



LONG-TERM THINKING FOR TODAY'S ISSUES

January 18, 2019

Michael Helfinger
Senior Policy Advisor
Ministry of Economic Development, Job Creation and Trade
Policy Coordination and Business Climate Branch
900 Bay Street,
Hearst Block, Floor 7
Toronto ON, M6H 4L1

Dear Mr. Helfinger,

**RE: The Open-for-Business Planning By-law
ERO 013-4293 Bill 66: Restoring Ontario's Competitiveness Act, 2018**

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

Cutting red tape can often speed up inefficient systems and economize on costly reporting. It is vital, however, to make sure that improved efficiency in one area does not cause undue harm in another. Within Bill 66, there are positive recommendations for reducing red tape, but there are also several recommendations that raise our concerns, primarily in the proposed addition of section 34.1 to the Planning Act (or the "open-for-business planning by-law"), as outlined in schedule 10 of Bill 66.

We are concerned that the amendment to the Planning Act as part of Bill 66 threatens issues of key importance to CFFO and to farmers more generally. Since the election, CFFO has written to three cabinet ministers regarding these issues, and we have shared these letters more broadly to further ministers and members. We would like to re-iterate our concerns with direct reference to what government is now proposing.

Our previous letters are attached but, in summary, our concerns are the following:

1. CFFO is concerned about the long-term protection of our best farmland for farming and stronger protections for all of the best available farmland facing development pressures—in and beyond the Greater Golden Horseshoe.

We need to balance growth with food production, especially since the greatest population growth is taking place in areas with the most productive farmland. Good planning and density targets can prevent urban sprawl onto our valuable food-growing and naturally sensitive lands. Without government intervention, building outward will

remain more profitable than building upward.

2. CFFO is concerned that provincial policies should promote not only economic success for the agri-food sector but also improved soil health, improved water quality, and safeguarded water quantity for the long-term success of the industry and the health of all residents.

In line with Bill 66, the CFFO supports the removal of unnecessary red tape, but given our priority concerns summarized above, we have understandable interest in schedule 10 of Bill 66. CFFO believes that the amendment to the Planning Act introducing section 34.1 would allow open-for-business planning by-laws to bypass existing, established, agreed-upon policies that should be considered essential rather than extraneous “red tape.” We encourage government to remember that rules and reporting that some may call “red tape” is necessary for the wider public good.

For example, schedule 10 of Bill 66 could allow municipalities to bypass important policies, such as section 39 of the Clean Water Act (2006), which was developed in response to the Walkerton tragedy that saw over 2,300 people fall ill and seven deaths, caused by a lack of effective protections for source water (CELA, 2018).

Furthermore, many of the provisions listed under subsection 6 of the open-for-business planning by-law, such as, but not limited to, section 39 of the Clean Water Act (2006) and section 7 of the Greenbelt Act (2005) were originally developed through extensive consultation with both the public and with experts. This process led to the creation of effective policies that are specifically intended to protect the environment, natural heritage sites, human health, and farmland. The Acts to be superseded by what Bill 66 proposes were developed via extensive processes to establish community support. There is no evidence to suggest any change in wider public preferences regarding the substance of these Acts or support for schedule 10, especially in how it supersedes these Acts.

It is important to recognize that farmland should be prioritized when considering development opportunities. Once farmland has been developed for residential or industrial purposes, the possibility of that land ever returning to agriculture is essentially nonexistent due to, for example, the loss of top soil during development.

What is best for society now and into the future from an optimal social, economic and environmental sustainability balance moving forward cannot be ignored.

If this is not the government’s priority, then we would like to hear this directly. On reading Bill 66 and especially schedule 10, the priority reads as one of economic growth at the expense of environmental and social well-being for current and future generations.

The proposed section 34.1 of the Planning Act runs contrary to CFFO’s long-term goals of soil quality, water quality, farmland preservation, and agri-food sector success. If Bill 66 is passed, regardless of the recent vocal widespread concerns, CFFO strongly recommends that it also include additional provisions to provide transparency and increase accountability in order to minimize these concerns.

CFFO recommends the following amendments to Bill 66 as proposed by your government:

1. Municipalities should focus on redeveloping brownfields within municipal borders and should be given incentives to adhere to *existing* provincial density targets that would have urban areas build vertically rather than expand outward into land that is valuable for agricultural

productivity, source water protection and natural landscapes, such as that within the Greenbelt.

- a. Incentives could be designed to reduce the current municipal dependence on a land tax revenue base, which is now biased towards extending “outwards” instead of “upwards.”
 - b. With urban sprawl, increasing scarcity of good farmland means its value is also rising. In the limit, it becomes priceless. Let’s not push our outward growth to that limit.
2. In order to establish public accountability, it is necessary that all deviations from the listed provisions under subsection 6 be documented in detail, listing the superseded provisions for all Acts, and the intention of the superseding, at both the municipal and provincial levels.
 - a. Firstly, it should be required that all municipal resolutions under the open-for-business planning by-law be voted on with full disclosure of all documented deviations from the list of provisions under subsection 6 of this amendment. This means that at the local level, prior to the vote by the municipal council, the council should list, and make public, all provisions under subsection 6 that are to be superseded by passing an open-for-business planning by-law.
 - b. Secondly, once the request to use the open-for-business planning by-law has been submitted to the Minister, the Minister should be required to make the application available for public review inclusive of the list of all the deviations from the provisions listed in subsection 6.
 - c. Thirdly, once the Minister drafts his or her decision, this decision should be made public, with the list of superseded provisions under subsection 6, for a period of at least 90 days for discussion and feedback before a final decision is made.

The provisions that could be superseded according to the proposed schedule 10 involved extensive consultation and careful planning to create meaningful and effective policies to protect public interests, such as drinking water and the Greenbelt. Further, the importance of protecting farmland from development cannot be understated – development of agricultural land is irreversible. For this reason, the CFFO believes that protocols need to be in place to provide accountability in the decision-making process so that farmland protections are not disregarded when planning future development projects and to ensure further safeguards that development goals indeed balance social, economic, and environmental concerns and sustainability moving forward.

Thank you for your consideration of these comments.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario
BD, JK

CC: Hon. Doug Ford, MPP, Premier of Ontario
Hon. Ernie Hardeman, MPP, Ministry of Agriculture, Food and Rural Affairs
Hon. Steve Clark, MPP, Ministry of Municipal Affairs and Housing
Hon. Rod Phillips, MPP, Ministry of Environment, Conservation and Parks



LONG-TERM THINKING FOR TODAY'S ISSUES

October 10, 2018

Hon. Ernie Hardeman, MPP
Ministry of Agriculture, Food and Rural Affairs
11th Floor,
77 Grenville Street
Toronto, ON
M7A 1B3
Discussed in person and delivered via email:
minister.omafra@ontario.ca

Re: Economic Success for Ontario Agriculture and Agri-food

Dear Minister Hardeman,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

We believe the agriculture and agri-food sector is a cornerstone of the Ontario economy, but political will is necessary to help it thrive.

The CFFO sees six issues of particular concern for ensuring that the agriculture and agri-food industry thrives in Ontario.

- 1) **Fiscal Responsibility:** Agriculture is a capital-intensive industry that relies both on credit and sophisticated management to maintain healthy and viable farm businesses. We ask that your government also demonstrate a commitment to fiscal responsibility by pursuing sensible debt management, maintenance of the highest international credit rating, and advocating at the federal level for a rational Canadian interest rate policy that can underpin a healthy agricultural sector.
- 2) **Minimum Wage and Labour Policy:** Labour policy should balance the needs of both employees and businesses. Extreme changes, as we've seen to minimum wage, jeopardize the livelihood of small and medium-sized business owners, as well as job security especially for new and young workers. Your government's announced reversal is one approach to dealing with these issues. An alternative could be a hold on further increases to facilitate adjustment to the higher cost of doing business.

Farmers also depend on a supply of labour that is sensitive to demand for seasonal labour. This kind of labour supply is not always sufficient locally. We therefore ask for your support at the federal level regarding time-sensitive and appropriate agricultural worker visas.

3) **Energy Policy:** Energy costs, including carbon pricing, have been onerous on agriculture. We encourage development of provincial energy policy that is sensitive to our needs and also reflects good stewardship of the land, atmosphere, and waters. We have concerns about future energy policy and would like to be consulted.

4) **Rural Infrastructure:** Rural communities and farm businesses need modern high-speed internet. They also require well-maintained transportation infrastructure, functional sewer and drainage systems, and reliable hydro services in order to thrive and grow.

We look forward to a better understanding of your government's proposed legislation to extend access to natural gas for rural Ontario.

5) **Trade:** Expanding our markets through international trade could provide for multiple benefits for both the industry and the province. We welcome the opportunity to consult with you and your staff regarding opportunities and how our industry could be assisted by policy and programs.

6) **Red Tape:** We agree with your government's focus on reducing Red Tape and look forward to detailing situations that could benefit from reductions and streamlining without compromising food safety.

The agriculture and agri-food sector has enormous potential in Ontario, but its potential requires policy that supports the needs of the industry. We are keen to help progress necessary improvements and would welcome opportunities to help in identifying specific areas for improvement.

Thank you for your consideration of these important issues. We are counting on your commitment to ensuring the continued success of Ontario's agriculture and agri-food sector.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario



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Hon. Steve Clark, MPP
Ministry of Municipal Affairs and Housing
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Via email: minister.mah@ontario.ca

Dear Ministers Hardeman and Clark,

Re: Farmland Preservation

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO is concerned about the long-term protection of our farmland. We believe that good planning and density targets in urban areas can prevent sprawl onto our valuable food-growing and naturally sensitive lands. Without such government intervention, population growth will continue to drive conversion of productive farmland to residential and industrial development. In light of concerns about food security, we note that growth is expected primarily in the regions of the province that are also home to our most productive farmland.

The focus of the CFFO's requests is on *monitoring and measuring* farmland assets because we cannot manage what we do not measure.

For this reason, we are asking the Ontario government to take the following actions to further protect productive farmland under growth pressure in the province:

- 1) **Extend the agricultural land-base mapping and system guidelines outside the Growth Plan Area** to apply in municipalities that have class 1-4 farmland and in all areas experiencing growth pressure.
- 2) **Expand the Agricultural System Portal to include data outside the Greater Golden Horseshoe (GGH)** and to include additional layers that are relevant to farmers and to the overall economic development of the agri-food system in Ontario.

1) Agricultural Land-Base Mapping and System Guidelines

Within the GGH region, significant protections on farmland and natural heritage features have been put in place, particularly through the Greenbelt Plan, the Growth Plan for the GGH, the Niagara Escarpment Plan, and the Oak Ridges Moraine Conservation Plan.

The CFFO sees the established concept of the Agricultural System model within the Growth Plan Area, consisting of the provincially mapped agricultural land base and the agricultural network, as a beneficial approach to protecting farmland and fostering successful agri-food businesses.

The CFFO wants the Agricultural System model to be extended to other regions of the province with class 1-4 farmland and areas that are also experiencing growth pressure.

2) Agricultural System Portal

The Agricultural System Portal was created as an online tool to encourage economic development of agriculture within the GGH region. The CFFO sees this as a valuable tool for farmers, agri-food businesses, and policy makers. We ask that this tool be updated regularly and expanded for use as an economic development tool across the province, not just within the GGH region.

In particular, we want to see existing data beyond the GGH added to all current layers in the portal. We also want to see new layers that are relevant to farmers and agri-food businesses, such as the provincial Natural Heritage System mapping. Once new Municipal Official Plans are approved, that mapping should also be added to the portal.

Summary

Creating the conditions for economic success within the agri-food system is a key element of farmland preservation. Government policies that foster economic development, such as the Agricultural System model, ensure that our farmers can successfully continue to operate businesses on our productive farmland. Tools like the Agricultural System Portal encourage greater capitalization on the potential of our province-wide agri-food sector, which will contribute to overall economic growth in both rural and urban areas.

Our ultimate concern is that, given the current measurement and management focus mainly on certain areas, such as the GGH, there is the risk that important management issues are not in focus for the rest of the province. Treating certain areas as more valuable can cause development pressures and other ramifications for surrounding areas. Provincial farmland assets need to be treated holistically.

We appreciate your consideration of these issues.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario



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Hon. Ernie Hardeman, MPP
Ministry of Agriculture, Food and Rural Affairs
11th Floor,
77 Grenville Street
Toronto, ON
M7A 1B3

Discussed in person and delivered via email: minister.omafra@ontario.ca

Re: Soil Health

Dear Minister Hardeman,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

Good soil stewardship on farms is foundational to the success of farming families and the health of the agricultural sector as a whole, and it has many benefits for society at large, as well. This vital resource rewards good management and can suffer significantly from poor management practices. While farmers work to be good stewards of the soil, there are many factors that impact how agricultural soils across the province are managed.

The CFFO affirms its support for Ontario's 2018 Agricultural Soil Health and Conservation Strategy.

The Soil Strategy is based on best available science and extensive consultation, of which CFFO was a part. It offers a plan to protect our soils through practices like increased crop rotation, cover crops, and livestock grazing. Initiatives through this strategy should be aimed to consider all the benefits that can be derived from healthy soil, including the positive impact this has on food production, water quality, greenhouse gas sequestration, and biodiversity – including soil biodiversity.

The CFFO believes the province must pursue timely implementation of Ontario's Soil Strategy actions. To that end, the CFFO proposes a number of key recommendations:

- 1) Support research on and adoption of soil health Best Management Practices (BMPs).**
 - On-farm trials, proof-of-concept projects, and innovation grants should be funded in order to test and demonstrate new BMPs by farmers.
 - Knowledge transfer and translation must be enhanced, both so that farmers can be informed about recent research results and researchers can learn about on-the-ground experiences of farmers.

- Soil health BMP adoption supports should be targeted regionally and should recognize both past practices and future potential; for example, practices such as crop rotation and cover crops are currently critical to improving water quality in vulnerable watersheds.
 - Research on barriers to BMP adoption needs to consider the impact of other government policy and regulations which might hinder easy adoption.
- 2) **Update provincial soil mapping for all regions**, not only agricultural regions.
- Soil type mapping and land suitability classification systems should continue to be updated, as well as expanded to include a finer scale of detail.
 - Data should be accessible electronically for all stakeholders, including farmers, extension personnel, and policy makers.
 - Ideally, soil maps should be made fully consistent with other maps used by provincial ministries, especially maps that track land use and environmental assets.
- 3) **Support farmers in their efforts to improve soil health and reduce nutrient losses.**
- Given the range of issues and importance of impacts, targeted and transparent funding will need to be increased. Programs, such as the Canadian Agricultural Partnership (CAP), need to be sufficiently funded in the long term to ensure that they continue to provide effective support for farmers.
 - Past regional programs such as GLASI, the Farmland Health Checkup and the Soil Health Checkup offered valuable education, extension and funding to support farmers' efforts to improve soil health and reduce nutrient losses. The CFFO strongly supports the Soil Strategy's action to expand availability of similar programs to other farming regions of the province. We encourage the province to establish a designated timeline, such as five years, to achieve this goal.

Summary

The CFFO recognizes that good soil stewardship is foundational to human health and prosperity, as well as the health of the broader environment, including water and air. While strong government, research and extension support is important, in the end, it will be primarily farmers on the front lines, promoting soil health improvements across the province. Through their good stewardship, all of society benefits. It is, therefore, vitally important that we collaborate productively, focus on achieving better soil health, and support the contributions farmers can make through their soil stewardship efforts.

Thank you for this opportunity to provide our input and share with you our priorities.

Sincerely,



Clarence Nywening, President

Christian Farmers Federation of Ontario



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Via email: minister.mecp@ontario.ca

Dear Ministers Hardeman and Phillips,

Re: Water Stewardship for Agriculture

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO wants an agricultural system that encourages good stewardship of our water resources through policy, research, and on-farm innovation. As Ontario's climate becomes increasingly erratic, farmers will need to produce quality crops and livestock in extremes of flood and drought. Good soil health, irrigation, drainage, and retention systems are necessary for food production.

We are asking the Ontario government to take the following actions:

- 1) **Guarantee funding for water quality research and monitoring projects** across the province.
- 2) **Ensure incentives to address water quality and soil health**, especially in sensitive watersheds.
- 3) **Ensure Ontario's agricultural water regulatory environment allows farmers to manage water on their farms** through drainage, irrigation, and retention systems.

1) Funding for Water Quality Research and Monitoring

Government plays a key role in providing funding to support water quality research and monitoring across the province. Many current monitoring projects and systems are already in place, but funding must be ongoing to establish baselines and to monitor the impact of stewardship efforts.

The CFFO calls on government to ensure that those on the front lines of water quality monitoring and research, such as our universities and conservation authorities, have sufficient funding over the long term to maintain data collection and in-field research projects. These are vital supports for agriculture and for society as a whole, as we work to improve water quality for the benefit of all who live in Ontario and in our broader watersheds, now and into the future.

To that end, the CFFO also supports Ontario's collaboration on regional and international management of Great Lakes water quality.

2) Water Quality and Soil Health Incentive Programs

The CFFO strongly encourages government to ensure that there is incentive funding to support farmers' water and soil stewardship efforts. Currently, the Canadian Agricultural Partnership (CAP) includes a project category focused on Environmental Stewardship to enhance water quality and soil health. Through this and other programs, the Ontario government has an important role to play in supporting farmers' on-farm stewardship work.

There are also other actions farmers can take to improve water quality and soil health. Incentives are especially important in cases where best practices are primarily for the public good and where farmers will not be able to recover the costs to implement these practices from the market place.

3) Agricultural Water Regulatory Environment

It is vital that water regulation in Ontario, including "permit to take water" and wetlands policy, recognizes the unique priorities of on-farm water management practices and infrastructure.

Biological use of water depends on having the right amount of water at the right time in order for crops and livestock to thrive. Farmers must use many techniques to control an increasingly erratic supply of water, including retention/storage, drainage, and irrigation systems.

Our water regulatory system needs to better facilitate implementation and use of these types of water control infrastructure. In particular, the definition of "wetland" needs to recognize the difference between existing or restored wetlands versus agricultural drainage and retention infrastructure. Farmers must be able to manage on-farm infrastructure and access stored water intended for farming.

We encourage you to engage with other ministries that control environmental, natural resource, and municipal policies and regulations so as to breach water management silos.

Summary

Good on-farm water stewardship promotes farm business sustainability over the long-term and respects the surrounding environment.

CFFO wants government commitment to enabling a more productive and profitable agricultural sector through water policy and ongoing funding for incentives and water quality monitoring and research. Policy needs to encourage soil health and wise use of irrigation, drainage, and retention for optimal farm water management. **Monitoring and research that leads to on-farm innovation will allow farmers to be more self-reliant in the face of floods and droughts.**

We appreciate your consideration of these issues.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario