

# CFFO POLICY TOUR REPORT



## FINDING THE BALANCE

# 2020



FARMING, DEVELOPMENT & ENVIRONMENTAL PROTECTION



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## EXECUTIVE SUMMARY

In winter 2020, the theme of the Christian Farmers Federation of Ontario's (CFFO) Policy Tour was Balancing Farming with Development and the Environment. Between January and March 2020, seventeen sessions with CFFO members focused on development and the environment, seeking feedback from members on three programs/policies:

- Agricultural Impact Assessments (AIAs)
- Environmental Farm Plan (EFP)
- Canadian Agri-Food Sustainability Initiative (CASI)

## AGRICULTURAL IMPACT FROM DEVELOPMENT

Across Ontario, non-agricultural development pressure affects farmers differently due to regional variance of zoning regulations and proximity to cities. Agricultural Impact Assessments (AIAs) are a tool to evaluate and avoid adverse effects of this development on agriculture in areas such as the Greenbelt and the Greater Golden Horseshoe (GGH). The Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) recently drafted guidelines to standardize these assessments.

As a provincial organization, the CFFO works to protect farmland in the interest of Ontario agriculture as a whole. While it appreciates the need for non-agricultural development, the CFFO wishes to ensure that the impacts of development on Ontario agriculture and individual farm operations are mitigated.

In general, CFFO Policy Tour participants felt AIAs were a positive tool and that the OMAFRA guidelines were comprehensive. However, there was skepticism over conflict of interest, in the case of both the developer and the municipality. This could be mitigated with increased transparency and grassroots engagement. Furthermore, CFFO members felt that AIAs should be a requirement more broadly across the province and not just in the (already regulated) areas around Toronto and the Greater Golden Horseshoe (GGH).

### THE CFFO RECOMMENDS

#### *THAT OMAFRA'S AIA GUIDELINES:*

A

Require an AIA for non-agricultural development anywhere designated a prime agricultural area, as defined by OMAFRA or within municipal official plans.

B

Require an AIA for any development project proposing to remove from production over 25 acres of a prime agricultural area, as defined by OMAFRA or within municipal official plans.

C

Require that an AIA report clearly state who prepared it and who has paid for its completion .

D

Allow agricultural stakeholders and OMAFRA the opportunity to review final AIA reports and provide recommendations to the respective review committees.

## ASSESSING ENVIRONMENTAL PRACTICES

The Environmental Farm Plan (EFP), administered by the Ontario Soil & Crop Improvement Association (OSCIA), is a voluntary and confidential tool for farmers to self-assess their operations for environmental risks and is a requirement to access cost-share funding. The Canadian Agri-Food Sustainability Initiative (CASI), now spearheaded by the Canadian Federation of Agriculture (CFA), has funding to roll out a verification program across the country that will streamline existing sustainability programs, getting farmers access to more markets while reducing their paperwork.

While the EFP and CASI are two distinct programs, they both rely on farmer buy-in. Throughout the CFFO Policy Tour, we heard that farmers care deeply about environmental sustainability but wonder who is defining the word "sustainable" and whether consumers are ready (or able) to pay more for it. They are concerned that national prescriptions and programs will

not appreciate the complexity of Ontario agriculture, by region or by commodity.

Despite the grassroots origins of the EFP, Policy Tour participants seemed skeptical of it, seeing it as a government program because it has become synonymous with provincial cost-share funding. While they value the EFP as an educational tool, they do not feel it is necessary to redo the workshop and workbook every five years.

As for CASI, the CFFO is in strong support and considers it the EFP for our times. Farmers are in favour of having their stewardship practices measured and demonstrated, so long as the paperwork is not too onerous. At the same time, however, they realize that no amount of paperwork can build trust or replace good stewardship. While farmers understand the complexity of global trade, they also strongly believe that all food imports to Canada should be required to meet the same standards of sustainability and safety as Canadian products.

## THE CFFO RECOMMENDS

E

That the EFP program be revamped to decrease paperwork while increasing the environmental accountability of both farmers and landlords, and that the following suggestions be considered:

01

That the EFP be made a distinct program. While an EFP should still be required for cost-sharing funding through OSCIA, high-risk scores should not be required to be eligible.

02

That the renewal of an EFP workshop/workbook every five years be replaced by a review of the Action Plan and completion of any new EFP categories and questions.

03

That the EFP be maintained through continuing education credits (CEUs) from approved stewardship-related events delivered through farm & commodity organizations.

F

That OMAFRA investigate pay-for-performance and/or outcome-based funding models, developing remote-sensing technology for verification.

G

That the federal government ensure food imports to Canada adhere to the same sustainability standards as those of Canadian farmers.

The full report details a wide range of farmer feedback from CFFO's 2020 Policy Tour in hopes of creating a more nuanced understanding of agricultural challenges and opportunities so farmers and policy makers can forge a sustainable path forward, together.

## INTRODUCTION

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization that advocates on behalf of its members for policy that encourages Christian stewardship and supports thriving family farms. Founded by 12 Christian farmers in 1954, the CFFO now represents over 4000 farm families across the 21 districts in the province. With eight board members and five staff based from the Guelph office, the CFFO advises the provincial government on policy solutions for a broad range of agricultural and rural issues.

Often held in conjunction with district annual meetings, the CFFO Policy Tour travels across the province every winter. It is an opportunity to collect feedback from members that will inform CFFO policy submissions. The Policy Tour has been ongoing for five years, including discussion on topics such as soil health, land use planning and best management practices. The Policy Tour built on the popular CFFO Seminar Series that ran from 1995 until 2011 and addressed the challenges of the day, from technology and farm management to government regulations.

In winter 2020, the theme of CFFO's Policy Tour was Balancing Farming with Development and the Environment. It was facilitated by a consultant, Mel Luymes, and addressed local development and environmental challenges and benefits, along with three specific topics:

- Agricultural Impact Assessments (AIAs)
- Environmental Farm Plan (EFP)
- Canadian Agri-Food Sustainability Initiative (CASI)

These topics were timely, as several organizations have been seeking producer input into these policies and programs and will be receiving this report.

Seventeen meetings were held between January and March 2020, before the quarantine lockdown related to the COVID-19 pandemic cancelled the remaining seven. Nonetheless, the following report is a result of over 1500 minutes of recorded discussion with approximately 150 CFFO members. Details related to dates and locations, along with the slide deck can be found in the Appendices.



Along with the discussion, CFFO members were asked to complete a short survey to rate the impact of various policies and programs in Ontario on their farms on a scale of 1 (very negative) to 5 (very positive). District by district, there were significant differences in perception and issues being faced. The results indicate that these programs affect farmers differently across the province.

In general, farmers perceive environmental and development zoning, including Minimum Distance Separation (MDS), as the most restrictive on their farming operations; they are most favourable to the Business Risk Management (BRM) programs and the Canadian Agricultural Partnership (CAP) and cost-share funding. Responses showed the most variability in impact of government trade and tariffs on farmers, with supply management often cited.

What follows is a detailed report on the issues and feedback contributed by CFFO members. It is a balanced, honest, and self-reflective look at their roles and responsibilities to the public and to the environment. As we will see from the discussion below, these are complex issues with no silver bullet solution.

THE ONLY  
SUSTAINABLE CITY –  
AND THIS, TO ME, IS  
THE INDISPENSABLE  
IDEAL AND GOAL  
– IS A CITY IN  
BALANCE WITH  
ITS COUNTRYSIDE.  
*WENDELL BERRY*

# BALANCING FARMING WITH DEVELOPMENT

Across Ontario, non-agricultural development pressure affects farmers differently. Participants in the 2020 Policy Tour were asked to describe the local influence of development and policy, related to both their challenges and opportunities. Responses illustrate the extent to which a farm's location impacts its experience, as municipal zoning and proximity to cities influences day-to-day life on the farm.

## *Pressures of Urban Development*

Farmers in or near Toronto's Greenbelt and Greater Golden Horseshoe (GGH) area feel the most pressure of escalating land prices, danger in driving farm equipment on increasingly busier roads and more public scrutiny of normal farm practices. The indirect impacts of expanding settlement areas are the disappearance of the agricultural network infrastructure, such as input suppliers, crop advisors and veterinarians. Farmers within the Greenbelt are protected in some sense, while also facing various other restrictions. Farmers renting land in the so-called "white belt" just down the road (that is, land owned by developers and slated for construction) operate on a year-to-year basis, without the ability to invest in longer-term field improvements.

Farmers are also impacted by the leap-frogging effect of development on the far sides of the Greenbelt, and similar pressures were noted in the area around the National Capital Commission (NCC), the federal land surrounding Ottawa that is rented to farmers. Local farmers believe NCC land to be marginal for farming and think it would be better served for development, which has now leap-frogged onto better farmland near the towns surrounding Ottawa.

Similar pressures are faced around London; however, local members felt that London city planners have done well to create industrial zones on the city's periphery. They believe this zoning has allowed for London Dairy, for example, to thrive in such close proximity to the city.

## *Pressures of Rural Development*

Still, farmers don't have to live near these major cities to feel development pressure. In several parts of the province, and depending on property severance policies, rural hamlets are expanding with subdivisions and, in the more scenic landscapes, estates and cottages are being built. While rural homes may impact a farm operation's ability to expand, due to Minimum Distance Separation (MDS) requirements, new rural neighbours can also be a good thing. They increase the municipality's tax base, keep rural schools thriving and demand higher levels of municipal services, which will also benefit farming families. Farmers with local markets may benefit from having new customers.

When rural settlements develop in earnest, however, farmers experience more public scrutiny and complaints about farming practices. They also make up a similar proportion of voters and

feel less represented on municipal councils; this lack of political power in rural areas (that still feel the negative impacts of amalgamation) affects property tax rates, local drainage regulations and the mandates of Conservation Authorities.

### *Weighing Benefits & Challenges*

Development can increase property values, and this is either a blessing or a curse depending on the life-stage of the farm operation. For retiring farmers, selling to a developer or cashing out at a high price is a one-time win. For farmers trying to get a foothold or to expand, buying land is next to impossible. It should be added, however, that this leap in land prices is not solely due to development, though it may be exacerbated by it. Ontario farms are experiencing this trend across the board, regardless of property sales for non-agricultural purposes.

It is not only housing development that impacts Ontario farmers. CFFO members in Haldimand face challenges due to the development of a landfill and the influx of cannabis-growing operations in the area. In the Chatham-Kent-Essex area, greenhouses are being built and inflating land prices in certain areas; Dufferin County struggled with the “mega-quarry” and wind turbines for years and now an expansive warehouse is slated to be constructed; in Rainy River, farmers are struggling with foreign ownership of farmland.

While farmland must be protected, farmers also understand that people need to live somewhere. Many CFFO districts felt that development should expand north of Toronto and that better public transit infrastructure should be developed to increase population density in cities and reduce traffic. Of course, the Simcoe County district did not agree that development should be slated there, and many farmers in Oxford are still protesting the high-speed rail that former-Premier Kathleen Wynne proposed between Windsor and Toronto. There are no easy answers.

TO HAVE GOOD  
FARMING OR  
GOOD LAND OF  
ANY KIND, YOU  
HAVE GOT TO  
HAVE LIMITS.  
*WENDELL BERRY*



## AGRICULTURAL IMPACT ASSESSMENTS (AIAS)

As defined in the Greenbelt Plan (2017), an Agricultural Impact Assessment (AIA) is “a study that evaluates the potential impacts of non-agricultural development on agricultural operations and the *Agricultural System* and recommends ways to avoid or, if avoidance is not possible, minimize and mitigate adverse impacts.”

AIAs are not new but have been used in an *ad hoc* manner across regulated areas, such as the Greenbelt and Niagara Escarpment. In reviewing these areas, the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) perceived concerns over the loss and fragmentation of farmland due to development and the need for a plan to address these concerns at the provincial

level, along with consistent guidelines on how an AIA should be conducted.

The 2017 Provincial Plans include updated versions of the Growth Plan for the Greater Golden Horseshoe, The Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan. The Niagara Escarpment Plan explains that “together, all four provincial plans build on the Provincial Policy Statement to establish a land use planning framework for the Greater Golden Horseshoe and the Greenbelt Plan Area that supports a thriving economy, a clean and healthy environment and social equity.”

The 2017 Provincial Plans require AIAs for non-agricultural development (i.e.

settlement expansions, infrastructure and aggregate sites) that are within Prime Agricultural Areas within the Growth Plan for the Great Golden Horseshoe (GGH), the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan.

Furthermore, AIAs are a component of Environmental Assessments required for most infrastructure proposals. In 2018, OMAFRA published a draft Guidance Document that defines provincial guidelines, outlines the technical requirements of an AIA and provides several mitigation measures to reduce the impact of development on agricultural operations and their networks.

### *Conducting AIAs*

Agricultural Impact Assessments are conducted by third party qualified professionals (QPs) with education and experience in agriculture on behalf of the municipality or developer, and their reports are reviewed by varying bodies, depending on the proposal:

- Settlement area expansions are reviewed by the Ministry of Municipal Affairs and Housing (MMAH) under the Planning Act.
- Infrastructure requiring an Environmental Assessment (EA) is reviewed by the Ministry of Environment, Conservation and Parks (MECP).
- Aggregate resource extraction proposals are reviewed by the local municipality.

In instances when the municipality reviews AIAs, OMAFRA recommends a peer review process, including other Qualified Professionals. OMAFRA recommends that this process be as transparent as possible, with reports made public, naming the project team, methods and stakeholders consulted.

The technical requirements for an AIA are quite rigorous and involve collecting all relevant policies, aerial imagery, topographic maps, Canada Land Inventory (CLI) soil maps and yield data. The report must also include local knowledge from agricultural organizations and stakeholders, both for the specific area in question and the surrounding area as well. The AIA must address not only the amount of farmland lost, but also any proposed fragmentation of farmland that would limit field access and changes to Minimum Distance Separation (MDS) calculations that could limit farm expansion in the future. Also included in an AIA are changes to drainage, groundwater and micro-climates along with the potential impact of noise, increased traffic and potential vandalism. The broader social and economic impacts are also included, such as connections to suppliers, markets and other networks.

Ultimately, an AIA makes a recommendation that the proposed non-agricultural development be either 1) avoided and an alternative site proposed, 2) adjusted to minimize the impact or 3) mitigated through a series of measures as applicable, such as planting trees as visible barriers, widening roads for farm machinery, re-sizing drainage infrastructure, conducting groundwater monitoring or creating a site rehabilitation plan.



## POLICY TOUR FEEDBACK

Most of the feedback on OMAFRA's AIA Guidance Document from CFFO Policy Tour participants were questions rather than opinions, likely because farmers were hearing about AIAs for the first time and didn't have direct experience with them. In general, farmers do not like regulations and red tape but were favourable toward this particular red tape if it helped protect farmland and agriculture. Participants wondered why only certain areas of the province triggered AIAs and felt that this could lead to similar leap-frogging effects experienced outside of the Greenbelt. Many felt that non-agricultural development anywhere in the province should trigger these impact studies, though this was not a concern in the more remote districts. Others wondered how agricultural and non-agricultural development were defined (particularly solar farms) and whether even agricultural development might do well with similar oversight.

Still, farmers were generally skeptical of the process, wondering who exactly pays for, conducts and reviews AIAs. “Just follow the money,” said participants in several districts. On one hand, if the developer pays a private consultant, farmers felt there would be a conflict of interest; on the other hand, they would not want the reports to be funded by municipalities and their tax dollars. They are also concerned with who these consultants, or Qualified Professionals, are and how much they would really know about local agriculture.

Participants were also worried that if cash-strapped municipalities conduct the assessments and reviews themselves, there may be a bias towards the development for more tax revenue. In the cases of provincial government review, they wondered if the recommendations of AIA reports hold any weight, or if the political party of the day would sway the decisions.

Some participants were downright suspicious, wondering if AIAs worked as a loophole to open up already protected agricultural land for development. Farmland that is currently protected from development should not be touched at all, so why would a development proposal be considered in the first place? Many members were frustrated with zoning in general, feeling that it needs a complete overhaul in Ontario and that all designations need more definition.

While it might seem like housing development or gravel pits come suddenly and out of nowhere, in reality, the areas being dug or built now were bought and approved long ago. Any present efforts to mitigate development may only be noticeable decades from now.

While some participants felt that every acre of farmland should be protected from development at all costs, others were more relaxed and questioned the practicality of denying a farmer the right to sell his or her land to a developer. Many felt that cities should be required to develop vertically; others struggled to deny young families with children a backyard in the suburbs while farmers enjoy their sprawling lawns on the farm.

Farmers understand that AIAs will not stop non-agricultural development but are a tool to incorporate local information and stakeholder insight to ensure that development minimizes any adverse impacts on agriculture. Farmers suggested mitigation strategies, such as widening roads or creating bypasses for safer travel with field equipment, educating new residents about normal farming practices and providing insurance to protect farmers in case livestock escape onto the road or into neighbouring properties.

Participants felt that the CFFO should have a role in commenting on AIAs whether at the local or provincial level. CFFO members may also be involved in municipal councils or agricultural advisory committees and would have opportunities to comment on AIAs, if they were a requirement for development in their communities. While many districts had collaborative relationships with the Ontario Federation of Agriculture (OFA), they wanted greater recognition of the CFFO as a separate organization in the consultation process.

## SUMMARY & RECOMMENDATIONS

To summarize, CFFO Policy Tour participants felt AIAs were a positive tool and that the OMAFRA guidelines were comprehensive. However, there is skepticism over conflict of interest, in the case of both the developer and the municipality. This could be mitigated with increased transparency and grassroots engagement. Furthermore, CFFO members felt that AIAs should be a requirement everywhere in the province and not just in the (already regulated) areas around Toronto and the GGH.

### *THE CFFO RECOMMENDS THAT OMAFRA'S AIA GUIDELINES:*

- A** Require an AIA for non-agricultural development anywhere designated a prime agricultural area, as defined by OMAFRA or within municipal official plans.
- B** Require an AIA for any development project proposing to remove from production over 25 acres of a prime agricultural area, as defined by OMAFRA or within municipal official plans.
- C** Require that an AIA report clearly state who prepared it and who has paid for its completion.
- D** Allow agricultural stakeholders and OMAFRA the opportunity to review final AIA reports and provide recommendations to the respective review committees.

### *TO IMPROVE ITS INTERNAL CAPACITY TO ADDRESS DEVELOPMENT CONCERNS, THE CFFO BOARD AIMS TO:*

- 01** Provide information to CFFO members about the AIA process, municipal zoning and official plans and mitigation recommendations; and provide training on how to participate most effectively in the stakeholder engagement process.
- 02** Encourage its members to be involved in local Agricultural Advisory Committees, and in the case when no such committee exists, to lobby municipalities to create one.
- 03** Provide training and/or resources to members about municipal politics.



**NOTE:** In its July 2018 response to OMAFRA'S AIA guideline document, the CFFO responded with the following recommendations to the document:

- That the guidelines need to more clearly outline how priorities and impacts will be weighted, both within an AIA and when considering AIAs alongside other studies and regulations to make a final land use decision.
- That AIAs should emphasize the importance of consultation with multiple local agricultural organizations.
- That AIAs need to consider the impact of elements of the agri-food network which may reach well beyond the primary and secondary study areas.
- That AIAs should consider the environmental benefits, as well as economic and social benefits, of agriculture and farm properties.

Furthermore, the CFFO recommended the following, in relation to the broader policy context:

- That AIAs have the power to determine if, not only where, land use changes will occur within specialty crop land and in some cases within prime agricultural land.
- That AIAs be required under the Aggregate Resources Act whenever the PPS requires or recommends rehabilitation back to an agricultural condition as well as for aggregate operations located next to prime agricultural land.
- That Agricultural System mapping be extended beyond the GGH region, with priority placed on those areas with productive farmland that are experiencing growth pressure.

# BALANCING FARMING WITH THE ENVIRONMENT

URBAN  
CONSERVATIONISTS  
MAY FEEL ENTITLED TO BE  
UNCONCERNED ABOUT  
FOOD PRODUCTION  
BECAUSE THEY ARE NOT  
FARMERS.  
BUT THEY CAN'T BE LET  
OFF SO EASILY, FOR THEY  
ARE ALL FARMING BY  
PROXY.

WENDELL BERRY

Across the province, farmers face diverse challenges and opportunities related to the environment and to environmental policy. Farmers care about the environment as much as anyone, even more so because they live and work with it every day. Soil health, tree windbreaks and 4R Nutrient Stewardship are clear areas of alignment between agriculture and the environment because they make economic sense for the farmer and provide significant environmental benefits. Farmers want policy makers and the public to understand that while they would love to protect the environment at all costs, they can't go bankrupt and lose the farm doing it. Farmers cannot compete with cheap imported food grown with chemicals that have been banned in Canada or produced under deplorable social and environmental standards. In this way, local environmental concerns cannot be separated from our global economy.

### *Factors Affecting Stewardship*

While geography largely determines a farm's experience of changing weather patterns, wildlife predation and soil/drainage classes, government decisions can have a tremendous impact on the farm and environment as well.

Nearly every major watershed in Southern Ontario is managed by a Conservation Authority that has varying levels of resources and interprets its mandate

differently. Regulations can be complicated with bylaws and zoning differing county by county. This can leave farmers with a sense of inequity and injustice. While Wellington County farmers expressed concern over a tree-cutting bylaw that could restrict them from cleaning their fencerows, they hear rumours that farmers in Northern Ontario are being paid to clear land.

Poor field drainage is another environmental concern in Ontario; it increases soil and nutrient erosion and decreases crop yields. Farmers along Lake Ontario and Lake Erie noted how rising water levels impacted field drainage in the area. Chatham-Kent farmers experienced drainage issues due to failing municipal infrastructure, while those farming in the Ottawa area noted that recent housing development in a wetland area had increased flooding in their fields. Others experience decreasing groundwater levels due to nearby development, forcing farmers to dig new wells for their drinking water.

Challenges and opportunities also vary by farm. Soil type and commodity type can determine which environmental best management practices (BMPs) apply and what can be afforded, and some BMPs are supported with cost-share funding while others are not. Land prices and whether land is

owned or rented may also determine a farmer's ability to invest in BMPs. While farm operations in the Lake Erie watershed are under greater scrutiny due to phosphorus concerns, they have also qualified for funding programs (i.e. Great Lake Agricultural Stewardship Initiative-GLASI, or Lake Erie Agriculture Demonstrating Sustainability-LEADS) that were not extended to farms in other watersheds, creating competitive advantages for certain farmers, especially on the edges of the Lake Erie watershed.

Furthermore (and this was one of the strongest disputes brought up across the province), farmers are often caught unaware that their properties have been re-zoned to floodplain or wetland until they submit plans to apply for a building permit. They don't feel that conservationists or planners have done due diligence in mapping, relying on outdated information instead of ground-truthing on farm properties. Farmers prefer to be consulted on zoning related to their property and have opportunity for contestation; at the very least, they would appreciate notification of any changes that would impact their ability to use their property.

## ENVIRONMENTAL FARM PLAN (EFP)

For over twenty-five years, the Environmental Farm Plan (EFP) has been a voluntary and confidential tool for farmers to self-assess their own operations for environmental risks. Delivered by Ontario Soil and Crop Improvement Association (OSCIA) as a workshop and workbook, it promotes awareness of risks across 23 categories, including water and energy efficiency, well protection, fuel, fertilizer, chemical and manure storage, disposal of deadstock, etc. Each worksheet was compiled by commodity organizations and experts in the field through a consensus-based process. Not all categories apply to all farm types.

The EFP has a strong history of collaboration. The first edition was developed in 1993 by the Ontario Farm Environmental Coalition (OFEC), which included the CFFO along with the OFA and

the two organizations that would later form Farm & Food Care Ontario (FFCO). It was an industry-led effort to get ahead of regulatory requirements and demonstrate the implementation of BMPs. Now in its 4th edition, released in 2013, farmer participation has ebbed and flowed over the history of the program.

### *EFPs Required for Cost-Share Funding*

To access federal, provincial and (oftentimes) local cost-share funding for BMPs, farmers are required to have completed or updated an EFP workbook in the last five years. Through a two-day workshop and large workbook (now offered online as well), farmers rate their farms based on risk. These workbooks are reviewed by OSCIA staff to ensure completion but remain confidential. It is important to note that having an EFP does not demonstrate that farmers have mitigated the environmental risks on their operation, but it ensures that they have considered them. Furthermore, in order to qualify for cost-share funding in a certain category, farmers must demonstrate a risk and need in that area through a low rating in their workbook.

According to Statistics Canada data, approximately 35% of Canadian farmers had an EFP in 2011. Since 2015, provinces have been working to harmonize their standards and create a national EFP, as well as benchmarking the program to the Sustainable Agriculture Initiative (SAI) Platform's Farm Sustainability Assessment (FSA) tool. As OMAFRA and OSCIA are discussing potential changes for the 5th edition of the EFP, we asked CFFO members across the province for their feedback.

## **POLICY TOUR FEEDBACK**

There is a strong desire in the CFFO membership to protect the brand of Ontario agriculture and to practice good stewardship; farmers believe sustainability is more than lip service. Most participants in the Policy Tour had completed an EFP at one point, though not necessarily in the last five years, and most often the motivation was to access cost-share funding. Most had a positive experience with the program and felt that the EFP was a good educational and awareness-raising tool, especially on issues related to well and groundwater contamination and the importance of proper fuel storage.

While farmers appreciated the information (and funding) the first time they did the workshop, others questioned why the EFP needed to be renewed every five years. Some felt the workbook was long and convoluted and didn't see enough changes in the workbook or available cost-share funding to justify the paperwork and two days spent at a workshop. While some (younger farmers) have taken advantage of the online option, others felt that their biggest takeaway from the workshop was the interaction with other farmers, and that would be sorely missing in the online version. Others felt that the allocation of cost-share funding was done unfairly or that the funding

rates were too low to justify applying; in this case, the perception of government cost-share funding influenced opinions on the EFP tool itself.

There were mixed feelings across the province as to whether the EFP should remain voluntary or be mandatory for all farmers. In the case of dairy farmers, however, an EFP will soon be mandatory for them due to the ProAction program being rolled out. Upon hearing that 35% of Canadian farmers had an EFP, participants commented that the statistic seemed too low. On the other hand, they commented that just because a farm didn't have an EFP didn't mean it wasn't a good farm. "Ultimately," one member summed up, "stewardship is about practice, not paperwork."

Regarding a national EFP, members did not see any particular value in harmonizing between provinces because they felt that agriculture is too diverse across the country. Even within Ontario, some felt that every commodity should have its own EFP due to conflicting standards and BMPs. For example, maintaining or creating wetlands should not be a BMP for poultry producers, due to biosecurity and disease threats from the wild birds

that would make use of the habitat. Farmers note that BMPs vary by soil type and climate, and when stewardship is so context-specific, a standardized EFP is next to impossible.

Some felt the EFP didn't go far enough and that it should have on-farm follow-up and audits, or that it should require farmers to implement changes on their farms in order to "pass" and be credited as having an EFP on their farm. Of course, most were content without the follow-up. Others felt suspicious that the EFP was now a government program and that OMAFRA would somehow use the information in EFP workbooks against farmers. Because cost-share funding is justified when there is a high environmental risk on a farm, farmers admit to modifying their answers and rating their farms as high risk in order to qualify. They feel that the ratings in EFP workbooks would grossly misrepresent farmers and should never be used as a reflection of Ontario farm stewardship, even in an aggregated form. They often wondered if there could be a separate program that would demonstrate their stewardship, which segued nicely to the next segment of the discussion.

## CANADIAN AGRI-FOOD SUSTAINABILITY INITIATIVE (CASI)

The Canadian Agri-Food Sustainability Initiative is a concept for a single-portal verification program that would provide assurance of sustainable production and, ultimately, market access for Canadian farmers. As trust in the food system has eroded over time, global markets are demanding proof of sustainability—social, economic and environmental responsibility.

CASI had its beginning in Ontario, with the publication of *Farm Food and Beyond: Our Commitment to Sustainability* (2015). Drafted by several of the personalities that spearheaded the EFP, including the CFFO, the document proposed transforming EFPs into Sustainable Farm & Food Plans that would demonstrate and communicate Ontario farm stewardship to the public. Sustainability would be defined not only as environmental stewardship but would include social practices relating to labour and animal welfare along with sound financial practices.

Building on this call to action, the Sustainable Farm and Food Initiative (SFFI) was an industry-led and government-funded program to create and pilot a practical verification tool for farmers (2016-2017). While the SAI Platform's FSA tool is a global standard, several commodity groups have also been developing more regional initiatives, such as the Canadian Roundtable for Sustainable Beef (CRSB) and the Roundtable for Responsible Soy (RTRS). SFFI was an effort to benchmark and streamline these programs, including the EFP, to minimize paperwork and create a one-stop-shop for farm sustainability verification.

The questionnaire was created and piloted with producers in the Ontario Dairy Goat Cooperative for proof-of-concept.

In early 2020, the Canadian Federation of Agriculture (CFA) announced that they had secured three-year Canadian Agricultural Partnership (CAP) funding to build on SFFI and develop it across the country. Renamed CASI, the initiative aims to measure and prove the efforts of Canadian farmers to the world. As they get ready to reach across Canada, the program is looking for feedback from farmers.

## POLICY TOUR FEEDBACK

CFFO members, like all farmers, are proud of the good work they do, and they want to demonstrate it to the public. They produce food, feed, fuel and fibre more safely and sustainably than anywhere in the world but, without metrics, they don't have a clear message. CASI appears to be a tool that will benefit farmers, not only to provide access to markets but to tell their story.

Farmers are favourable of any program that reduces or streamlines paperwork. Any hesitation to CASI was in response to sustainability programs and paperwork in general. For CASI to work, participants emphasize that it will need to seamlessly integrate into or replace the current program paperwork.

However, farmers have several questions, many of which are the questions that SFFI likely wrestled with over the past years. They questioned whether this would be a mandatory pre-competitive tool, a voluntary program for a premium or whether they would be ultimately penalized if they did not do the paperwork. Several participants were already involved in quality assurance programs that had promised premiums but found that the extra pennies they made were nothing when compared to the additional paperwork that was

required. Farmers also wondered who would bear the cost of consultants and auditors; they assumed it would be yet another cost to them.

As it stands now, the EFP is a foundation for the CASI tool and will be required in order to satisfy much of the environmental component. Farmers are aware that the EFP and CASI are different tools. Farmers may be asked the same question but provide two completely different answers depending on whether they are demonstrating risk or good stewardship, whether they need funding or market access. One farmer likened it to a tractor pulling all the field implements at once; the EFP cannot be used for both purposes at the same time.

Farmers were glad to hear that CASI was led by the agricultural industry and stressed that it should remain industry-managed and kept at arm's length from the government. They stressed that this type of program would need to include experts with a deep understanding of agriculture and of every separate commodity. When it came to verification, CFFO members felt most comfortable with their own commodity groups doing the "policing."

Proper paperwork does not necessarily ensure quality, said many CFFO members. What the public is really after is safe and healthy food, with positive environmental and social outcomes; in that case, only testing would give them true verification. They wondered where it would all end, adding, as an example, that now milk inspectors are being inspected, and maybe one day those inspectors would be inspected. If the issue is the erosion of accountability and trust, they argued, no amount of paperwork would fix that. Furthermore, especially for Christians, stewardship comes from a deep intrinsic motivation, and this may be under threat if stewardship becomes compulsory. When sustainability is covered in red tape, farmers may treat it like they do other restrictions and try to find ways around it.

CFFO members also had deeper questions. They wondered who gets to define sustainability. Are these practices backed in science, with a practical understanding of every local context, or is it just what the public thinks looks good? Is there really a global market for sustainability, and will consumers really put their money where their mouth is? Consumers seem to just prefer cheap food, said many participants, and farmers can't produce cheap food, especially if they have to meet new sustainability standards. If sustainability is what the world is after, it must be truly pre-competitive, and standard regulations must be applied across the entire world. If Canadian farmers will be held to a certain level, all food imports into Canada must meet the same standards. Reflecting on how even the word "organic" cannot be protected in Canada, despite decades of rigorous auditing and certification, they wonder how the word "sustainable" will have any teeth to it.

## SUMMARY & RECOMMENDATIONS

While the EFP and CASI are two distinct programs, they both rely on farmer buy-in. Despite its grassroots origins, participants seemed skeptical of EFP as a government program because it has become synonymous with government cost-share funding, and their self-assessment is skewed to demonstrate risk and access funding. While they value the EFP as an educational tool, they don't feel it is necessary to have to redo the workshop every five years.

As for CASI, the CFFO is in strong support and considers it the EFP for our times. Farmers are in favour of having their stewardship practices measured and demonstrated, so long as the paperwork is not too onerous. At the same time, however, they realize that no amount of paperwork can build trust or replace good stewardship. While farmers understand the complexity of global trade, they also strongly believe that all food imports should be required to meet the same standards of sustainability and safety as Canadian products.

**REGARDING THE EFP, THE CFFO RECOMMENDS TO OMAFRA THAT:**

E

The EFP program be revamped to decrease paperwork while increasing the environmental accountability of both farmers and landlords, and that the following suggestions be considered:

01

That the EFP be made a distinct program. While an EFP should still be required for cost-share funding through OSCIA, high-risk scores should not be required to be eligible.

02

That the renewal of an EFP workshop/workbook every five years be replaced by a review of the Action Plan and completion of any new EFP categories and questions.

03

That the EFP be maintained through continuing education credits (CEUs) from approved stewardship-related events delivered through farm & commodity organizations.

F

OMAFRA investigate pay-for-performance and/or outcome-based funding models, developing remote-sensing technology for verification.

**THE CFFO RECOMMENDS TO THE CANADIAN FOOD INSPECTION AGENCY THAT:**

G

The federal government ensure food imports to Canada adhere to the same standards as those of Canadian farmers.



# BALANCING THROUGH COLLABORATION

The CFFO Policy Tour concluded with a short discussion on collaboration. In CFFO's 2018 Water Stewardship Workshop, Dr. Rob De Loë (University of Waterloo) presented a riveting call to collaboration. "We often fail our way into collaboration," he stated. There are issues that no one can solve with force, and collaboration can be a last resort to solve a shared problem. He urged farmers to invest time in multi-stakeholder collaborations, such as conservation or water stewardship groups, because there is a give-and-take. Society at large benefits from understanding agriculture's perspective, and it puts farmers in a good light to be team players. But it also benefits farmers to be involved because it prevents top-down regulation, and farmers get a sense of what might be coming down the pipes. Ultimately, De Loë argued, better decisions are made if farmers are part of the decision-making process.

The CFFO is a relatively small organization that makes an impact on Ontario agriculture through collaboration, both provincially and at the local level. Provincially, the CFFO has been involved in OFEC and Farm & Food Care, as well as participating in countless working groups over the years.

On a local level, CFFO members are involved in Conservation Authority advisory boards, Rural Water Quality Program and ALUS funding decision boards and water stewardship committees. They are involved in their municipalities as council members, on agricultural advisory boards, drainage committees or Natural Heritage

Plan reviews. They are also involved in local Chambers of Commerce and *ad hoc* community groups, along with involvement in other farm and community organizations. As well, personal relationships should not be underestimated as a kind of collaboration. Oftentimes there are key people in a region that hold collaborations together; some of these people are CFFO members!

Collaboration is both challenging and rewarding. CFFO members took care to collaborate with reputable organizations that have a clear purpose. In one example of a water stewardship committee in Eastern Ontario, one of the rules of the group was that no finger-pointing was allowed. This simple rule helped the committee function to solve their collective issues.

To balance farming with development and the environment, we will have to become experts in collaboration, in the give-and-take, in breaking down the divisions between "us" and "them." As illustrated in this report, farmers' perspectives are diverse. Any one policy or issue will affect farmers differently across the province, and the same goes for municipal planners, developers, governments and the public. In bringing all perspectives to the table, we will create a more nuanced understanding of agricultural challenges and opportunities so that we can forge a path ahead, together.

# APPENDICES

## APPENDIX A: POLICY TOUR SLIDE DECK



Slide 1

### Who's talking?



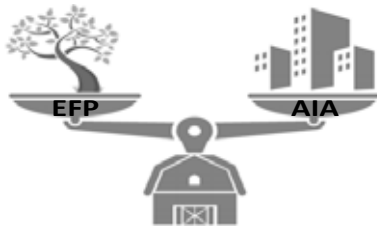
**Melisa Luymes**

- Luymes Farms Ltd (Wellington)
- MA Rural Sociology (U of G)
- Research, communication & facilitation



Slide 2

### Finding the balance



*"To have good farming or good land use of any kind, you have got to have limits." - Wendell Berry*

Slide 3

### What pressures are you under?



Slide 4

### Where can we find win/wins?



Slide 5

### Complexity

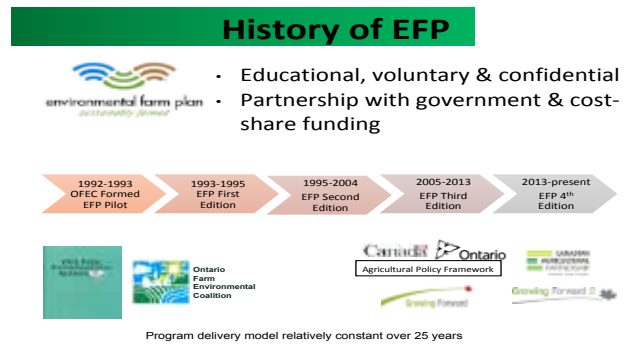
If designed right, policy tools can facilitate the food system. Create win-wins, with limits in the right places.



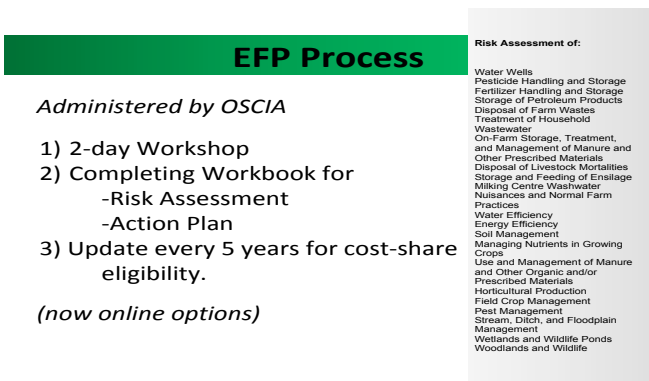
Slide 6



Slide 7



Slide 8



Slide 9



Slide 10



Slide 11



Slide 12



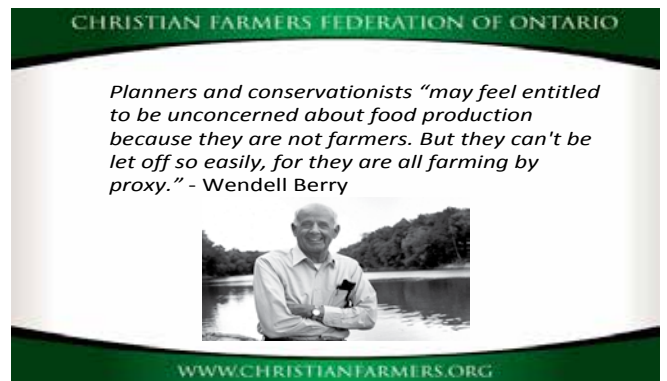
Slide 13



Slide 14



Slide 15



Slide 16

**What is an AIA?**

- Introduced in Ontario 2018 (still under review)
- Conducted 3<sup>rd</sup> party Qualified Professionals
- Evaluates potential impacts of non-ag dev't
- Uses mapping & ag stakeholder engagement

Slide 17

**What will an AIA address?**

- Amount of farmland lost & fragmentation
- Changes to drainage & micro-climates
- Changes to MDS & loss of growth opportunities
- Economic & community impacts
- Impact of noise, increased traffic & vandalism

Makes recommendations to Avoid, Minimize or Mitigate impact on agriculture.

Slide 18

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### Discussion

- What are your thoughts on AIAs?
- What role could CFFO play in stakeholder engagement of AIAs?
- What are practical ways to mitigate the impacts of development on agriculture?



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Slide 19

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Agri-Environmental  
**COLLABORATION**

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Slide 20

**CFFO & Collaboration**



*(Lots of meetings!)*

Slide 21

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## Rob De Loë Video

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Slide 22

CHRISTIAN FARMERS FEDERATION OF ONTARIO

### Discussion

- What are the benefits of collaboration?
- What are some pitfalls to avoid?
- What collaborations are working well here?
- What other organizations or initiatives might CFFO do well to collaborate with?



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Slide 23

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Thank you for coming  
and for your input!



**CFFO Policy Tour 2020**

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Slide 24

## APPENDIX B: POLICY TOUR MEETING DATES & LOCATIONS

1	22-JAN-20	WENTWORTH-BRANT	ST GEORGE
2	23-JAN-20	PERTH COUNTY	STRATFORD
3	29-JAN-20	GREY-BRUCE	KEADY
4	31-JAN-20	HALDIMAND-NORFOLK	JARVIS
5	3-FEB-20	OXFORD	MOUNT ELGIN
6	6-FEB-20	RENFREW-LANARK	RENFREW
7	7-FEB-20	ST LAWRENCE-OTTAWA VALLEY	MORRISBURG
8	11-FEB-20	QUINTE	TRENTON
9	12-FEB-20	EAST CENTRAL	PETERBOROUGH
10	13-FEB-20	SIMCOE COUNTY	BARRIE
11	21-FEB-20	CHATHAM-KENT-ESSEX	RIDGETOWN
12	22-FEB-20	LAMBTON	SARNIA
13	25-FEB-20	RAINY RIVER	EMO
14	27-FEB-20	THUNDER BAY	THUNDER BAY
15	09-MAR-20	ELGIN	SPRINGFIELD
16	11-MAR-20	DUFFERIN-WELLINGTON	GRAND VALLEY
17	12-MAR-20	WELLINGTON	ALMA

## APPENDIX C: CONSULTANT BIO

### *MELISA LUYMES (HEADLANDS AG-ENVIRO-SOLUTIONS)*

Mel is a facilitator, researcher and communicator working at the intersection of agriculture, environment, and sociology. She grew up on a family farm in Wellington County (still CFFO members!), lived & traveled overseas and came back to complete a Master's Degree in Rural Sociology at University of Guelph. Before starting her own "one-gal" consulting shop in 2017, she worked with farmers at the Maitland Valley Conservation Authority, as a Regional Communications Coordinator at Ontario Soil & Crop Improvement Association and as an Environmental Coordinator at Farm & Food Care Ontario. Since then, she has worked on several projects related to farm stewardship, most notably co-founding the Ontario Soil Network in 2018 and coordinating the Huronview controlled drainage project in 2019. She has been involved in several farm organizations including the Agricultural Adaptation Council and the Innovative Farmers Association of Ontario. She is also a freelance writer, a regular columnist for the *Rural Voice* magazine and local history publications.

## APPENDIX D: REFERENCES & RESOURCES

### **AGRICULTURAL IMPACT ASSESSMENTS**

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*Niagara Escarpment Plan (2017)*. Ontario Ministry of Municipal Affairs and Housing, 2017. [https://files.ontario.ca/appendix\\_-\\_niagara\\_escarpment\\_plan\\_2017\\_-\\_oc-10262017.pdf](https://files.ontario.ca/appendix_-_niagara_escarpment_plan_2017_-_oc-10262017.pdf)

*Oak Ridges Moraine Conservation Plan (2017)*. Ontario Ministry of Municipal Affairs and Housing, 2017. <https://files.ontario.ca/oak-ridges-moraine-conservation-plan-2017.pdf>

### **ENVIRONMENTAL FARM PLAN (EFP)**

“Canada-Ontario Environmental Farm Plan.” Ontario Ministry of Agriculture, Food and Rural Affairs, last modified July 17, 2020. <http://www.omafr.gov.on.ca/english/environment/efp/efp.htm>

“Environmental Farm Plan.” Archived content from Statistics Canada, 2011. <https://www150.statcan.gc.ca/n1/pub/21-023-x/2013001/part-partie1-eng.htm>

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Canadian Agricultural Sustainability Initiative (CASI) Website. Canadian Federation of Agriculture, 2020. <https://www.agrifoodsustainability.ca>

“Farm, Food & Beyond: Our Commitment to Sustainability.” Christian Farmers Federation of Ontario, et. al., 2015. <http://www.niagaraknowledgeexchange.com/wp-content/uploads/sites/2/2016/03/OurFarmSustainableAgenda-LR.pdf>

Sustainable Farm & Food Initiative (SFFI) Final Report. Wilton Group, 2017.

# CFFO POLICY TOUR REPORT

# 2020



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