



June 19, 2023

Impact Assessment Agency of Canada
22nd Floor, Place Bell
160 Elgin St
Ottawa ON K1A 0H3

RE: Draft Terms of Reference - Rouge National Urban Park Study

Dear Minister Guilbeault,

I am writing on behalf of the Ontario Farmland Trust (OFT) to provide comments and recommendations for the draft terms of reference (ToR) for the study on the Rouge National Urban Park (the Park). These recommendations aim to enhance the clarity, inclusivity, and comprehensiveness of the study, ultimately supporting the preservation of ecological and agricultural integrity within the Park. The following recommendations are based on careful consideration of the existing ToR.

Recommendation 1: Enhancing the recognition of needing the study to focus on the agricultural integrity of the Park.

Supporting information: Enhancing the recognition for the study to focus on the agricultural integrity of the Park will emphasise the crucial role that agriculture plays in the local economy, food security, ecological interdependencies, farmland loss concerns, economic contributions, and ecological resilience. Two thirds of the park consists of farmland, indicating the significance of any impacts development on the Duffins Rouge Agriculture Preserve will have on the agricultural system and farming operations within the Rouge National Urban Park.

The ecological and agricultural integrity of the Park are closely intertwined. Agricultural practices within the Park can have direct impacts on the surrounding ecosystems, such as water quality, soil health, and biodiversity. Conversely, healthy ecosystems, including wildlife corridors and habitat, contribute to the sustainability and productivity of agricultural lands. By emphasizing the interdependencies between ecological and agricultural systems, the study can better address the potential synergies and conflicts, leading to more effective and balanced management strategies.

The agricultural lands within the Park provide an essential ecological buffer zone between urban areas and natural habitats. They act as a buffer against encroaching urbanization, preserving the integrity of surrounding ecosystems and wildlife habitats. By recognizing the agricultural integrity of the Park, the study emphasizes the importance of maintaining this buffer, ensuring wildlife corridors, and enhancing the overall ecological resilience of the region.



Ontario's ongoing loss of farmland, at a rate of 319 acres per day, poses a significant threat to the agricultural sector and food security. The Park's agricultural lands, characterized by their fertile soil and favorable climate, are particularly valuable for food production. Recognizing the agricultural integrity of the Park in the study's language underscores the urgent need to protect and conserve these prime agricultural lands. It highlights the potential risks associated with encroachment, urban development, or other activities that could jeopardize the long-term viability of local food production.

The agricultural activities within the Park contribute significantly to the local economy and food security. By recognizing and prioritizing the agricultural integrity of the Park in the study, it emphasizes the importance of maintaining and supporting local food production. This not only ensures a sustainable and reliable food source for local communities but also reduces dependence on imported food, contributing to regional self-sufficiency and resilience.

The agricultural activities in the Park make a substantial contribution to Canada's agricultural sector, exports, and GDP. By focusing on the agricultural integrity of the Park in the study, it acknowledges the economic significance of these activities. Maintaining a robust agricultural sector in the region supports job creation, rural livelihoods, and sustainable economic growth. It also strengthens Canada's global competitiveness as a reliable supplier of high-quality agricultural products.

An example of how recommendation 1 could be applied includes:

- 1.2 The Study will focus on: ... b) “The ecological **and agricultural** integrity of the Park and the ability of the Park to meet its management objectives, including as described in the Park management plan”; and
- 5.1 (j) “Identify its conclusions on the magnitude of potential effects, including cumulative effects, of development activities on the ecological **and agricultural** integrity of the Park...”

Recommendation 2: Allow for the public to nominate or submit candidates' names for the committee.

Supporting information: The rationale for the recommendation to allow the public to nominate or submit candidates' names for the committee is rooted in the recognition of the complex and interdisciplinary nature of agriculture, particularly in relation to the study's objectives. By opening up the nomination process to the public, the aim is to broaden the pool of potential committee members and enhance the overall expertise available for consideration.

Agriculture, as a field, intersects with various disciplines such as ecology, social sciences, and economics. It requires a comprehensive understanding of ecological systems, sustainable farming practices, community dynamics, and economic



implications. By allowing the public to nominate individuals known for their expertise in these intersection areas, the committee can benefit from a diverse range of perspectives and knowledge.

Involving the public in the nomination process acknowledges that there are individuals outside of traditional government channels who possess valuable insights and expertise related to the study's scope. These individuals may include farmers, researchers, community leaders, or professionals with direct experience and knowledge in the agriculture sector.

The diverse perspectives brought forth by public nominations can contribute to a more comprehensive and well-rounded committee. It increases the likelihood of including individuals who possess a deep understanding of the challenges and opportunities at the intersection of agriculture, ecology, social dynamics, and economics. By involving the public, the selection process becomes more inclusive and transparent, fostering a sense of ownership and legitimacy among stakeholders.

An example of how recommendation 2 could be applied includes:

- Section 2.2 could read, "The identification and evaluation process for the Committee members will be coordinated by the Impact Assessment Agency of Canada (the Agency) and will include seeking nominations from Indigenous communities, **as well as community members at large.**"

Recommendation 3: Amend section 2.3 to be more encouraging of the Minister to attempt to replace a committee member should they be unable to complete the study with another candidate with similar knowledge and skills that would replace the committee member.

Rationale: The inclusion of this recommendation aims to ensure continuity and maintain the expertise required for an effective study. In complex and interdisciplinary projects like this, each committee member brings specific knowledge and skills that contribute to the overall success of the study. If a committee member is unable to continue their participation due to unforeseen circumstances, it is crucial to find a replacement who can provide similar expertise. By emphasizing the need for continuity in terms of knowledge and skills, the study can maintain a consistent and robust approach throughout its duration.

The amendment ensures that the study's integrity is upheld, even if a committee member needs to be replaced. It recognizes the importance of maintaining the collective expertise and knowledge base within the committee, which is crucial for providing well-informed recommendations. By seeking candidates with similar knowledge and skill sets, the continuity of the study's objectives, methodologies, and insights can be



preserved, allowing for a seamless transition and minimizing potential disruptions or gaps in expertise.

Having a clear procedure for replacing committee members instills a sense of accountability and transparency in the study. It assures stakeholders, including the public, Indigenous communities, and other interested parties, that the study is well-prepared to handle unexpected situations. Demonstrating the commitment to maintaining expertise and knowledge within the committee helps build trust and confidence in the study's outcomes, ensuring that the recommendations are based on a solid foundation of expertise and informed decision-making.

An example of how recommendation 3 could be applied includes:

- Section 2.3 - "Should one or more Committee members be unable to complete the Study, the Minister **will attempt to replace the Committee member(s) with similar knowledge and skill sets or depending on circumstances and after consultation with the remaining committee members**, the Minister may decide to have the Committee proceed to complete the Study with the remaining members"

Recommendation 4: Amend section 5.1 (f) to include in the description of potential development activities that may occur in the federal lands adjacent to the Park.

Rationale: The recommendation aims to recognize the interconnected nature of the federal lands adjacent to the Park with regards to ecological and agricultural integrity. These lands are not separate entities but rather play a crucial role in supporting and influencing the overall functioning and sustainability of the Park. They can serve as buffers, wildlife corridors, and habitat extensions for species present in the Park. Additionally, these lands possess prime agricultural areas and contribute to the local food production system.

Including the federal lands adjacent to the Park in the description of potential development activities acknowledges the historical and ongoing threats these lands face given the potential use of these lands for an airport. Furthermore, given that the terms of reference have already recognized the federal lands adjacent to the Park in earlier sections, it is essential to ensure consistency and avoid any oversight in the subsequent sections, including the description of potential development activities.

By including these lands in the description of potential development activities, the study acknowledges their significance and ensures a comprehensive assessment of the impact that development may have on the entire area.

An example of how recommendation 4 could be applied includes:



- Section 5.1(f) - "Provide a description of the development activities that may occur in the Duffins Rouge Agriculture Preserve **and federal lands adjacent to the Park** and how provincial laws and regulations..."
- Section 5.1(h)(i) – "The ability of the Park to meet its management strategies and objectives as described in the Park management plan, including an evaluation of whether future development activities in the Duffins Rouge Agricultural Preserve **and the federal lands adjacent to the Park** may be compatible with park objectives. All Park management objectives must be considered either qualitatively and/or quantitatively (guidance provided in Annex I).

Recommendation 5: Add a section to 5.1(h) under "Identification of valued components must include:" language pertaining to the ability for farming operations to remain viable and be able to engage in normal farming practices unencumbered by development on the Duffins Rouge Agricultural Preserve and the federal lands adjacent to the Park.

Rationale: This recommendation provides a more comprehensive understanding of the importance of preserving agricultural viability, mitigating conflicts and challenges, distinguishing between temporary inconveniences and public health/safety risks, understanding the holistic nature of agricultural operations, considering neighborhood relations, and supporting sustainable land use planning. These points collectively strengthen the justification for including the proposed language in the terms of reference, ensuring that the impacts on farming operations are appropriately assessed and addressed throughout the study.

The inclusion of this value components recognizes the importance of maintaining the viability of farming operations within the study area. Agriculture plays a vital role in the local economy, food production, and the preservation of agricultural heritage. By acknowledging the potential impact of development on agricultural viability, the study ensures that the long-term sustainability of farming practices and businesses is taken into account.

Development in proximity to agricultural areas can create conflicts and challenges for farming operations. These conflicts may arise from factors such as noise, odour, dust, and differences in land use which leads to complaints by adjacent land users that the farmers now must deal with despite these nuisances being a result of normal farming practices. Furthermore, the increase in traffic on rural roads where heavy farming equipment operates can create a challenging and at times dangerous conditions for the farmer and those in their vehicles who are not used to sharing the road with such equipment. Including this language in the terms of reference highlights the need to assess and understand the potential impacts on agricultural operations, enabling the



development of mitigation strategies to minimize conflicts and maintain harmonious relationships between agricultural activities and other land uses.

Recommendation 6: amend 5.1(l) to include “Department of Agriculture and Agri-Food Act.”

Rationale: The recommendation to include the "Department of Agriculture and Agri-Food Act" in section 5.1(l) of the terms of reference is driven by a growing concern over the future viability of Canada's food security. The continuous development on our class 1 soil and other prime agricultural lands raises significant apprehensions about our ability to sustainably produce enough food to meet the nation's needs.

By incorporating the "Department of Agriculture and Agri-Food Act" into the study, there may be opportunities identified for the federal government to address the critical importance of preserving and protecting prime agricultural lands for the long-term food security of Canada. It acknowledges the need for the federal government to assess the potential impacts of development activities on these valuable agricultural resources and provides an opportunity to inform decision-makers about the importance of maintaining the integrity of our agricultural lands.

By incorporating the "Department of Agriculture and Agri-Food Act" into the terms of reference, the study underscores the commitment to ensuring sustainable food production, protecting agricultural resources, and upholding Canada's long-term food security. This inclusion not only reinforces the significance of the study within the context of national agricultural policies but also highlights the imperative to make informed decisions regarding land use and development activities that may impact our nation's food security.

Recommendation 7: Include the opportunity for the public to submit comments in confidence.

Rationale: Incorporating an opportunity for the public to submit comments in confidence serves as a crucial step in recognizing and addressing the existing power dynamics and concerns within the farming community. It acknowledges the unique circumstances faced by individuals who are currently leasing land from developers and the potential challenges they may encounter when expressing their views openly.

By providing a mechanism for confidential submissions, the study demonstrates a commitment to creating an inclusive and transparent environment that encourages diverse perspectives. This approach recognizes that individuals who lease land from developers may have legitimate concerns about appearing to work against the property owners, jeopardizing their lease agreements, or facing other repercussions. Allowing them to submit comments in confidence ensures that their voices are heard without fear of negative consequences, thus fostering a more open and honest dialogue.



By embracing the opportunity for confidential submissions, the study not only encourages greater participation from the farming community but also enhances the overall credibility and integrity of the research. It sends a clear message that the study values and respects the input of all stakeholders, regardless of their circumstances or potential vulnerabilities.

Recommendation 8: Include in Potential valued components found in Annex 1: (i) viability to carry out operational activities of farms within the Rouge National Urban Park; and, (ii) Ecological integrity that supports quality agricultural soil and functions.

Rationale: This recommendation significantly enhances the comprehensiveness and relevance of the study by explicitly recognizing two critical aspects: the viability of operational activities of farms within the Rouge National Urban Park and the essential role of ecological integrity in supporting quality agricultural soil and functions.

By including the viability of operational activities of farms as a valued component, the study acknowledges the importance of sustaining agricultural practices within the park. This recognition reflects the significant economic and social contributions of farming activities to the local community, including the provision of locally-grown food, job opportunities, and the preservation of agricultural traditions. By explicitly addressing the viability of farm operations, the study underscores the need to protect and support these activities to maintain the long-term sustainability and vitality of the agricultural sector within the Rouge National Urban Park.

Furthermore, emphasizing ecological integrity that supports quality agricultural soil and functions aligns the study with the fundamental principles of sustainable agriculture and ecosystem health. Agricultural soil, particularly high-quality soil such as class 1 soil, is a finite and valuable resource that plays a crucial role in food production and maintaining healthy ecosystems. By recognizing and prioritizing the ecological integrity that supports agricultural soil and functions, the study demonstrates a commitment to preserving the natural resources necessary for sustainable farming practices.

This inclusion also acknowledges the interdependence between agriculture and the environment. Healthy agricultural ecosystems contribute to biodiversity conservation, water and air quality, and the mitigation of climate change impacts. By recognizing the importance of ecological integrity in supporting quality agricultural soil and functions, the study ensures a holistic approach that considers both the ecological and agricultural aspects within the Rouge National Urban Park.



I trust that these recommendations will contribute to a more robust and effective study of the impacts on the Rouge National Urban Park. Your consideration of these recommendations is greatly appreciated, as they reflect the insights and concerns of various stakeholders. Should you require any further clarification or assistance, please do not hesitate to contact me.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Straathof", is positioned below the word "Sincerely,".

Martin Straathof, Executive Director
Ontario Farmland Trust