



Ontario Federation of Agriculture

Ontario AgriCentre

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June 8, 2017

Hon. Jeff Leal
Minister of Agriculture, Food and Rural Affairs
77 Greenville Street, 11th Floor
Toronto, ON
M7A 1B3

Via email: minister.omafra@ontario.ca

Dear Minister:

RE: Farm Business Registration fee increase request

The Ontario Federation of Agriculture (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. OFA is the leading advocate and voice for Ontario farmers.

As you know, on October 5, 2016, the OFA and the other two accredited general farm organizations submitted our joint proposal for an increase in the Farm Business Registration Fee to take effect January 1, 2018. Implementation of this fee increase proposal requires your leadership given this fee is set in regulation as per the *Farm Registration and Farm Organizations Funding Act, 1993*.

Since our previous submission, OFA's Budget Committee has met to develop the 2018 budget for our next fiscal year (commencing Sep 1, 2017). Based on those Committee discussions, we have refreshed the financial projections provided in October 2016. We are more optimistic that OFA membership numbers will remain strong in 2018. Unfortunately, expenses are now forecasted to be higher than originally anticipated. As a result, we remain very committed to the FBR fee increase taking effect January 1, 2018.

OFA requested letters of support for a fee increase from our local branches. We have received letters from 39 county federations to date, of which 37 communicated their full support for the increase, representing 87% of our membership. Two have responded unsupportive, representing 3% of our membership. We are following for responses from the remaining 13 county federations, representing 10% of our membership.

For your information, we have enclosed the following:

1. October 5, 2016 joint submission;
2. Supplementary OFA answers to questions posed by OMAFRA;
3. Refreshed OFA financial projections; and
4. List of local branches providing their support along with sample letters.

Farms and Food Forever

We thank you in advance for your decisive leadership with respect to our Farm Business Registration fee increase request.

Sincerely,



Keith Currie
President

Enclosures (4)

cc: Greg Meredith, Deputy Minister, OMAFRA
Phil Malcolmson, Assistant Deputy Director, Policy Division, OMAFRA
OFA Board of Directors



Ontario Federation of Agriculture



National
Farmers
Union
Ontario

October 5, 2016

Hon. Jeff Leal, MPP
Minister of Agriculture, Food and Rural Affairs
11th Floor, 77 Grenville Street
Toronto, ON M7A 1B3

Via email: minister.omafra@ontario.ca

Dear Minister:

The three ACCREDITED Farm Organizations respectfully submit our proposal for an increase in the Farm Business Registration Fee. As you know, the fee is set in regulation as per the *Farm Registration and Farm Organizations Funding Act, 1993*.

Our organizations have met with OMAFRA staff to discuss the fee setting process and have developed a unique proposal for a "stepped" fee commencing January, 2018. The stepped fee addresses a number of concerns of members and our organizations, providing a predictable and prudent level of funding for the next several years.

We are developing and will soon deliver a comprehensive communications program to explain the fee proposal to our respective memberships to ensure Ontario farmers support this undertaking.

We trust you will find the proposal and related issues raised to be clear and concise. We look forward to working with you and Ministry staff to realize our fee increase effective January, 2018.

Sincerely,

Don McCabe
OFA President

Clarence Nywening, President
Christian Farmers Federation of Ontario

Emery Huszka, President
National Farmers' Union (Ontario)

Enclosures (2)

cc: David Haggarty, Ontario Ministry of Agriculture, Food and Rural Affairs

Proposal to Seek an Increase in the Farm Business Registration Fee

From

Ontario's Accredited Farm Organizations

Background:

Ontario's three Accredited Farm Organizations (AFOs): the Christian Farmers Federation of Ontario (CFFO), the National Farmers' Union – Ontario (NFUO) and the Ontario Federation of Agriculture (OFA) are granted accreditation with accompanying obligations and authorities under the *Farm Registration and Farm Organizations Funding Act, 1993*.

Of particular importance is the legislative requirement that farming businesses, registering as required by the Act, are also obliged to provide payment of an amount prescribed in regulation to an accredited farm organization (the Farm Business Registration (FBR) fee, or the "fee"). The fee constitutes a "supporter" payment which can be a membership payment on the request of the farming business.

The fee represents the primary and majority source of funding for each of the three accredited farm organizations. The value of the fee is set in regulation as prescribed by the Act. Historically, Section 3.(2) of O. Reg. 723/93 established the amount of the payment to be provided to the Ministry at \$150. On January 1, 2010, subsection (2) was amended by striking out "\$150" and substituting "\$195".

The fee has remained at the \$195 amount since this 2010 amendment.

The three AFOs collaboratively identified the rationale for the 2010 fee increase and collectively developed and implemented a communications strategy to advise members of the proposed change, inform members of the need for the change and solicited their support for the higher fee. The communications strategy proved effective and the new fee was established via regulatory amendment.

FBR Fee Proposal:

The three AFOs have again identified a need to establish a new fee in regulation. Allowing for sufficient time for another communications strategy and enabling the regulatory process to flow, the AFOs propose that:

Ontario's O.Reg. 723/93, Section 3.(2) be amended to enable a stepped fee increase so that the FBR fee will be \$225 effective January 1, 2018; \$240 effective January 1, 2020 and \$255 effective January 1, 2022.

A Stepped Fee:

The novelty of the above request is the proposal for a “stepped” fee increase. Traditionally, a single fee value is in the regulation. Given that the fee is in regulation, fee increases are only undertaken periodically. The change from \$150 to \$195 in 2010 was in process for several years before the amendment was in force. The time required to secure the necessary regulatory change and the unwillingness on the part of AFOs and perhaps of government to commit to frequent regulatory changes to revise the fee means the fee must be established at a level sufficient to sustain the AFOs for several years.

While the future membership levels and necessary expenditures are not certain, the AFOs have generally sought fee increases that are predicted to last 8 to 10 years.

This practice necessitates a relatively large increase – certainly much higher than a current inflation rate. Consequently, the membership may suffer “sticker shock” when informed of a significant increase in the fee.

Further, the larger increase in the fee over several years requires that the AFOs budget surpluses in the first half of the period (say 4 or 5 years), followed by deficits in the latter half of the period as surplus accumulated funds are depleted.

This process is not well understood and may be perceived as irregular by members. The notion of carrying deficit budgets for several years while depleting surpluses is not a preferred practice of any Board of Directors. As such it presents challenges to current and future Boards of Directors and the perception of their fiduciary responsibilities.

A relatively simple solution is proposed to address these issues. Although the fee must be prescribed in Regulation there are no conditions or terms on what fee can be prescribed.

Consequently, the Regulation is able to prescribe a chronologically varying fee that steps up in value according to a prescribed schedule.

In this case, the AFOs propose that the fee be established in regulation as follows:

- \$225 effective January 1, 2018;
- \$240 effective January 1, 2020; and
- \$255 effective January 1, 2022

Rationale:

The attached spreadsheets demonstrate the effect of this stepped fee increase through 2025. As can be seen, the fee increase immediately precipitates a projected budget surplus. This surplus is significantly smaller than would be the case with a higher fee. The phenomenon noted above is also demonstrated, whereby the surplus balance declines in subsequent years, necessitating another smaller fee increase to avoid deficits – in this case in the years 2020 and 2022.

The spreadsheets use averaged estimates of declines in membership levels (1% per year) and inflation impacts (2% per year). This does not account for extraordinary circumstances such as a catastrophic drop in membership. We believe the risk of such an event is minimal. Clearly,

though, in such an event and for years beyond 2024 another fee increase must be set in regulation.

The scenarios presented also use the assumption that the fee paid to Agricorp for administering the Farm Business Registration process remains at \$8.90 per registering farm business. This fee was established in 2003 and has not changed. Any change in this value can have a significant impact on net revenue from the FBR fee. Consequently, if the Agricorp administrative fee is changed the AFOs must have the right to amend this fee request accordingly.

Also relevant to the level of the fee is the issue of the refund process (see below: The Refund Process). AFOs are obliged to provide refunds, in full, to any request filed by a registered farming business within 90 days of the issuance of renewal notices. This is a costly administrative function exacerbated by the additional cost of the Agricorp fee of \$8.90 per refund for which there is no revenue.

One of our obligations under Act in seeking accreditation as an AFO is to appear before the Farm Organizations Accreditation Tribunal every three years to demonstrate that we meet or exceed the accreditation criteria.

Amongst other criteria, the regulations stipulate that we must demonstrate the following:

- Our purpose is to represent farm businesses
- We provide training and education on agricultural matters
- Individual members have the right to make submissions
- We provide analysis and advice to governments concerning agricultural issues and on programs or policies of interest to farmers

In addition, AFOs must file audited financial statements with the Tribunal. The information provided to the Tribunal in 2015 for these purposes is available and will be supplied on request. The submissions made will clearly demonstrate the use of the available funds in the service to supporters, members and government.

Communication with Members:

The AFOs believe it is our responsibility to educate and inform members of the proposed fee increase. We also believe it is our responsibility to secure a broad consensus across farm members for the proposed fee increase. Clearly, a matter as fundamental as an organizational fee must reflect the will of the membership.

As before, we intend to develop and execute a comprehensive information campaign about the fee increase – the process, the when and the why. We will explain the rationale for the stepped fee and rationalize the values of the fee by disclosing our projected budgets.

We know that members value the work that we do on their behalf. We can justify value for the current fee of \$195 and will validate the proposed fee increases.

The process has already begun, although not definitively. OFA announced at its Annual General Meeting in November, 2015 that we would be seeking a fee increase. Feedback to date suggests

it was expected and not unwelcomed as members recognize the fact of declining memberships against inflation and see value for money.

Our communications initiatives beginning September, 2017 and running through 2017 will include:

- Print ads in farm media steering members to respective websites for details
- Social media communications
- Member feedback surveys
- Regional meetings
- Comprehensive review at next AGM

Feedback from members will be solicited and compiled. It will be used to adapt the communication messages as needed throughout the campaign.

The Refund Process:

The Act establishes in s. 21(7) that any registering farm business is able to request a refund of the fee within the prescribed time. The prescribed time is within 90 days of the Farm Business Registration deadline. Typically, this is the end of May.

On written request from a registered farm business, each AFO is obligated to process and send a refund in the full amount of the fee (currently \$195). The processing and mailing cost for each refund is estimated at approximately \$20. The breakdown is as follows:

- Agricorp fee \$8.90
- Handling \$11.00

The handling portion, for OFA, includes:

- Staff – receiving, processing and sending mail \$6,400
- Accounting and cheque run \$2,000
- Phone calls \$2,000
- Materials costs and storage \$3,500
- Bank costs \$2,000

The respective refund rates and total costs of providing refunds for the 2016 FBR year are:

CFFO	5.9%	\$ 4,000
NFUO	1.8%	\$ 540
OFA	3.8%	\$28,940

These costs must be borne by those farm businesses that remain as supporters or members in the AFOs. It is important to note that the refunding farm businesses enjoy the same rights and privileges as any other registered farm business, excepting those member benefits offered by the AFOs.

For example, refunding farm businesses remain eligible to apply for funding under the Environmental Farm Plan program – a program developed by (and until recently administered by) the AFOs. Generally, the mandatory full refund process enables farm businesses to free-ride the FBR system, taking advantage of the work of the AFOs on behalf of farmers in Ontario.

It is not unusual for businesses seeking refunds in other areas of the economy to be charged an administrative or refund processing fee. The cost of providing a refund is acknowledged in this non-refundable portion of the original payment. Providing this is known in advance, it is common practice and not deemed improper if the amount is reasonable and justifiable.

Consequently, the AFOs propose that the government of Ontario consider ways and means of imposing an administrative fee on refunds of the FBR fee as a “non-refundable” portion of the fee. We recommend this non-refundable amount be \$20.

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ONTARIO FEDERATION OF AGRICULTURE
STATEMENT OF INCOME AND EXPENSES
5 YEAR PROJECTION BASED UPON BUDGET 2017
SUMMARY

NEW FEE STARTS JANUARY 2018
AGRICORP CONSTANT at \$8.90

FBR fee	\$225	\$225	\$240	\$240	\$255	\$255	\$255	\$255
Net change	\$24.93	\$24.93	\$37.40	\$37.40	\$49.87	\$49.87	\$49.87	\$49.87

BUDGET	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE
2016	2017	2018	2019	2020	2021	2022	2023	2024	2025

1 % annual decrease in membership
2% annual inflation on expenses

NET FBR	36,200	36,300	35,937	35,578	35,222	34,870	34,521	34,176	33,834	33,496
INCOME	8,291,500	8,088,500	8,017,715	7,947,638	7,878,261	7,809,579	7,741,583	7,674,267	7,607,625	7,541,648
EXPENSES	8,287,200	8,419,000	8,587,380	8,759,128	8,934,310	9,112,996	9,295,256	9,481,161	9,670,785	9,864,200
SURPLUS	\$4,300	(\$330,500)	(\$569,665)	(\$811,490)	(\$1,056,049)	(\$1,303,417)	(\$1,553,673)	(\$1,806,894)	(\$2,063,160)	(\$2,322,552)
Net additional income due to fee increase	0	0	896,075	887,115	1,317,365	1,304,191	1,721,533	1,704,317	1,687,274	1,670,401
Surplus after increase	326,410	75,625	261,316	774	167,859	(102,577)	(375,886)	(652,151)		
Accumulated funds from increases	402,035	663,351	664,125	831,985	729,408	353,522	(298,629)			

FBR Fee Increase Additional Information from OFA

What impact will these changes have on young/new farmers joining your organizations? Would a fee increase disproportionately impact them?

With greater information and networking needs, beginning farmers benefit most from belonging to an adequately-funded general farm organization. The proposed modest stepped FBR fee increases will ensure OFA can continue to:

- inform members about government programs and regulations affecting their farm businesses;
- provide networking opportunities with fellow OFA members;
- facilitate the sharing of knowledge and advice on issues affecting our farm community; and
- provide access to OFA's Member Service Representatives for assistance on farm-related concerns.

What is the cost-benefit of the increase to members? Do producers get additional services with their higher membership fees? Will the fee increase expand services or maintain existing service levels?

The proposed modest stepped increases in the FBR fee will enable OFA to maintain existing service levels. FBR fees represent OFA's main source of funding used to finance the organization's activities. OFA continually evaluates the effectiveness of its activities and cost-effective ways to deliver those activities. Rising costs, including the accelerating pace of EBR work and communication requirements, has put the OFA's 2017 fiscal budget (for the year ending August 31, 2017) in a deficit position in the amount of \$330,500.

What are the implications for members/services, if the fee increase were not to move forward?

OFA provides many member services and contributes and engages in various activities for the greater good of Ontario agriculture. The proposed modest stepped increases in the FBR fee is needed to maintain existing OFA services and activities. In fact, the cost of existing services and activities already exceeds OFA's annual revenues. OFA's 2017 fiscal budget (for the year ending August 31, 2017) is in a deficit position in the amount of \$330,500. Should a fee increase not materialize, OFA will need to take immediate measures to balance its budget by reducing OFA activities and potentially, staff levels.

OFA can look to other smaller general farm organizations in Ontario and across Canada as to what activities and expenditures could be eliminated or reduced. One likely result would be less OFA direct and/or in-kind support contributed towards joint projects, coalitions, and other organizations. Some examples of important contributions OFA makes currently include: a \$5,000 contribution to a farmer mental health U of Guelph project, office space and supplies to Junior Farmers of Ontario, an annual \$30,000 contribution to Farm and Food Care, and

FBR Fee Increase Additional Information from OFA

provision of policy research assistance/presentations to various commodity and farm groups upon request.

The provision of many OFA services and activities requires OFA staff time. A smaller OFA budget would likely necessitate reducing the OFA staff complement. Two main consequences of less staff resources will be reduced member support/services and future OFA policy positions will be developed without the same level of technical advice and input on members' perspectives. During 2016, OFA staff reviewed 130 government proposals and drafted 60 submissions requested by government. OFA would be forced to scale back this work should the OFA staff complement be reduced, thereby providing significantly less service to members.

How many memberships were refunded over the last 5 years per AFO?

Year	2016	2015	2014	2013	2012
Gross FBR	38,116	37,929	38,368	39,575	37,106
Less Refunds	1,353	1,447	1,714	2,360	1,780
Net FBR	36,763	36,482	36,654	37,215	35,326
Refund Rate	3.55%	3.82%	4.47%	5.96%	4.80%

Note: 2012 Gross FBR number was lower given farm businesses were unable to register after all AFOs lost accreditation. Only OFA and CFFO were accredited for the 2013 FBR registration period.

Has the UCFO been engaged or informed of the changes being proposed by your organizations?

An increased fee will directly benefit UCFO. Like the other AFOs, OFA pays to the UCFO a sum of money equivalent to 1.5% of gross revenue, net of HST and net of refunds from payments, received from all farming businesses. OFA has a collaborative relationship with UCFO, most recently engaging UCFO and its members in OFA member surveys.

Although OFA has not directly corresponded with UCFO on this matter, it is reasonable to assume UCFO would respond favourably to a provincial regulatory posting proposing to amend O.Reg. 723/93 to provide for modest stepped increases in the FBR fee.

To date, what have been members' reactions to the proposed fee increase? If organizations have not formally engaged members, please confirm plans to do so.

In the past, OFA Convention Delegates have raised concerns over the financial sustainability of the OFA. The intention to seek a fee increase was announced at the 2015 Convention during the discussion on the motion to accept the financial statements (<http://ofa.on.ca/agm-webcast->

**FBR Fee Increase
Additional Information from OFA**

2015-day1-morning; time 55:50). The issue was noted at our Fall Policy Advisory Council meetings to a favourable reaction and was not raised as a concern of the delegates at the 2016 AGM.

Any other information that AFOs feel would be relevant to support the business case for the fee increase.

OFA appreciates the opportunity to pursue the stepped fee increase as it addresses a number of concerns with periodic regulated fee changes. We feel OMAFRA has adequate information to proceed with a provincial regulatory posting proposing to amend O.Reg. 723/93 to provide for modest stepped increases in the FBR fee as outlined in the OFA/CFFO/NFU-O joint letter dated October 5, 2016 addressed to Minister Leal. Time is of the essence to ensure the first increase in the fee is implemented on January 1, 2018. Therefore, OFA asks that OMAFRA communicate any additional information requests it may have as soon as possible.

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NEW FEE STARTS JANUARY 2018

ONTARIO FEDERATION OF AGRICULTURE STATEMENT OF INCOME AND EXPENSES 5 YEAR PROJECTION BASED UPON BUDGET 2018 SUMMARY

FBR fee	\$225	\$225	\$235	\$235	\$250	\$250	\$250	\$250	\$250
Net change	24.93	24.93	33.25	33.25	45.71	45.71	45.71	45.71	45.71
BUDGET 2017	ESTIMATE 2018	ESTIMATE 2019	ESTIMATE 2020	ESTIMATE 2021	ESTIMATE 2022	ESTIMATE 2023	ESTIMATE 2024	ESTIMATE 2025	ESTIMATE 2026

1 % annual decrease in membership
2% annual inflation on expenses

NET FBR INCOME	36,300	36,600	36,234	35,872	35,513	35,158	34,806	34,458	34,114	33,772
EXPENSES	8,088,500	8,242,500	8,160,075	8,078,474	7,997,690	7,917,713	7,838,535	7,760,150	7,682,549	7,605,723
SURPLUS	8,419,000	8,694,000	8,867,880	9,045,238	9,226,142	9,410,665	9,598,879	9,790,856	9,986,673	10,186,407
Net additional income due to fee increase	0	912,607	903,481	1,192,595	1,180,669	1,607,064	1,590,993	1,575,083	1,559,332	1,543,739
Surplus after increase	\$130,607	195,676	225,831	(47,784)	114,111	(\$169,350)	(\$455,623)	(\$744,792)	(\$1,036,945)	
Accumulated funds from increases		326,283	552,114	504,330	618,441	449,091	(\$6,532)	(\$751,324)	(\$1,788,268)	

	Dec 31 2016 FBR	Yes	No	Yes	No				
Algoma	153								
Amprior	278	278		1					
Brant	582		582		1				
Bruce	1,429	1,429		1					
Cochrane	93	93		1					
Dufferin	548	548		1					
Dundas	431	431		1					
Durham	1,074	1,074		1					
Elgin	1,104	1,104		1					
Essex	1,373	1,373		1					
Frontenac	349		349		1				
Glengarry	460	460		1					
Grenville	231	231		1					
Grey	1,438	1,438		1					
Halimand	625	625		1					
Hallon	346								
Hamilton-Wentworth	547	547		1					
Hastings	627								
Huron	1,971	1,971		1					
Kenora / Dryden	23								
Kent	1,897	1,897		1					
Lambton	1,841	1,841		1					
Lanark	403	403		1					
Leeds	450	450		1					
Lennox & Addington	346								
Manitoulin / Sud West	178								
Middlesex	1,872	1,872		1					
Muskoka	51								
Niagara North	1,002	1,002		1					
Niagara South	329	329		1					
Norfolk	1,154	1,154		1					
Northumberland	744								
Ottawa	648	648		1					
Oxford	1,415	1,415		1					
Parry Sound/Nip East	167	167		1					
Peel	360	360		1					
Perth	1,700	1,700		1					
Peterborough	673	673		1					
Prescott	515	515		1					
Prince Edward	308								
Rainy River	145								
Renfrew	569	569		1					
Russell	289								
Simcoe	1,510	1,510		1					
Stomont	337								
Sudbury East/ Nip West	195								
Temiskaming	256	256		1					
Thunder Bay	96	96		1					
Victoria - Haliburton	873	873		1					
Waterloo	748	748		1					
Wellington	1,378	1,378		1					
York	632	632		1		outstanding			
	36,763	32,090	931	37	2	13			
		87%	3%						



To: The Ontario Federation of Agriculture

Date: April 1, 2017

The Leeds County Federation of Agriculture has reviewed the proposal of the Ontario Federation of Agriculture for a stepped increase in the Farm Business Registration fee, commencing January, 2018.

We understand and agree that the fee increase is necessary to maintain services to farm family members across Ontario, which includes financial support for our own efforts on behalf of farmers in Leeds County.

We appreciate the stepped fee approach as a new way to sustain adequate financial resources without a large, onetime fee increase that may be less acceptable to farm members. We agree with this approach.

Leeds federation looks forward to continuing our work with OFA on behalf of farmers, knowing that the organization will be financially stable with the new stepped fee increase.

Sincerely,

Kim Systma
LCFA President

Farmers working for Farmers

Ontario Federation of Agriculture
Ontario AgriCentre
100 Stone Road West
Suite 206
Guelph, ON N1G 5L3



Tuesday April 11th, 2017

Re: Farm Business Registration Fee

The Middlesex Federation of Agriculture has reviewed the proposal of the Ontario Federation of Agriculture for a stepped increase in the Farm Business Registration fee, commencing January, 2018.

We understand and agree that the fee increase is necessary to maintain services to farm family members across Ontario, which includes financial support for our own efforts on behalf of farmers in Middlesex County.

We appreciate the stepped fee approach as a new way to sustain adequate financial resources without a large, onetime fee increase that may be less acceptable to farm members. We agree with this approach.

The Middlesex Federation of Agriculture looks forward to continuing or work with OFA on behalf of farmers, knowing that the organization will be financially stable with the new stepped fee increase.

Sincerely,

David Bolton, President
Middlesex Federation of Agriculture

DB:ll

633-4 Lions Park Drive, Mt. Brydges, ON N0M 1W0 (519) 264-9812 mfa4h@bellnet.ca

If you ate today, thank a farmer. If you are a farmer, thank you!



To: The Ontario Federation of Agriculture

Date: April 24, 2017

The directors of the Niagara North Federation of Agriculture have reviewed the proposal of the Ontario Federation of Agriculture for a stepped increase in the Farm Business Registration fee, commencing January, 2018.

We understand and agree that the fee increase is necessary to maintain services to farm family members across Ontario. This increase will include continued financial support at a rate of 25% per farm family registration for our own efforts on behalf of our farmer members in Niagara North. Niagara North works very hard to educate consumers and politicians on the importance of the agriculture industry in Ontario. We also provide educational programs for our members and support those who are faced with regulatory challenges.

We appreciate and agree with the stepped fee approach as a new way to sustain adequate financial resources without a large, onetime fee increase that may be less acceptable to farm members.

Niagara North looks forward to continuing our work with OFA on behalf of farmers, knowing that the organization will be financially stable with the new stepped fee increase.

Sincerely,

Robert Bator
President