



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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September 5, 2018

The Honourable Laurie Scott  
Minister of Labour  
Ontario Ministry of Labour  
400 University Avenue, 14th Floor  
Toronto ON  
M7A 1T7

**VIA email**

Dear Minister Scott,

The Ontario Federation of Agriculture (OFA) once again congratulates you on your appointment as Minister of Labour. We believe that together we can accomplish much to make our farming and food sector a driving force in a vibrant Ontario economy.

Labour is a significant issue for our farm families. The nature of farming presents a whole host of workplace circumstances that are not seen in the manufacturing or service sectors. The reality of agricultural production and work has not changed and will not likely change in the future.

At its core, farming involves the management of biological processes and living organisms that are often subject to highly variable climatic and environmental conditions. Farming attempts to control the growth of plants and animals under conditions that are rarely under a farmers' control. To do this successfully requires a very flexible approach to managing people, and a flexible approach to matching human resources with the demands of food production.

In addition to issues of seasonality and climate, the agriculture sector trades in a highly perishable product. Many of the good things grown in Ontario have a narrow window between emergence and harvest. The speed at which various commodities can begin to lose value before, during and after harvest creates a unique labour management situation.

Unfortunately, the agricultural sector also faces a chronic shortage of reliable farm workers. Our ability to attract and retain workers is made more challenging by the nature of the work and the fact that the majority of Ontario commodities compete in a global marketplace where producers have little influence over their potential returns or ability to pass on increased costs of production to consumers.

When Bill 148, the Fair Workplaces, Better Jobs Act was introduced, the OFA and many other farm organizations explained in detail how the proposed amendments would be detrimental to Ontario's agricultural sector. We expressed that, while these amendments may work for industrial workplaces, they simply do not translate to the unique circumstances of agriculture or rural small businesses. The rapid increase in costs to farm employers resulting from Bill 148 has already significantly impacted farm production with operations decreasing the number of employees,

changing from horticultural crops to less labour-intensive crops, or by choosing not to expand their operations.

While OFA understands it may be difficult to rescind the additional benefits given to workers through Bill 148, we request that the remaining regulations scheduled to come into force on January 1, 2019 be stopped and that the Ministry of Labour open consultations with employers to ensure existing regulations reflect the realities of agricultural workplaces.

As a member of the Ontario Chamber of Commerce's *Keep Ontario Working Coalition*, we support their appeal for government to take immediate action on this issue, appropriately consult with stakeholders, and provide comprehensive economic analysis of any future changes to employment standards.

Our goal is to produce food and other agricultural products that Ontarians need and want. To do this effectively, Ontario's farm employers need a regulatory framework that understands and respects the realities of growing crops and raising animals while protecting the rights of workers.

Once again, congratulations on your appointment as Minister of Labour, and we look forward to working with you and your Ministry to grow Ontario.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Currie", enclosed in a thin black rectangular border.

Keith Currie,  
President

C: Hon. Ernie Hardeman, Minister of Agriculture, Food & Rural Affairs  
OFA Board of Directors