

October 11, 2025
Provincial Land Use Plans Branch
13th Floor, 777 Bay Street
Toronto, ON M7A 2J3
Canada

Re: PROPOSED UPDATES TO THE PROJECTION METHODOLOGY GUIDELINE TO SUPPORT THE IMPLEMENTATION OF THE PROVINCIAL PLANNING STATEMENT, 2024 (ERO 025-0844)

Dear Minister Flack,

The Ontario Greenhouse Vegetable Growers (OGVG) appreciates the opportunity to submit our feedback on the updates on *Provincial Planning Statement (PPS) 2024* to assist planning authorities with identifying population and employment forecasts and assessing land needs for the growing greenhouse vegetable sector.

Our sector has grown 5% per year over the last decade, contributing \$2.4 billion in Gross Domestic Product (GDP) to Ontario's economy. When municipalities are developing housing needs forecast over the 20-to-30-year planning horizon, we request that provincial guidance over municipalities containing specialty crop areas and prime agricultural lands to consider our 5% growth rate when updating their land use and employment forecasts with special attention to the availability of infrastructure, such as water, waste water, electricity, and natural gas, that are required to support our industry and its forecasted growth.

Specialty crop areas and prime agricultural lands must be protected from being re-purposed for development to support Canada's food security needs. In addition, agricultural support buildings essential to greenhouse operations should remain classified as agriculture. Recently, the MTO has redefined the use of support buildings, especially packhouses, on agricultural greenhouse land as "commercial." Similarly, some municipalities have applied industrial development charges to structures like boiler rooms, which are used to maintain optimal temperature for plant growth, rather classifying them as agriculture. We believe it would benefit both the provincial government and the greenhouse sector to maintain and enforce the previous provincial policies on support buildings for greenhouse operations to retain their agricultural status. These redefinitions have resulted in project delays, increased costs for farmers, and potential impacts on the continuity of food production, undermining the long-term security of Ontario's greenhouse sector.

We further ask that temporary foreign worker housing be included in assessments of housing needs and land use. Notably, additional workers could be housed on a greenhouse property if the MECP's sewer discharge guideline threshold is increased over 10,000 L /day without the need for a sewage works approval process. Coordinating guidelines with other ministry policies could enable efficient on-farm housing, reducing reliance on off-site accommodations and daily transportation.

OGVG represents 170 farming families managing over 4,300 acres of tomatoes, peppers, and cucumbers, supporting more than 35,000 high-quality jobs throughout the full value chain. We live in the communities that we work in and understand the importance of affordable housing for our neighbors. The growth of our sector, the need for housing for our workers, and consistent application of agricultural definitions should be considered with this revision to the provincial planning statement.

OGVG members appreciate provincial support for growth and prioritizing infrastructure. We look forward to supporting infrastructure initiatives that strengthen greenhouse operations and the sector's economy across Ontario. As always, we remain available to answer any questions and provide further comment.

Sincerely,



Richard Lee
Executive Director