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LONG-TERM THINKING FOR TODAY'S ISSUES

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December 2, 2022

Attention: Greenbelt Consultation  
Provincial Land Use Plans Branch  
Ontario Ministry of Municipal Affairs and Housing  
College Park, 13<sup>th</sup> Floor, 777 Bay St.  
Toronto, ON  
M7A 2J3  
Via email: [greenbeltconsultation@ontario.ca](mailto:greenbeltconsultation@ontario.ca)

**Re: ERO 019-6216 Proposed Amendments to the Greenbelt Plan, ERO 019-6217 Proposed Amendments to the Greenbelt Boundary Regulation and ERO 019-6218 Proposed Redesignation of Land under the Oak Ridges Moraine Conservation Plan**

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 is concerned about the protection of productive agricultural land. This land is highly valuable as a source of food, as an economic driver and as a provider of environmental goods and services.

The current proposals of land exchange would add mainly Urban River Valleys, land that is largely already protected, along with a small portion of the Paris Galt Moraine, in exchange for significant loss of farmland and natural heritage land removed from within the existing Greenbelt. Further farmland loss would result from the proposed designation changes within the Greenbelt boundaries.

The CFFO strongly objects to these proposals on the basis of the significant direct farmland loss that would result and because of the increased risk this precedent would set for future losses.

The CFFO recommends that:

- Protection of land within the Greenbelt must be permanent.
- No specialty crop land should be lost either via redesignation to settlement within the Greenbelt or by removal from the Greenbelt boundaries.
- The Duffins Rouge Agricultural Land Preserve should remain protected within the Greenbelt and under the *Duffins Rouge Agricultural Land Preserve Act, 2005*.

## Value of Farmland

Ontario's farmland is the foundation of the significant economic contributions of our overall agri-food sector. The sector has proven to be resilient and agile in adjusting to significant challenges and new opportunities. It will continue to be important to a strong Ontario economy far into the future – but only if our agricultural land base is protected.

Farmland also provides many important environmental goods and services including flood risk mitigation and wildlife habitat. Within the Greenbelt, protected farmland and natural features together ensure greater environmental benefits and corridors for wildlife and water through the landscape.

Productive farmland is vital to our food security, here in Ontario and globally. Recent disruptions to supply chains and global food systems demonstrate the value of food-producing land, especially close to home. All these benefits need to be considered when reviewing development proposals that will permanently remove farmland from production.

## Solutions for Housing

The CFFO has long recognized that land use planning is a challenging process to balance many different competing interests within a finite single landscape. In balancing provincial priorities, we should carefully consider the need to protect our valuable farmland and Agricultural System, especially in regions of the province where we have the highest quality, most productive farmland and where growth pressure is most significant, including within and around the Greenbelt.

The CFFO recognizes the need for increased housing supply across the province and strongly encourages facilitating brownfield redevelopment, increasing density within settlement area boundaries and prioritizing use of land currently designated for development without designating more farmland for future development. We do not need to use Greenbelt protected land to meet increased housing needs.

## Permanent Protection

“The Greenbelt is a broad band of permanently protected land which: Protects against the loss and fragmentation of the agricultural land base and supports agriculture as the predominant land use;”<sup>1</sup>

**The CFFO strongly supports the vision and goals of the Greenbelt, including the stated goal that land should have permanent protection.** Permanent protection cannot occur in a Greenbelt that is constantly subject to land removals in one place and additions in another. Even if the total land area within the Greenbelt remains the same or increases, specific features in one place cannot be replaced elsewhere. Furthermore, land exchanges make no guarantee of

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<sup>1</sup> “The Greenbelt Plan (2017),” p. 3.

maintaining the same balance of land use, and thus risk significant loss of farmland within the Greenbelt.

In previous consultations on proposed changes to the Greenbelt, this government clearly indicated that no requests of removal or land exchanges would be considered. The CFFO is extremely disappointed by the proposal of permitting removal of land from the Greenbelt by land exchanges. **No removals of land or land exchanges should be considered.**

Permanent protection of land within the Greenbelt, including farmland, can only be maintained when land stays within the Greenbelt. Permitting land to be removed from the Greenbelt clearly signals that the government is not committed to the provincial interest of protecting farmland. This precedent will open a floodgate of requests for development within the current Greenbelt boundaries. This will increase land speculation within and around the Greenbelt, which will drive up the price of farmland. It will undermine the intended protection of key features, including specialty crop land and prime agricultural land. This erodes any notion of permanent protection within the Greenbelt. **The CFFO wants to see permanent protection to the agricultural land base within the Greenbelt boundaries.**

The proposed land exchange comes with direct loss of farmland overall. The land exchange is primarily based on the addition of Urban River Valleys and a small area along the Paris Galt Moraine. These areas are solely or primarily focused on natural heritage features and the water cycle and not on food production. In exchange, protected countryside and natural heritage land is proposed to be removed from the Greenbelt or converted to settlement land use. The areas for removal include important headwater areas that will impact water quality and drainage. These areas also include significant acres of prime agricultural land including some specialty crop land and all of Ontario's Duffin's Rouge Agricultural Preserve. This is a significant loss for agriculture.

### **Specialty Crop Land and Duffins Rouge Agricultural Preserve**

The current proposal would see both specialty crop land and significant prime agricultural land currently within the Greenbelt permanently lost via conversion to settlements. **No specialty crop land should be lost either via redesignated to settlement within the Greenbelt or by removal from the Greenbelt boundaries.**

The Ontario Ministry of Agriculture, Food and Rural Affairs has a clear definition of "prime agricultural areas" that is applied and mapped within the Greater Golden Horseshoe region and is also used as a designation in official plans across the province. This definition of prime agricultural areas acts as a reference to the most important areas where development *should not occur*.

We have only two designated areas of specialty crop land, our tender fruit- and grape-producing region in Niagara and the vegetable-producing area in the Holland Marsh. Ontario also currently has only one agricultural land preserve, the Duffins Rouge Agricultural Land Preserve. All of these areas are currently within the Greenbelt and should enjoy the permanent protection that was intended by including them.

The Duffins Rouge Agricultural Land Preserve is protected not only within the Greenbelt, but also under a separate “Duffins Rouge Agricultural Preserve Act, 2005” which is currently proposed to be repealed in *Bill 39, Better Municipal Governance Act, 2022*. This agricultural land should continue to be protected both within the Greenbelt and under the *Duffins Rouge Agricultural Preserve Act, 2005*. **The CFFO objects to repealing the *Duffins Rouge Agricultural Preserve Act, 2005*.**

The CFFO supports the Agriculture System model operating within both the “Greenbelt Plan” and “A Place to Grow: Growth Plan for the Greater Golden Horseshoe” that supports the highly productive farmland, including these specialty crop and special microclimate areas.

### **Conclusion**

In a context of increased pressure for housing development, productive farmland stands to be the loser from settlement boundary expansions. The current proposals of land exchange would add mainly Urban River Valleys and a small area in the Paris Galt Moraine in exchange for significant loss of farmland. The CFFO recommends that protection of land within the Greenbelt must be permanent. Furthermore, no specialty crop land should be lost either via redesignated to settlement within the Greenbelt or by removal from the Greenbelt boundaries. The Duffins Rouge Agricultural Land Preserve should remain protected within the Greenbelt and under the *Duffins Rouge Agricultural Land Preserve Act, 2005*.

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

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario