housing opportunities for farm families.

The extended consultation period provided the Minister of Agriculture, Food and Rural Affairs and the Associate Minister of Housing the opportunity to hold a roundtable meeting in July with Ontario's general farm and commodity groups to discuss other aspects of the proposed PPS.

When communicating with government in regards to the above issues and the preservation of agricultural lands more generally, we continuously acknowledge that efforts to build housing in Ontario is necessary to meet the demands of our fast-growing population; however, housing development must be focused on existing urban and rural communities where municipal services are present, and addressing Ontario's housing crisis must balance the need to protect our agricultural lands and ability to produce food locally. BFO's comments on the proposed PPS consultation can be found on the BFO website.

Thank you to the Beef Farmers of Frontenac for bringing this resolution forward. BFO will continue to push for land use policies that support the protection of agricultural lands in Ontario and communicate the importance of Ontario's farmland for supporting local food production, our rural economies, the environment, and food security.

Sincerely,



Jack Chaffe  
President

cc: Jeff Peters (Secondar)  
Jenna Perry (Secretary)