

TO: The Mayor and Councillors  
Corporation of the Township of Uxbridge  
51 Toronto Street South  
P.O. Box 190  
Uxbridge, Ontario  
L9P 1T1

March 27, 2019

CC: Debbie Leroux, Director of Legislative Services

SUBJECT: Grainboys Zoning Application: Grain & Seed Sources – Major Inconsistencies

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Dear Mayor and Council:

I am writing to document concerns with Major Inconsistencies in the source of grains and seeds that are proposed to be processed at the Grainboys Industrial Milling Operation in the Zoning Application. I believe this has been brought to Council's attention before as a concern, but may have lost focus as an item, given the vast number of reports and extensive public response on a number of other concerns.

I am not a weed expert, but I understand that noxious weed contamination is a clear and present danger to our Community and Wellbeing as confirmed by the Weed Specialist from the Ministry of Agriculture, Food and Rural Affairs as a legitimate concern in the Planner's Final Report to Council (page D-5).

I believe the resident's concerns are most sensitive to imported grains and seeds, especially from 3<sup>rd</sup> world countries. Processing and cleaning standards are anticipated to not be as high as in North America. These foreign countries are also host to weeds that are not native to North America. Grains and seeds from Ontario, the rest of Canada, and the US are likely to much less of a concern. (Ontario history is full of examples of damaging, non-native invading species such as Ash Beetle, Zebra Mussels, Japanese Beetle, Asian Carps, etc).

This is why I believe it is imperative that Council be accurately informed, and for the Public Record, precisely what is the Grain & Seed source that the Applicant is bringing to our town. To date, I don't believe that has been reliably disclosed. On the contrary there have been Major Inconsistencies in the Grain & Seeds source and amounts.

Below is a timeline of documents – all posted on Township's web-site. It is not clear if only the grains are local and the seeds are all imported. It's not clear if the seeds are a percentage of the total tonnage, or not. The Applicant and the Planner have made no mention of foreign country sources outside of North America. What is clear, is that it is all confusing.

**TIMELINE:**

**i) April 2018: Planning Justification Report**

Page 1:

*“Approximately **80 % of the grain** is supplied from the grain producing Counties and Regions in Ontario including Durham Region.” - Grainboys*

**ii) June 25, 2018, Town of Uxbridge Council Agenda:**

Page 289:

*“According to Industry Canada’s Importer Database, **Port Royal Mills is listed as a “major Canadian Importer” for six grain-related** Harmonized System codes...” – Conrad Richter*

**iii) Feb 14, 2019: Grainboys Holdings Inc, Response to Public Comments (1)**

Page 3:

*“GRAIN SOURCE – MILLING GRAINS ARE FROM CANADA ONLY. NO IMPORTED GRAINS. **10% OF SEEDS ARE IMPORTED**” -Grainboys*

**iv) March 21, 2019 Grainboys Holdings Inc, Response to Public Comments (3)**

Page 1:

*“In response to concerns expressed regarding benefits to local agriculture, Port Royal Mills reviewed the origin of milled **grains and seeds**: • Ontario 70%; Manitoba and Saskatchewan; 20 % ; and U S A 10 %” - Grainboys*

Page 8:

*“The seeds from **foreign sources** such as rice that is milled into meal or flour is no risk. The other seeds such as sunflower, sesame, poppy and quinoa are used internally in blends with no possible risk of exiting the facility in anyway whatsoever even if they were contained in said products.” - Grainboys*

Page 9:

*“GRAIN SOURCE CLARIFICATION **Grains used and milled in the facility are from Canada only no imported grains. Imported products consist of seeds only** and are used in blending directly from the bag to the blender” - Grainboys*

**v) April 8, 2019: Report DS-17/19 - Elizabeth Howson, Macaulay Shiomi Howson Ltd. - Final Report**

Page 10:

*“The Applicant has further advised that “Milling grains are from Canada only. **No imported grains. 10% of seeds are imported for blending use**”” – Liz Howson*

Page D-6:

*"It should also be noted that the applicant has advised that the origin of the milled grains and seeds is: • Ontario 70%; • Manitoba and Saskatchewan 20%; and, • U.S.A. 10%" – Liz Howson*

Page D-11: Page D:12

*"Milling grains are from Canada only. No imported grains. 10% of seeds are imported for blending use...." – Liz Howson*

Additional inconsistencies present themselves when we reference the Government of Canada, Industry Canada: Canadian Importers Database. This details all Major Importers of products in to Canada (major being defined as the top importers making up 80% of the total tonnage/dollar value of the imports). Grainboys (aka Port Royal Mills) appears as a Major Importer of six related grain and seed products:

1. Poppy Seeds: Total Cdn Imports: \$3.1M; Port Royal Mills is a Top 10 Importer  
<https://www.ic.gc.ca/app/scr/ic/sbms/cid/productReport.html?hsCode=120791>

2. Sunflower Seeds: Total Cdn Imports: \$35.5M; Port Royal Mills is a Top 32 Importer  
<https://www.ic.gc.ca/app/scr/ic/sbms/cid/productReport.html?hsCode=120600>

3. Millet Total Cdn Imports: \$0.3M; Port Royal Mills is a Top 24 Importer  
<https://www.ic.gc.ca/app/scr/ic/sbms/cid/productReport.html?hsCode=100829>

4. Sesame Seeds: Total Cdn Imports: \$16.8; Port Royal Mills is a Top 21 Importer  
<https://www.ic.gc.ca/app/scr/ic/sbms/cid/productReport.html?hsCode=120740>

5. Un-milled Cereals: Total Cdn Imports: \$4.9M; Port Royal Mills is a Top 13 Importer  
<https://www.ic.gc.ca/app/scr/ic/sbms/cid/productReport.html?hsCode=100890>

6. Other Vegetable: Total Cdn Imports: \$10.7M; Port Royal Mills is a Top 24 Importer  
<https://www.ic.gc.ca/app/scr/ic/sbms/cid/productReport.html?hsCode=100890>

Of special note, some seeds such as Poppy (illegal) and Sesame are not grown in North America at all. Therefore, there must be a component that *is* imported from overseas in the planned operations of the proposed mill.

I believe it is incumbent on Council to clear up these Major Inconsistencies on the Grain and Seeds sources, and bring truth and clarity to the record. We now know this is a material consideration in the decision to approve the application as a local Weed Inspector was made mandatory in the Planner's final report as a condition of zoning approval.

If a Weed Inspector is required to ensure the mill operation "(a) are directly related to, and compatible with, farm operations in the surrounding area and do not hinder those farm operations" per the ORMCP, then the public and farmers must know what is the true risk and impact is to our Greenspace.

I therefore ask Council to determine, and make public, a Consistent, Verifiable & Full Accounting of the sources and percentages by tonnage of all seeds and grains to be processed at the proposed mill. We cannot decide on what we do not know. We cannot manage what we do not understand.

Regards,

David O'Leary  
Hamlet of Goodwood, ON  
647-722-5428