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October 4, 2017

Helma Geerts
Policy Advisor
Ministry of Agriculture Food and Rural Affairs
Policy Division
Food Safety and Environmental Policy Branch
1 Stone Road West
Floor 2
Guelph, ON
N1G 4Y2

Dear Helma Geerts,

EBR 013-0968 Draft Agricultural System Mapping and Implementation Procedures for Consultation

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

The CFFO is pleased to see the Agriculture System approach taken in the four plans within the Greater Golden Horseshoe (GGH). This is a clear indication of the government's focus on the importance of agriculture in this region. This Agricultural System appropriately recognizes that agriculture requires both a land base and key surrounding infrastructure to thrive. The three tools proposed to help implement the Agricultural System are important first steps on behalf of the province to see this concept implemented.

Summary of Key Recommendations

Draft Agricultural Land Base Map

- 1) That the weighting of the LEAR formula used to determine "prime agricultural area" needs to be adjusted regionally to ensure protection of the best classes of farmland which are currently in farm production. In order to determine the appropriate weighting of CLI classes and fragmentation in each region, we recommend that this be considered as part of further local consultation or as part of the municipal implementation process of the mapping. The revised formula should be applied to generate a revised map in those regions.

Draft Agricultural System Portal

- 2) That a layer showing the proposed Natural Heritage System (NHS) be added as soon as possible to the portal.
- 3) That a goal be set to develop the Agricultural System Portal tool to include data layers of interest to agriculture from other ministries (MNRF, MOECC) and agricultural system data for all agricultural regions of the province (not just the GGH).



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- 4) That the tool be updated regularly to maintain its relevance for all uses.
- 5) That the provincial and federal governments continue to work with industry to improve access to quality internet in all rural areas of Ontario, thus making the tool more accessible to all.

Implementation Procedures

- 6) That all upper- and single-tier municipalities be encouraged to establish Agricultural Advisory Committees including opportunity for representation from each of the three Accredited Farm Organizations and other agricultural organizations active within the community.
- 7) That Agricultural Impact Assessments (AIAs) consider the most suitable placement of supporting agri-food network infrastructure, businesses, services and assets so as to minimize any negative impacts on primary production.
- 8) That AIAs consider fragmentation impacts of projects on rural lands within the agricultural land base as well as within prime agricultural areas.
- 9) That AIAs consider buffer zones and traffic implications of new projects abutting or encroaching on the agricultural land base.

Provincial Draft Agricultural Land Base Map

- 1) That the weighting of the LEAR formula used to determine “prime agricultural area” needs to be adjusted regionally to ensure protection of the best classes of farmland which are currently in farm production. In order to determine the appropriate weighting of CLI classes and fragmentation in each region, we recommend that this be considered as part of further local consultation or as part of the municipal implementation process of the mapping. The revised formula should be applied to generate a revised map in those regions.

Land use planning is a vital process for protecting the integrity of key resources, natural and cultural, for the benefit of all Ontarians. Protecting our limited farmland as farmland in the long-term benefits current farmers, new farmers, and future generations of farmers. Protection of our dependable productive farmland is vital across the province, but especially in the Greater Golden Horseshoe (GGH) region.

The CFFO supports the goal of mapping out a contiguous area connecting the specialty crop areas, prime agricultural areas and select rural lands into the agricultural land base. Common nomenclature and consistent factors and datasets are important to achieve greater consistency across municipalities. However, in order to appropriately address differences between regions and municipalities, some adjustments need to be allowed to the weighting of the LEAR formula used to determine prime agricultural areas and rural lands within the agricultural land base.

Land in farm production reflects the diversity of farm businesses in Ontario. The CFFO supports strong protection on the best farmland in any given area, which is not always only class 1-3 land and not always large parcels of land. We recommend that the formula used to determine “prime agricultural area” needs to be adjusted regionally to ensure protection of the best classes of farmland which are currently in farm production in the region.



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While the “prime agricultural area” formulation does include class 4-7 lands in agricultural production that are closely connected to class 1-3 lands in agricultural production, this formula does not protect all the best farmland in each region of the whole Golden Horseshoe area. In some cases, the land classification weighting may need to include lower classes (such as class 4) to capture the best classes in the region. In other areas, the fragmentation weighting may need to be adjusted to reflect active farming in smaller parcels of high quality land where development pressures are higher.

In particular, consultation with our members raised concerns about the weighting of the LEAR formula in part of the GGH. The Natural Heritage System (NHS) map proposal (EBR 013-1014) recognizes two distinct areas within the region for which they have set different criteria for core areas within the NHS. We feel that likewise, the white or non-hashed area across Simcoe, Kawartha Lakes, Peterborough, and Northumberland counties (demarcated in Fig. 2, page 7 “Development of the Proposed Regional Natural Heritage System for the Growth Plan for the Greater Golden Horseshoe”) should have an adjusted formula for calculating “prime agricultural area.” For example, in order to protect the best farmland in this area, Canada Land Inventory class 1-4 land may need to be given heavier weighting (not just 1-3) to ensure proper protection of active productive farmland. In order to best determine the appropriate weighting of CLI classes in this area, we recommend that further consultation with regional farmers and experts should take place and the revised weighting to the formula should then be applied to generate a revised map incorporating more of the currently farmed land into stronger protection.

Draft Agricultural System Portal

- 2) That a layer showing the proposed Natural Heritage System (NHS) be added as soon as possible to the portal.
- 3) That a goal be set to develop the Agricultural System Portal tool to include data layers of interest to agriculture from other ministries (MNRF, MOECC) and agricultural system data for all agricultural regions of the province (not just the GGH).

The CFFO would like to see greater cooperation between ministries so that mapping layers relevant to farmers in the GGH can be added to this online tool. First and foremost, a layer showing the proposed Natural Heritage System (NHS) should be added to this tool. This will allow farmers to view both the NHS and the Agricultural Land Base Map at the same time within the tool, and see more clearly how both map onto their own properties.

This online tool is comparatively easy to use, and it already contains many valuable layers of information. While the focus of the tool is within the GGH, some of these layers already extend beyond to the whole province. The CFFO would like to see a future goal for this tool to include more data layers for all agricultural regions of the province and other regionally specific data layers for other key agricultural regions around the province.

- 4) That the tool be updated regularly to maintain its relevance for all uses.

It is also vital that this tool be regularly updated so that it remains a useful and relevant tool for agri-food businesses across the value chain and for all levels of government.



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- 5) That the provincial and federal governments continue to work with industry to improve access to quality internet in all rural areas of Ontario, thus making the tool more accessible to all.

Being an online tool, the Agricultural System Portal's relevance will partly depend on easy access in rural areas. It is important that the provincial and federal governments cooperate and push ahead to improve access to internet services and the quality of internet in all rural areas in Ontario.

Draft Implementation Procedures for the Agricultural System in the GGH

- 6) That all upper- and single-tier municipalities be encouraged to establish Agricultural Advisory Committees including opportunity for representation from each of the three Accredited Farm Organizations and other farm organizations active within the community.

This third tool, the Implementation Procedures document, includes significant valuable information for municipalities in order to explain and illustrate how the Agricultural System is intended to be implemented at a local level. We are supportive of the goal indicated that municipalities "should continuously look for opportunities to make improvements" (p.39) in their efforts to actively support the agri-food sector.

Connections between agri-food sector businesses and municipalities are crucial to ensure that efforts by municipalities are relevant and impactful. Agricultural Advisory Committees are one important way to build and maintain connection between agriculture and municipal governance. All upper- and single-tier municipalities should be encouraged to establish and support the work of these committees. In order to best reflect the diversity of agriculture in the area, committees should allow representation from each of the three Accredited Farm Organizations and from other active farm organizations represented in the local community.

Agricultural Impact Assessments

- 7) That Agricultural Impact Assessments (AIAs) consider the most suitable placement of supporting agri-food network infrastructure, businesses, services and assets so as to minimize any negative impacts on primary production.
- 8) That AIAs consider fragmentation impacts of projects on rural lands within the agricultural land base as well as within prime agricultural areas.
- 9) That AIAs consider buffer zones and traffic implications of new projects abutting or encroaching on the agricultural land base.

Many different types of land use occur in close proximity within this region. Emphasis on supporting the Agricultural System will need to ensure that normal farming practices, including livestock farming, and key supporting infrastructure are accommodated alongside other land uses.

Input suppliers, abattoirs and other food processing facilities, transportation, and storage facilities are all necessary to support production agriculture. However, these do not need to be located *within* prime agricultural areas; they do need to be located in areas where they will not negatively impact agricultural practices or land use (such as through creating minimum distance "shadows").



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Because rural lands within the agricultural land base are intended to help ensure or improve the contiguous nature of the land base, Agriculture Impact Assessments (AIAs) should also be required for infrastructure projects and for aggregate applications in order to ensure they are not fragmenting the surrounding farmland.

For projects that abut or encroach on the agricultural land base, AIAs should require that buffers be included within settlement expansions or infrastructure projects to minimize impacts, including consideration of any minimum distance “shadow” created by the expansion. Increased traffic implications and access for farm vehicles should also be important considerations for an AIA for infrastructure projects, settlement expansions, and aggregate applications.

We appreciate this opportunity to respond to these draft tools. Thank you for consideration of our comments.

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario