



WELLINGTON FEDERATION OF AGRICULTURE

Janet Harrop

President

7764 Nichol SR 5 RR1 Fergus ON

N1M 2W3

519-820-9293

ijharrop@hsfx.ca

www.wfofa.on.ca

Lisa Hern

Secretary-Treasurer

RR 2 Kenilworth ON

N0G 2E0

519-848-3774

wellington@ofa.on.ca

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Township of Puslinch
7404 Wellington Road 34
Aberfoyle, ON N0B 2J0

Dear Council:

The Wellington Federation of Agriculture (WFA) is the largest farm organization in the County of Wellington and works in concert with the Ontario Federation of Agriculture (OFA). Both federations work to develop consensus in a diverse agriculture industry and lobby for policies that create a sustainable and profitable environment for farming in Ontario. In fact, WFA represents over 1400 farm business within the County of Wellington.

Wellington County is an agricultural powerhouse. According to the 2016 census of Agriculture, Wellington County farms generate more than \$ 940 Million in farm gate receipts annually—one of the biggest farm-gate sales generating Counties in the province. WFA was a partner in the County of Wellington Business Retention and Expansion study, whereby agriculture was identified as one of 4 key sectors within the county. Therefore, it is imperative we have the ability to remain competitive with our neighbouring municipalities, provinces, and the world.

The WFA has many members who are stewards of the natural environment areas within Puslinch. The WFA is concerned over the Natural Environment (NE) designations and the wording of its proposed comprehensive By-Law. In southern Ontario, farmers are the most invested stakeholder group with the most direct control over rural landscapes. Stewardship of the land is a hallmark particularly for those who make the multigenerational commitment to farming. The majority of Ontario farmers have made a commitment to improving their understanding of environmental risks specific to their farm through participation in the Environmental Farm Plan (EFP). The EFP is a site-specific risk assessment where farmers identify risks on their farm and then develop action plans to reduce or remove the risk. The success of EFP in the farm community can be attributed to its voluntary and participatory principles.

A paper published in 2008, "Farmers and nature context factors and actions affecting conservation?" confirms the key elements found in the EFP as the elements of success for agri-environmental schemes and cautions against rigid prescriptions:

"Farmers often do not feel empowered to initiate modifications of farm management, and feel stifled by rigid requirements that turn out to be detrimental to adoption of schemes if there is little flexibility... The agri-environmental schemes ought to be so flexible that farm-specific solutions can be allowed if they can help fulfill the goals and follow the principles of the scheme."

Lessons can be learned from this wisdom in developing a successful by-law around Agricultural Zoning and Natural Environment. Flexibility and genuine stakeholder participation are key elements in that success.

The position of the WFA is that prime agriculture designation already provides protection to natural environment areas. In practice the types of agriculture activities most often found adjacent to Natural Environment on Agricultural zoned lands already act as a buffer to more invasive human activity.

A 2012 review completed by BEACON Environmental:

“As discussed, there are many factors that make appropriate buffer determination challenging. Buffer determination is complex; it is influenced by the stressors, the receiver, the nature of the buffer itself and of course project objectives.”

The concept of buffers underlines that science is never absolute but a process of continual discovery.

Unfortunately, farmers do operate in a world where some absolutes exist. There is the absolute reckoning of accounts owing for seed, fertilizer, fuel, machinery repairs and the mortgage to name a few. Land capable of sustainable agriculture that is idled is land not generating income needed to cover expenses. Understandably, farmers become unsettled when an uncertain science might limit use of their farmland. Is a physical buffer worth more than the buffer of a farmer motivated to adopt more innovative and sustainable farming practices?

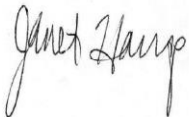
Therefore, the WFA proposes that the Town of Puslinch should only highlight the NE zone, and use language that will allow agricultural owned properties to work with Conservation Authorities to determine the correct NE location and any setbacks required, rather than “drawing a line in the sand” as its currently proposing to do.

Other Areas of concern within the Draft Zoning By-Law:

- Accessory Farm Employee Accommodations
 - Very restrictive; should simply state that they are allowed, and as per Ontario Policy, should be mobile if possible.
- Outdoor Storage Areas
 - Many farms store equipment and materials outdoor. Restricting where should not be done in Ag. Zones.
- Farm Businesses
 - Should not be subject to site control plans, which can be very costly. Work should be done to reduce the highly restrictive and potentially costly language. Ontario Policy states that more on-farm diversification is needed. This section will restrict this, not help.

We hope that in the next draft significant changes are made around the Agricultural Zone so that farmers in Puslinch can work with the Town towards economic success.

Respectfully,



Janet Harrop,
President