



LONG-TERM THINKING FOR TODAY'S ISSUES

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Re: ERO 019-2785 Land Use Compatibility Guidelines

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.

Many different land uses are competing for space, especially within the most populated areas of the province. Our most productive agricultural land is predominantly found in these highly populated regions of the province. Our agricultural production is vital to our economy and to our overall food security as a province. Ontario's farmers work hard to grow high quality food, fibre and fuel using stewardly farming practices, thus making significant contributions to both human and environmental health.

It is important that land use planning appropriately considers potential impacts of neighbouring land uses, be they agricultural, industrial, residential or other types of land uses. Agricultural uses, especially in the most populated regions of the province, will need to be effectively planned with many other types of land use in close proximity. Good planning will help to ensure the ongoing vitality of the agricultural sector in these regions of the province.

Changes in the agriculture sector come from changes in regulations, innovations in technology and techniques, or changes in market demands. Agricultural production will be taking place within settlement boundaries to a larger extent, including production of new crops or traditional crops grown in new ways. This will likely include both indoor and outdoor agricultural production. Where this production meets the definition of "agricultural," rules and regulations need to treat it as such. As the diversity of crops and methods of agricultural production continue to change and expand, it is important that agriculture continues to be respected and protected as agriculture.

The CFFO recommends that:

- Licensed cannabis production facilities with a valid FBR number be clearly defined and treated as “agricultural” and should therefore not fall under the definition of “major facility,” regardless of location.
- New Minimum Distance Separation regulations should be developed specifically for cannabis production facilities. Once established, these Minimum Distance Separation rules should be consistently applied to these facilities wherever they are located, be it within settlement area boundaries, prime agricultural areas or rural lands.

Cannabis Production as Agriculture

Appendix K clearly states that “agricultural uses are not considered major facilities in the PPS and as such are not specifically referenced in this guideline” (p.124). Licensed cannabis production, indoors or outdoors, undertaken by a farming operation with a valid FBR number should be considered agricultural production. These operations, regardless of whether they are located within or outside a settlement area boundary, should fall under the category of “agricultural uses” and therefore should not be considered major facilities.

The CFFO therefore opposes language in the draft Guideline that classifies “indoor cannabis production facilities that are located in a settlement area on lands that are zoned for industrial uses” as qualifying as a class five major facility. These references should be removed.

It is also important that licensed cannabis production facilities are not governed by different setback rules depending on where they are located, such as if they are located within or outside settlement areas. The CFFO strongly recommends that the same setback rules from sensitive land uses should apply to cannabis production facilities within settlement area boundaries as within rural and prime agricultural areas. These rules should be based on cannabis production as an agricultural land use and not be based on definition as a major facility under the PPS or any other non-agriculture-based definition.

Minimum Distance Separation for Cannabis

The CFFO recommends that cannabis production facilities should be regulated by rules designed to govern agricultural production. Currently, Minimum Distance Separation rules are designed to apply to livestock production and anaerobic digestors only. The CFFO recommends that a set of Minimum Distance Separation guidelines and regulations should be developed specifically to apply to cannabis production facilities.

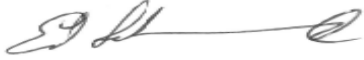
Once established, these Minimum Distance Separation rules should be consistently applied to licensed cannabis production facilities with an FBR number, wherever they are located, including within settlement area boundaries, prime agricultural areas and rural lands.

Conclusion

The CFFO recommends that licensed cannabis production facilities with a valid FBR number should be clearly defined and treated as “agricultural” and should therefore not fall under the definition of “major facility,” regardless of location. The CFFO also recommends that new Minimum Distance Separation regulations should be developed specifically for cannabis production facilities. Once established, these Minimum Distance Separation rules should be consistently applied to these facilities wherever they are located, be it within settlement area boundaries, prime agricultural areas or rural lands.

We appreciate this opportunity to provide input, and thank you for your consideration of our concerns and comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Scharringa', with a long horizontal flourish extending to the right.

Ed Scharringa, President
Christian Farmers Federation of Ontario