



December 2, 2022

Hon. Doug Ford
Premier of Ontario
Legislative Building, Queen's Park
Via Email: Premier@ontario.ca

Dear Premier Ford,

We are writing to share the perspectives of the Ontario Fruit and Vegetable Growers' Association on Bill 23, *More Homes Built Faster Act, 2022*, regarding several aspects that are of interest to the sector and the future of Ontario's fruit and vegetable production. Ontario's fruit and vegetable production plays a leading role in ensuring Ontarians have access to fresh and local produce for consumption, in addition to helping drive Ontario's economy with over \$1.6 billion in exports.

The OFVGA appreciates the unprecedented challenge faced by the Ontario government to address the significant housing shortage in the province, and we understand the province must take decisive action to address this issue. We agree that solving this shortage will require numerous policy measures and efforts from all levels of government to create an environment that will lead to the required housing to be built.

The OFVGA supports responsible development that protects our finite agricultural land resources and capacity to produce food and does not limit the current or potential economic value of the agri-food sector, especially for fruit and vegetable production. In this regard, we want to work closely with your government to balance protecting our domestic food production with the need for more housing.

As the Ontario government proceeds with its current or any future proposals that may have an impact on the province's capacity to grow food, the OFVGA is requesting the government consider the following principles:

- **Allow for sufficient engagement and meaningful open dialogue with impacted stakeholders**, including the agri-food community, before proceeding with land-use changes, especially when it may result in removing productive farmland from an agricultural use.
- **Work towards a longer-term plan that will meet the needs of food production and future housing needs**, to avoid circumstances that require significant changes in land use policy that may not lead to the best possible outcome.
- **Protect specialty crop land required for fruit and vegetable production.** Lands used for fruit and vegetable production are much more unique and limited than other agricultural production, including specific soil types, microclimates or other land features that make it suitable to be productive for high valued fruits and vegetables.
- **Factor in the potential agricultural productive capacity, not just the current land-use when assessing a property's best use.** The current land-use may not reflect its most productive capacity from an agriculture standpoint, and that there may be other key factors preventing that land from becoming its most productive. For example, there is agricultural land in Niagara Region that is not

currently in grape or tender fruit production but would be suitable if appropriate irrigation infrastructure was established.

- **Avoid policies and land use decisions that lead to unintended consequences that further exacerbate potentially damaging farmland losses.** For example, developers may now receive the message that speculating on farmland in protected zones will pay off in the future if a future government opens the land for development. This will lead to lands becoming less productive as the land will not be managed for long term productivity, reducing its long-term food production capacity. In addition, if the land is suitable for orchard or vineyard production, ownership by a speculator will almost certainly prevent the investment in tree fruit or vineyard production as there is no guarantee the investment would have a full return before the land is developed.
- **Ensure that all lands slated for development have appropriate and enforceable density requirements** to ensure that the developed land is utilized as effectively as possible.
- **Ensure changes to development charges do not result in increased costs on existing taxpayers** in the region.
- **Ensure growers are competitive and sustainable into the future.** Having a resilient fruit and vegetable sector also relies on strong government policy that enables growers to be as productive as possible. This includes strong risk management programming, balanced environmental policy, and strong energy infrastructure.

Premier, thank you for considering the perspectives of the OFVGA on this incredibly important matter. We are prepared to work with the Ontario government to find ways we can strike the right balance for Ontario to be more self-sufficient for these two important necessities of life – food and housing.

Sincerely,



Charles Stevens
Chair, OFVGA Board



Brian Gilroy
Chair, OFVGA Property, Infrastructure, Energy & Food Safety Section

cc: Hon. Lisa Thompson, Minister of Agriculture, Food & Rural Affairs
Rob Flack, Parliamentary Assistant to Minister of Agriculture, Food & Rural Affairs
Trevor Jones, Parliamentary Assistant to Minister of Agriculture, Food & Rural Affairs
Hon. Steven Clark, Minister of Municipal Affairs and Housing
Kevin Holland, Parliamentary Assistant to the Minister of Municipal Affairs and Housing
Michael Parsa, Associate Minister Municipal Affairs and Housing