

**National Farmers Union - Ontario Submission
to Ontario Ministry of Agriculture, Food and Rural Affairs
Re: Agricultural Impact Assessment Guidance Document, ERO number 013-2454**

The National Farmers Union (NFU) is pleased to submit input on the draft guidance document outlining the conditions for completing an Agricultural Impact Assessment (AIA), ERO number 013-2454.

The NFU is Canada's only national direct-membership voluntary general farm organization. The NFU in Ontario (NFU-O) is accredited under the *Farm Registration and Farm Organizations Funding Act, 1993*. NFU members believe that the problems facing farmers are common problems, and that farmers producing diverse products must work together to advance effective solutions. The NFU works toward the development of economic and social policies that will maintain the family farm as the primary food-producing unit in Canada.

Our comments on the Agricultural Impact Assessment Guidance Document focus on the pre-consultation and consultation processes, impacts on rural community and agricultural economy, and the documentation of impacts with and without mitigation.

The NFU's has a long-standing position regarding protection of farmland, as follows:

We recommend an immediate freeze on urban and industrial development located on prime agricultural land and that such agricultural land be designated for agricultural use only. The preservation of farmland requires close co-operation between all levels of government. It is also imperative that local communities be involved as directly and deeply as possible. The higher levels of government should be responsible for determining the basic guidelines, and it is essential that land zoning be administered by the provincial government within the context of a National Land Policy. Federal/provincial legislation should be enacted prohibiting the use of Class 1, 2, and 3 soils for any industrial and residential development.

Farmland particularly suited to specialized crops (eg. fruit and vegetable growing) should be dedicated exclusively to agriculture, even though it may require zero growth of development for other purposes. The federal and provincial governments in Canada should prevent the further loss of such land for purposes such as industrial uses or through flooding for hydroelectric projects.

We support the Government of Ontario's existing efforts to protect Class 1, 2, and 3 farmland from industrial and residential development. We urge the government to amend the laws and regulations to include all Class 1, 2, and 3 farmland in the province and to strengthen the protection measures. Farmland is precious and irreplaceable. The uncertainty of future climate, population levels, transportation costs, and energy availability means that Ontario's food security cannot be taken for granted. Keeping all of our Class 1, 2, and 3 farmland intact should be our top priority.

The AIA Guidance document is a tool for developers, proponents, consultants, and governments to help them navigate the many regulations and processes required or recommended in order to obtain approval for new residential, industrial, infrastructure, or quarries where the development would affect local agriculture. We believe this document should direct users to be more thorough, inclusive, and transparent in order to provide authorities with enough information to properly protect our farmland.

Pre-Consultation (page 15):

The Pre-Consultation meeting should invite and include representatives from farm organizations. The farm organizations should be provided with the draft terms of reference for the AIA in advance so they can prepare for the meeting. Farm organizations should be involved in determining the Study Area for the AIA at this stage. Their input during the pre-consultation meeting should be recorded and available for review at later stages of the process. If no pre-consultation meeting is held, the regulatory authority should provide the AIA's draft terms of reference to farm organizations for review and input.

Consultation (page 16):

The Guidance Document should recommend public consultation for all AIAs, beyond just those situations where required by law or regulation.

Study Areas (page 17 – 20)

The primary and secondary study areas should include the watersheds affected by the proposed development. Impacts on drainage, water quality, groundwater, and water supply need to be assessed, as water is essential for agriculture.

Economic and Community Benefits of Agriculture (page 27-28)

The Guidance Document should recommend a more thorough documentation of the Economic and Community Benefits of Agriculture.

We agree with the use of Census Data, as it is highly accurate and can be tightly focussed geographically, however the Census is only done every five years. In addition to the Census, more recent survey data should also be used, such as the Labour Force Survey and farm financial surveys.

We recommend that future agricultural potential be assessed as well. Farmland in the study area may have the capacity to produce higher value crops and livestock than is currently the case. Changes in international conditions, climate, domestic policy, consumer tastes, and emerging knowledge could make it possible for increased community and economic benefits from agriculture. In light of these possibilities along with uncertainty about future food security, the Guidance Document should ensure AIA's take a conservative position in order to maximize protection of food-producing land.

We would like to draw attention to the economic and community benefits of organic agriculture, which need to be recognized and supported when AIAs are done. Demand for certified organic food is growing, so additional land suitable for organic production will be needed. Organic certification requirements, such as adequate buffer zones and clean water supplies should be explicitly addressed by AIAs. The contributions of existing organic farms need to be recognized and protected, and the potential for organic farming expansion (larger and more farms) need to be accommodated.

The Guidance Document should assess the infrastructure needs of agriculture and ensure that businesses that rely on local farmers, including food processors, farm equipment suppliers, farm service providers (such as veterinarians and mechanics) are included in the AIA. Likewise, social infrastructure needed/supported by rural farm families, such as rural schools, health care facilities, community centres, etc., should be included in the AIA.

Net Impacts (page 31):

This section says "Assuming that the recommendations of measures to avoid, minimize and mitigate impacts of the development are implemented, this section should describe the anticipated net

impacts, after mitigation measures have been put in place ...” We are concerned that the assumption that mitigation measures are all implemented and that they all perform as expected might promote undue optimism. The Guidance Document should provide a range of net impacts based on scenarios of poor, good, or excellent both the implementation of and effectiveness of proposed mitigation measures. Measurable indicators for impacts should be provided so that if the development is approved, the actual performance of mitigation measures can be evaluated over time.

3.5 Rehabilitation – Mineral Aggregate Resource Extraction within Prime Agricultural Areas (page 45):

We understand that this consultation is about the Guidance Document for AIAs, not the actual regulations, however, we will again register our objection to any mineral aggregate resource extraction from Class 1, 2, and 3 farmland. It is not possible to return gravel pits and quarries back to their original condition. Farmland is irreplaceable ... aggregate can be found in other locations and transported. The cost of additional transportation can be borne, but once destroyed, farmland is gone forever.

All of this respectfully submitted by

National Farmers Union – Ontario

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