



Ontario Federation of Agriculture

Ontario AgriCentre

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October 25, 2018

Mr. Gerald Gillespie
Senior Policy Advisor
Ministry of the Environment, Conservation and Parks
Policy and Program Division
Program Management Branch
40 St. Clair Avenue West, 4th Floor
Toronto, ON M4V 1M2

Dear Mr. Gillespie;

RE: EBR Registry No. 013-3867 Redesigning Ontario's Drive Clean Motor Vehicle Emission Testing Program

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 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.

The Ontario Federation of Agriculture welcomes the provincial government's intentions to wind down the Light Duty vehicle emissions testing program. A reduction in light duty vehicle emissions has been achieved through stricter vehicle emissions standards and fuel standards improvements which has effectively rendered Ontario's Light Duty vehicle emissions testing program an unnecessary regulatory burden.

Turning to the provincial government's proposed changes to Ontario's Heavy-Duty vehicle emissions testing program, we support the use of the vehicles on board diagnostic (OBD) computer-based emissions controls.

Questions:

The current Heavy Duty (HD) vehicle emissions testing program requires tests for trucks with a registered gross weight over 4,500 kg (9,920 lbs.). We see no reason to change that threshold. The current program also mandates heavy duty vehicle tests every year, once the vehicle is more than seven (7) years old. Given the advances in on board diagnostic (OBD) computer-based emissions controls, we do not believe that an annual test requirement is necessary. From OFA's perspective, vehicle tests every two years should suffice. We further believe that the current requirement that test begin once a vehicle is more than seven years old, is appropriate.

Currently, a pass be required to resell a heavy-duty vehicle that is more than 1 model year old. We see no reason to continue this practice. If a vehicle that remains in its owner's possession for more than seven years only begins to be tested at the seven-year point, we believe that vehicles resold within that same seven-year time frame deserve equal treatment. OFA believes that a heavy-duty vehicle's first test should come once it is more than seven years old, regardless of it being resold or not.

Farmers have repeatedly noted that there has been a decline in the number of Heavy Duty Drive Clean test centers since the program's inception, forcing owners of heavy-duty vehicles requiring a Drive Clean test to travel further and further from home to obtain the necessary test. This negative impact of this decline has been borne primarily by vehicle owners who live and operate their businesses at some distance from larger urban centres. As part of this program redesign, how will the provincial government address the decline in heavy-duty test facilities, particularly across Ontario's rural and agricultural municipalities?

Lastly, we support the provincial government's plans to improve on-road enforcement of vehicle emission's standards and performance for both light and heavy-duty vehicles.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Currie', written in a cursive style.

Keith Currie
President

KC/pj

cc: OFA Board of Directors