

Honourable Paul Calandra,  
Minister of Municipal Affairs and Housing,  
Queens Park, Toronto ON, M7A 1A2

November 24, 2023

Dear Minister Calandra,

I am writing on behalf of the Federation of Sisters of St. Joseph to express our support in principle for Bill 136 (Greenbelt Statute Law Amendment Act, 2023). At the same time, it is important that the following amendments be included in the final version of the legislation:

**1) Legislate that in the 10-year Greenbelt review, outside of minor housekeeping, any amendments to boundaries can only add lands to the Greenbelt with no possibility for land swaps.**

In 2005, the Greenbelt was created to permanently protect the agricultural lands, natural areas, and water resources of the Golden Horseshoe from a rapidly growing environmental threat: unrestricted low-density expansion of our urban centres into the countryside. That's why it was so disturbing in November and December 2022 to see how the Ontario government was able to carve out 7,400 acres from the Greenbelt. For this reason it is essential to legislate that any amendments to Greenbelt boundaries can only add lands to the Greenbelt with no possibility for land swaps.

**2) Amend the Greenbelt legislation so that future governments are compelled to consult meaningfully with First Nations and Indigenous communities.**

Indigenous rights should be integrated into all future legislation in Ontario, as required by UNDRIP.

**3) Introduce a provision prohibiting new "Overall Benefit Permits."**

We have seen that these permits enable developers to harm habitat critical to the protection of Species at Risk in the Greenbelt.

**4) Protect all prime agricultural lands in the Greenbelt through conservation easements.**

This is important to ensure speculators are dissuaded from purchasing protected agricultural lands in the Greenbelt.

**5) Immediately end the grandfathering of previous zoning for future planning applications.** Reject applications that harm the Greenbelt's ecological, water and agricultural functions.

Last year's amendments to the Greenbelt Act, the introduction of the Better Municipal Governance Act, and the Duffin's Rouge Agricultural Preserve Repeal Act demonstrated that current Greenbelt legislation does not ensure the permanent protection of the Greenbelt.

The Greenbelt is important for the protection of agricultural lands, biodiversity, and precious groundwater resources. As such it also plays an important role in addressing climate change. It is critical that the Ontario government legislate the permanent protection of these lands.

Sincerely,

Dr. Sue Wilson, CSJ  
Executive Director, Office for Systemic Justice  
Federation of Sisters of St. Joseph of Canada