



October 4, 2017

Ala Boyd
Manager, Natural Heritage Section
Ministry of Natural Resources and Forestry
300 Water Street
Peterborough, Ontario K9J 8M5

Dear Ms. Boyd,

Re: 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

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 proposed criteria, methods and mapping of the Natural Heritage System for the Greater Golden Horseshoe, as approximately 6,000 beef producers live within this region's boundaries.

The Natural Heritage System of such a large and heavily populated region of Ontario could have far-reaching impacts on agriculture and the beef industry. Further to this, the way in which municipalities incorporate the Natural Heritage System into their official plans will affect local farmers. It is therefore essential that the system's mapping be accurate, and that it not impede the viability of agriculture within the Greater Golden Horseshoe.

Regarding the principles and criteria for mapping the Natural Heritage System, BFO notes that there is no framework for verification or "ground-truthing" of the natural heritage features and core areas proposed for inclusion in the system. The criteria and guiding principles used in mapping the Natural Heritage System should include verification, to help ensure that proposed natural heritage features and core areas are not misidentified or misrepresented in the mapping. For example, satellite imagery may misidentify an irrigation pond as wetlands. Satellite imagery and remote mapping cannot be solely relied upon without on-the-ground verification. It is essential that verification of the mapping occurs before the Natural Heritage System map is passed on to municipalities to implement in their official plans.

BFO believes that guidance materials on the Natural Heritage System should be developed by the Ministry of Natural Resources and Forestry in order to educate private landowners on the components of the system (core areas and linkages), the role of the system, and what it means for private and/or agricultural land to be included. We are concerned that there will be confusion on the part of some landowners regarding why their land is included in the Natural Heritage System and what policies will apply. To address these questions, there must be sufficient guidance materials available to landowners



from the Ministry or municipalities. Explaining that a private landowner's agricultural land was included because it helps form a nature corridor between key natural heritage features, for example, would add clarity.

BFO recommends that the core areas and linkages be clearly identified within the map of the Natural Heritage System. By better illustrating that land is included in the system because it is considered to be part of either a core area or linkage, the rationale for including pieces of private land will be more explicit to landowners. This level of detail in the map could be a useful public education piece, and also provide better guidance to municipalities.

BFO is providing separate comments on *EBR Registry 013-0968 - Release of draft Agricultural System mapping and Implementation Procedures for consultation*, and we have several comments that are aimed at how the two systems – Natural Heritage and Agricultural – will interact.

Census data shows that Ontario lost 319,773 acres of farmland in the 5-year span from 2011 to 2016, with pastureland lost at a higher rate than other farmland. BFO has serious concerns regarding the loss of farmland, especially pastureland, and the impact on the Ontario beef industry's sustainability. Given the anticipated population growth in Ontario and globally, added priority needs to be placed on the protection of farmland in order to maintain sufficient capacity for food production.

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.

Agriculture should be the protected use for land that is designated as prime agricultural or is in agricultural use, even if the land is within the Natural Heritage System. This can be achieved through agricultural impact assessments and other policies that support agriculture over other development.

Implementation guidelines should be provided to municipalities, clarifying that the Natural Heritage System is an overlay that does not constrain or limit agricultural activities on rural or agricultural land. It should also be made clear to all municipalities that agricultural or rural land designation does not change to "natural heritage land designation" unless there is official rezoning, even if the land is included in the Natural Heritage System map/overlay.

The Beef Farmers of Ontario would like to thank the Ministry of Natural Resources and Forestry for the opportunity to comment on the proposed criteria, methods and mapping of the Natural Heritage System for the Greater Golden Horseshoe. 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

