



WELLINGTON FEDERATION OF AGRICULTURE

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Monday, June 23, 2014.

Gary Cousins  
Director of Planning and Development  
County of Wellington  
Administration Centre  
74 Woolwich St  
Guelph ON N1H 3T9

**Re: Ghent Pit-H. Bye Construction, Application for Official Plan Amendment, OP-2014-02**

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.

Prime agricultural land is the foundation of a secure food supply. Ontario has the greatest area of the best farmland in Canada. However, even with attempts to strengthen protections for prime farmland the loss of farmland seems unstoppable as noted by OFA:

“Every day, prime agricultural land is lost to non-agricultural uses like housing and commercial developments and aggregate extraction. Statistics Canada reports illustrate this very clearly. In the five-year period between 2006 and 2011, nearly 260,000 hectares of farmland was lost. Whatever the reason, Ontario cannot sustain this level of land loss and continue producing enough food, fiber and fuel.”

260,000 hectares or 642,000 acres lost in just the last 5 years! This translates to about 350 acres every day - an unsustainable attrition happening across the province! A direct result of an accumulation of too many “minor” changes to official plans for “just” 60 acres here and there. This application for the Ghent Pit is typical of the processes that lead to the overall depletion of farmland in this province.

The Wellington Federation of Agriculture does not support this application to change the Official Plan to allow a pit on Class 1 farmland.

Specifically:

- There seems to be little discussion in the application about the need for the aggregate that will take this property out of food production for the foreseeable future. Currently there would appear to be 38 licensed sites covering nearly 1,600 acres with over 5.6 million tonnes set as the annual maximum tonnage that could be drawn from pits surrounding Mount Forest. (Source: MNR website listing of licenses for geographic townships of Arthur, Egremont, and Minto.)
- A similar lack of discussion is noted about the potential impacts on local farm operations and local residents resulting from increased use of roads and daily aggregate extraction. For example, the Mount Forest area has been home to Old Order Mennonite congregations since the 1960's. Horse and buggies, bicycles and pedestrians of all ages are commonly found travelling the narrow gravel roads. What is the

track record of the operator of this proposed pit in terms of minimizing adverse impacts? What steps will be taken to insure public safety along the haul route?

- Much is riding on the applicant's commitment to progressive rehabilitation of the site back to agriculture production. Can evidence be provided that the applicant can deliver on commitments made in this application? The applicant holds other licenses in the area. Can the applicant provide proof that rehabilitation is proceeding in a timely fashion on these sites? Have there been site plan amendments to these pits or changes to the conditions of the existing permits?
- The WFA expects that rehabilitation will meet the standard set by the recently updated Provincial Policy Statement (2014) to return the land to an agricultural condition, "...a condition in which substantially the same areas and same average soil capability for agriculture are restored." As an example if this property can produce a yield of 140 bushels of corn per acre currently, will it be returned to a state where that yield can be anticipated using the same agronomic practices after extraction of aggregate? The WFA sees this as a reasonable expectation of a successful rehabilitation back to agriculture. Anything short of this expectation means that food production capacity is lost for future generations.
- 60 acres will be lost to food production for a generation or more if this pit proceeds. Proof that the aggregate industry, locally, is demonstrating "due diligence" is more than reasonable given past history of the aggregate industry at the provincial level. Is the local industry living up to its commitments to put farmland back into viable food production?

It is not the wish of WFA to single out only this particular application. Most of WFA's comments would be applicable to other applications, as well. The WFA's cautions reflect not just those expressed in the farm community. Much criticism has been directed at the oversight and enforcement level of the aggregate industry. Local decisions makers are tasked more than ever to provide cautious oversight and due diligence in approving the extraction of our aggregate resources ...

*"The [Ontario] government is sending a strong message that the public should lower its expectations about what MNR [Ministry of Natural Resources] will do to sustainably manage the province's natural resources," says the Environmental Commissioner. "Cuts to MNR's core laws and regulations, cuts to staff, and cuts to programs will indeed transform the ministry. These short-sighted changes to MNR will potentially have disastrous results for our province's natural heritage."*

(Source: *Gutting MNR: Lowered Standards, Dangerous Risks*, Gord Miller, Environmental Commissioner of Ontario, October 10, 2013)

Extra due diligence is required for all those in the position of approving this request.

**The Wellington Federation of Agriculture, in the interest of preserving Class 1 farmland, does not recommend changes to the Official Plan to allow for the Ghent Pit application.**

Respectfully,



Gordon Flewwelling  
President

cc:  
Township of Wellington North  
Bruce Fulcher