

To: Standing Committee on Heritage, Infrastructure and Cultural Policy
Re: The implications of Bill 23 on Ontario food systems and food insecurity
From: Food Systems Workgroup, Ontario Dietitians in Public Health
Date: November 17, 2022

Please accept this submission in response to *Bill-23 More Homes Built Faster Act, 2022* on behalf of the Food Systems Workgroup of the Ontario Dietitians in Public Health (ODPH).

ODPH is the independent and official voice of Registered Dietitians working in the Ontario public health system. ODPH provides leadership in public health nutrition by promoting and supporting member collaboration to improve the health of Ontario residents through the implementation of the Ontario Public Health Standards.

We support and recognize the need for Ontario to develop more affordable housing, however, express concern on the impacts Bill 23 will have on food insecurity in Ontario. This includes the long-term implications of lost farmland and delicate ecosystems on the resilience of our food system, but also on the affordability of housing and food, and therefore the cost of health, living and well-being for citizens of Ontario.

With Bill 23, the Ontario government is proposing to address a crisis in housing by stripping away measures that place any constraints on uncontrolled urban development and protect our non-renewable land resources—including farmland, wetlands, greenspaces and foodlands. This poses a harmful impact on our environment, our lands, and our waters, and therefore, a negative impact on our food security and food sovereignty. Despite daily acknowledgements that Ontario rests on Indigenous lands, under treaty or unceded, the Indigenous principles of

conservation of lands, and of sustainability for seven generations forward, are not part of this Bill. Food is grown, harvested, and processed in our communities and the lands and waters that surround them — our continued food security relies on us doing so in a sustainable manner. In the face of a rapidly changing climate and uncertain seasonal weather patterns, the disruption of complex wetland systems can have massive impacts on above- and below-ground waterways, and the production potential of adjacent agricultural lands. Further, disruptions to long food supply-chains, increased transportation expenses, crop failure in other parts of the world, and the need to limit our use of carbon-based fuels, require us to increase our food security by deepening our access to sustainably produced, locally grown food.

Individuals and families are also increasingly needing to choose between the rising costs of housing and the rising costs of food. Inflation and supply-chain disruption in recent years shines a light on the urgent need for both affordable housing and to protect all foodlands and farmlands as key components of our current and future food security. Relying heavily on urban sprawl as a solution, instead of densification, whittles too much of the already small share of land devoted to local agriculture. Urban sprawl solutions often means getting to food is harder to achieve, as transportation in newly developed, low-density communities is often inadequate or expensive.

The predictable, long-lasting consequences of this open assault rest on a falsehood: that we have to choose between protecting the land and building housing. Groups across Ontario, including groups focused on food and farming, have long presented reasonable, evidence-based options that demonstrate how we can both provide needed, affordable housing and conserve lands that are essential to build sustainable communities across the province for generations to come. In fact, many of the principles underlying the relevant existing policy structure and regulations (e.g the Provincial Policy Statement, Growth Plan) have worked toward the essential balance between housing and conservation—a balance that we must find in order to build sustainable communities.

Bill 23 erodes our food sovereignty, our food security, our democratic processes. Permanently protecting agricultural land in the province is crucial—once it's lost to development, it is gone forever. ODPH urges the Government of Ontario to halt Bill 23 and re-start with guiding principles that balance the long-term mutually supportive needs for housing, ecological services and farmland protection, and adopt an inclusive, collaborative approach that targets liveable neighbourhoods, farmland protection, food security and participatory governance. ODPH would welcome the opportunity to provide feedback and further discussion related to this bill and its connection to food insecurity and sustainable, just, and resilient food systems. Housing and food security must be planned for together.

Sincerely,



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Year 1



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