

December 4, 2022

Hon. Steve Clark
Minister, Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto, Ontario M7A 2J3
Submitted online and sent via email to minister.mah@ontario.ca

Re: ERO 019-6216 Proposed Amendments to the Greenbelt Plan, ERO 019-6217 Proposed Amendments to the Greenbelt Area Boundary Regulation O. Reg. 59/05, and ERO 019-6218 Proposed Redesignation of Land under the Oak Ridges Moraine Conservation Plan O. Reg. 140/02

Minister Clark,

The National Farmers Union - Ontario (NFU-O) is categorically opposed to the Ontario Government's proposals to alter the Greenbelt's boundaries and remove 7,400 acres of **permanently** protected agricultural and natural heritage lands. We are appalled that this Government thinks it can placate farmers with a lackluster "[Grow Ontario: A Provincial Agri-Food Strategy](#)" while deregulating 5,000+ acres of protected farmland that we need to feed Ontarians. There is no "growing Ontario" without permanent protections for the remaining 5% of land in the province suitable for growing food and raising livestock.

The NFU-O is an accredited farm organization representing thousands of sustainable farmers in Ontario and has advocated for farmers across Ontario since 1969. Members work together to achieve agricultural policies that ensure dignity and income security for farmers, while protecting and enhancing rural environments for current and future generations.

The NFU-O has long championed [the need to grow](#), not carve up, the Greenbelt. We were among the signatories supporting the proposed [Bluebelt Expansion Area](#), which would extend the Greenbelt to protect areas of high ecological and hydrological value such as moraines, wetlands, headwater areas, and cold water streams. We also participated in 2017 and 2021 when the Ontario Government sought "[feedback on ways to grow the size of the Greenbelt](#)" — to date, the Government has not shared the results from these consultations. This Government has gone from proposing Greenbelt growth to sowing the seeds of its destruction. Reneging on [multiple promises](#) to protect the Greenbelt, this Government is moving us in a direction that will have dire consequences for farmers, eaters, and the province's fragile ecosystems.

Solving the housing crisis does not require the removal of finite, irreplaceable, and invaluable agricultural and natural heritage lands. The Government's own [Housing Affordability Task Force](#) has made it abundantly clear that "a shortage of land isn't the cause of the problem." There are 86,500 acres within the Greater Toronto and Hamilton Area alone that exist within municipal settlement boundaries and are available for development. We understand the need

to build affordable, “missing middle” housing, but let’s do it where people already live and work and leave the farmland to feed our growing population.

The NFU-O is deeply concerned by the immediate loss of 4,700 acres of prime farmland in the Duffins Rouge Agricultural Preserve and within the City of Pickering. This farmland has the potential to produce local food for diverse GTA communities; instead, this proposal earmarks it for urban sprawl. We also find the redesignation and removal of specialty crop and natural heritage land near the town of Grimsby in the Niagara region extremely misguided. Designated for the production of stone fruits and wine grapes due to its soil and unique climate, the removal of these lands from Greenbelt protection threatens a cornerstone of Ontario agricultural diversity and removes an extremely rare land base for specialty crop production.

Ontario already loses 319 acres of farmland daily and when that land is paved over it is never suitable for growing food again. Farmland in Ontario is a diminishing resource at the center of our \$47 billion agri-food sector. The economic impact of the past two years has taught us the importance of investing in resilient localized supply chains that will keep food on the shelves in our province. The loss of farmland, especially near our most populated urban areas, directly undermines the ability of Ontario farmers to grow food, threatening our food security, the economy, climate change mitigation strategies, and the public health of all Ontarians.

The *Greenbelt Act*, by protecting sensitive ecological areas, wetlands, and agricultural lands is a crucial legislative tool for us to effectively mitigate climate change. By putting Greenbelt protections on the chopping block and by encouraging urban sprawl, we are only going to escalate our carbon emissions, increasing the climate threat for current and future generations.

By signaling that no land within the Greenbelt is permanently protected, this Government is setting farmers and land-seeking agriculturalists up for increased competition, as speculators and developers hedge their bets and buy up Greenbelt farmland, leasing it back to growers at exorbitant rates, while lobbying the government until it greenlights development on their investments. We have already seen how such land speculation has inflated farmland prices in vulnerable and unprotected lands adjacent to the Greenbelt. For example, leapfrog development has been rampant within the Grand River Watershed in Brant County, with some properties selling for more than [\\$35,000/acre](#).

At a time when the average Ontario farmer is at or past retirement age, we need a government willing to find solutions to the problem of farmland affordability. Instead, by altering the Greenbelt’s boundaries and removing land from its protection, this Government is encouraging speculation that will effectively prevent the next generation of farmers from being able to afford to own, manage, and care for our finite agricultural lands. **We need [legislation](#) that ensures farmland for farmers, not speculators!**

The NFU-O is also deeply concerned by the sensitive natural heritage land that is being slated for removal. By damaging the ecological integrity of the Greenbelt, especially crucial watersheds, the paving over of natural heritage land will increase flood risks and water

contamination, threatening nearby farming operations. Developing the triangle of land between the Rouge River and Duffins Creek watersheds will impact thousands of acres of nearby farmland, valleys, woodlands, and wetlands, including the wildlife that makes its home there.

The 9,400-acre land swap—land the Government proposes to add to the Greenbelt—is cold comfort. Much of this land was already off limits for development. The protection of the Paris-Galt Moraine and Urban River Valley (URVs) lands and waterways were already part of previous Greenbelt expansion proposals (which the NFU-O supported) and are, conveniently, not suitable for development. These “newly” protected areas are also not suitable for farming; as such, the proposed additions to the Greenbelt do not compensate for the farmland lost to developers. Similarly, the land swap only calls for the inclusion of publicly-held land, even though we know that privately-held land is the most susceptible to development. We find it unacceptable that the government thinks it can sugar-coat the loss of agricultural and natural heritage land through an inequitable land swap. While we welcome the inclusion of the Urban River Valleys into the Greenbelt, the government’s ecological offsetting in no way mitigates the net loss of protected lands.

We urge you to abandon these proposals and, instead, work with farmers and environmental organizations to further preserve and permanently protect our farmland and natural ecosystems. We further call on you to work—not only with property developers—but with affordable housing advocates, the precariously-housed, public planners, and municipal leaders to support the construction of affordable and missing middle housing within existing urban and municipal boundaries. Our natural heritage ecosystems, our farmers and our farmland, and our precariously-housed citizens are counting on this Government to do the right thing. Do not let Ontarians down just to line the pockets of a handful of well-heeled speculators.

For Greenbelt expansion, not attrition,



Max Hansgen, President
National Farmers Union – Ontario

cc: The Honourable Graydon Smith, Minister of Natural Resources and Forestry
The Honourable Lisa Thompson, Minister of Agriculture, Food and Rural Affairs