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Federation of  
Agriculture

**July 31, 2017.**

Jim Clark  
Interim Chair  
Ontario Farm Products Marketing Commission  
1 Stone Road W,  
Guelph, ON N1G 4Y2  
Fax: 519-826-3400

Dear Mr. Clark,

**Re: Proposal #17-MAFRA002 - Proposed Amendments to R.R.O. 1990, Regulation 441 (Vegetables for Processing - Plan) and minor consequential amendments to R.R.O. 1990, Regulation 400 (By-laws for Local Boards) under the Farm Products Marketing Act.**

The three accredited general farm organizations, the Christian Farmers Federation of Ontario (CFFO), the National Farmers Union – Ontario (NFU-O), and the Ontario Federation of Agriculture (OFA) are pleased to come together to provide our advice regarding the proposed amendments which proposes changes to the governance structure of the Ontario Processing Vegetable Growers.

The CFFO is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario. The CFFO is a professional organization for families called to the vocation of farming. The CFFO values family farm enterprise, profitability, and responsible stewardship of resources. CFFO policy promotes economically, socially and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The NFU-O believes agriculture should be environmentally, socially and economically sustainable. On local, provincial, national and international levels, the NFU-O, alongside like-minded organizations, advocates for alternative structures and government policies that resist corporate control of food. The NFU-O promotes vibrant rural communities, the production of safe, wholesome food and biodiverse natural ecosystems.

OFA is the largest voluntary, general farm organization in Canada, representing over 36,000 farm families across Ontario. As a dynamic farmer-led organization based in Guelph, Ontario, OFA works to represent and champion the interests of Ontario farmers through government relations, farm policy recommendations, lobby efforts, community representation, media relations and more.

Although the Farm Products Marketing Commission (the Commission) does not delegate powers to or make regulations affecting our three organizations, we represent the interests of the approximately 400 Ontario farmers who grow processing vegetables. In our view, it is



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those approximately 400 Ontario processing vegetable growers who should be engaged and consulted regarding amendments to O. Reg. 441 and 400.

As you know, in the Directive issued in 2016 (<http://www.omafra.gov.on.ca/english/farmproducts/fpmc-letter.htm>), the Minister directed the Commission to: “Develop a plan for engagement and consultation with interested parties and stakeholders (emphasis added) concerning any proposed amendments to the regulatory framework for the vegetables for processing industry.”

It is our view that the Ministerial directive clearly indicates a need to consult with the growers. There is no question that the growers fit the bill of “interested stakeholders.”

Our organizations qualify as “interested parties” and have certain views on the appropriate governance model for a grower organization. The model proposed is, in our view, not a good governance model for a number of reasons.

However, we believe that a direct plan for engagement and consultation with the affected growers regarding the proposed amendments to O. Reg. 441 and 400 is necessary. We propose that the Commission hold a plebiscite of producers to determine whether growers are in favour of these amendments.

We thank you for this opportunity to provide our input.

Sincerely,

Clarence Nywening, President  
Christian Farmers Federation of Ontario

Emery Huszka, President  
National Farmers Union - Ontario

Keith Currie, President  
Ontario Federation of Agriculture

cc: Hon. Jeff Leal, Minister, OMAFRA