

April 24, 2024

Karen Redman, Regional Chair, and Councillors Region of Waterloo Council c/o Regional Clerk 150 Frederick St., 2<sup>nd</sup> Floor Kitchener, ON N2G 4J3 Via email: Clerk

Re: Proposed Land Assembly in Wilmot Township

Dear Regional Council,

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.

The CFFO calls on all levels of government to pause the ongoing process of land assembly in Wilmot Township until full public transparency of the process, proper public consultation, and proper consideration of the impacts on agriculture have taken place. Lands designated as "prime agricultural areas" in official plans should be protected for agricultural uses.

Until recently, farm businesses in Waterloo Region could operate with confidence in regional and municipal land use planning that values farm businesses and the need to protect the high-quality productive farmland in the Region. The Region is home to a vibrant farm community neighbouring a growing urban community, to mutual benefit. Farm businesses could plan for future growth and benefit from a consumer market close to home.

With the proposed land assembly in the Township of Wilmot, six farm businesses are suddenly facing a very different prospect. If this land assembly goes forward as proposed, farmers across the Region, and indeed across Ontario, will be faced with a very different prospect about the level of confidence they can place in operating and investing in their businesses. Expropriation in this form must never be allowed to happen to Ontario's hardworking farmers.

## **Transparency and Public Consultation**

No public consultation has taken place. Very little information is available about the process that has been undertaken to date in selecting this site, in what type of use is proposed, or why such a forceful method is being used to secure these lands. Councillors, who should be accountable to their constituents, have been put under non-disclosure agreements, which is unacceptable.

In forcing sale of land, not for publicly owned infrastructure such as highways or hospitals, but for the benefit of a private industrial business, the government is placing value on one type of business against another.

CFFO President Ed Scharringa expressed his unwavering support for the affected farmers and their families. "As President of CFFO, I stand in solidarity with the farmers of Wilmot facing expropriation," said Scharringa. "It's shameful that our farmers, stewards of our land, are left vulnerable to such injustice. Our government systems should protect them, not put them at risk."

Scharringa further emphasized the failure of governmental bodies to safeguard the interests of farmers and farmland. "All levels of government should be ashamed that these farmers are even in this position," he asserted. "They have been failed by the very system meant to protect them and our farmland."

We strongly encourage all levels of government, local, regional, and provincial, to be transparent and consultative in major changes in land use that affects farmed land, offering time for the local community to consider the possibilities, costs and benefits and to offer input in the process.

The CFFO is also concerned about the impact of land use planning changes such as this on farm businesses. Those farm businesses directly impacted deserve due consideration of the seasonal nature of their businesses, and potential impacts on both crops and livestock. It is vital to allow suitable time for landowners to fairly consider their options and plan for necessary changes.

An Agricultural Impact Assessment should be conducted as part of the public consultation process. This will help to ensure the impacts on the broader agricultural system, including farm and farm-related businesses in the area, is properly understood and mitigation of impacts is undertaken.

## **Farmland Protection**

The CFFO is concerned about the protection of productive agricultural land. This land is highly valuable as a source of food, as an economic driver and as a provider of environmental goods and services.

Ontario's farmland is the foundation of the significant economic contributions of our overall agri-food sector which will continue to be important to a strong Ontario economy. Farmland

and natural features together ensure environmental benefits and corridors for wildlife and water through the landscape. Productive farmland is vital to our food security, here in Ontario and globally. All these benefits are lost when farmland is permanently removed from production.

Brownfield or industrial zoned lands, especially those already within existing settlement area boundaries, should be considered for industrial uses. The 770 acres proposed are designated as part of the "Prime Agricultural Areas" in the municipal official plan and should be protected for ongoing agricultural uses.

## Conclusion

We call on the Region to stop action on this farmland immediately. The process of land assembly in Wilmot Township must be put on pause until the full public transparency of the process, proper public consultation, and proper consideration of the impacts on agriculture have taken place.

Most importantly, our prime agricultural land deserves protection over the long term. Brownfield sites or areas already zoned industrial, especially within settlement area boundaries, are more suitable for industrial uses. Prime agricultural lands must be preserved for agricultural uses, now and into the future.

We appreciate your consideration of our concerns and comments.

Sincerely,

Ed Scharringa, President

Christian Farmers Federation of Ontario

CC: Hon. Lisa Thompson, MPP, Ontario Minister of Agriculture, Food and Rural Affairs Her Worship Natasha Salonen, Mayor, Township of Wilmot