



# CHRISTIAN FARMERS FEDERATION OF ONTARIO

ACCREDITED FARM ORGANIZATION

April 19, 2024

Attention: Stormwater Funding Review  
City of Hamilton  
Hamilton City Hall  
71 Main St. W  
Hamilton, ON L8P 4Y5  
Delivered via email: [StormwaterFundingReview@hamilton.ca](mailto:StormwaterFundingReview@hamilton.ca)

## Re: Stormwater Funding Model

Dear City of Hamilton,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO is concerned about the fair allocation of fees for stormwater management within the City of Hamilton. Unlike other municipalities that have implemented similar fee systems, the City of Hamilton encompasses significant rural area and many diverse farm businesses.

The change in fee structure is intended to more fairly attribute costs for stormwater management to beneficiaries, especially commercial and industrial buildings that benefit from the urban stormwater infrastructure, but do not currently use significant drinking water supplies.

The proposed new stormwater fee rate, as currently set, will unfairly burden farm businesses, especially those with significant hard surface area such as greenhouse operations. It also fails to recognize the different ways all types of farms are able to collect, redirect, infiltrate, or clean stormwater runoff.

### **The CFFO asks that farm businesses be exempt from stormwater fees within the City of Hamilton.**

The CFFO recognizes the proposal for a system of credits that would be available to farm property owners. However, this system would add significant administrative burden to farm businesses, even for those who may qualify for a more than 50% credit of stormwater fees. It is far more beneficial to exempt farmers from the stormwater fees, rather than to add a complicated system of refunds for fees that should not be charged in the first place. Incentives to support best practices or improvements on rural properties would be a more appropriate and efficient way forward.

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REPRESENTING FARMERS SINCE 1954

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1-855-800-0306 or 519-837-1620      info@christianfarmers.org      www.christianfarmers.org

## Conclusion

The CFFO asks that farm businesses be exempt from stormwater fees within the City of Hamilton. The proposed new stormwater fees for farmers will unfairly burden farm businesses, especially those with significant hard surface area such as greenhouse operations. Farms are able to collect, redirect, infiltrate, and clean stormwater runoff. **These businesses do not benefit from urban stormwater infrastructure and should not be required to pay stormwater fees.**

We appreciate your consideration of our recommendations and concerns.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario



Jon Bos, President  
Christian Farmers Federation of Ontario – Wentworth-Brant District

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