



November 16, 2022

The Honourable Steve Clark  
Ministry of Municipal Affairs and Housing  
Provincial Planning Policy Branch  
777 Bay St., 13th Floor  
Toronto, ON  
M5G 2E5

**RE: ERO 019-2927 – Proposed updates to the regulation of development for the protection of people and property from natural hazards in Ontario**

Dear Minister Clark,

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated ecological lands through direct land securement, stewardship, policy research, and public education. Our goal is to ensure a safe and sustainable food supply for future generations in this province by protecting farmland in perpetuity.

With growing food insecurity in the province and the world, it is more important than ever before that we protect the finite and non-renewable resource that is our agricultural soil. Ontario's farmland directly supports the agri-food sector, which is the largest economic sector in the province, employing more than 860,000 Ontarians along the supply chain and annually contributing over \$47 billion to the province's GDP<sup>1</sup>. In order to preserve the viability of Ontario's agri-food sector, it is crucial that the province's finite supply of agricultural land is protected.

In the past, OFT has commended the Province's commitment to the policies that strengthen agriculture in Ontario. We recognize the need to address issues of housing availability and affordability, however, OFT would like to encourage the Province to continue showing a strong commitment to Ontario's agri-food sector by making policy decisions that protect agricultural systems, agricultural land and food security and support the continued production of local food.

**The housing crisis facing Ontario is a real and wide-spread problem, however, OFT is concerned that the provincial policy changes in Bill 23 will not provide an effective solution. If this crisis is not addressed effectively, it will only exacerbate the other challenges Ontarians have to face, such as rising food insecurity, rising land prices, and the destruction of the agricultural system in Ontario.**

**To strengthen this proposal, OFT recommends that all proposed changes to the *Conservation Authorities Act* are revoked.**

Farmland works in tandem with natural lands and the ecosystem services they provide. First, natural lands provide habitat to pollinators which crops depend on<sup>2</sup>. Additionally, natural lands, including wetlands, absorb water from precipitation which can mitigate flooding, and in turn, prevents soil erosion from occurring during flood events<sup>3</sup>. As it takes approximately 100 years to form just one inch of soil (at minimum)<sup>4</sup>, it is crucial that erosion risks are minimized. Ontario's food security depends on natural lands



and the services they provide, and Ontario's Conservation Authorities play a key role in protecting this natural land.

The proposed changes to the *Conservation Authorities Act* that will allow for development to be exempted from requiring a permit issued by the Conservation Authority directly puts farmland, natural habitats, and home-buyers at risk. Ontario's Conservation Authorities were created to protect Ontarians and their properties from natural hazards, and their watershed boundaries allow for the work of Authorities to meet the specific needs of the local area that they serve. This local perspective is crucial, and is why OFT also believes that the proposed single regulation for all Authorities should be revoked and that Authorities should maintain their individual regulations. Finally, restricting comments from Authorities in the planning approval process will only prevent Authorities from being able to make comments specific to the needs of their area. In areas with high concentrations of agriculture, this may prevent Authorities from being able to engage positively with their agricultural community.

**As such, OFT strongly urges the Province to revoke the proposed changes to the *Conservation Authorities Act*.**

**Ontario needs an increased housing supply, but what is proposed in Bill 23 is not an effective solution.** Ontarians need affordable, high-density housing solutions that provide residents with easy, walkable, access to public transit and amenities<sup>5</sup>. New development built upon annexed farmland and natural areas are not an equitable solution to the housing crisis, and will only serve to magnify both the climate crisis and food insecurity.

Thank you for this opportunity to share our recommendations and feedback on ERO Registry #019-2927. We sincerely hope you take our suggestions into consideration when reviewing the feedback you receive. If you have any questions or would like to speak further on these issues, please do not hesitate to get in touch. We look forward to continuing to work with the Province to strengthen the agricultural system and protect the viability of the agricultural sector.

Most Sincerely,

Martin Straathof  
Executive Director  
Ontario Farmland Trust

Bernard Pope  
Chair, Board of Directors  
Ontario Farmland Trust

Margaret Walton  
Chair, Policy and Education Committee  
Ontario Farmland Trust



#### References:

- [1] Ontario Federation of Agriculture. 2020. Agriculture Matters – A Guide for Municipal Councillors and Staff. <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [2] Garibaldi, L. A., Requier, F., Rollin, O., and Andersson, G. K. S. (2017). Towards an integrated species and habitat management of crop pollination. *Current Opinion in Insect Science*. 21:105-114.
- [3] Pattison-Williams, J. K., Pomeroy, J. W., Badiou, P., and Gabor, S. (2018). Wetlands, flood control and ecosystem services in the Smith Creek Drainage Basin: A Case Study in Saskatchewan Canada. *Ecological Economics*. 147:36-47.
- [4] Protz, R., Martini, I. P., Ross, G. J., and Terasmae, J. (1984). Rate of Podzolic Soil Formation near Hudson Bay, Ontario. *Canadian Journal of Soil Science*. 64(1):31-49.
- [5] Jacobus, R. (2019). Inclusionary housing: Creating and maintaining equitable communities. *Lincoln Institute of Land Policy*. <https://www.jstor.org/stable/pdf/resrep22075.pdf>