

December 9, 2004

Victor Doyle, Manager  
Provincial Planning and Environmental Services Branch  
Ministry of Municipal Affairs and Housing  
777 Bay St. 14<sup>th</sup> Floor  
Toronto, Ontario  
M5G 2E5

**Re: EBR Registry NO PF04E0006 – Draft Proposed Greenbelt Plan**

Dear Mr. Doyle,

I am writing to you regarding the draft proposed Greenbelt Plan for the greater golden horseshoe region (EBR Registry No. PF040006).

The Pembina Institute has followed the province's greenbelt initiative closely over the past year, and made submissions to the Greenbelt Task Force, the Standing Committee on General Government regarding Bill 27, the *Greenbelt Protection Act, 2004*, and to the Ministry of Municipal Affairs and Housing regarding Bill 135, the proposed *Greenbelt Act*.

The Pembina Institute welcomes the introduction of the proposed greenbelt plan, released on October 28, 2004. The Institute believes the greenbelt initiative is an important component of the government's overall efforts to reform Ontario's land-use planning system to curb urban sprawl, protect key natural heritage, prime agricultural and source water lands, and promote more sustainable urban development patterns.

The Pembina Institute's comments on the plan are focused on the geographic scope of the plan, the plan's approach to defining greenbelt components, policies regarding infrastructure, source waters, non-renewable resources and rural and settlement areas and the plan's implementation and governance provisions.

**The geographic scope of the greenbelt plan (Section 2.0)**

The protected countryside incorporated into the greenbelt plan leaves a significant amount of land between current settlement areas and the greenbelt area, particularly south of the Oak Ridges Moraine. The Neptis Foundation has identified more than 1,000 square kilometres of underdeveloped land within the region's existing settlement area boundaries that is zoned and

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□ **DRAYTON VALLEY** (HEAD OFFICE)  
Box 7558, Drayton Valley, AB T7A 1S7  
Tel: (780) 542-6272, Fax: (780) 542-6464

□ **CALGARY**  
Suite 520, 600 – 6<sup>th</sup> Avenue SW, Calgary, AB T2P 0S5  
Tel: (403) 269-3344, Fax: (403) 269-3377

□ **OTTAWA**  
164 Wellington Street, Gatineau, QC J8X 2J4  
Tel: (819) 483-6288, Fax: (819) 770-2784

□ **EDMONTON**  
2<sup>nd</sup> Floor, 2830 Parsons Road, Edmonton, AB T6N 1H3  
Tel: (780) 485-9610, Fax: (780) 485-9640

available for development. The foundation has concluded that this land is sufficient to meet the region's housing and employment needs for the next twenty to thirty years, even assuming no progress in increasing urban development densities, or in prompting the infill and redevelopment of existing areas.<sup>1</sup>

There is therefore no need to leave a large area of land available for development between the greenbelt and existing designated settlement area. This area encompasses prime agricultural areas and natural heritage and source water lands, and should be included in the greenbelt. Failure to incorporate the lands into the greenbelt will encourage speculation and unnecessary urban sprawl.

The possibility of the need to make lands outside of the greenbelt's prime agricultural and natural heritage and water resources system areas available for development can be assessed during the ten-year review of the greenbelt plan. At that stage, it will be possible to assess population growth and any changes in development patterns that may be emerging, with more than adequate time to make additional land available if it is needed. The need for any settlement area expansions beyond existing settlement area boundaries should be assessed at that time against the criteria outlined by the Pembina Institute in its submissions on the June 2004 draft Provincial Policy Statement (PPS)<sup>2</sup> and July 2004 draft growth management plan for the greater golden horseshoe region.<sup>3</sup>

At the same time, the outer boundary of greenbelt needs to be extended outwards to better encompass the Greater Toronto Area commutershed. The greenbelt needs to include, in particular, the southern part of Simcoe County, where there are already intense pressures for low-density urban development, particularly in the Bradford-Bond Head area.<sup>4</sup> Similar concerns are emerging with respect to Northumberland County south of the Oak Ridges Moraine. In the absence of an extension of the area encompassed by the greenbelt there is a significant risk that the initiative will prompt low-density 'leapfrog' development in these locations. Such outcomes have been seen in other jurisdictions, particularly in the United States, when attempts to establish greenbelts as urban containment boundaries have not been undertaken on a sufficiently regional basis.<sup>5</sup>

'Leapfrog' sprawling developments would undermine one of the basic goals of the province's greenbelt plan and other planning reform and growth management initiatives. These initiatives have sought to contain urban sprawl by concentrating future growth in existing and emerging urban centres, where infrastructure can be provided efficiently, and communities can be cost-effectively provided with public transit services and other alternatives to automobile-based travel.

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<sup>1</sup> See IBI Group, in association with Dillon Consulting Ltd. *Toronto Related Region Futures Study. Interim Report: Implications of Business-As-Usual Development* (Toronto: Neptis Foundation, August 2002), pg.50.

<sup>2</sup> M.Winfield, N.Heap, C.Brunt and C.Bowman, *Comments on the June 2004 Provincial Policy Statement Draft Policies* (Ottawa: The Pembina Institute, August 2004) Section IV.1.

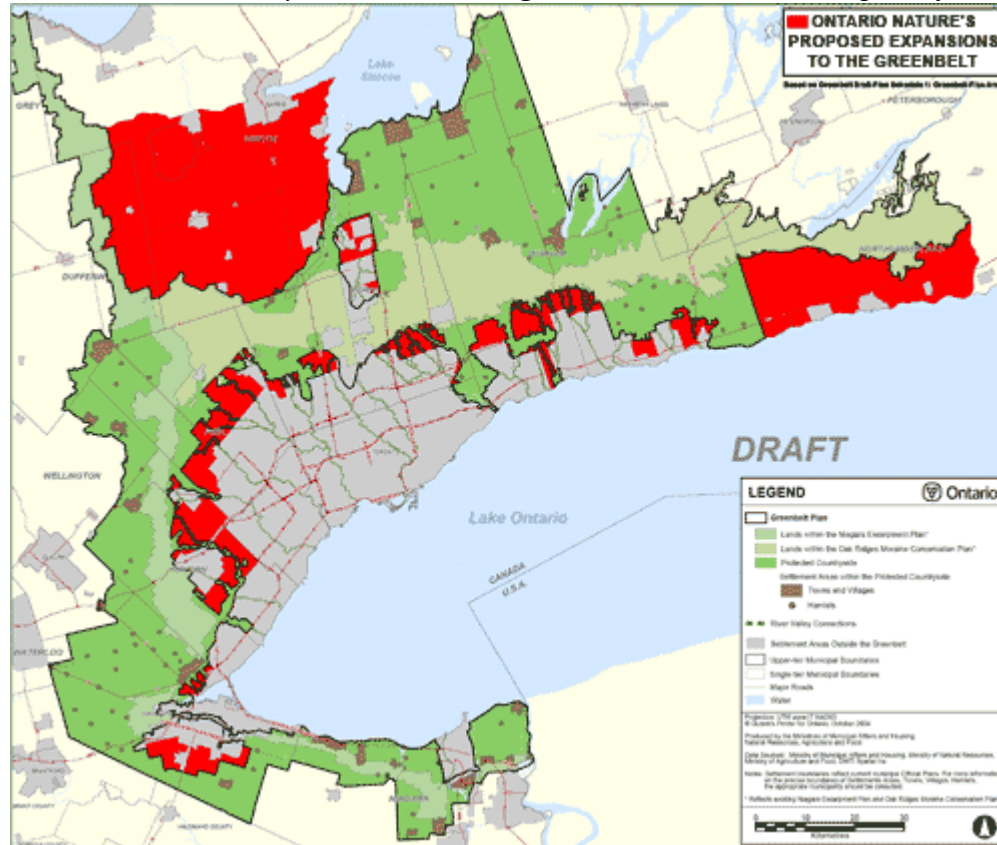
<sup>3</sup> See M.Winfield, *Comments on Places to Grow: The Golden Horseshoe Growth Management Plan* (Ottawa: The Pembina Institute, September 2004), section 3.1.4.

<sup>4</sup> See L.Birnbaum, L.Nicolet and Z.Taylor, *Simcoe County: The New Growth Frontier* (Toronto: Neptis Foundation, May 2004).

<sup>5</sup> See generally R.Pendall, J.Martin and W.Fulton, *Holding the Line: Urban Containment in the United States* (Washington, D.C.: Brookings Institution Centre on Urban and Metropolitan Policy, August 2002).

## Recommendation

1. The greenbelt plan should include in the 'protected countryside' of the area outlined in the following map prepared by Ontario Nature, including the areas between the current settlement area boundary and the Oak Ridges Moraine, the southern part of Simcoe County, and Northumberland County south of the Oak Ridges Moraine.



County, and Northumberland County south of the Oak Ridges Moraine.

## The definition of greenbelt components (Section 3)

The proposed greenbelt plan would rely on the designations in existing municipal official plans to define prime agricultural areas within the greenbelt, other than specialty crop areas. The latter are to be provincially defined (s.3.1).

The proposed approach assumes that existing plans encompass all of the relevant lands in their current designations. Stronger provincial guidance and direction is needed to ensure that all prime agricultural areas are appropriately designated in official plans at the time that they are brought into conformity with the greenbelt plan. Provincial direction will be particularly important in light of the opportunity for municipalities to reassess their designations of prime agricultural lands when they bring their official plans into conformity with the greenbelt plan (s.5.2).

## Recommendation

2. *The province should provide specific direction and guidance to municipalities in their designation of prime agricultural lands at the time of bringing their official plans into conformity with the greenbelt plan, to ensure that all such lands are appropriately designated.*

## **Infrastructure policies (Section 4.2)**

The aspects of the greenbelt plan dealing with infrastructure (s.4.2) are an area of major concern. The draft plan makes it clear that major new infrastructure will be permitted within and across the greenbelt area.

New sewer and water infrastructure is to be subject to a requirement for the demonstration of no negative impacts on natural features and functions, ground and surface water quality and quantity or stream base flows, and consideration of the applicable watershed plans and budgets (s.4.2.2).

### **Recommendation**

3. *New sewer and water infrastructure should be required to be consistent with the applicable watershed plans and budgets, rather than simply ‘consider’ them.*

No similar qualifications would be established by the plan with respect to other forms of infrastructure, particularly transportation infrastructure. In fact, the plan explicitly references a perceived need for new highway corridors (the Mid-Penninsula Highway, 407 east extension and GTA west corridor) through and across the greenbelt area.

These projects represent significant threats to integrity of the greenbelt. They have the potential to fragment the agricultural, natural heritage and water resources systems of the greenbelt. The construction and operation of these projects will also have significant impacts on surface and ground water quality as a result of the run-off of construction debris, road salt, fuels, oils and other vehicle related fluids, spills and other events.

Proposed approach to transportation related infrastructure also reinforces the concerns regarding the possibility of the greenbelt inducing ‘leapfrog’ development beyond its borders. The greenbelt plan references the need to ensure that urban development is not encouraged within the countryside (s.4.2.1), but makes no reference to the need to avoid extending infrastructure in ways that will encourage inappropriate development beyond the greenbelt. All three of the proposed transportation corridors are likely to have precisely that effect.

Given their implications for the integrity of the greenbelt, and for development patterns beyond the greenbelt, it is essential that major new transportation corridors through or traversing the greenbelt only be considered as options of last resort. The potential for the maximization of the use of all existing modal corridors and options must be considered before new corridors can be established.

*Places to Grow*, the government's proposed July 2004 growth management plan for the greater golden horseshoe region indicated that the highway corridor projects are justified almost entirely in terms of goods movement needs in the region.<sup>6</sup>

## **Recommendations**

4. *As recommended in the Pembina Institute's comments on Places to Grow, a thorough, independent review of future goods movement needs in the greater golden horseshoe region, considering long-term structural shifts in the economy, the impacts of potential changes in transportation technologies and policies and other factors, should be completed before any new major road transportation corridors (e.g. 400 series highways) proceed in the region.*<sup>7</sup>
5. *Major new transportation infrastructure projects should be subject full environmental assessments, including consideration of the need for and alternatives to the undertakings. These assessments should include the options of the maximization of the use of all existing modal corridors, and consideration of the collateral impacts of the projects in terms of the development patterns they may induce and their implications for the integrity of the greenbelt.*

## **Source water protection policies (Sections 3.2.3 and 3.2.4)**

The Natural Systems component of the greenbelt includes a "water resource system." The water resources system would include the Oak Ridges Moraine and Niagara Escarpment, and the upper reaches of watersheds to the west of the Niagara Escarpment, lands around primary discharge zones, the portions of major river valleys between the Moraine/Escarpment and the approved urban boundaries to the south, and the major discharge areas associated with the former lake Iroquois shoreline (s.3.2.1)

Development or site alteration would not be permitted within key hydrologic or natural heritage features, including (s.3.2.4):

- Significant habitat of species at risk
- Fish habitat
- Wetlands
- ANSIs
- Significant valleylands
- Streams
- Natural Lakes and their shorelines and
- Seepage areas and springs.

One hundred twenty metre vegetative protective zones would be required around hydrologic features, except in the case of agricultural uses, where 30 metre protective zones would be required. A 30 metre protective zone required for natural heritage features.

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<sup>6</sup> Ministry of Public Infrastructure Renewal, *Places to Grow: A Growth Plan for the Greater Golden Horseshoe Region* (Toronto: Queen's Printer for Ontario, July 2004), pg.33.

<sup>7</sup> See M. Winfield, *Comments on Places to Grow: The Golden Horseshoe Growth Management Plan* (Ottawa: The Pembina Institute, September 2004), section 3.2.3.

These provisions are significantly stronger than those contained in the draft Provincial Policy Statement (PPS) released by the Ministry of Municipal Affairs in June 2004, and should provide the basis for strengthening the provisions of the final version of the PPS.

The greenbelt plan also includes a number of specific water resource system policies (s.3.2.3). These provisions reference the development of watershed plans, the protection of wellhead areas and inherently susceptible aquifer areas, but the policies only “expect” or “encourage” rather than require these measures.

### **Recommendation**

6. *The identification, mapping and protection of wellhead protection areas and inherently susceptible aquifer areas are core elements of source water protection, and should be required in both the greenbelt plan and the PPS.*

### **Rural Area Policies (Sections 3.1.4 and 4.1)**

The provisions of the proposed plan prohibiting new multiple units or lots for permanent residential dwellings (including estate developments and retirement communities (3.1.4) and associated with tourism and recreation uses (4.1.2)) are strongly supported.

The plan’s general policies regarding non-agricultural uses would permit a wide range of uses, including golf courses, race tracks, and commercial, institution and industrial uses. Such uses would need to be considered “inappropriate” for settlement areas, and provided with “appropriate” sewer and water services.

Non-agricultural uses would be permitted within the natural heritage system, subject to certain conditions, and permitted in the protected countryside provided that there are no negative impacts on key natural heritage and hydrologic features, or on the biodiversity or connectivity of the natural heritage system.

### **Recommendations**

7. *Non-agricultural land uses should be excluded from key natural heritage and hydrologic features of the greenbelt, and be demonstrated to have no negative impacts on the functions of these features in order to be permitted in rural areas.*
8. *Definitions of the “appropriateness” of uses in settlement areas, and of water and sewer servicing should be provided by the province.*

### **Settlement area policies (Section 3.4)**

The proposed plan would permit towns and villages enclosed by the greenbelt plan to make proposals for “modest growth” at the time of the ten year review of the greenbelt plan (s.3.4.2). The plan proposes a number of criteria that growth proposals would need to meet, including not

exceeding the assimilative and water production capacity of the local environment, consistency with the watershed plan and non-extension into natural heritage and specialty crop areas.

However, the plan established no criteria on the basis of which the need for expansions of the settlement areas within the protected countryside would be justified.

### **Recommendation**

9. *The greenbelt plan should establish criteria, including population growth, available development capacity via the use or redevelopment of the existing settlement area, for the establishment of the need for the expansion of the settlement areas of towns, villages and hamlets within the greenbelt area.*

*In all cases, expansions of settlement areas within the greenbelt should be limited to rural areas. Expansions into prime agricultural areas, as well as natural heritage and specialty croplands, should not be permitted.*

## **Natural resources policies (Section 4.3)**

### ***Renewable resources (Section 4.3.1)***

Section 4.3.1 of the plan would permit the use of renewable resources (forestry, water-taking, fisheries, conservation and fish and wildlife management) within the protected countryside, and within key natural heritage features in a manner that maintains or improves key natural features and their functions.

Surprisingly, given the government's interest in the promotion of conservation and renewable energy sources, the plan makes no reference to whether low-impact renewable energy projects would be permitted within the protected countryside.

### **Recommendation**

10. *Low-impact renewable energy generation facilities (e.g. wind, run of the river hydro, biogas recovery) should be permitted within the rural, agricultural and settlement areas of the greenbelt, but excluded from key natural heritage features, and the escarpment natural and protected areas of the Niagara Escarpment and the core natural areas of the Oak Ridges Moraine.*

### ***Non-renewable resources (s.4.3.2)***

In addition to permitting aggregate operations in the protected countryside, the proposed greenbelt plan would permit aggregate operations within key natural heritage features except significant wetlands and significant habitat of threatened or engaged species, subject to a requirement that the health, diversity, size and connectivity of other key natural features will be restored or improved. The plan would also permit aggregate operations and wayside pits in significant woodlands subject to certain conditions.

The proposed approach would continue the province's long-standing, if increasingly archaic, approach of giving aggregate extraction priority over other potential land uses. Given their

potentially significant and unremediable impacts, mineral aggregate operations are not appropriate land uses within the natural heritage and water resource systems of the greenbelt.

### **Recommendation**

11. *Mineral aggregate operations should be excluded from all key natural heritage and hydrologic features of the greenbelt.*

Proposed policy makes no reference to the establishment of the need for aggregate operations within the greenbelt. Given the extremely poor state of knowledge regarding the status of and demand for the province's aggregate resources,<sup>8</sup> requirements for the establishment of need would help to build a stronger and more complete picture of aggregate demand and supply. The Pembina Institute will be publishing a study on the state of knowledge regarding the province's aggregate resources, and the potential for conservation measures to reduce demand, shortly.

### **Recommendation**

12. *The greenbelt plan should require that the need for aggregate operations within the greenbelt be established for such operations to be permitted to be initiated or expanded. Such assessments should include consideration of the availability of alternative supplies and materials, and the scope for meeting the need in some other way.*<sup>9</sup>

The poor record of rehabilitation efforts at aggregate operations has been widely documented.<sup>10</sup>

### **Recommendation**

13. *Aggregate operations outside of the natural heritage and water resource systems, expansion should only be permitted to expand on the basis of substantial progress on the rehabilitation of the disturbed area within the existing licenced area (generally no less than 50 per cent rehabilitation of the disturbed area). Similar requirements should be applied to all aggregate operations in the province.*

## **Governance and implementation issues (Section 5)**

### **Status and Effect of Greenbelt Plan (Section 5.1)**

The proposed greenbelt plan would apply to decisions on applications made under the *Planning Act*, *Condominium Act* and the *Ontario Planning and Development Act* made on or after December 16, 2004. Under the proposed *Greenbelt Protection Act*, the plan would not apply to certain types applications commenced before that date.

This approach may prompt a rush of application prior to the finalization of the greenbelt plan.

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<sup>8</sup> See, for example, Environmental Commissioner of Ontario, *2002-2003 Annual Report* (Toronto: Environmental Commissioner of Ontario, 2003), pg.34.

<sup>9</sup> The provisions of the United Kingdom's *Guidelines for Aggregates Provision in England*, (Office of the Deputy Prime Minister, 2001, para 70 and 71) may provide guidance for appropriate tests in this context.

<sup>10</sup> See R.Holt, *Gravelwatch Submission on the Proposed Provincial Policy Statement*, August 2004, [www.plg/uwaterloo.ca/~holt/pits/pps/gravel-watch-ont-pps-040803a-final.htm](http://www.plg/uwaterloo.ca/~holt/pits/pps/gravel-watch-ont-pps-040803a-final.htm)

## **Recommendation**

14. *Decisions on applications made before December 16, 2004, should be made on the basis of the rules in place at the time of the final decision on the application. In other words, applications upon which final decisions have not been made by December 16, 2004 should be evaluated on the basis of the provisions of the greenbelt plan.*

## **Municipal Implementation of Protected Countryside Policies (Section 5.2)**

### ***Wellhead protection areas and inherently susceptible aquifer areas***

## **Recommendation**

15. *As noted with respect to section 3.2.3., municipalities should be required, rather than encouraged, to map wellhead protection areas and inherently susceptible aquifer areas, and adopt policies for the protection of these areas within their official plans*

### ***The adoption of more restrictive/protective policies***

The greenbelt plan would prohibit municipalities from adopting official plans and zoning by-laws that are more restrictive on agricultural activities or mineral aggregate resources than the provisions of the greenbelt plan or PPS. Such an approach fails to consider the potential need for policies that are more protective of communities, public health, source waters, and natural heritage features than those provided for in the plan or PPS, where local conditions warrant a more protective approach.

## **Recommendation**

16. *The greenbelt plan and PPS should permit decision-makers on planning applications to adopt policies that are more stringent than the requirements of the plan or PPS. In the alternative, mechanisms should be established to permit the adoption of more stringent requirements where local conditions warrant such action.*

### ***Agricultural/rural/open space designation adjustments***

The greenbelt plan would permit municipalities to adjust their designations of prime agricultural, rural and open space areas at the time they bring their official plans into conformity with the greenbelt plan, if an upper or single tier municipality has not adjusted its designations to reflect the 1994 PPS, or through a comprehensive official plan review.

These provisions may provide municipalities considerable scope to re-designate rural areas for urban development and agricultural areas as rural (s.3.1.3).

## **Recommendation**

17. *Consistent with recommendation 2, the province should provide guidance and direction in the designation of agricultural lands, to ensure that all prime agricultural areas within the greenbelt area are, in fact, appropriately designated in official plans.*

18. *Modifications to settlement area boundaries should not be permitted at the time municipalities bring their official plans into conformity with the greenbelt plan.*

### **Plan review (Section 5.5)**

The greenbelt plan provides for a ten year review of the plan.

### **Recommendations**

19. *The review of the plan should be conducted by the advisory council proposed in section 5.8.*
20. *Modifications to urban boundaries should not be permitted at the completion of the ten year review without a comprehensive justification, considering the criteria outlined by the Pembina Institute in its submission on the proposed June 2004 PPS,<sup>11</sup> and unless recommended by the advisory council in its ten year review report. If justified, urban boundary expansions should only be permitted onto lands that are not agricultural, natural heritage or water resource areas, and be required to be replaced by other lands, as per recommendation 22.*

### **Plan amendments (Section 5.6)**

Plan amendments would be required to be proposed by the Minister of Municipal Affairs and Housing and approved by the Lieutenant Governor in Council. Consistent with the provisions of Bill 135, the proposed *Greenbelt Act* (ss.12 and 13), amendments would be required to not have the effect of reducing the total land area of the Greenbelt Plan.

The latter requirement is extremely open-ended, and does not require that amendments to the plan be consistent with the maintenance of the ecological and functional integrity of natural heritage, water resources and agricultural systems of the greenbelt. In fact, the provision would permit the removal of prime agricultural areas, and key natural heritage and hydrologic features from the plan and their replacement with lands of little or no agricultural, natural heritage or hydrologic value.

### **Recommendation**

21. *Amendments to the greenbelt plan removing specialty crop areas, prime agricultural areas, and natural heritage and water resource systems and features from the plan should only be permitted where recommended by the advisory council at the completion of the ten year review of the plan, and only in situations where the areas and features in question no longer meet the criteria for designation.*
22. *Amendments to remove of rural areas from the plan and their replacement through the addition of other lands should only be permitted upon recommendation of the advisory council where it is demonstrated that there will be no adverse impacts on the*

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<sup>11</sup> M.Winfield, N.Heap, C.Brunton and C.Bowman, *Comments on the June 2004 Provincial Policy Statement Draft Policies* (Ottawa: The Pembina Institute, August 2004) Section IV.1.

*agricultural, natural heritage and water resource systems of the greenbelt, and where the addition of lands will enhance those systems.*

The proposed plan would permit the consideration of amendments outside of the ten-year review process where there are major new provincial policies, legislation or regulations creating the need for an amendment, the overall effectiveness and integrity of the plan would be affected if the amendment is deferred, and the effectiveness and or relevance of the plan's policies would be improved through the amendment.

The proposed criteria for plan amendments outside of the formal review cycle are excessively permissive, given that "major new provincial policies etc." is an undefined term, and could encompass a very wide range of initiatives which many not be consistent with the effectiveness and integrity of the plan.

### **Recommendation**

23. *Amendments to the plan outside of the 10 year review process should only be permitted where directly required by legislation, or where the amendment is recommended by the advisory council as meeting the criteria of being immediately necessary to protect the effectiveness and integrity of the plan, or to improve the effectiveness and relevance of the plan's policies.*

### **Monitoring and Performance (Section 5.7)**

#### **Recommendation**

24. *The proposed advisory council should play a leading role in the establishment of performance measures for the greenbelt plan. Performance measures should focus on specific outcomes in terms of the achievement of the goals outlined in section 1.2 of the plan, as well as the maintenance of the integrity and viability of the greenbelt's agricultural, natural heritage and water resource systems.*

### **Advisory Council (Section 5.8)**

#### **Recommendation**

25. *As recommended in the Pembina Institute's comments on Bill 135, the establishment of an advisory council should be a statutory duty of the Minister of Municipal Affairs.*
26. *The advisory council's mandate should include:*
- *The establishment of performance measures for the greenbelt plan as per section 5.8. of the plan.*
  - *The leadership of the ten-year review of the plan and making recommendations for modifications to the plan on the basis of that review.*
  - *The provision an annual report on the effectiveness of the greenbelt plan and making recommendations to protect the integrity of the plan and improve its effectiveness*

- *The provision of advice on the implementation and administration of the plan, including comments and recommendations regarding decisions and undertakings that may affect the integrity and effectiveness of the plan.*
- *The evaluation of the justification for, and the making of recommendations with respect to, proposed amendments to the greenbelt plan outside of the ten-year review cycle.*
- *The provision of advice to the Minister of Municipal Affairs on matters relating to the plan as requested by the minister.*

*The provisions of Bill 135 should be amended to reflect these roles.*

27. *As proposed in the draft plan, the advisory council should include individuals with expertise in the areas of agriculture, conservation, environmental protection, tourism and recreation, natural resources management, municipal affairs, and development.*
28. *The advisory council's reports and recommendations should be matters of public record.*

### **Definitions**

The proposed definitions of “development” and “site alteration” would exclude activities or works under the *Drainage Act*. The establishment and operations of agricultural drains under the Act can have significant negative impacts on wetlands, and surface and groundwater flows.

### **Recommendation**

29. *Activities or works under the Drainage Act should be included in the greenbelt plan's definitions of “development” and “site alteration.”*

I would be pleased to respond to any questions that you or your colleagues may have regarding the Pembina Institute's views on these matters.

Yours sincerely,

A handwritten signature in black ink, appearing to read "M.S. Winfield", with a long, sweeping flourish extending to the right.

Mark S. Winfield, Ph.D.  
Director, Environmental Governance  
Tel: 416-978-5656.

Cc: The Hon. D. McGuinty, Premier of Ontario  
The Hon. J. Gerretsen, Minister of Municipal Affairs  
The Hon. D. Caplan, Minister of Public Infrastructure Renewal  
The Hon. L. Dombrowsky, Minister of the Environment  
The Hon. D. Ramsay, Minister of Natural Resources  
The Hon. S. Peters, Minister of Agriculture and Food  
The Hon. H. Takhar, Minister of Transport  
The Hon. D. Duncan, Minister of Energy  
Tim Hudak, M.P.P., PC Municipal Affairs Critic  
Marilyn Churley, M.P.P., NDP Environment Critic  
Gordon Miller, Environmental Commissioner of Ontario.