



October 4, 2017

Helma Geerts
Policy Advisor
Ministry of Agriculture, Food and Rural Affairs
Policy Division, Food Safety and Environmental Policy Branch
1 Stone Rd. West, Floor 2
Guelph, Ontario N1G 4Y2

Dear Ms. Geerts,

Re: EBR Registry 013-0968 Release of draft Agricultural System mapping and Implementation Procedures for consultation

The Beef Farmers of Ontario (BFO) represents the 19,000 beef producers across Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development. We appreciate the opportunity to provide comments on the draft mapping and implementation procedures for the Agricultural System for the Greater Golden Horseshoe, as approximately 6,000 beef producers live within this region's boundaries.

BFO is encouraged by the concept of an Agricultural System for the Greater Golden Horseshoe, and we believe that it represents a positive step in protecting and promoting agricultural uses on land that is integral to Ontario's agriculture industry and rural communities, but is not designated as prime agricultural. Pastureland, for example, is extremely valuable environmentally and agriculturally, but is often Class 4 or 5 land and therefore not designated as prime agricultural and protected from non-agricultural uses.

The mapping and implementation of the Agricultural System for the Greater Golden Horseshoe will help dictate how municipalities incorporate the system into their official plans and how the related policies affect local farmers, while also setting an example for how municipalities outside the Greater Golden Horseshoe can support and protect their own local agricultural sectors. BFO recommends that the Agricultural System concept extend beyond the Greater Golden Horseshoe, as Ontario's entire agricultural land base and network deserve policies that encourage and support economically viable agricultural uses over non-agricultural uses.

The Agricultural System map and online portal could serve as useful tools for municipalities and other organizations to understand the layout of agricultural infrastructure and assets across the Greater Golden Horseshoe. These tools have the potential to enable municipalities and organizations in economic development and strategic planning, based on the gaps or opportunities made visible through the mapping.



In our view, the following comments and recommendations should be considered in order to enhance the utility of the online portal:

- Dataset titles on the map should be reworded to more user-friendly or “plain English” language. For example, if “2.7.7.2 Red Meat-Beef” refers to locations of beef operations, retitle to simply state “Beef Farms”.
- It is useful to have the data source referenced for each layer of information, but it should also include the date or year that the data is from, so users can weigh the information based on how recent it is. There should also be reference to the geography that the entire original dataset covers, so users can consider comparing the data to a wider area. In addition, a link to the data source should be provided. In the interest of keeping the design clean and uncluttered, this data source information could open in a separate window or through another link in the portal.
- Guidance materials, including a video tutorial, should be provided to aid different users in getting the most out of this tool. Further to this, there needs to be more information on whether OMAFRA will be providing assistance to municipalities and other organizations so the mapping information is utilized in the most effective way possible.
- There needs to be more information provided on how the data will be updated and how the online portal will be maintained. This tool is only as valuable as it is up-to-date.
- There should be a process for organizations to load customized data for their own use in the mapping, as well as a process for organizations to suggest additional datasets or data sources.

BFO is providing separate comments on *EBR Registry Number 013-1014 - Criteria, methods and mapping of the proposed regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe*, and we have provided the Ministry of Natural Resources and Forestry with several comments regarding how the two systems – Natural Heritage and Agricultural – will interact. In general, BFO believes that there needs to be more clarity on the policies that municipalities should follow in the areas that are designated as prime agricultural and also included in the Natural Heritage System. It is not clear if this land, because it is prime agricultural, would also be considered within the Agricultural System, and what type of impact assessment would be required when there is proposed development – environmental or agricultural or both.

The Beef Farmers of Ontario would like to thank the Ministry of Agriculture, Food and Rural Affairs for the opportunity to comment on the draft Agricultural System mapping and implementation procedures. We would be pleased to answer any questions on the comments contained in this document.

Sincerely,



Matt Bowman
President

cc: BFO Board of Directors
Ontario Federation of Agriculture

