The Normal Farm Practices Protection Board[1]

1.0 Introduction

Person A

I want to enjoy my property: I want to have barbeques outdoors and play catch with my children, hang clothes outside to dry and listen to the birds in the bush beside our home. I enjoy getting up in the early hours before the long drive to work, to find deer in the field behind our house. I enjoy the reprieve from city life, and working life, our country home provides. And I know that I moved into the country! I knew I was moving beside a pig farm. I knew on some days it would smell, but come on - some days I can't go out of the house because for the smell. They must be able to do something! Friends of ours live beside an even bigger barn and they don't have any problems with smells.

Person B

I too enjoy the quiet of country life. The farm has provided my family with a livelihood for many years. My kids learn about nature: life and death, hard work, consequences, bad luck and good luck. I earn a living from working the ground and caring for my animals. If I don't do it right, if I get lazy or sloppy, it comes out of my pay-cheque. Of course I am going to farm responsibly! But there are some things, like the smell of pigs on a hot, windless day that I can do nothing about – people want to eat pork they just don't know anything about how it's done. Pigs smell, period.

Who is in the right? Who has the right to enjoy their property the way they would like to? Not only do these examples document the different perspectives people may

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have about the land they live in, it also hints to the personal conflicts that can potentially arise given this context. The rising incidence of conflicts between farmers and their neighbours and/or municipalities is not surprising given that between 1931 and 1991 there has been a 290 percent increase in the rural non-farm population of Ontario (Toombs, 1996a). It is to this problem of land use conflicts that right-to-farm legislation generally and Ontario's Normal Farm Practices Protection Board (NFPPB), specifically came into being. Although these laws acknowledge that people have a right to use and enjoy their property, they also recognize that certain farm related activities can be bothersome to adjacent lands, but are still considered 'normal farm practices' and therefore protected against nuisance complaints. The province of Ontario considers itself to have an interest in providing legislation that "balances the needs of the agricultural community with provincial health, safety and environmental concerns" (FFPPA, 1998:1). But does the legislation provide such a balance in the minds of the public and those people involved in farm nuisance complaints?

This paper begins with a discussion of right-to-farm legislation generally and then describes how Ontario has come to incorporate such ideas into its own legislative toolbox. The role of Ontario's NFPPB to prevent and mediate land use conflicts is documented through two case studies in Ontario.

2.0 Right-to-farm Legislation in North America

Urbanization has long been considered a threat to agriculture (Toombs, 1996a). Ex-urbanites migrating into the countryside often take with them a coloured expectation of their new rural landscape (Leckie and Troughton, 1999). Such people may be several

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generations removed from an agricultural background and simply do not know anything about what happens on a modern day farm (ibid.). They may be expecting their farming neighbours to have a 'mom and pop operation – Old McDonald style'. Perhaps farmers expect their new neighbours to have these preconceived notions and therefore refuse to take any of their neighbour's concerns about their farming operation seriously. However the situation arises, it is often found that conflicts arise between these two population groups. Many of these disputes are considered land use conflicts.

Land use conflicts can be defined as, "simply any dispute or harm which results when one person interferes with the way another person wants to use his land" (Lisansky and Clark 1987:219). The decision of a farmer to sell his or her agricultural operation for development because of pressures from urbanization is the most direct and permanent result of urbanization (bid). However, prior to development (indeed 'development' may not necessarily occur) there are other adverse effects of urbanization felt by farmers and non-farmers alike. They include: decreased investment in agricultural operations, i.e. decreased planning for the future of a farm; decreased agriculturally related or support industries; increased social tensions within a community; changed production decisions and overvaluation/undervaluation of land (Lisansky and Clark, 1987:221). Right-to-farm legislation although universally intended to protect farmers from the stress and cost of unfounded nuisance complaints, may also be used to ease, prevent, and mediate the source of such complaints.

The premise behind right-to-farm legislation is that some farming practices, although 'normal', can be a disturbance to those living on or near adjacent lands. The common law of nuisance states that a person who unreasonably interferes with another

person's use and/or enjoyment of his or her land can be sued (Toombs, 1996d). Many states and provinces consider it to be in their interest to provide protection to farmers from potential nuisance lawsuits (bid).

There are several concerns regarding the effectiveness of right-to-farm legislation to protect agriculture, and presumably agricultural land. First, the law of trespass may be an impediment to nuisance protection. While odour may be a nuisance protected as an expected by-product of a normal farm practice, it may not be protected from the law of trespass (Lapping, Penfold, and S Machpherson, 1983:466; Lapping and Leutwiler, 1987:214).

Secondly, the assumption that agriculture is a special industry that requires special legislative protection is debated (Lisansky, 1986:365). Thirdly, the legislation, because it is often written vaguely may provide opportunities for 'creative adherence' (Lapping, Penfold, and S Machpherson, 1983:466). Right-to-farm legislation usually requires that farms and farming practices be considered unique to each context and must be evaluated accordingly. Thus it is considered a necessary evil that Ontario's right-to-farm legislation may express a particular intent, but it must commensurate that intent to each and every complaint case on an individual basis (Toombs, 2002). The consequences of this for municipalities will be discussed later.

Yet another criticism of right-to-farm legislation is that is does not address the real and impeding problem of increasing land values as urban people increasingly see the rural country side as an attractive place to live (Lapping and Leutwiler, 1987:214). Keeping these criticisms in mind, let us look to the Ontario context and evaluate its version of right-to-farm legislation.

3.0 Right-to-farm in Canada: History and Summary

Right-to-farm legislation in Canada has been around for quite some time. It has been recognized that the character of such legislation has changed over time to become more sophisticated and responsive to changing needs (Toombs, 1996d). The first generation of right-to-farm legislation can be exemplified by the early legislation in New Brunswick and Nova Scotia (ibid.). In New Brunswick, two particular lawsuits against farmers in the early eighties have come to be recognized as the driving force behind right-to-farm legislation in Canada (Lapping and Leutwieler, 1987:215). In both cases, the decisions went against the farmers. The provincial Department of Agriculture and Rural Development responded to the cases with a statement strongly condemning the unreasonable expectations urban migrants have of the character of the countryside and activities of farmers (ibid.). In further response to the lawsuits, the first livestock manure and waste management provincial standards were created (ibid.). Since then, farmers in New Brunswick who follow such standards were protected from nuisance complaints regarding odour, noise and dust (Toombs, 1996c). In Nova Scotia, in addition to creating provincial standards for agricultural practices, it also created a board to hear all nuisance complaints (ibid.). Both Nova Scotia and New Brunswick sought only to protect farmers from nuisance complaints (ibid.).

The second generation of right-to-farm legislation in Canada can be characterized by providing a more preemptive and conciliatory environment to land use conflicts. Although Alberta, Manitoba and Saskatchewan, as well as Ontario, are considered to be

of this generation, only Ontario's legislation is described here. In 1986 the Ontario Ministry of Agriculture and Food conducted a survey to find out the extent of right-to-farm concerns in the province (Lapping and Leutwiler, 1987:216). Following the results of the survey a Right-to-Farm Advisory Committee was created. In 1986 the advisory committee submitted their report to the Ministry (ibid.). Although some of the recommendations made by the advisory committee never came to fruition, several important ones did, such as limiting farm severances, making minimum separation distances required between incompatible land uses, the establishment of the Farm Practices Protection Board to hear farm nuisance complaints, and mandating mediation be used in an attempt to solve a land use conflict before the problem is brought before the Board (The Ontario Right-to-farm Advisory Committee, 1986). The legislation was passed in 1988 and named the Farm Practices Protection Act (FPPA). The critical intention of this legislation was to not only protect farmers from frivolous nuisance complaints, but to promote better relationships between people given the continuously changing demographics in the countryside (ibid.).

Finally, the third generation of right-to-farm legislation occurred in the mid 1990's and examples of such legislation can be found in British Columbia, Quebec and the updated version of Ontario's FPPA (Toombs, 1996d). Ontario's revision of the FPPA (1988), now called the Farming and Food Production Protection Act (FFPPA, 1998) is a good example of the difference between the second and third generation of right-to-farm legislation.

3.1 Changing Rural Ontario

Representatives of Ontario's agricultural community thought that the FPPA was out of date and inadequate to deal with the significant changes that had taken place in the farming industry (Fraser and F. Desire, 2002:2). Like any other industry, agriculture has found efficiency in the practice of spreading costs over larger capital investments, be they increased land area or larger numbers of animals, and subsequently bigger barns. As a result farm related complaints might be considered a response, whether founded or unfounded, to these new technologies, or wider spread use of such technologies. This trend, coupled with the ever-increasing exodus of urban people to rural areas quickly changed the demographics of municipalities. Municipalities quickly realized that there was a significant voter population with concerns about agricultural operations and practices (Turvey, 2002). Council members began passing by laws under the Municipal Act (that can not be appealed to the Ontario Municipal Board) to restrict farm practices in order to gain or maintain voter confidence (ibid.). Although the Farm Practices Protection Board was created to hear farm nuisance complaints under the FPPA (1988) it intended to address only individual-to-individual complaints, and not individual versus municipality complaints. Thus, for many reasons the FPPA rightly needed revision.

4.0 The Farm and Food Production Protection Act, 1998

There are four important revisions to the original FPPA act that have had significant effect on the legislated relationship between parties involved (or potentially involved) in land use conflicts. First, as suggested above, while the original FPPA 1988, dealt only with nuisances related to noise, odour and dust, the updated legislation, FFPPA 1998, expanded nuisances to include light, vibration, smoke and flies (Fraser and Desire, 2002:4). Secondly, in addition to broadening the scope of nuisances the FFPPA,

1998 also included procedures to deal with municipal by-laws that intentionally (or unintentionally) restricted normal farm practices (Toombs, 1996d). Thirdly, the revised act specifically stated that, "agricultural activities may include intensive operations that may cause discomfort and inconveniences to those on adjacent lands" (1998). The provincial position on large livestock operations is quite clearly made: normal farm practices can include, but does not automatically equate to, those activities necessary to operate large agricultural facilities.

Finally, and perhaps most relevant to this paper, is the conciliatory nature of the FFPPA's preamble. The final paragraph of the preamble states that, "It is in the Provincial interest that in agricultural areas, agricultural uses and normal farm practices be promoted and protected in a way that balances the needs of the agricultural community with provincial health, safety and environmental concerns". Thus while noting the importance of protecting agricultural pursuits, the Act also acknowledges the important concerns other parties may have in rural areas. It is in the Provincial interest to maintain a balanced relationship in the countryside.

The Act provided several means to attempt to maintain and promote this 'balanced relationship', the most important of which is the Normal Farm Practices Protection Board (referred to here as the NFPPB).

4.1 The Normal Farm Practices Protection Board

The NFPPB is intended to provide parties involved in land use conflicts a forum to demonstrate their 'case' in front of impartial board members (FFPPA, 1998). Whether or not the board is impartial is sometimes questioned (Turvey, 2002). A board hearing is to occur only after mediation has been unable to resolve the conflict (FFPPA, 1998). The

Board's mandate is "to inquire into and resolve a dispute respecting an agricultural operation and to determine what constitutes a normal farm practice, and to make the necessary inquiries and orders to ensure compliance with its decision" (FFPPA, 1998:5). A 'normal farm practice' is defined by the act as an activity that, 1) "is conducted in a manner consistent with proper and acceptable customs and standards as established and followed by similar agricultural operation under similar circumstances, or 2) makes use of innovative technology in a manner consistent with proper advanced farm management practices" (ibid:2). It is important to remember that according to this definition, a normal farm practice varies based on context and time (Fraser and Desir, 2002:3). The Board only has jurisdiction to determine whether an activity is a normal farm practice if the complaint is in regard to one of only seven specific disturbances including light, vibration, smoke, flies, noise, dust and odour (ibid:4).

There are two general variations to the cases heard before the Board: individual versus individual, and individual versus municipality. In both cases the Board is instructed to make one of three decisions: 1) the farm practice is a normal farm practice; 2) the farm practice is not a normal farm practice; 3) the farm practice will be a normal farm practice if the farmer makes specific modifications in the practice within the time set out in the decision (FFPPA, 1998:6). It is the ability of the Board to make its own recommendations, of a compromising nature, that is most different to the win/lose character of the court system (Toombs, 2002). However, all decisions made by the Board must be consistent with directives, guidelines or policy statements issued by the Ontario Ministry of Agriculture and Food, and will also soon include the regulations being

formulated under the new Nutrient Management Act legislation (Fraser and Desir, 2002:4 and Toombs, 2002).

4.2 Municipal Cases and the NFPPB

This paper evaluates the NFPPB by detailing two board hearings that involved farmers and municipalities. Only individual versus municipal cases are documented here for two reasons. Firstly, the two types of cases differ significantly in their nature and procedures leading up to the hearing, and due to time constraints, only one of the types can be represented effectively. Secondly, rural land use conflicts can escalate significantly when municipalities become involved therefore it is important to understand how the Board attempts to calm such problems.

4.2.1 Knip Vs Biddulph (OMAFRA, 1998)

Fred Knip, and relations of Fred Knip Farms Inc, intended to build 2,000 hog facility, which happened to contravene a Biddulph by-law. Biddulph passed a by-law limiting the number of livestock units at one site to 500. Fred Knip's proposed barn would hold approximately 750 livestock units. In addition, the township's by-law required that 1 acre of tillable land be available for every 1.5 livestock units unless more is determined to be required. Further, the by-law made it compulsory for the owner of the operation to own 66% of the required land base.

It was determined in the hearing that the township's by-law was created in response to "concerns expressed by members of the community with regard to the increasing size of intensive livestock operations in Southern Ontario" (OMAFRA,

1998:5). Environmental concerns about unregulated management of livestock manure and farm wastes were the main thrust behind the by-law's formation. A committee of citizens was created to help the township compile background information for the preparation of the by-law.

In determining whether a municipal by-law restricts a normal farm practice, the Board must consider four factors (FFPPA, 1998:8):

1. The purpose of the by-law has the effect of restricting the farm practice;
2. The effect of the farm practice on abutting lands and neighbours;
3. Whether the by-law reflects a provincial interest as established under any other piece of legislation or policy statement;
4. The specific circumstances pertaining to the site.

The board decided on each of the by-law sections challenged by the Knips. It was determined that placing a cap on the number of livestock units that can be located on any one site would restrict normal farm practice. It was suggested that the requirement of a properly monitored nutrient management plan would be more appropriate to manure management than a livestock cap. The Board also determined that the section of the by-law that would necessitate a 1 acre to 1.5 livestock unit ratio is arbitrary and therefore would restrict normal farm practices. Members of the Board noted that the acre to animal unit ratio is not static but a function of soil type. Finally, the Board contemplated the section of the by-law that required the owner of the operation to own 66% of the total land base. It found that the requirement of ownership was also unreasonable. The Board pointed out that many families may own contiguous, but separate plots of land and may partner in livestock operations. It is therefore common that the land may be under long

term control but the documented owner of a livestock operation may own very little land. The NFPPB suggested that long-term control over land, and not ownership should be required. That 66% of the land base be under long-term control was a moot point on which the Board did not have to decide, as the Knip's did have long-term ownership of more than 66% of the land base necessary for a 750 livestock unit facility.

This case is a particularly good example of issues that farmers, municipalities and members of the NFPPB have to face in farmer versus municipality cases. First, during testimony, the Board heard accounts of the by-law's inception - that it had been a response to environmental concerns regarding manure management. One witness for the municipality gave a detailed account of a personal experience with odour and manure runoff problems (and inaction of the MOE) from another swine operation. It is clear that this witness equated a particular commodity group with inevitable environmental problems. Although the Board made it clear that the farm practices of the Knip family were more environmentally-friendly and less likely to cause the same sorts of problems, it is important to note that the general public may not have a good grasp on agricultural practices. This is especially important given that it was a community committee originally completed the research for the drafting of the by-law.

Another important aspect of the case was that the Township of Biddulph decided to appeal the Board's decision to the Ontario Divisional Court (Turvey, 2002). If by-laws are passed under the Municipal Act, the only way to seek a 'non-application' of the by-law, a type of appeal process, is through the NFPPB (FFPPA, 1998). To appeal an NFPPB decision, a party must make a request to the Ontario Divisional Court to hear the case (Turvey, 2002). In the Knip vs. Biddulph case, the Township of Biddulph decided

to appeal the NFPPB's decision. However, before or shortly after the appeal process began the hog industry went through an extreme income crisis as the return price of hogs plummeted (ibid.). Fred Knip and his family decided that they did not have enough money to continue on with the appeal process and chose not to build the proposed swine facility (ibid.). The township took these events to mean that they had 'won' the appeal. However, the appeal had not been completed and no ruling had been made.

The point to be made from these events is that the process of participating in a NFPPB case and continuing to have the decision appealed is an expensive, time consuming and stressful task. For these reasons the NFPPB could be thought of as an incentive to resolve conflicts through mediation before the conflict reached the Board. However, it is far less likely that a case involving a farmer and a municipality will be resolved through mediation than a case involving two individuals (Turvey, 2000; Toombs 2002). Therefore, not only is the municipality less likely to compromise its position (because of political pressure), there may also be a significant difference between a municipality's and an individual's ability to access resources to fund a by-law appeal to the NFPPB and beyond (ibid.). Perhaps only certain types of farmers, those wealthy enough or backed by agricultural groups, will be able to pursue by – law appeals (McRae, Kent, and J. Day, 2002). However, the fact that the Board is unable to set precedents may deter commodity groups or other agricultural advocacy groups from financially backing cases, particularly smaller farms, more frequently.

4.2.2 Jansen vs. Adelaide-Metcalfe Township (OMAFRA, 2001)

Mr. Jansen is a swine farmer who wanted to build a new sow barn holding 559 livestock units, which according to his own nutrient management plan required 881.5

acres of tillable land. Mr. Jansen owned only 153 working tillable acres, while the rest of the land was rented from two local farms.

The Township of Adelaide-Metcalfe's by-law, a by-law clearly drafted after the initial Knip vs Biddulph decision, mandated that 60% of the total land base required for manure management be under long-term control. It was the by-law's definition of long-term control that proved to be the source of contention between the two parties. Land controlled through corporate entities or personally with family members, and lands subject to leasing agreements, were all considered under long-term control. However, the NFPPB was asked to determine whether leasing agreements required the operator to have exclusive rights over the land, or just a contractual right to place manure on the land.

The Board decided that 'long-term control' meant control over land for the purpose of managing manure. However it gave strict directives regarding the details of the agreement so to make them more binding. It made three recommendations: 1) that contracts not provide loopholes that landowners can use to refuse manure onto his or her land; 2) that contracts should be binding for five-year periods, but if such contracts are not available, less binding contracts should be signed, again for a period of not less than 5 years; 3) if contracts are not binding, surplus land should be under the owner's exclusive control incase a contract is unexpectedly terminated. Perhaps more significant however, is that the Board stated that it is "entitled to rely upon the expertise of the members and other decisions of the Board when determining what is and what is not normal farm practice" (OMAFRA, 2001:7). It is quite clear that the Board's directives in the Jansen versus Adelaide-Melcalfe decision were intended to be used to guide future Board hearings, and inform municipalities of proper by-law standards.

However, despite the intention of the Jansen decision, the NFPPB must hear each case brought to it that is within its jurisdiction, so long as it is not frivolous (FFPPA, 1998). For a number of reasons, municipalities will continue to pass by-laws that they know will likely not stand up to a NFPPB hearing. First, each case brought before the Board is considered unique and cannot be swept under the broad generalizations that precedents create (Toombs, 2002). Secondly, if a Board makes a decision against a municipality, the by-law is not repealed, merely an individual is awarded a non-application to the by-law (he or she is exempt from the by-law) (Turvey, 2002). Therefore the same municipality may be brought before the NFPPB for the same section of a by-law many times over, and the decision continually being awarded to farmers. Although time consuming, this event would likely be more burdensome to each of the individual complainants than the municipality (ibid.). Finally, in the event that a municipality passes a by-law that it knows restricts normal farm practices, the benefits of doing so are two-fold. The municipality is able to demonstrate its willingness to side with its urban constituents on farm matters thereby gaining valuable voter confidence and, in the event the NFPPB does grant a non-application of a by-law to a farmer, the municipality can suggest to the voting public that the NFPPB and not the municipality is to blame.

5.0 Conclusion

The NFPPB does have a purpose to serve - to protect and promote agriculture from the encroachment of urbanization and the misunderstandings, misconceptions, and conflicts that arise as a result. However, is the NFPPB as accessible to a farmer of an aging 80 sow farrow-to-finish operation as it is to an operator of a 2,000 hog finishing

unit? Would a commodity group be willing to equally fund both operations to appear before the Ontario Divisional Courts? How can municipalities be encouraged to mediate land use conflicts more often? These are questions yet to be answered.

Clearly there are problems with the NFPPB in terms of accessibility. It is simply the fact that the time and bookwork required to prepare for a NFPPB case is a significant deterrence to small farmers (Turvey, 2002). Municipal NFPPB cases also trigger many concerns. That municipal councilors are elected every 3 years not only makes them sensitive to the concerns of the public, it also works against singular municipal leadership in an issue over any length of time (ibid.). How these by-laws will be interpreted and enforced will certainly be interesting to note as time passes and new councilors are elected.

It is also to be determined if the presence of the NFPPB improves relationships between farmers and non-farmers in the countryside. That mediation must be tried and failed prior to an NFPPB hearing encourages people to settle their problems themselves. However, in municipal cases, councilors have passed by-laws to appease the concerns or fears of the general public. Even in the event of a public meeting, where typically the general public greatly out-numbers farmer representation, it is highly unlikely that a farmer can effectively address such concerns (Hannonberg, 2002). It seems that in such a context education is the only key to improve relationships in the countryside.

6.0 Bibliography

Beesley, Kenneth B. (1999). Agricultural land Preservation in North America: a review and survey of expert opinion. In Furuseth, O., and Mark Lapping (Eds.) *Contested Countryside: The Rural Urban Fringe in North America*. Bookfield USA: Ashgate pp. 57-91

Fraser, H W., and F. Desir. *The Farming and Food Production Protection Act (FFPPA) and Nuisance Complaints*. Canada: OMAFRA. Accessed July 3, 2002. Available: www.gov.on/OMAFRA/english/engineer/facts/02-003.htm

FFPPA. (1998). *The Farming and Food Production Protection Act*. Canada: OMAFRA. Accessed July 3, 2002. Available at: http://192.75.156.68/DBLaws/Statutes/English/98f01_e.htm

Lisansky, Judith. (1986). Farming in an Urbanizing Environment: Agricultural Land Use Conflicts and Right to Farm. In *Human Organization*. 45(4):363-371.

Lapping, M. and Nels Leutwiler. (1987). Agriculture in Conflict: Right – to – Farm Laws and the Peri – Urban Milieu for Farming. In Lockeretz, W. (ed.). *Sustaining Agriculture Near Cities*. Boston: Soil and Water Conservation Society, 209-218.

Lapping, M., Penfold, G., and Susan Macpherson. (1983). Right-to-Farm laws: Do they resolve land use conflicts? *Journal of Soil and Water Conservation*. 38(6)465-467.

Leckie, G. and M. Troughton. (1999). Livestock in Industrial Agricultural Landscapes: Some Preliminary Observations. In Olgivie, Smithers, and Wall (Eds). *Sustaining Agriculture in the 21st Century, Proceedings from the 4th Biennial Meeting North American Chapter, International Farming Systems Association*. Gueph.

Lisansky, J., Andrews, M., and Rigoberto A. Lopez. (1988). The Determinants of Right-to-Farm Conflicts. *Rural Sociology*. 53(2)246-255.

Lisansky, J., and George Clark. (1987). Farmer – Non-farmer Conflicts in the Urban Fringe: Will Right- to Farm Help? In Lockeretz, W. (ed). *Sustaining Agriculture Near Cities.* Boston: Soil and Water Conservation Society, 219-229.

Mitchell, M. (2002). *Ontario Divisional Court Upholds Municipality's Authority to Place Zoning By – Law Cap on Livestock*. Accessed: July 1, 2002. Available at: www.mountain mitchell.com/What'sNew.htm

OMAFRA. (1998). *Knip vs. The Corporation of the Township of Biddulph*. Canada: Accessed July 9, 2002. Available: www.gov.on.ca/OMAFRA/english/engineer/nfppb-decisions.htm

OMAFRA. (2001). *Jansen vs. The Corporation of the Township of Adelaide – Metcalfe*. Canada: OMAFRA. Accessed July 9, 2002. Available: www.gov.on.ca/OMAFRA/english/engineer/nfppb-decisions.htm

Toombs, Michael. (1996a). *Cultivating Farm, Neighbour, and Community Relations.* Proceedings from the Animal Agriculture and the Environment North American Conference. New York.

Toombs, Michael. (1996b). *Mediation and Agricultural Conflicts*. Proceedings from The Animal Agriculture and the Environment North American Conference. New York.

Toombs, Michael. (1996c*). Right To Farm Provincial Experiences*. Proceedings from The Animal Agriculture and the Environment North American Conference. New York.

Toombs, Michael. (1996d). *Overview of Right to Farm Legislation in North America*. Proceedings from the Animal Agriculture and the Environment North American Conference. New York.

Toombs, Michael. (2002). *Personal Interview*. Director. Client Services: Agriculture And Rural Division. Ontario Ministry of Agriculture, Food and Rural Affairs. Canada: July 19, 2002

Turvey, John. (2002). *Personal Interview*. Land Use Planner: Southwestern Ontario Division. Ontario Ministry of Agriculture, Food and Rural Affairs. Canada: July 17, 2002.