



LONG-TERM THINKING FOR TODAY'S ISSUES

February 7, 2019

The Honourable Victor Fideli, Minister of Finance

7th Floor, Frost Building South

7 Queen's Park Crescent

Toronto, ON

M7A 1Y7

Delivered via email: Minister.fin@ontario.ca and submissions@ontario.ca

Re: Pre-Budget Consultation 2019

Dear Minister Fideli,

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.

First of all, we thank you for your government's swift commitment to fiscal responsibility, reduced red tape initiatives, commitments to rural infrastructure improvements (natural gas and internet), energy and minimum wage policies and the essential investment of \$3.8 billion in mental health, for which we ask that rural Ontarians receive their fair share.

Your government's recent announcements respond in part to our requests made over the past months in our letters to your ministerial colleagues. Our requests were made in order to promote CFFO's four priorities of agri-business sustainability, improved soil health, improved water quality and water quantity, and farmland preservation. The specific requests are included below as Attachment A. Our previous ministerial letters are included as Attachments B – E.

We come to you with now with requests for investments that include, but also build on, our previous requests so as to generate value for money returns and simultaneously promote CFFO's four priorities.

Our investment recommendations focus on helping the government fulfill its duty of care for supporting the wealth and wellbeing of all Ontarians now and into a more equitable and sustainable future.

To this purpose we are asking for investments in three initiatives:

- 1. Provincial leadership for tax reform.**
- 2. Investment in modern planning tools to better assess and publicize the costs and benefits of options for prosperity and sustainable growth.**
- 3. Increased investment in research that preserves and supports improvements in natural capital including soil, water, and air quality.**

1. Provincial leadership for tax reform.

Tax reform has long been on the national agenda. We believe that changes that could better distribute Ontario's significant wealth, rather than having it increasingly concentrated in a smaller and smaller top few would be welcomed by most Canadians. We urge you to lead Canada swiftly in tax and incomes reforms across all levels of government. Two recent examples drive home the need for a tax system that is more equitable and less distortionary.

Firstly, the public outcry that led to the recent withdrawal of Schedule 10 of Bill 66 – The Open-for-Business Planning By-law – demonstrated not only that this government listens and responds to the public's concerns, but also that the public is adamant that municipal sprawl should be held in check.

Moreover, the public outcry came in part at the realization that legislated protections are vulnerable. We need mechanisms and instruments that will endure in protecting farmland and green space. It is time to assess whether incentives at the municipal level need to be brought into line with broader public preferences. For instance, is municipal dependence on a land tax base at the core of the incentive to continually expand out into what is often the best agricultural land, or is it the case that municipalities are not equipped with the tools necessary to resist development pressures? Is it time to expand Growth Plans to areas outside the Greater Golden Horseshoe? Should we move to world class levels in our density targets? Is that the key to the farmland and greenspace preservation people want?

In general, there may be better ways to fund municipal services with public housing just one example and, therefore, a review is urgently needed to correct distortions that may be caused by our current municipal funding models. A further option should be consideration of using public funds to purchase land to preserve it in the public interest as crown land, which could remedy the inequitable wealth distortions caused by designating greenbelts.

Secondly, the release of Canada's new food guide brought into focus the reality that the best diet, according to the nutrition science experts, is too costly for too many people despite the very high, world-class average wealth in this province. Surely, this second example drives home the urgent need for not only social policies to support incomes but also basic income and tax reforms to deal with our provincial income disparity problem.

2. Investment in modern planning tools to better assess and publicize the costs and benefits of options for prosperity and sustainable growth.

- a. Investment in a framework that integrates all forecasting and planning models currently used across government portfolios.
- b. Addition of tools that assess changes in all types of natural capital to the government's current suite of models. This requires further investment in updated and refined mapping for the whole province – beyond the Greater Golden Horseshoe – with support for local ground truthing and support for data banks recording soil and water quality and quantity mapping information. Inventories should be supported as well for the full range of natural capital assets of the province (See [Attachment A](#) for some specifics).

Integrated modelling tools are available and being used elsewhere in the world by governments that want to assess policy options for important matters, such as land use and greenhouse gas emissions, among others. Integrated modelling is required because it incorporates the feedbacks that occur in the real world.¹ In reality, we know that all sectors of the economy and all aspects of natural capital depletion and replenishment are inter-related, triggering changes in the system that ultimately determine our economic, environmental and social outcomes. Having models that simulate these inter-relationships enables us to assess alternative scenarios that integrate these feedbacks.

The bottom line is that we could plan better and with more transparency. Good modelling provides an opportunity to assess the tradeoffs involved in choices. For example, alternative density targets for municipalities can be assessed, or “costed”, in terms of how much farmland is preserved with higher or lower alternatives. We in Ontario want to know how density targets affect all things we value, including farmland preservation. The models can help us better understand what we give up when we make choices – the costs and the benefits of the options.

Departmental models and expertise already exist across government; there is real potential to build an integrated framework for Ontario. A new coordinating agency may be needed in order to ensure all aspects of the integrity of the modelling framework is preserved.

3. Increased investment in research that supports improvements in natural capital including soil, water and air quality.

The government has the duty of care to society to ensure environmental sustainability. We need ongoing commitment to improving how we all impact the environment and how we can best minimize harm. This, in turn, requires ongoing research and therefore we call on you to invest in the research that will enable all farmers to collectively be the best possible stewards of the land in our farming practices. Furthermore, for phosphorus and greenhouse gas emissions, research will do double duty in helping us fulfill Ontario’s international commitments for Great Lakes water quality and global warming. [Attachment A](#) lists some required investments.

Summary of Requested Investments

In summary, CFFO is asking for investments in tax reform, that can be financed by a shift in priority for your many in-house experts. A great deal of advice is in the public domain as well and, therefore, while the process may be long and difficult, the extra spending should not be significant and may indeed reap dividends. For our modelling, mapping and data requests, a multi-year commitment to invest in scoping, designing and implementing a framework for integrating existing models is required. Advice is there for the asking from leaders in this field elsewhere in the world where this has already been done and, at your request, our staff would be willing to assist in this as well. Our final request is for research investment on an ongoing and increasing amount to fund publicly available research.

¹ Steve Hatfield-Dodds, et. al. “Australia is ‘free to choose’ economic growth and falling environmental pressures,” **Nature**, 527: 49–53 (05 November 2015).

The cost is but one side of the equation. Our requested investments will generate a perpetual stream of benefits in terms of well-being for Ontarians. Tax reforms reducing income disparities will undoubtedly crowd out provincial social policy expenditures. Natural capital research and sustainable land and water management and farmland preservation all generate improved productivity, food security and rural resiliency.

Investing in modelling facilitates planning for sustainable prosperity and growth across government departments where public servants can “sing from the same song sheet” through the integrated process, reducing competition for funds and priorities.

The additional and no doubt priceless benefit generated by the modelling recommended by CFFO is the public trust it engenders.

All people can assess scenarios that are clearly laid out with all tradeoffs out in the open and ready to vote on. If there are winners and losers, they will each have the information they need to reach a settlement.

In conclusion, we thank you for the opportunity to offer our requests for investments that we feel are the best ways to promote CFFO’s four priorities of agri-business sustainability, improved soil and water quality and water quantity, and farmland preservation. In closing, let us emphasize yet again that we need better integrated modelling across sectors so we can assess the consequences of alternative plans for actions before we make commitments that are irreversible:

Once we develop on our farmland, it is lost forever.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario
BD

CC: Hon. Doug Ford, MPP, Premier of Ontario
Hon. Ernie Hardeman, MPP, Minister of Agriculture, Food and Rural Affairs
Hon. Steve Clark, MPP, Minister of Municipal Affairs and Housing
Hon. Rod Phillips, MPP, Minister of Environment, Conservation and Parks
Hon. John Yakabuski, MPP, Minister of Natural Resources and Forestry
Hon. Todd Smith, MPP, Minister of Economic Development, Job Creation and Trade
Hon. Caroline Mulroney, MPP, Attorney General
Dr. Dianne Saxe, Environmental Commissioner of Ontario

Active Requests by CFFO

Excerpts from letters to your ministerial colleagues with recommendations to promote CFFO's four priorities of agri-business sustainability, improved soil health, improved water quality and water quantity, and farmland preservation. In those letters we asked for the following initiatives that would affect the public purse. **We maintain these requests as active ones in support of the initiatives we submit to the Pre-Budget consultations 2019.**

- 1) Extend the agricultural land-base mapping and system guidelines outside the Growth Plan Area to apply in municipalities that have class 1-4 farmland and in all areas experiencing growth pressure to further protect productive farmland under growth pressure in the province.
- 2) Expand the Agricultural System Portal to include data outside the Greater Golden Horseshoe (GGH) and to include additional layers that are relevant to farmers and to the overall economic development of the agri-food system in Ontario.
- 3) Guarantee funding for water quality research and monitoring projects across the province.
- 4) Ensure incentives to address water quality and soil health, especially in sensitive watersheds.
- 5) Support research on and adoption of soil health Best Management Practices (BMPs).
 - a) On-farm trials, proof-of-concept projects, and innovation grants should be funded in order to test and demonstrate new BMPs by farmers.
 - b) Knowledge transfer and translation must be enhanced, both so that farmers can be informed about recent research results and researchers can learn about on-the-ground experiences of farmers.
 - c) Soil health BMP adoption supports should be targeted regionally and should recognize both past practices and future potential; for example, practices such as crop rotation and cover crops are currently critical to improving water quality in vulnerable watersheds.
 - d) Research on barriers to BMP adoption needs to consider the impact of other government policy and regulations which might hinder easy adoption.
- 6) Update provincial soil mapping for all regions, not only agricultural regions.
 - a) Soil type mapping and land suitability classification systems should continue to be updated, as well as expanded to include a finer scale of detail.
 - b) Data should be accessible electronically for all stakeholders, including farmers, extension personnel, and policy makers.
 - c) Ideally, soil maps should be made fully consistent with other maps used by provincial ministries, especially maps that track land use and environmental assets.
- 7) Support farmers in their efforts to improve health and reduce nutrient losses.
 - a) Given the range of issues and importance of impacts, targeted and transparent funding will need to be increased. Programs, such as the Canadian Agricultural Partnership (CAP), need to be sufficiently funded in the long term to ensure that they continue to provide effective support for farmers.
 - b) Past regional programs such as GLASI, the Farmland Health Checkup and the Soil Health Checkup offered valuable education, extension and funding to support farmers' efforts to improve soil health and reduce nutrient losses. The CFFO strongly supports the Soil Strategy's action to expand availability of similar programs to other farming regions of the province. We encourage the province to establish a designated timeline, such as five years, to achieve this goal.



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Hon. Ernie Hardeman, MPP
Ministry of Agriculture, Food and Rural Affairs
11th Floor,
77 Grenville Street
Toronto, ON
M7A 1B3
Discussed in person and delivered via email:
minister.omafra@ontario.ca

Re: Economic Success for Ontario Agriculture and Agri-food

Dear Minister Hardeman,

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.

We believe the agriculture and agri-food sector is a cornerstone of the Ontario economy, but political will is necessary to help it thrive.

The CFFO sees six issues of particular concern for ensuring that the agriculture and agri-food industry thrives in Ontario.

- 1) **Fiscal Responsibility:** Agriculture is a capital-intensive industry that relies both on credit and sophisticated management to maintain healthy and viable farm businesses. We ask that your government also demonstrate a commitment to fiscal responsibility by pursuing sensible debt management, maintenance of the highest international credit rating, and advocating at the federal level for a rational Canadian interest rate policy that can underpin a healthy agricultural sector.
- 2) **Minimum Wage and Labour Policy:** Labour policy should balance the needs of both employees and businesses. Extreme changes, as we've seen to minimum wage, jeopardize the livelihood of small and medium-sized business owners, as well as job security especially for new and young workers. Your government's announced reversal is one approach to dealing with these issues. An alternative could be a hold on further increases to facilitate adjustment to the higher cost of doing business.

Farmers also depend on a supply of labour that is sensitive to demand for seasonal labour. This kind of labour supply is not always sufficient locally. We therefore ask for your support at the federal level regarding time-sensitive and appropriate agricultural worker visas.

3) **Energy Policy:** Energy costs, including carbon pricing, have been onerous on agriculture. We encourage development of provincial energy policy that is sensitive to our needs and also reflects good stewardship of the land, atmosphere, and waters. We have concerns about future energy policy and would like to be consulted.

4) **Rural Infrastructure:** Rural communities and farm businesses need modern high-speed internet. They also require well-maintained transportation infrastructure, functional sewer and drainage systems, and reliable hydro services in order to thrive and grow.

We look forward to a better understanding of your government's proposed legislation to extend access to natural gas for rural Ontario.

5) **Trade:** Expanding our markets through international trade could provide for multiple benefits for both the industry and the province. We welcome the opportunity to consult with you and your staff regarding opportunities and how our industry could be assisted by policy and programs.

6) **Red Tape:** We agree with your government's focus on reducing Red Tape and look forward to detailing situations that could benefit from reductions and streamlining without compromising food safety.

The agriculture and agri-food sector has enormous potential in Ontario, but its potential requires policy that supports the needs of the industry. We are keen to help progress necessary improvements and would welcome opportunities to help in identifying specific areas for improvement.

Thank you for your consideration of these important issues. We are counting on your commitment to ensuring the continued success of Ontario's agriculture and agri-food sector.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario



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Hon. Ernie Hardeman, MPP
Ministry of Agriculture, Food and Rural Affairs
11th Floor,
77 Grenville Street
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M7A 1B3

Discussed in person and delivered via email: minister.omafra@ontario.ca

Re: Soil Health

Dear Minister Hardeman,

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.

Good soil stewardship on farms is foundational to the success of farming families and the health of the agricultural sector as a whole, and it has many benefits for society at large, as well. This vital resource rewards good management and can suffer significantly from poor management practices. While farmers work to be good stewards of the soil, there are many factors that impact how agricultural soils across the province are managed.

The CFFO affirms its support for Ontario’s 2018 Agricultural Soil Health and Conservation Strategy.

The Soil Strategy is based on best available science and extensive consultation, of which CFFO was a part. It offers a plan to protect our soils through practices like increased crop rotation, cover crops, and livestock grazing. Initiatives through this strategy should be aimed to consider all the benefits that can be derived from healthy soil, including the positive impact this has on food production, water quality, greenhouse gas sequestration, and biodiversity – including soil biodiversity.

The CFFO believes the province must pursue timely implementation of Ontario’s Soil Strategy actions. To that end, the CFFO proposes a number of key recommendations:

- 1) **Support research on and adoption of soil health Best Management Practices (BMPs).**
 - On-farm trials, proof-of-concept projects, and innovation grants should be funded in order to test and demonstrate new BMPs by farmers.
 - Knowledge transfer and translation must be enhanced, both so that farmers can be informed about recent research results and researchers can learn about on-the-ground experiences of farmers.

- Soil health BMP adoption supports should be targeted regionally and should recognize both past practices and future potential; for example, practices such as crop rotation and cover crops are currently critical to improving water quality in vulnerable watersheds.
 - Research on barriers to BMP adoption needs to consider the impact of other government policy and regulations which might hinder easy adoption.
- 2) **Update provincial soil mapping for all regions**, not only agricultural regions.
- Soil type mapping and land suitability classification systems should continue to be updated, as well as expanded to include a finer scale of detail.
 - Data should be accessible electronically for all stakeholders, including farmers, extension personnel, and policy makers.
 - Ideally, soil maps should be made fully consistent with other maps used by provincial ministries, especially maps that track land use and environmental assets.
- 3) **Support farmers in their efforts to improve soil health and reduce nutrient losses.**
- Given the range of issues and importance of impacts, targeted and transparent funding will need to be increased. Programs, such as the Canadian Agricultural Partnership (CAP), need to be sufficiently funded in the long term to ensure that they continue to provide effective support for farmers.
 - Past regional programs such as GLASI, the Farmland Health Checkup and the Soil Health Checkup offered valuable education, extension and funding to support farmers' efforts to improve soil health and reduce nutrient losses. The CFFO strongly supports the Soil Strategy's action to expand availability of similar programs to other farming regions of the province. We encourage the province to establish a designated timeline, such as five years, to achieve this goal.

Summary

The CFFO recognizes that good soil stewardship is foundational to human health and prosperity, as well as the health of the broader environment, including water and air. While strong government, research and extension support is important, in the end, it will be primarily farmers on the front lines, promoting soil health improvements across the province. Through their good stewardship, all of society benefits. It is, therefore, vitally important that we collaborate productively, focus on achieving better soil health, and support the contributions farmers can make through their soil stewardship efforts.

Thank you for this opportunity to provide our input and share with you our priorities.

Sincerely,



Clarence Nywening, President

Christian Farmers Federation of Ontario



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Hon. Ernie Hardeman, MPP
Ministry of Agriculture, Food and Rural Affairs
11th Floor,
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Hon. Rod Phillips, MPP
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Via email: minister.mecp@ontario.ca

Dear Ministers Hardeman and Phillips,

Re: Water Stewardship for Agriculture

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 wants an agricultural system that encourages good stewardship of our water resources through policy, research, and on-farm innovation. As Ontario’s climate becomes increasingly erratic, farmers will need to produce quality crops and livestock in extremes of flood and drought. Good soil health, irrigation, drainage, and retention systems are necessary for food production.

We are asking the Ontario government to take the following actions:

- 1) **Guarantee funding for water quality research and monitoring projects** across the province.
- 2) **Ensure incentives to address water quality and soil health**, especially in sensitive watersheds.
- 3) **Ensure Ontario’s agricultural water regulatory environment allows farmers to manage water on their farms** through drainage, irrigation, and retention systems.

1) Funding for Water Quality Research and Monitoring

Government plays a key role in providing funding to support water quality research and monitoring across the province. Many current monitoring projects and systems are already in place, but funding must be ongoing to establish baselines and to monitor the impact of stewardship efforts.

The CFFO calls on government to ensure that those on the front lines of water quality monitoring and research, such as our universities and conservation authorities, have sufficient funding over the long term to maintain data collection and in-field research projects. These are vital supports for agriculture

and for society as a whole, as we work to improve water quality for the benefit of all who live in Ontario and in our broader watersheds, now and into the future.

To that end, the CFFO also supports Ontario's collaboration on regional and international management of Great Lakes water quality.

2) Water Quality and Soil Health Incentive Programs

The CFFO strongly encourages government to ensure that there is incentive funding to support farmers' water and soil stewardship efforts. Currently, the Canadian Agricultural Partnership (CAP) includes a project category focused on Environmental Stewardship to enhance water quality and soil health. Through this and other programs, the Ontario government has an important role to play in supporting farmers' on-farm stewardship work.

There are also other actions farmers can take to improve water quality and soil health. Incentives are especially important in cases where best practices are primarily for the public good and where farmers will not be able to recover the costs to implement these practices from the market place.

3) Agricultural Water Regulatory Environment

It is vital that water regulation in Ontario, including "permit to take water" and wetlands policy, recognizes the unique priorities of on-farm water management practices and infrastructure.

Biological use of water depends on having the right amount of water at the right time in order for crops and livestock to thrive. Farmers must use many techniques to control an increasingly erratic supply of water, including retention/storage, drainage, and irrigation systems.

Our water regulatory system needs to better facilitate implementation and use of these types of water control infrastructure. In particular, the definition of "wetland" needs to recognize the difference between existing or restored wetlands versus agricultural drainage and retention infrastructure. Farmers must be able to manage on-farm infrastructure and access stored water intended for farming.

We encourage you to engage with other ministries that control environmental, natural resource, and municipal policies and regulations so as to breach water management silos.

Summary

Good on-farm water stewardship promotes farm business sustainability over the long-term and respects the surrounding environment.

CFFO wants government commitment to enabling a more productive and profitable agricultural sector through water policy and ongoing funding for incentives and water quality monitoring and research. Policy needs to encourage soil health and wise use of irrigation, drainage, and retention for optimal farm water management. **Monitoring and research that leads to on-farm innovation will allow farmers to be more self-reliant in the face of floods and droughts.**

We appreciate your consideration of these issues.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario



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Hon. Ernie Hardeman, MPP
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Hon. Steve Clark, MPP
 Ministry of Municipal Affairs and Housing
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 777 Bay St.
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 Via email: minister.mah@ontario.ca

Dear Ministers Hardeman and Clark,

Re: Farmland Preservation

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 is concerned about the long-term protection of our farmland. We believe that good planning and density targets in urban areas can prevent sprawl onto our valuable food-growing and naturally sensitive lands. Without such government intervention, population growth will continue to drive conversion of productive farmland to residential and industrial development. In light of concerns about food security, we note that growth is expected primarily in the regions of the province that are also home to our most productive farmland.

The focus of the CFFO's requests is on *monitoring and measuring* farmland assets because we cannot manage what we do not measure.

For this reason, we are asking the Ontario government to take the following actions to further protect productive farmland under growth pressure in the province:

- 1) **Extend the agricultural land-base mapping and system guidelines outside the Growth Plan Area** to apply in municipalities that have class 1-4 farmland and in all areas experiencing growth pressure.
- 2) **Expand the Agricultural System Portal to include data outside the Greater Golden Horseshoe (GGH)** and to include additional layers that are relevant to farmers and to the overall economic development of the agri-food system in Ontario.

1) Agricultural Land-Base Mapping and System Guidelines

Within the GGH region, significant protections on farmland and natural heritage features have been put in place, particularly through the Greenbelt Plan, the Growth Plan for the GGH, the Niagara Escarpment Plan, and the Oak Ridges Moraine Conservation Plan.

The CFFO sees the established concept of the Agricultural System model within the Growth Plan Area, consisting of the provincially mapped agricultural land base and the agricultural network, as a beneficial approach to protecting farmland and fostering successful agri-food businesses.

The CFFO wants the Agricultural System model to be extended to other regions of the province with class 1-4 farmland and areas that are also experiencing growth pressure.

2) Agricultural System Portal

The Agricultural System Portal was created as an online tool to encourage economic development of agriculture within the GGH region. The CFFO sees this as a valuable tool for farmers, agri-food businesses, and policy makers. We ask that this tool be updated regularly and expanded for use as an economic development tool across the province, not just within the GGH region.

In particular, we want to see existing data beyond the GGH added to all current layers in the portal. We also want to see new layers that are relevant to farmers and agri-food businesses, such as the provincial Natural Heritage System mapping. Once new Municipal Official Plans are approved, that mapping should also be added to the portal.

Summary

Creating the conditions for economic success within the agri-food system is a key element of farmland preservation. Government policies that foster economic development, such as the Agricultural System model, ensure that our farmers can successfully continue to operate businesses on our productive farmland. Tools like the Agricultural System Portal encourage greater capitalization on the potential of our province-wide agri-food sector, which will contribute to overall economic growth in both rural and urban areas.

Our ultimate concern is that, given the current measurement and management focus mainly on certain areas, such as the GGH, there is the risk that important management issues are not in focus for the rest of the province. Treating certain areas as more valuable can cause development pressures and other ramifications for surrounding areas. Provincial farmland assets need to be treated holistically.

We appreciate your consideration of these issues.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario