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April 17, 2026

Attention: Consultation – Future uses of the Pickering Lands  
Transport Canada  
4900 Yonge St  
Toronto, ON M2N 6A5

## Summary

The Greenbelt Foundation welcomes the opportunity to provide input on the future of Transport Canada’s Pickering Lands. This is a rare and timely opportunity to build a legacy that delivers critical benefits today and for generations to come. The expansion of Rouge National Urban Park, one of Canada’s smallest but most unique and visited National Parks, will make a critical investment in ecological integrity and biodiversity, food security and agri-food economy, rural revitalization, and access to nature in an area serving Canada’s largest population.

As Prime Minister Mark Carney said at Davos: “A country that can't feed itself, fuel itself or defend itself, has few options.”

**We strongly support the transfer of all federal Pickering Lands to Parks Canada for integration into Rouge National Urban Park (RNUP),** along with adequate resources and a strengthened mandate to fully address the scope of opportunity including unique agriculture and agri-food possibilities within a national park context.

As part of Canada’s commitment to Reconciliation, **we strongly encourage consultations with First Nations that respect their rights, perspectives and expectations for meaningful engagement,** including their informed consent on issues that impact their rights, lands, territories and resources.<sup>1</sup>

The expansion of RNUP will strengthen complementary goals and objectives of the Greenbelt, which surrounds the park and incorporates an immensely important set of natural heritage, water resource and agricultural landscapes and systems in Ontario. With 1 in 4 Canadians living in or within 20 kilometres of the Greenbelt, this protected area also benefits and sustains Canada’s most significant urban region.

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<sup>1</sup> <https://www.justice.gc.ca/eng/csj-sjc/principles-principes.html>



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The Greenbelt's agricultural land base is a strategic asset, producing high value fruits and vegetables, greater farmgate revenues per acre (+68% on average) and proximity to the country's largest food processing hub and consumer market. Expanding agriculture in RNUP leverages these advantages and provides opportunities to strengthen local agriculture, including the need for new entrants and access to affordable and protected farmland.

RNUP anchors habitat for biodiversity and species at risk (SARs) in the region, with the Greenbelt providing additional habitat and ecological connectivity between large landscapes in southern Ontario, including other national and provincial parks.<sup>2</sup> Together, these near urban nature landscapes enhance climate resilience in the region, including carbon storage, flood management and temperature moderation,<sup>3</sup> and create an unparalleled opportunity for Canadians to experience nature close to home.

RNUP further provides ecological and hydrological connectivity between the Greenbelt's Oak Ridges Moraine, Lake Ontario, and coastal wetlands, protecting a critical water resource link for Ontario.

In supporting the transfer of the Pickering Lands to RNUP, the Greenbelt Foundation supports a federal approach which further:

- Promotes systems-based land use planning for agriculture, natural heritage and water resource systems.
- Supports a multi-functional landscape integrating sustainable agriculture, biodiversity conservation, nature-based recreation and education.
- Maintains federal stewardship of the lands and enables Parks Canada to fulfill a modernized mandate through effective stewardship, partnership and program delivery.

## **Ontario's Greenbelt and Greenbelt Foundation**

Established in 2005, the Greenbelt Foundation is a charitable organization dedicated to supporting the integrity and success of Ontario's Greenbelt. Our work focuses on ensuring that the Greenbelt's interconnected natural and agricultural systems are protected and continue to provide clean air and water, locally grown food, thriving rural economies, and greenspace for the people of Ontario and Canada.

The Greenbelt protects over 2 million acres of farmland and highly sensitive ecosystems in the Greater Golden Horseshoe including forests, wetlands, major aquifers, rivers, and lakes. It is a

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<sup>2</sup> [https://greenbelt.ca/research-report/improving\\_large\\_parks\\_access/](https://greenbelt.ca/research-report/improving_large_parks_access/)

<sup>3</sup> [https://greenbelt.ca/research-report/cooling\\_corridors/](https://greenbelt.ca/research-report/cooling_corridors/)



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critical and irreplaceable asset that sustains the quality of life and resilience of communities and people in Southern Ontario.

The Greenbelt also supports significant regional economic activity by leveraging favourable conditions for investment and employment, including agricultural production, food processing, recreation, and tourism. Each year, the Greenbelt contributes more than \$12 billion to Ontario's GDP, supports over 200,000 full-time jobs, and provides approximately \$4.4 billion in federal and provincial tax revenue.<sup>4</sup>

Greenbelt plans and policies support the goal of creating complete communities that offer affordable housing, social services, amenities, and employment opportunities, while protecting agricultural, natural heritage and water resource systems that enable and support growth.

Protecting the Pickering Lands within the broader Greenbelt landscape would reinforce provincial and regional priorities for conservation, recreation, food security, and economic growth.

## **Strengthen Ontario and Build a Legacy for Canadians**

The integration of the Pickering Lands into the Rouge National Urban Park represents a once-in-a-generation opportunity to:

- Achieve Parks Canada's ecological integrity goals and RNUP's unique mandate to support agriculture.
- Reverse habitat loss with an opportunity to restore significant natural features and functions and enhance the beauty of Canada's national parks.
- Support reconciliation and Indigenous presence on the land through co-management frameworks with First Nations.
- Expand tremendous recreation and educational benefits that connect millions of residents and visitors to enjoy nature in the Greater Toronto Area.
- Strengthen Canada's domestic food systems, food security and agricultural economy.
- Increase jobs and innovation in the agri-food sector.
- Meet international commitments on biodiversity and protection of SARs and significant ecological corridors.
- Maintain a federal role in stewarding the lands for long-term public value and future generations.
- Support the Greenbelt and creation of complete communities and affordability in Ontario.

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<sup>4</sup> [https://greenbelt.ca/research-report/economic\\_impact\\_assessment/](https://greenbelt.ca/research-report/economic_impact_assessment/)



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These actions align with, and reinforce, federal, provincial and regional priorities including Parks Canada, Canada's 2030 Nature Strategy, Ontario's Greenbelt and Durham Region's Agri-Food Network Strategy. These actions will also help close a growing gap in residents' access to greenspace in the region and promote growth that delivers affordable housing and cost-effective infrastructure, while protecting natural systems that enable development and increase climate resilience.

## Future of Pickering Lands: Guiding Principles, Appropriate Uses and Recommendations

The 9,300 acres of Pickering Lands consist mainly of Class 1 farmland, a finite and irreplaceable resource that is increasingly important to Canada and Ontario due to global supply chain disruptions, rising tariff and trade challenges and climate change. An extensive and connected network of natural systems contributes to biodiversity, the health of contiguous natural areas and climate resilience, including stormwater and flood management for adjacent and downstream communities.

The lands would make a significant contribution to increasing access to greenspace in the region, while the cultural and historical significance of the lands needs to be explored.

By bringing these lands into Rouge National Urban Park, Canada can transform underutilized assets into a legacy of thriving ecosystems, productive farmland, and connections to nature and cultural history for generations.

### Guiding Principles

A cohesive federal approach should be guided by the following principles:

- **Advance reconciliation with local First Nations and Indigenous Peoples** through meaningful consultation and engagement that respects rights, interests, and the pursuit of free, prior, and informed consent.
- **Promote system-based land use planning** for agriculture, natural heritage and water resource systems.
- **Support a multi-functional landscape** integrating sustainable agriculture, biodiversity conservation, nature-based recreation, and education.
- **Align with federal priorities** by strengthening food security and the local agricultural economy, advancing biodiversity conservation commitments, accelerating climate resilience, and enhancing opportunities for Canadians to connect with nature.



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- **Maintain federal stewardship of the lands and enable Parks Canada to fulfill a modernized mandate** through effective stewardship, partnership, and program delivery.
- **Support the development of complete, efficient, and affordable communities** in Ontario through coordinated infrastructure, land use, and conservation planning.

## Appropriate Uses

### 1. *Revitalizing Agriculture and Protecting Class 1 Farmland*

The Pickering Lands include some of Canada’s highest-quality agricultural soils. Class 1 farmland only makes up 0.5% of Canada’s land mass. At a time when prime agricultural land is being lost at an unsustainable rate, federal leadership is essential.

Certainty and stability are critical for long-term investments in farm operations and related businesses. The protection of RNUP provides a predictable land-use environment for potential farmers, supporting confidence and encouraging investment.

Revitalizing agricultural production on the Pickering Lands, within RNUP, will enhance a strategic agricultural area for Ontario and Canada. The surrounding Greenbelt accounts for 52% of Ontario’s fruit acreage and 10% of field vegetable acreage. About 60% of Ontario’s food and beverage manufacturing capacity is found in the immediate vicinity of the Greenbelt - these businesses make up the 3<sup>rd</sup> largest food industry cluster in North America.<sup>5</sup>

There are real opportunities to enhance food security, boost manufacturing and accelerate growth in an innovative sector that serves local and global markets including import replacements, growing value-added consumer markets, and agri-tourism experiences.

The rise in GDP contributions by the Greenbelt between 2016 and 2022 are based on strong sectoral growth in agriculture, forestry and fishing, reflecting expanding primary-sector activity.

Transferring the Pickering Lands to RNUP can support these opportunities and help address critical barriers in the agri-food sector, including land affordability and generational renewal.

### 2. *Environmental Sustainability and Climate Resilience*

The Pickering Lands form a critical link between Duffins Creek and Rouge River watersheds, the Greenbelt and Lake Ontario. Together, these watersheds form one of the last intact wildlife corridors connecting the ORM to Lake Ontario. RNUP is also a critical biodiversity anchor in the region, with the Greenbelt supporting ecological connectivity across Southern Ontario, including

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<sup>5</sup> <https://greenbelt.ca/research-report/key-to-food-security/>



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national and provincial parks. These landscapes are critical refuges for SARs in the region, with evidence that the number of SARs in the Greenbelt (and likely RNUP) has doubled over the last 20 years.<sup>6</sup>

An expanded RNUP will further enable Parks Canada to achieve its ecological integrity goals, which will help reverse the loss of biodiversity in the region and increase climate resilience. Within RNUP, the Pickering Lands can be enhanced and restored to deliver on these goals and provide greater ecosystem service benefits to local communities and residents. The Greenbelt Foundation works with municipalities to value, maintain and enhance ecosystem services that provide clean air and water, stormwater and flood management, temperature moderation, and recreation to their residents and communities. These services are valued in the billions.

A recent case study completed for the Grindstone Creek watershed determined that it provides the equivalent of \$2 billion in capital infrastructure for stormwater management alone.<sup>7</sup> Municipalities and all levels of government would be significantly challenged to cover the replacement cost of ecosystem services that nature already provides for free.

### **3. Access to Nature**

An expanded RNUP would tackle a growing gap in the current supply of large parkland in the region. The Golden Horseshoe, where RNUP is located, needs to create 32,000 ha of parkland by 2051 to maintain the current provision of large parkland based on projected population growth.<sup>8</sup>

Two million people in the Golden Horseshoe are currently living in neighbourhoods with low accessibility to parks, particularly for underserved communities.

A value of nature survey for the Greenbelt demonstrates the importance of nature for recreation and the contribution nature makes to the physical and mental health of Ontarians and the local economy.<sup>9</sup> During COVID, 85% of adults in the Greater Golden Horseshoe participated in nature-based activities, with 50% travelling locally to access nature.<sup>10</sup> In 2022, recreation activities in the Greenbelt contributed \$10 billion to Ontario's GDP and supported 190,000 jobs.<sup>11</sup>

RNUP is accessible through sustainable transportation options such as transit, cycling trails and connected trail systems, that can also be enhanced for residents. As the most visited national

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<sup>6</sup> Ontario Nature. (2026). Species At Risk in the Greenbelt: Successes, Challenges and Opportunities. (Unpublished report).

<sup>7</sup> <https://naturalassetsinitiative.ca/documents/grindstone-creek-watershed-natural-assets-management-project/>

<sup>8</sup> [https://greenbelt.ca/research-report/improving\\_large\\_parks\\_access/](https://greenbelt.ca/research-report/improving_large_parks_access/)

<sup>9</sup> [https://greenbelt.ca/research-report/value\\_of\\_nature/](https://greenbelt.ca/research-report/value_of_nature/)

<sup>10</sup> [https://greenbelt.ca/research-report/value\\_of\\_nature/](https://greenbelt.ca/research-report/value_of_nature/)

<sup>11</sup> Ernst and Young. (2026). Economic Impact Assessment for the Greenbelt. (Unpublished report).



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park, RNUP is a welcoming and inclusive space for people and families to connect with nature, agriculture and cultural heritage.

#### **4. Supporting Complete Communities and Affordability**

The Greenbelt Foundation recognizes the critical need to build affordable housing in the region. Development pressures have resulted in Durham Region and the City of Pickering approving new greenfield development to meet their 2051 population projections.

In 2024, Durham Region established an intensification target to accommodate a minimum of 50% of all new residential units within the existing built-up area.<sup>12</sup> Recent research completed by the Foundation shows that only 14% of designated greenfield areas in Durham Region were developed for housing and employment uses between 2000-2024. This represents the lowest proportion of greenfield development within the Greater Toronto and Hamilton Area. Approximately 37,000 acres of greenfields in Durham Region are still available for development. Regional and local needs for housing can be met within existing greenfields and serviced settlement areas for at least the next 25 years.

We further note that:

- The Pickering Lands are not contiguous with existing settlement areas.
- Building housing or commercial businesses would conflict with complete community principles that promote mixed uses and housing diversity, walkability and transit supportive density, access to services and amenities, and economic vitality.
- The high cost of building new infrastructure would be passed on to new renters and buyers and would increase property taxes for existing residents.
- Suburban development would undermine the viability of a cohesive agricultural system, fragment ecological connectivity, compromise ecological integrity, and lose a significant opportunity to address a growing deficit in accessible greenspace for the country's largest concentration of residents.

### **Recommendations**

#### **I). Land Transfer and Governance**

We strongly support the transfer of all Pickering Lands to Parks Canada for incorporation into RNUP. The federal government has a leadership role in securing long-term value for these public

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<sup>12</sup> <https://www.durham.ca/en/doing-business/resources/Documents/PlanningandDevelopment/Envision-Durham/Approved-Durham-ROP-2024.pdf>



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lands. Federal leadership will ensure cohesive, long-term stewardship under a proven national framework.

We recommend that the Government of Canada:

- Transfer all Pickering Lands to Parks Canada for incorporation into the Rouge National Urban Park.
- Provide sustained federal investment to enable Parks Canada to effectively manage an expanded park that integrates agriculture, conservation, and public access.
- Strengthen policy direction to prioritize agriculture, conservation, and public access.
- Work collaboratively with regional partners to align with agricultural and environmental strategies.

## **II). Strengthen Indigenous Partnerships**

RNUP has established a strong foundation for First Nations inclusion in the management of the park. Expansion should:

- Build on existing governance and partnership frameworks.
- Support Indigenous leadership in land stewardship, programming, and interpretation.
- Advance reconciliation through meaningful, ongoing collaboration.

## **III). Enhance the Park's Multi-Functional Role**

The expanded park should be designed to maximize the combined value of:

- Ecological integrity.
- Agricultural productivity.
- Recreational access.

This requires a balanced and integrated model where each function reinforces the others—ensuring the park's long-term viability as a living landscape. We recommend:

### **Ecological Integrity**

- Protect and restore forests, wetlands, and water systems.
- Enhance biodiversity and ecological connectivity across southern Ontario.
- Strengthen climate resilience through natural infrastructure, including flood mitigation and carbon sequestration.
- Embed climate-ready practices across all park operations.



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## Agricultural Productivity

- Permanent protection of Class 1 farmland within the park.
- Innovative land access models to support new and young farmers.
- Opportunities for on-farm housing and servicing that enable viable farm operations and contribute to rural community revitalization.
- Support for diverse farm types and local food production.

## Recreational Access

- Safe and connected trail systems aligned with regional networks such as the Oak Ridges Moraine Trail, Greenbelt Route, Great Lakes Waterfront Trail, and Trans Canada Trail.
- Sustainable transportation options to reduce reliance on private vehicles.
- Improved access for surrounding urban and rural communities.

The park should also continue to serve as a welcoming and inclusive space where Canadians can:

- Connect with nature, agriculture, and cultural heritage.
- Access meaningful recreational opportunities.
- Learn about the importance of protected landscapes like the Greenbelt.
- Participate in and support local food systems.

## Conclusion

The future of the Pickering Lands presents a legacy-building opportunity for Ontario and Canada and a unique convergence of agricultural, ecological, and community-building potential that delivers lasting benefits. The expansion of RNUP would protect a nationally significant land base while advancing a forward-looking model of sustainable land use.

The Greenbelt Foundation urges the Government of Canada to secure this opportunity for food security, for nature, and for future generations.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward McDonnell". The signature is fluid and cursive.

Edward McDonnell  
Chief Executive Officer