



May 14, 2020

Jack Van Gemeren
Ministry of Natural Resources and Forestry
Hearst District Office
613 Front Street
P.O. Box 670
Hearst, Ontario P0L 1N0

Dear Mr. Van Gemeren,

Re: ERO # 019-1468: Proposed agricultural land use amendment for Hearst and Kapuskasing

Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments as part of the Ministry of Natural Resources and Forestry's proposal to amend land use policies in the Hearst Administrative District to facilitate the sale or lease of Crown land for agriculture purposes. BFO represents the 19,000 beef farmers across Ontario by advocating in the areas of policy planning, industry development and research, environment, animal health and welfare, and domestic and export market development.

Within the Hearst Administrative District there are five land use areas that restrict the disposition or do not permit the disposition of Crown land for agriculture. BFO believes these policies, which have been in place with little to no changes since 1983, are outdated and create unnecessary restrictions on the benefits agriculture would provide in the district.

BFO fully supports the proposed land use amendment. Northern Ontario is one of the few areas in the province with an abundance of relatively affordable land, and providing farmers with opportunities to access affordable and sufficiently sized parcels of land provides promise for long-term agricultural growth and the next generation of farm families in the north.

State of the Ontario Beef Sector

Land is the single largest cost in the establishment of a farm, and with over a million acres of farmland lost to urban sprawl every decade, land values in southern and eastern parts of Ontario continue to rise. Land used for beef production is being lost at an even faster rate, and Ontario's beef cow herd (breeding animals) has dropped by over 32 per cent in the last decade.

Despite the shrinking cow herd and agricultural grassland (pasture and forage production) land base, there is huge demand for Ontario beef domestically (less than 50 per cent of the beef consumed in Ontario currently comes from Ontario farms) and globally (the Ontario Corn Fed Beef brand, for



example, is expanding rapidly in markets like Japan). Ontario has the second-largest finishing sector for beef in the country, but a large portion of the calves finished in Ontario come from Western Canada because Ontario's cow-calf sector is too small to provide enough supply.

There are growth opportunities Ontario beef farmers can't take full advantage of until we find new places to expand cow-calf production in the province. BFO believes northern Ontario represents the largest opportunity for expanding Ontario's cow herd and accompanying agricultural grasslands.

Why Northern Ontario?

The combination of market demand for beef, land values, changing climate, environmental benefits of agricultural grasslands, and ideal growing conditions (soil type, long days, cool nights, consistently cold winters) provides ample evidence that beef production would be a good fit for northern Ontario, as well as a valuable, long-term driver of economic development in northern municipalities. Agriculture provides jobs on farms and in related service industries, as well as consistent economic growth in local economies.

A project funded through Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) New Directions stream in 2017 assessed the Greenhouse Gas (GHG) impacts of expanding beef production in northern Ontario, with comparisons made to other jurisdictions. Through modelling based on Ontario beef production practices, it was found that beef production in northern Ontario could likely have a smaller carbon footprint than beef produced in other parts of Ontario and Canada. This report was conducted by the University of Guelph, though it is not yet published.

Considerable background work has already been undertaken by BFO to clearly define the opportunities in northern Ontario, including an October 2014 feasibility study conducted in conjunction with OMAFRA to confirm the initiative's economic sustainability, and a Growing Forward 2 project in 2015-2016 that combined farmer outreach, production and policy research, stakeholder engagement, and various communication activities. Much of this work is reflected on BFO's website dedicated to potential for beef in northern Ontario, BeefNorth.com.

Agriculture has been consistently identified by the provincial government as an opportunity and priority for economic development in northern Ontario. Expanding beef production in northern Ontario has received strong provincial, municipal and sector-wide support because it makes imminent sense.

Access to Crown Land

One study commissioned by BFO in 2016 provided an overview of Canadian policies governing access to Crown land for agricultural use, which clearly articulated the stronger history and enhanced opportunities in other provinces for allowing agriculture on Crown land. This report, along with other studies and initiatives, has informed BFO's request for making beef expansion in the north a reality through improved access to Crown land for farmers.

The application process for farmers to access Crown land, which includes providing detailed maps, extensive business and financial plans, and environmental and archaeological assessments, is lengthy and expensive. Restrictions on what activities can be permitted and the overly burdensome and lengthy approvals process – that can take two years or more to complete – eliminates potentially massive opportunities for agricultural growth in the north.



There are also significant limitations in the amount of land that can be accessed. Farmers can apply for up to 160 acres of Crown land, but economic modeling has shown us they need to be able to access approximately 2,000 acres to have a land base sufficient for achieving an economy of scale in a reasonable amount of time. Farmers want to raise cattle as their full-time job if they're applying for Crown land, and the current process doesn't allow them to do so.

BFO fully supports the proposed land use amendment in the Hearst Administrative District to facilitate the sale or lease of Crown land for agriculture purposes. Additionally, BFO requests the Ontario Government recognize agriculture as the preferred and primary use of Crown land not used in forestry or mining. As a result of this prioritization by the province, the application process for farmers to lease and/or purchase Crown land must be made more user-friendly.

This could include assessing, identifying and holding parcels of Crown land for agriculture use so farmers applying to lease and/or purchase Crown land would have a shorter list of criteria to fulfill. Conducting assessments and evaluations in advance of farmers' applications would allow a standardized and efficient approach to be taken across a larger amount of land at one time. Farmers must also be able to apply for larger parcels of land.

Having sustainable, pasture- and forage-based farms on just a small fraction of Crown-owned land in northern Ontario will provide huge benefits to a variety of stakeholders and help advance numerous provincial priorities:

Red tape reduction: We want Ontario to be open for business. Unfortunately, the current process for accessing Crown land for agricultural production is anything but open. An agriculture-dedicated stream for streamlined access to Crown land for agriculture is the definition of red tape reduction.

Generating of provincial revenue: Crown land is sold at fair market value, based on the region and land. Easing the application process for farmers to lease and/or buy Crown land would create a revenue stream for the province that would grow over time.

Economic development: Establishment of family farms and the expansion of agriculture on Crown land would be a long-term, sustainable source of jobs and economic activity for northern Ontario and its local municipalities.

The next generation of farmers: Land in southern and eastern Ontario is getting scarcer and more expensive. Expansion into northern Ontario is necessary for the long-term sustainability of the sector and for the next generation of farmers. Enabling access to Crown land for agriculture for farmers and their families would help ensure farming is an economically viable career choice and would provide opportunities for new, young and expanding beef farmers.

Environmental benefits: Beef production and the agricultural grasslands managed and maintained by Ontario's beef farmers do more than produce beef – they provide critically important ecosystem goods and services and have inherent environmental value, without which Ontario's natural environment would suffer. These ecosystem goods and services include:

- *Biodiversity*, with over 1,000 plant, animal and insect species making their home on land used for cattle grazing in Canada. Further to this, plant communities depend on grazing livestock for removal of plant aftermath, the distribution of seeds, and the provision of open niches that can increase biodiversity.



- *Carbon sequestration services*, with perennial forages and grasses storing large amounts of carbon in the soil. Land used for beef cattle production in Canada is currently storing about 1.5 billion tonnes of carbon, and globally, grasslands store nearly 30% of the world's soil carbon.
- *Soil health improvements*, with the presence of cattle and other grazing livestock on agricultural land improving soil fertility and structure through manure deposits, providing erosion control from fencerows and windbreaks, and promoting soil ecosystem health through the production of perennial forage crops that minimize tilling and soil disruption. Forage and beef production systems, by nature and by default, support the key principles of soil health. Even when compared to no-till cropping systems that include cover crops and crop rotation, land with livestock on it will typically provide better soil health outcomes due to improved soil ecosystems, fertility and structure.
- *Moderation of nutrient run-off* through perennial forages and grasses that are able to absorb nutrients as living crops with deep root systems.

Beef Farmers of Ontario would like to thank the Ministry of Natural Resources and Forestry for the opportunity to comment on the proposed land use policy amendments in the Hearst Administrative District. We would be pleased to answer any questions on the comments contained in this document, and we look forward to participating in further discussions on land use policy.

Sincerely,



Rob Lipsett
President

cc: BFO Board of Directors

