



**CHRISTIAN FARMERS
FEDERATION OF ONTARIO**
ACCREDITED FARM ORGANIZATION

June 09, 2025

Attention: Planning Consultation
Ministry of Municipal Affairs and Housing
College Park
777 Bay St.
Toronto, ON
M7A 2J3

RE: ERO 025-0462 Proposed Regulations – Complete Application

Dear Ministry,

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.

Regarding proposed regulations on reports or studies required as part of a complete application for municipal planning, the CFFO:

- Recommends that Agricultural Impact Assessments continue to be required as outlined in the Provincial Planning Statement, 2024.
- Recommends that the Minister continue to permit and approve municipal requirements for studies that promote successful farm businesses and farmland protection.
- Supports requirements for studies to be completed by appropriately qualified professionals.
- Recommends that municipalities still be permitted to deem studies incomplete or to require peer review.

Complete Application Requirements

Requirements for Agricultural Impact Assessments (AIAs) were recently changed through the Provincial Planning Statement, 2024 (PPS). Some municipalities may not have updated their list of required studies since the implementation of the new PPS. Any studies required to meet PPS requirements, including Agricultural Impact Assessments, should continue to be permitted through this legislation.

While increasing consistency between municipalities is a good aim, it is also important to recognise that Ontario municipalities serve diverse communities across significantly different landscapes. Studies appropriate in a large urban setting should be different than those required in an agricultural setting. We request that the Minister continue to

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permit studies that are intended to support thriving farm businesses and protect vital farming assets, including farmland, in communities with active farming.

Certified Professionals

The CFFO also supports the need for studies to be completed by appropriately qualified professionals as part of the municipal planning application process. Municipalities should not, however, be required to accept studies based solely on the qualifications of the author(s). Municipalities should continue to be able to deem a study as incomplete and to have access to the peer review process. This will ensure that studies meet the highest standards and have presented a balanced point of view.

Conclusion

In looking to minimize study requirements, it is important that those studies required by the Provincial Planning Statement, including Agricultural Impact Assessments, continue to be required. We also recommend that the Minister continue to approve municipal requirements for studies that promote successful farm businesses and farmland protection. While it is important that studies are prepared by appropriate qualified professionals, this does not override the need to ensure studies are complete or the value of the peer review process.

We appreciate your consideration of our concerns and recommendations.

Sincerely,



Henk Vaarkamp, President
Christian Farmers Federation of Ontario

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