



“Connecting our Community to the Work of Building a Healthy Food System”

Ken Seiling and Regional Councilors
Region of Waterloo
150 Frederick Street
Kitchener, ON N2G 4J3

Re: 2nd Draft of the Regional Official Plan

May 12, 2009

Dear Councilors,

The Waterloo Region Food System Roundtable is pleased to provide our input on the second draft of the Regional Official Plan (ROP). We have reviewed the ROP with a particular view to how it might help bring about a healthier food system, and are generally pleased that, overall, it is a step in the right direction.

The Roundtable consists of 18 members from diverse sectors of the local food system, including farmers, food distributors, food retailers, restaurants, food service managers, university researchers, consumers, food banks and health professionals. Our goal is to help create a healthy food system in Waterloo Region, which we define as one in which “all residents have access to, and can afford to buy, safe, nutritious, and culturally-acceptable food that has been produced in an environmentally sustainable way and that sustains our rural communities”. We think that good land use policies in the ROP are an essential part of the path to achieve that goal.

Overall, we are pleased with the vision and direction of the draft ROP, and feel that, if adopted in its current form, it will help bring about a healthier food system in Waterloo Region. We will comment below on some specific policies in the document, but wish to state upfront that the most important thing the ROP can do for the future of our food system is protect our farmland from future development. The Countryside Line and the Protected Countryside designation attempt to do that, and we note that both these policies have been weakened somewhat since the first draft. We feel strongly that these two policies must be as strong and as permanent as possible. We have lots of room for urban intensification in our Region, and there is no need to take away any more of our prime agricultural farmland.

Almost as important as farmland protection, though more difficult to achieve through a land use plan, is to help make it economically viable for farmers to stay in the business of farming, and to reduce the barriers to entrepreneurs who want to make a living selling local foods in our cities. Our comments below focus on those areas of the ROP which address those issues, but we feel more can be done by all levels of government, including Regional Council and area municipalities, to correct what the free market has been unable to do for the food system, which is to make farming profitable and make local sustainable foods a convenient choice for consumers. Please keep this in mind when you consider future decisions that will implement the intent of the ROP.

Access to Healthy and Other Local Foods (2.D.1, 2.D.2, 3.F)

We and many other groups and citizens made detailed comments on the Access to Healthy Food section of the first draft of the ROP. The second draft revised this section significantly, changing the title, inserting a new introductory paragraph, and adding new requirements in the General Development Criteria and Transit Oriented Development Policies. While we continue to wish that these policies were stronger and more binding on area municipalities, we appreciate their intent and urge Councilors not to let them be watered down any further.

We are pleased to see the insertion of requirements that new developments facilitate access to locally grown and other healthy foods in the General Development Criteria (in 2.D.1), and are also pleased to see that new developments near rapid transit stations must include a range of uses including food destinations in the Transit Oriented Development Policies (in 2.D.2). We believe these changes will help ensure that food is available in every neighbourhood.

We are also pleased with the changes to the section on Access to Local and Other Healthy Foods, in 3.F. The title is more appropriate than the first draft, in that it places an emphasis on local foods, which are a big step toward making our food system healthier. We like that Area Municipalities will be required to establish policies to permit temporary farmers' markets and community gardens (3.F.2 and 3.F.3, respectively), and look forward to working with the area municipalities to shape the look of those policies once the ROP is approved.

Secondary Uses on Farms (6.C.8)

We commented on this section in our previous submission to Council on the first draft of the ROP, and understand that it has not changed since the first draft, but wish to add one more concern. Paragraph 6.C.8c) permits minor retailing of foods directly from farms provided such goods are *primarily* produced or manufactured on the farm. While we support this concept in principle, we wonder if a strict interpretation of this policy by our rural municipalities might result in farms being prohibited from selling food produced by neighbouring farms.

Most farm gate stands or farm stores try to offer a range of products for sale so that customers can get all their food at one place. So naturally, successful farm stores usually sell more than just their own foods. But depending on how the word *primarily* is interpreted, farm stores or stands may not sell more than 50% of foods from neighbouring farms. We think this is a problem that needs addressing: the intent of these policies, as described in the introductory paragraph of the chapter is to help farms be economically viable, but this policy may have the reverse effect. The emphasis should be on selling local foods, not necessarily just foods from the one farm.

Finally, we wish to thank Regional Planning staff for their work on the ROP to date. We ask Regional Councilors to take our comments – and the goal of creating a healthy food system – into consideration as they consider the final draft of the ROP.

Sincerely, on behalf of the Waterloo Region Food System Roundtable,



Ellen Desjardins, co-chair



Steffanie Scott, co-chair