



# CHRISTIAN FARMERS FEDERATION OF ONTARIO

ACCREDITED FARM ORGANIZATION

December 4, 2023

Attention: Public Input Coordinator  
Ministry of Natural Resources and Forestry  
Resources Planning and Policy Development Branch  
Natural Heritage Section  
300 Water St. 2<sup>nd</sup> Floor South  
Peterborough, ON K9J 3C7  
Delivered via email: [NHplanning@ontario.ca](mailto:NHplanning@ontario.ca)

## **Re: ERO 019-7696 “Proposed Amendments to the Niagara Escarpment Planning and Development Act.”**

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.

The CFFO recognizes the value of protecting land within the Niagara Escarpment Plan and the importance of enforcing regulations fairly. The CFFO supports efforts to improve service delivery and reduce redundancy and administrative burdens. When considering ways to increase compliance tools for the NEC, it is important to still respect compliant property owners.

The CFFO recommends:

- Posting notices in newspapers should be recommended but not required for amendment proposals and associated hearings.
- Exemptions for low-risk activities should be implemented with standardized conditions.
- Enforcement officers should be required to have a warrant for access to properties within the NEP when permission for access has not previously been obtained from the property owner.
- Exchange of information between NEC staff and other enforcement personnel should be permitted.

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**REPRESENTING FARMERS SINCE 1954**

231 Shearson Crescent, Unit 101, Box 2, Cambridge, ON, N1T J5  
1-855-800-0306 or 519-837-1620      [info@christianfarmers.org](mailto:info@christianfarmers.org)      [www.christianfarmers.org](http://www.christianfarmers.org)

## **Niagara Escarpment Plan**

Ontario's farmland is the foundation of the significant economic contributions of our overall agri-food sector which will continue to be important to a strong Ontario economy. The Niagara Escarpment Plan (NEP) seeks to protect key natural features and associated landscape along the Niagara Escarpment, and is intended to control land use activities to those compatible with the goals of the NEP.

Many farming operations fall within the NEP defined lands. Farmers within this area often find it challenging to get permits to undertake certain activities and improvements or expansions as part of their farming operations and may face lengthy delays. At the same time, complaints can result in enforcement personnel entering properties without warning, whether or not the complaint is founded.

Efforts to improve service delivery, reduce redundancy and administrative burdens need to consider the impacts on farm operations.

## **Notices in Newspapers**

The CFFO supports the recommendation to remove the requirement to post notices in local newspapers for amendment proposals and associated hearings. However, this practice is still beneficial for many reasons, including reaching a broader audience within the local community. This practice should continue to be recommended, even if no longer required.

## **Exemptions for Low-Risk Activities**

Many landowners within the NEP area are often frustrated by the time it takes to get permission approvals, even for simple activities. In order to make the best use of administrative resources, low-risk activities should be exempt so long as standardized conditions are met. This should allow NEC administration to process approvals for other types of activities more quickly.

## **Access to Lands for Inspection**

NEC inspection officers should request permission from property owners in advance of any access to property for inspection purposes. If access for inspection is required and permission has not previously been obtained, NEC officers should be required to obtain a warrant. This should ensure that property owners are not facing unwarranted access to their property because of frivolous complaints, while still allowing access as necessary for inspection purposes.

## **Exchange of Information**

Enforcement personnel should be able to exchange information in an efficient manner to reduce redundancy and ensure fair treatment. Personal information collected and exchanged should be properly protected throughout this process.

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## Conclusion

The CFFO supports efforts to reduce red tape by improving service delivery, reducing redundancy and administrative burdens. When considering ways to increase compliance tools for the NEC, it is important to still respect compliant property owners.

Thank you for your consideration of our input and concerns.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario

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