



SUSTAIN

Alliance for healthy, just and sustainable food & farming
Working across Indigenous Territories / Ontario

Support New Entrants and Protect Foodland: Policy Recommendations



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About this Document:

Sustain is a province-wide, cross-sectoral alliance of organizations that work through collaborative action towards productive, equitable and sustainable food and farming systems that support the health and wellbeing of all people in Ontario/Indigenous Territories.

These policy recommendations have been developed through a participatory process between September 9, 2024 and March, 2025 engaging 90+ organizations, as well as academics who contributed expertise, across Ontario/Indigenous Territories.

This is not a finished product. It was shared in its current version to raise awareness of recommendations during the February 2025 Ontario election.

The participatory process to develop this document included:

- A survey of food and farming organizations about policy priorities
- A policy grey literature review
- Multiple meetings among organizations in Sustain-facilitated networks
- 2 rounds of review by Sustain network organizations
- Review by academics working in respective policy areas

Next steps:

Sustain will continue to gather expertise and solutions, building increasing participation and consensus on priority recommendations. Sustain will facilitate network engagement across organizations to work with the provincial government, and staff, to implement these recommendations over the next four years. Sustain recognizes and looks forward to elevating the leadership and expertise of organizations to do this policy work from within the networks.

To join a network, please email networks@sustainontario.com

Definitions and Scope:

This policy brief outlines areas of provincial policy change to support foodland protection, access to farmland and supports for new entrants, and to build value chain resilience, and foster soil regeneration.

Definition of New Entrant:

- 1) In acknowledgement of the dual governance on these lands, we must centre new Indigenous entrants into food harvesting, fishing and agriculture (and prioritize outstanding land and treaty issues related to land access which remain, in addition to environmental concerns on associated lands and waters);
- 2) Intra-family new farmers who are successors to a family farm;
- 3) Rural and urban young people who do not have a farm in the family or access to land;
- 4) Second careerists (often identified as being over 30) who do not have land in the family;
- 5) New Canadians bringing substantial agriculture experience, with a need for support to transition to a new climate, soil conditions, markets, food preferences, and sometimes language;
- 6) Temporary foreign workers on farms, seeking pathways to citizenship.

Each category brings its own complexities and compounded challenges. Within these categories, there are social-economic diversities leading to additional inequitable access to land, finances, and support.

Definition of Foodland:

Foodland includes broad classes of soil supporting diverse types of agriculture, small parcels that are productive, parcels that are productive and not contiguous to farmland, productive food forests, waterways that support food and fish harvesting, and meadows supporting foraging.

Recommendations include:

- Protect Foodland for everyone
- Increase access to Foodland for New, Young, and Underrepresented Farmers
- Promote Value Chain Resilience
- Fund Soil Regeneration
- Support New Entrants
- Support Local Production and Gathering of Culturally important Foods

Foodland Protection

Key Issues:

- Unacceptable, embarrassing outstanding Indigenous land and treaty issues remain, often blocked, stalled or ignored by provincial and/or federal administrations, civil servants, and risk-averse advisors
 - At the same time, legitimate concerns increase over community health and negative environmental outcomes related to resource extraction (and infrastructure) on the associated lands and waters;
- After a century of farmland loss with little attention to meaningful protection, Ontario's foodland/farmland face growing pressures from aggressive urban development and growth, weak provincial policy guidance, and ineffective zoning protections;
- From 2016 to 2021, the total acreage of productive land in Ontario decreased from 12,348,463 to 11,766,071, increasing the rate of loss to approximately 319 acres per day (Statistics Canada, 2022);
- These calculations do not include farmland that has already been swallowed within expanding urban boundaries, and lost to development over the next 20 years, as identified by the official plans of adjacent urban centres;
- Land use planning in Ontario, as directed by the Provincial Policy Statement issued under section 3 of the *Planning Act*, has not meaningfully protected against the loss of foodland/agricultural land in the province;
- Loss of productive land (classes 1-4) reduces land access options for new entrants, harms rural communities, and is a threat to local food supply through the fragmentation of farming communities, loss of employment, and loss of local and farm/harvest-related businesses and services. The needless loss of high quality productive soil is magnified by increasing, climate-impacted soil degradation globally.

Recommendations:

Development and Planning

- Prevent the loss of food/farmland, combat urban sprawl, unnecessary highway development and aggregate extraction on agricultural lands through:
- Amendment of provincial land-use policy to ensure meaningful long-term food/farmland protection;
 - Update Ontario's LEAR process to prioritize farmland protection rather than magnifying past mistakes and ineffective efforts;
 - OMAFA guidance to municipalities must acknowledge that diverse landscapes support a diversity of production styles;
 - in peri-urban regions of the province smaller agricultural parcels (<50 acres) support viable direct-marketing horticultural enterprises, and are worthy of full protection;

- All municipalities / regions must conduct a LEAR assessment to establish clear, unambiguous and absolute protections for farmland/foodland;
- Close loopholes and ensure municipalities prioritize farmland protection;
 - Amend zoning rules to prioritize agriculture over development, with no exceptions to exploit;
 - Designate all land parcels in the "protected" areas after the LEAR scoring is completed with an "Agricultural Land Reserve" zoning that cannot be revoked, for any reason;
 - Designate all other parcels of prime farmland, and all parcels currently being farmed, as "agricultural";
 - Require any potential change of use or rezoning of "agricultural" land to be subject to an Agricultural Impact Assessment;
 - Increase development charges on food/farmland zoned "agricultural";
 - Require municipalities to set measurable farmland protection and use goals, based on this "agricultural" designation, with penalties for non-compliance;
 - Place strict limits on the expansion of urban boundaries into natural and food-producing lands;
 - Enact housing policies to encourage increasing urban density and balance the needs of housing with food provisioning.
 - Stop use of Minister's Zoning Orders to fast track development projects;
 - Tie development permissions to mitigation requirements that require developers to reserve a percentage of the land for foodland use;
 - Integrate urban farming spaces into urban planning citing demonstrable health and community development benefits of community farming
 - Reduce existing barriers to urban food production and selling urban-produced food
 - Amend municipal/regional zoning and by-laws

Foodland

- Federal and provincial governments must prioritize and commit to completely resolving all outstanding Indigenous land and treaty issues, within one term;
 - Apply immediate cease and desist orders to all resource extraction taking place on such contested lands;
 - Resolution must acknowledge and include damages for the many traditional Indigenous food sources that have been wiped out, and many others which are under threat;
- Include "foodlands" in legislation with a broader definition of land intended for protection, and explain diversity of "foodlands"
 - including broad classes of soil supporting diverse types of agriculture, small parcels that are productive, parcels that are productive and not contiguous to farmland, productive food forests, waterways that support food and fish harvesting, meadows supporting foraging, etc.

- Include land used as a source for natural dyes, foraging, basketry (animal/plant-related), etc.

Land Ownership Controls

- Limit the amount of farmland that one person or corporation can own;
- Develop [Farmland grabbing legislation](#)—perhaps similar to PEI’s legislation—preventing non-farmer, non-resident investment in farmland;
 - Widen the scope of limitations on the purchase of agricultural lands to include all private investment funds, private pension plans, wealthy non-farming individuals, hedge-funds, and Real Estate Investment Trusts;
 - Legislation must demand full transparency in land purchase / ownership records to include address the use of shell companies, etc. to mask beneficial owners;
- Place limits on the purchase of any and all farmland lots around urban boundaries;
- **A Foodshed Lands Program:** in collaboration with Community-owned land trusts and land banks, develop a non-market farmland acquisition program in the peri-urban areas to ensure Class 1-4 farmland is protected and available to new entrants for food production at rental/lease rates aligned with the land’s food production value;

Taxation / Resilience Payments

- Provide climate change mitigation tax incentives for proven practices that build soil, water cycle and climate resilience (e.g. regenerative/ecological), to assist with farmland preservation;
 - Protect gains by incentivizing ongoing resilience rather than rewarding only the implementation of new projects;
 - Provide municipal land tax incentives OR payments directly to producers, linked to soil organic carbon rates, species at risk / habitat protections on farmland, organic certification;
 - Integrate municipal land tax assessments with policies that support and provide protection incentives to those with existing ecological assets (eg hedgerows, soil health, water conservation features, and key habitats)
- Incentivize local and domestic food production;
 - Focus on food for direct human consumption, prioritizing food security;
 - Consider subsidies to emergency food providers who purchase direct from farmers, or direct compensation to these producers

Access to Foodland for New Entrants

Key Issues:

- New Entrants have difficulty accessing foodland due to high cost
- Many farmers do not have succession plans
- Addressing issue of land tenure beyond short-term land access is an issue of investing in production systems, support infrastructure, startup costs, and the soil itself

Recommendations:

- Collaborate with new entrants to create succession plans that maintain food/farmland use over generations, ensuring long-term, local food production;
- Provide provincial support for programs that provide land access and/or land sharing programs, and organizations that support new entrants re. infrastructure, amenities, services;
 - (e.g. Black Creek and Just Food Community Farms; / Many Hands Farm, Downsview Park; as well as urban farms on provincial land);
 - Learn from models in other provinces (ex. Quebec's [L'Arterre](#))
- Create government-supported vehicles for removing some food/farmland from the market so that new entrants can access it to develop future businesses that support food production in Ontario
 - **A Foodshed Lands Program:** in collaboration with Community-owned land trusts and land banks, develop a non-market farmland acquisition program in the peri-urban areas to ensure Class 1-3 farmland is protected and available to new entrants for food production at rental/lease rates aligned with the land's food production value;
- Encourage and support alternative land ownership and/or governance models
 - EFAO, NFU-O, and Farms @ Work are currently working on an updated publication on alternative land ownership models, including info on creating effective lease/succession/land sharing agreements;
- Complete an inventory of public lands with soil suitable for agricultural production;
 - Provide funding to support the expansion of public land lease programs for ecological agriculture in target areas across the province;
 - Establish and enforce a moratorium on selling any public lands suitable for agriculture;
- Multi-year funding under the Sustainable Canadian Agricultural Partnership for an Ontario program matching new entrants with farmers who are retiring or looking to create succession plans—taking into account Young Agrarians successes/failures in land-matching programs in B.C.;
- Create a Long term Microloan program through OMAFA:
 - *An ownership micro-loan* stream that would support diversified-farm down-payments and/or costs for building or repairing buildings on a farm property

- An *operating microloan stream* that would provide stable funding support for diversified farmers in their first 5-years for infrastructure like: essential tools and equipment, fencing and trellising etc. and organic certification, and marketing and distribution costs.
- An *equity-deserving farmer grant stream* that provides start-up grants to women, Indigenous Peoples, people with disabilities, people who are part of 2SLGBTQI+ communities, religious minority groups, and racialized farmers seeking to establish or expand diversified food production initiatives within their communities.
- A *Beginning Farmer Tax Credit program*: property tax credits to landholders to lease to new entrant, diversified farmers;
- *Capital gains incentives* for selling to diversified farmers that extend current capital gains exemptions, deferrals, and reserves;

Value Chain Resilience

Key Issues:

- The Canadian food system is heavily consolidated, with a small number of corporations often dominating at the inputs, purchaser and retailer links of the food supply chain;
- Just and resilient food chains require moving from a 'supply chains' to a 'value chains' philosophy that links producers with all others from farm to fork;
- Ensuring value chain resilience requires the diversification of Canada's agricultural production;
- farm net incomes are a significant barrier to entry for most;
 - Agribusiness represents a tiny proportion of all farms but captures 95% of farm revenue (Qualman, 2019, p. 5).

Recommendations:

- Tax credit program to support community economic development in Food Value Chains
 - Develop the enabling legislation to allow a Community Economic Development Investment Fund (CEDIF) program similar to FarmWorks in Nova Scotia, at no cost to Ontario taxpayers;
- Financial support for the establishment of cooperative models similar to Federated Coops;
- Financial support for the establishment of infrastructure to link producers with small-scale processors, including local processing, storage and/or transshipment hubs, transportation, etc.;
 - create value chain coordinators who can aggressively link farmers and processors making sure all involved are thriving;
- Targeted Producer Subsidies and Supports
 - Provide targeted producer subsidies, which are designed to increase net farm income, for practices which encourage farm resilience, minimize or

reverse soil degradation (loss of soil organic matter), and encourage the viability of as many family farms as possible (People's Food Policy Project, 2011, p. 6)

- Reduce and replace subsidies which support “cheap food” with negative impacts across the spectrum:
 - reliance on cheap, exploited migrant labour;
 - Business risk management (BRM) programs which promote risky expansion of monocultural, large-scale industrial production practices that externalize costs to local and regional biodiversity, soil, water;
 - Heavier use of synthetic fertilizer, tile drainage;
 - Land tax assessment should account for added municipal costs
- Insurance
 - Subsidized insurance programs specifically designed for small producers, helping to alleviate costs and encourage their participation in harvesting and distributing food;
 - cooperative models where farmers pool resources to share the burden of insurance;
- Living wage for producers
 - Financial supports for new, small and medium sized farms, such as wage subsidies, farm labour grants, or [Basic Income policy](#)
 - These policy options contrast with current cost-sharing initiatives such as Ontario’s *Rural Economic Development Program* (Government of Ontario, 2024b).

Resources for Soil Regeneration & Ecological Stewardship

Key Issues:

- Supports, along with a suite of incentives and penalties, are required to encourage a shift in practices, and support ongoing best practices in:
 - soil regeneration;
 - nutrient management;
 - soil integrity/cover crops;
 - restoring marginal land;
 - on-farm climate change mitigation;
 - Diversity of crops;

Recommendations:

- Focus government support (including BRM payments, tax incentives and grant programs) to individual farmers using regenerative, agro-ecological practices to support long-term sustainability—and the organizations who serve them;

- Fund Farmer-led research (e.g. via EFAO) to build evidence for agro-ecological practices;
- Introduce and implement standards for regular soil testing led by farmers, modeled on [B.C. example](#);

Supports to New Entrants and the organizations who serve them

Key Issues:

- The need for support for organizations that help new entrants as they move through their first 10 years, in terms of ongoing education, mentoring and integration into the farm community;
- New farmer training, HR training for small-scale farm operations;
- Address barriers of access to land, capital and knowledge for new farmers, with a focus on those coming from equity-deserving communities.

Recommendations:

- Open access to full complement of new farmers and diversified farms into all federal and cost-shared programs:
 - Ensure the definition of ‘beginning and young farmer’ encompasses all new entrants, including those not from farming backgrounds, second careerists, Indigenous Peoples and New Canadians. This also includes recognizing a broader range of farm operations, variable in size, structure, production practices, scale and scope.
- **Seed Capital and Financing:** Increase access to start-up capital and financing for new farmers using tools such as establishment grants, early stage loans, loan guarantees, cash flow programs.
- **Training, Research and Knowledge Transfer:** Make training and knowledge transfer accessible to new farmers through direct subsidies for training costs as well as through core funding for organizations offering on-farm training, farm apprenticeships, and farmer-to-farmer exchanges.
- **Support Infrastructure Development:** Provide support for hard infrastructure costs to eliminate the bottlenecks holding back the expansion of regional markets. Examples include support for abattoirs, regional food hubs, clear links to regional branding programs within the Ontario Foodland program.
- **Ensure new farmer supports favour both regional and provincial groups who have innovated within this space for the past 15+ years:** There is also a longstanding issue of provincial funding programs prohibiting—as acceptable budget lines—payment for either pre-existing staff or project administration, and it being cited that this is a legislation issue.
- Bring back OMAFRA extension agents and add diversified agriculture specialists
 - to provide guidance from the beginning to end of a farming career,
 - including training and education, business planning and support, financial

- support, land access,
 - wrap-around supports, and ensure that equity-deserving farmers have access to tailored support with accommodations for specific language and cultural needs.”
- Enhance supports for childcare and mental health programs for new entrants, including access to group benefit plans
- Youth programs about production and innovation leading to opportunities:
 - Black and Indigenous youth, seeds of diversity;
 - certified program to take to the bank to get a loan;
- Coordinate all organizations serving new Entrants, to come together in an alliances, on a unified ask for province-wide funding with coordinated delivery;
 - OMAFRA-led program for a new stream of funding to New Entrants organizations, to work together;
 - The program should be administrative light-money into the hands of new and aspiring farmers

Support Local Production and Gathering of Culturally Relevant Important Foods

Key Issues:

- Equity is based on opportunity.
- Currently access to traditional lands and resources is not sufficient for resilient Indigenous food systems.
- Provincial policy is not developed with Indigenous stakeholders at the centre, so it does not prioritize Indigenous-led initiatives and the rights of Indigenous communities to access and manage traditional food sources

Recommendations:

- Share land, seeds and knowledge to support local production of culturally important foods;
 - Participation in sustainable structures and systems for culturally important food production and distribution in a local food system leads to food sovereignty and prosperity;
 - New Canadians and refugees are looking for work and have expertise and experiences;
- Increase the mix of land use and connectivity to food retail services that provide culturally appropriate foods, especially for produce;
- Support urban Indigenous peoples' access to traditional foods and spaces for ceremonies, trade, and knowledge-sharing;
 - Access to land for revitalization of Indigenous foodways/ country foods/ wild game; including indigenous corn
 - Prioritize Indigenous land protection and sovereignty in policy development.

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Appendix A: Definitions

Agricultural Impact Assessments: a study evaluating the impacts of non-agricultural development on agricultural operations (Government of Ontario, 2022).

New Entrants: Include Indigenous entrants into food harvesting, fishing and agriculture; Intra-family new farmers who are successors to a family farm; Rural and urban young people who do not have a farm in the family or access to land; Second careerists (often identified as being over 30) who do not have land in the family; New Canadians bringing substantial agriculture experience, with a need for support to transition to a new climate, soil conditions, markets, food preferences, and sometimes language; Temporary foreign workers on farms, seeking pathways to citizenship.

Net Farm Income: “the amount of money that farmers have left after they pay their production costs; it is not the same as profit since it is calculated before allowances are made for farm family labour and management” (Qualman, 2018, p. 103).

Appendix B - Agricultural Impact Assessments

The Government of Ontario defines an agricultural impact assessment as a study evaluating the impacts of non-agricultural development on agricultural operations that recommends ways to avoid, or if avoidance is not possible, minimize and mitigate adverse impacts of the development (Government of Ontario, 2022).

Completion of an Agricultural Impact Assessment includes:

- Identifying and assessing potential impacts from development of agriculture (including impacts on farmland);
- Recommending measures or strategies to avoid impacts (i.e., considering alternative locations where possible); and
- Recommending measures to minimize or mitigate impacts (Government of Ontario, 2022)

Appendix C - Bill 27, Protecting Agricultural Land Act, 2022

In 2022, the Ontario New Democratic Party's Agriculture critic, John Vanthof, put forward a private members bill – Bill, 27, *Protecting Agricultural Land*. The bill proposed an amendment to the *Planning Act* to require that agricultural land cannot be rezoned and the uses permitted on agricultural land cannot be changed unless an Agricultural Impact Assessment has been completed with the requirement, including application to municipal zoning by-laws and Minister's Zoning Orders (Legislative Assembly of Ontario, 2022). While the bill lost on division, it was widely supported by organizations representing tens of thousands of farm families across Ontario (Ontario Federation of Agriculture, 2022; Christian Farmers Federation of Ontario, 2022).