



**CHRISTIAN FARMERS
FEDERATION OF ONTARIO**
ACCREDITED FARM ORGANIZATION

June 09, 2025

Attention: Planning Consultation
Ministry of Municipal Affairs and Housing
College Park
777 Bay St.
Toronto, ON
M7A 2J3

**RE: ERO 025-0461 Proposed Planning Act and City of Toronto Act,
2006 Changes (Schedules 3 and 7 of Bill 17 – Protect Ontario by
Building Faster and Smarter Act, 2025)**

Dear Ministry,

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.

Regarding proposed changes under Bill 17 *Protect Ontario by Building Faster and Smarter Act, 2025*, the CFFO:

- Supports proposals to allow conditions on Minister's Zoning Orders.
- Recommends that Agricultural Impact Assessments continue to be required as outlined in the Provincial Planning Statement, 2024.
- Recommends that the Minister continue to approve municipal requirements for studies that promote successful farm businesses and farmland protection.
- Supports requirements for studies to be completed by appropriately qualified professionals.
- Recommends that municipalities still be permitted to deem a report incomplete or to require peer review.

Minister's Zoning Orders

The CFFO supports proposals to allow the Minister of Municipal Affairs and Housing to impose conditions on Minister's Zoning Orders. This step will contribute to increased oversight and accountability within the Minister's Zoning Order process.

In particular, we hope that where a Minister's Zoning Order will impact actively farmed land, conditions placed on the order will look to avoid or minimize impacts on farm businesses and loss of farmland.

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Study Requirements – Complete Application

Requirements for Agricultural Impact Assessments (AIAs) were recently changed through the Provincial Planning Statement, 2024 (PPS). Some municipalities may not have updated their list of required studies since the implementation of the new PPS. Any studies required to meet PPS requirements, including Agricultural Impact Assessments, should continue to be permitted through this legislation.

While increasing consistency between municipalities is a good aim, it is also important to recognise that Ontario municipalities serve diverse communities across significantly different landscapes. Studies appropriate in a large urban setting should be different than those required in an agricultural setting. We request that the Minister continue to permit studies that are intended to support thriving farm businesses and protect vital farming assets, including farmland, in communities with active farming.

Study Requirements – Certified Professionals

The CFFO also supports the need for studies to be completed by appropriately qualified professionals as part of the municipal planning application process. Municipalities should not, however, be required to accept studies based solely on the qualifications of the author(s). Municipalities should continue to be able to deem a study as incomplete and to have access to the peer review process. This will ensure that studies meet the highest standards and have presented a balanced point of view.

Conclusion

The CFFO sees value in allowing conditions to be placed on Minister's Zoning Orders. In looking to minimize study requirements, it is important that those studies required by the Provincial Planning Statement, including Agricultural Impact Assessments, continue to be required. We also recommend that the Minister continue to approve municipal requirements for studies that promote successful farm businesses and farmland protection. While it is important that studies are prepared by appropriate qualified professionals, this does not override the need to ensure studies are complete or the value of the peer review process.

We appreciate your consideration of our concerns and recommendations.

Sincerely,



Henk Vaarkamp, President
Christian Farmers Federation of Ontario

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