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Michele Doncaster
Food Safety and Environmental Policy Branch
Ontario Ministry of Agriculture, Food and Rural Affairs
1 Stone Road West
Ontario Government Building 2nd Floor SW
Guelph, ON
N1G 4Y2

ERO 013-2454 – Agricultural Impact Assessment Guidance Document

Dear Minister,

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

The “Draft Agricultural Impact Assessment (AIA) Guidance Document” attempts to address a variety of situations where impacts to agriculture need to be considered in land use planning across the province. It does a good job of clearly outlining the different scenarios where an AIA is currently required, as well as those where an AIA is a useful tool to meet policy requirements that do not specifically call for an AIA. It outlines useful technical guidelines for completing an AIA and provides helpful resources to support the process.

The CFFO’s key recommendations regarding the “Draft AIA Guidance Document” are:

- 1) 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.
- 2) that AIAs should emphasize the importance of consultation with multiple local agricultural organizations.
- 3) 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.
- 4) that AIAs should consider the environmental benefits, as well as economic and social benefits, of agriculture and farm properties.

The CFFO’s key recommendations for the policy context in which AIAs are conducted are:

- 1) 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.

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- 2) 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.
- 3) that Agricultural System mapping be extended beyond the GGH region, with priority placed on those areas with productive farmland that are experiencing growth pressure.

Key Recommendations for Draft AIA Guidance Document

Weighting Competing Priorities

AIAs are part of a suite of studies and regulations that must be balanced in order to make land use decisions. It is important that it is clear for municipalities, land use planners, and approval and appeal bodies how multiple requirements and needs are to be weighted and prioritized in the decision-making process.

Even within the AIA process itself, while priorities are named, the finer details of weighting one priority against another for the purpose of final recommendations need to be more clearly outlined.

Where an AIA is required, the process for appealing or requesting review of the recommendations of an AIA also needs to be clearly outlined in the guidelines.

Section 2.2, AIA Study Components Part 2, Process – Consultation; Part 4, Study Methodology Identification – Local Knowledge and Input

It is important that all references indicate the need to consult with local farm organizations, not just a single local farm organization. There are multiple farm organizations, including the three accredited farm organizations and relevant commodity organizations depending on the types of farming found in the local area. Those active local farm organizations will all have important input to offer. Consulting with local agricultural advisory committees is a valuable way to engage with agriculture and to help assess which farm organizations are most active in the area for further consultation.

Section 2.2, AIA Study Components, Part 3, Study Areas – Secondary Study Area

The recommended 1.5km radius around the primary study areas is appropriate for considering the impact on surrounding land for things like Minimum Distance Regulation, noise, traffic and hydrological changes, as outlined in the document. However, a 1.5km radius may not be appropriate for considering the community and economic impact on the Agricultural System, and in particular of elements of the agri-food network.

For example, a local abattoir will serve customers from a much greater distance than just 1.5km, and the impact of removing or relocating that abattoir may impact



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agricultural and food businesses in a much wider region. The same may be said for an agricultural input supplier, a food processor, and other key elements of the agri-food network. In this case, we recommend that an AIA should consider the radius of impact of these particular businesses, that is to say, how many customers they have and within what radius. For an abattoir, this should be based, at a minimum, on the transportation distance regulations for livestock coming to the facility. When considering impacts, an AIA should also address how far farm and other businesses will need to go in order to meet their needs if that piece of the agri-food network is removed.

Section 2.2, AIA Study Components, Part 5, Description (Soils, Land)

Part 5 includes sections on Soil Resources, Slope/Topography, Hydrology, Hydrogeology and Drainage, Climate, Soil Suitability and Microclimate, Land Use Characteristics, and Economic and Community Benefits of Agriculture. To this list, we recommend a section on Environmental Benefits of Agriculture be added, recognizing the benefits of agriculture and agricultural properties for things like water quality and quantity (e.g., flood mitigation), greenhouse gas sequestration, habitat and so on. This proposed Environmental Benefits section should consider those features identified in the Land Use Characteristics section that are part of agricultural properties, such as fencerows, riparian areas, forests, and wetlands for the environmental goods and services they provide.

Further Recommendations to Increase Farmland Protection

The CFFO is concerned about the loss of highly productive farmland both within the Growth Plan area and beyond the GGH region. Further policy changes are required to strengthen protection of farmland, including through the process of doing AIAs.

Power of AIAs

The CFFO wants to see stronger powers given to the outcomes of AIAs. An AIA should have the power to determine ***if***, not only ***where***, a change in land use will occur that would result in permanent removal or permanent degradation of specialty crop land, and in some cases where the same would be the case to prime farmland. Our specialty crop land is very limited and should enjoy much stronger protection from any non-agricultural use, including aggregate operations, infrastructure, institutional and recreational uses than is currently in place. Stronger protections are also needed on prime agricultural land, especially in areas where prime farmland is regionally limited.

Aggregate Resources Act

The CFFO recommends changes to the Aggregate Resources Act (ARA) requiring an AIA be submitted to the province as part of any requirement to rehabilitate agricultural land back to an agricultural condition, as per current PPS requirements. AIAs should also be required for any aggregate operation neighbouring prime agricultural land (even if not

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directly on prime agricultural land) in order to properly assess, avoid, minimize, and mitigate impacts to neighbouring agricultural operations.

Agricultural System Mapping Beyond the GGH

The CFFO also recommends that the provincial mapping of the Agricultural System, including both the agricultural land base and the agri-food support network, be expanded to other agricultural areas across the province beyond the Greater Golden Horseshoe region. In expanding this mapping, priority should be given to areas with productive agricultural land (as defined by the Canada Land Inventory) that are also experiencing growth pressure, such as in the region surrounding London. This would allow better protection of farmland and more successful compatibility between farming and other land uses.

Summary

The Draft AIA Guidance Document provides important technical guidance, supporting resources, and a clear outline of the different scenarios when an AIA is required and when an AIA is a useful tool to meet policy requirements.

The CFFO's key recommendations for both the Draft AIA Guidance Document and for policy changes beyond the guidelines call for stronger protection of farmland and the broader agri-food network within the land-use planning process across the province.

We appreciate this opportunity to respond to this proposed guidance document and thank you for your consideration of our comments.

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario
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