



Ontario Federation of Agriculture

Ontario AgriCentre

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December 6, 2016

Ms. Arielle Mayer, Senior Policy Advisor
Ministry of Transportation
777 Bay Street, Suite 3000
Toronto, ON
M7A 1J8

Dear Ms. Mayer;

RE: EBR Registry Number 012-8680 Third Party Advertising Along Provincial Highways

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

OFA appreciates MTO's outreach for feedback on ways to improve its current Corridor Signing Policy. Such outreach is prudent before intensifying the Ministry's efforts to enforce the Policy.

As noted in the posting, the Policy provides a set of guidelines, which regulate the placement of signs adjacent to provincial highways across the province. This policy covers a variety of signs including: location, temporary (e.g. election signs, special event signs) and billboards.

The Policy objective is to balance the potential for advertisement opportunities with driver distraction, aesthetic and environmental considerations, and the nature and location of appropriate advertising displays.

OFA encourages MTO take the opportunity to better align this Policy with Ontario's Local Food Strategy. Roadside signs play a key role in helping consumers become aware of the local food available to them.

However, we note that before important revisions to the Corridor Signing Policy can be made, amendments to Section 34 of the Public Transportation and Highway Improvement Act are required.

Section 34(1) defines an "agricultural product" as meaning an agricultural product that is not edible, an agricultural food product or a food product that is processed on a farm in Ontario from an agricultural food product.

Including the words "agricultural" and "product" in the definition of an "agricultural product" offers little insight into what is meant. A better definition would align with other existing definitions. For

example, the Farm Products Marketing Act includes a definition of “farm product” as meaning “animals, meats, eggs, poultry, wool, dairy products, grains, seeds, fruit, fruit products, vegetables, vegetable products, maple products, honey, tobacco, wood, or any class or part of any such product, and articles of food or drink manufactured or derived in whole or in part from any such product, and such other natural products of agriculture as are designated in the regulations, and, for the purposes of this Act, fish shall be deemed to be a farm product”.

Section 34(2) permits, under specified conditions, signs displaying directions to a place where agricultural products produced in Ontario, other than tobacco, are offered for sale or information about the sale.

Restricting the size of these signs to not more than 122 centimetres by 122 centimeters for two-sided signs, or not more than 122 centimetres by 244 centimetres for one single-sided signs, needs to be revisited. Smaller signs may be harder for drivers to read and may cause more driver distraction than larger, easier to read, signs.

The condition that signs be displayed on premises zoned for agricultural uses, should also be revisited. OFA would suggest that the wording needs to be expanded to include lands not only zoned for agricultural activities but also lands currently used for agricultural activities. Municipal land-use zoning may change long before non-farm development occurs. In many cases, the time between a zoning change and development occurring can extend to a decade or more. Farmers should be encouraged to carry on their on-farm sale of farm products, instead of preventing them from continuing their business by denying them signage due to a municipal land-use zoning change. OFA recommends that farm product signage be permitted for regardless of the municipal land-use zoning applied to the premises.

In closing, OFA welcomes the opportunity to provide our recommendations on how roadside farm and agricultural product signage could be enhanced to support Ontario’s Local Food Strategy objectives. We look forward to working with MTO and OMAFRA to ensure the drafting of a Bill to amend the Public Transportation and Highway Improvement Act provides for the needed changes.

Sincerely,



Keith Currie
President

cc: Hon. Steven Del Duca; Minister of Transportation
Hon. Jeff Leal; Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors