

December 19, 2023

Jennifer Freeman
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RE: Plan 20-50 and the Agriculture Sector

Dear Jennifer Freeman:

A number of Manitoba agricultural groups are writing to respectfully request consideration of some changes to the draft Winnipeg Metropolitan Region Plan 20-50 to help ensure it is reflective of the needs of this important sector.

Agriculture plays an indispensable role in the social and economic fabric of Manitoba. There are over 14,500 farms in the province with a large number of farms located within the Winnipeg Metropolitan Region. In 2022, farm cash receipts totaled \$9.75 billion with the sector contributing 8 per cent of the provincial GDP. As agriculture continues to grow in the province it is important that public policy supports this.

Plan 20-50 is an influential framework which will guide the development and growth in the Winnipeg Metropolitan Region for decades to come. Manitoba agricultural groups are supportive, in principle, of a framework which outlines this growth and development; however, it is vitally important the needs of the agricultural sector are clearly outlined and protected.

There are specific areas within the draft plan we recommend amending. These are outlined below.

Protection of Agriculture

One of the actions of policy area four in the plan calls for the “protection and preservation of agricultural land” (p. 71). Section 10.3(2)(b)(ii) of the Planning Act states regional plans are to incorporate policies that “protect agricultural land and agricultural operations.”

Furthermore, section 3.1.2 of the Provincial Planning Regulation emphasizes that “land designated for agricultural use must be protected for agricultural operations.”

Given the size, scope and value of agriculture in the province we are concerned these two words – *agricultural operations* – are omitted throughout Plan 20-50. We are supportive of language which protects and preserves both agricultural land and agricultural operations in all policy statements in Plan 20-50.

Recommended amendment: Protection and preservation of agricultural land and **agricultural operations** (p. 71).

To protect and preserve agricultural land use and **agricultural operations** within the Outer Metropolitan Area, as identified on Schedule 7, growth will primarily be directed to the Metropolitan Core, Inner Metropolitan Area, Urban Centres, Rural Centres, and Settlements (p. 72).

Additional examples for including ‘agricultural operations’ are found in sections 1.1.6, 1.1.7 & 1.1.8,

Regional Agricultural Master Plan and Circular Economy

Manitoba agricultural groups support, in principle, the development of a Regional Agricultural Master Plan. Groups that represent agriculture in the province have extensive knowledge and understanding of the sector and should be seen as key participants in the development of a master plan. We also believe agricultural groups and research-orientated organizations (e.g., universities and agriculturally focused research facilities) can positively contribute to actions laid out in section 4.1.6. We recommend referencing these groups in sections 4.1.4 and 4.1.6.

Recommended amendments: To ensure the protection and preservation of agricultural lands and support the growth of the agricultural sector, the Winnipeg Metropolitan Region (WMR) will prepare a Regional Agricultural Master Plan in collaboration with **agricultural organizations**, member municipalities, Indigenous Nations, the Province of Manitoba, and other stakeholders (p. 72).

To foster a circular economy, the Winnipeg Metropolitan Region (WMR), **agricultural organizations**, municipalities and **other stakeholders** will work toward developing strategies and actions that foster healthy soil, increase efficiencies that minimize food waste, enhance access to affordable and sustainable food, create new collaborative partnerships, and optimize circular economic opportunities (p. 72).

Environmental Farm Plan

The environmental farm plan (EFP) is a valuable self assessment tool for producers to better understand potential environmental risks on their farm and ranches. Since 2004, Keystone Agricultural Producers (KAP) has been the administrator of the EFP and is well suited to promote the program and its benefits. We recommend including KAP in section 3.4.3(a).

Recommend amendment: In collaboration with the province and Keystone Agricultural Producers, promote the voluntary use of Environmental Farms Plans to agricultural producers to help reduce potential risks to surface and ground water, including riparian areas (p. 67).

Map Illustrations

Section 10.3(3) of the Planning Act requires the inclusion of maps within a regional plan to provide a sense of direction. We have concerns regarding the accuracy and level of detail provided on page 74. For example, the outline of the City of Winnipeg encompasses agricultural land, however this land is not fully illustrated within the map. If the intent of the map is to provide “long-term land use and servicing planning and development” (p. 101) then it is critical the illustrations outline current agricultural land within the Winnipeg and elsewhere.

Recommendation: Update the regional map on page 74 to include all agricultural land. Similarly, any maps posted on the Plan 20-50 website itself in the future should include a greater level of granularity.

Definition of Agricultural Lands

Defining agricultural lands in Manitoba is key in determining how the plan is interpreted and applied. The reference to ‘negative environmental impacts’ in the definition of agricultural lands leads to questions about what specific practices leading to negative environmental impacts (p. 121). This is not fully elaborated in the definition. Furthermore, the mention of ‘natural limitations’ is ambiguous and requires further clarity. We recommend refining the definition of agricultural lands to provide a better understanding of the concept.

Recommendation: Refine the definition of agricultural lands to provide a better understanding of the concept.

Community Growth and Development

As highlighted previously it is important that agriculture is considered in land use and development. Section 1.1.6 of the plan states the need for studies to be conducted if expansion of certain areas were to occur. This includes studies looking at the impact of expansion such as demographic projections, supply and demand for land use and a natural asset assessment. If one of the goals is to 'protect agricultural lands' – as stated in section 1.1.6 – then it would be logical to require a study assessing the impact the proposed expansion would have on agricultural land.

Recommendation: Require a study examining the impact that proposed expansion would have on agricultural land and agricultural operations.

Recommended amendment: Section 1.1.6 – To protect agricultural lands and to encourage complete communities, expansion of the Inner Metropolitan Area and an Urban centre, Rural Centre, or settlement will only be permitted if the area proposed for expansion is:

- a) Contiguous with existing land use designations and can be serviced;
- b) Supported through studies identifying potential impacts of the expansion including, but not limited to:
 - i. Demographic, population, and employment projections;
 - ii. Supply and demand or market analysis for residential and other land uses, which may include consideration for development constraints;
 - iii. Traffic and transportation;
 - iv. Existing and future municipal servicing infrastructure; and,
 - v. A natural asset assessment

NEW: vi. agricultural land and agricultural operations

Additional Observations

In managing farms and ranches, Manitoba's agricultural producers can provide an array of ecosystem services that benefit all Manitobans. A large number of farm acres are found within the Winnipeg Metropolitan Region which contain wetlands, forests, grasslands and wildlife which fall under a diverse range of agroecosystems. There appears to be a limited reference to agriculture within the environment section of the plan. We recommend incorporating agriculture further into the section while recognizing the important role it can play in contributing to the goals in policy area 3.

Lastly, we are supportive of measures within the plan which emphasize dense, concentrated growth within a city or town that limit encroachment, fragmentation and conversion of agricultural land. Agriculture is a vital asset in Manitoba, and it is critical that planners are able to balance the needs of a growing population while protecting and preserving this vital asset. Agriculture is not just a rural issue. Thousands of jobs inside the City of Winnipeg are derived from, and depend upon, agricultural production. Including agriculture commodity groups and farmers in the development of the plan will help preserve and grow these job opportunities.

Thank you for the opportunity to provide feedback on Plan 20-50. We look forward to reading an updated version of the plan and for there to be continuous engagement with agricultural commodity groups to help inform this and future iterations of the plan. If you have any questions about this letter, please contact Neil Van Overloop at neil.vanoverloop@kap.ca.

Sincerely,



Brenna Mahoney
General Manager, Keystone Agricultural Producers Inc.



Jennifer Seward
Executive Director, Manitoba Seed Growers' Association



Lawrence Knockaert
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Cam Dahl
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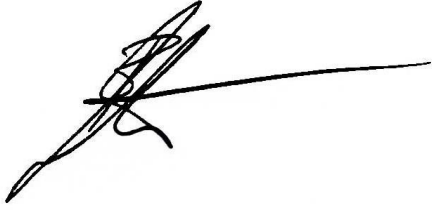
Ian Stepler
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CC: Brenda DeSerranno, Deputy Minister of Agriculture

Bruce Gray, Deputy Minister of Municipal and Northern Relations and Indigenous Economic
Development