

May 31, 2019

Ministry of Economic Development, Job Creation and Trade  
400 University Avenue, 4th Floor, Toronto, ON M7A 2R9

Delivered via email: [ontarionominee@ontario.ca](mailto:ontarionominee@ontario.ca)

**RE: Proposal 19-MEDJCT002 - Proposed Amendments to Ontario Regulation 422/17 (General), a Minister's Regulation made under the Ontario Immigration Act, 2015**

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to the Ministry of Economic Development, Job Creation and Trade (MEDJCT) on the proposed amendments to Ontario Regulation 422/17 (General) under the Ontario Immigration Act, 2015. OFA is Canada's largest voluntary general farm organization, representing over 38,000 farm families across the province. These farm businesses form the backbone of a robust food system; helping to drive the Ontario economy forward.

In general, OFA is in favour of the proposed changes to the In-Demand Stream of the Ontario Immigrant Nomination Program (OINP) and we support efforts that will allow Temporary Foreign Workers (TFW) an easier pathway to becoming a permanent part of the Ontario labour force. OFA supports the goal of this consultation, to "improve the responsiveness of the OINP to current labour market and employer needs, including supporting regions that do not traditionally see significant levels of immigration".

TFWs are a key to the success of the agriculture and agri-food sector and while OFA supports the principle of providing jobs to Canadians first, we recognize foreign labour will also be required to fill a significant and ever-increasing shortfall in farm labour. We invite MEDJCT to review the Labour Market Inventory (LMI) research completed by the Canadian Agricultural Human Resources Council (CAHRC) that details how severe this labour gap has become and the impact it has on the growth potential of the agriculture and agri-food sector.

Improving the OINP has the potential to provide Ontario's farms and food processors who require year-round employees with a more stable, skilled workforce, improve their international competitiveness, and continue to provide employment to Canadians. It is important to note that very few agriculture and food processing employers have used the In-Demand Stream since the program was launched in August 2017. This is in part because the program is intended for TFWs who have a job offer for year-round/full-time work upon immigration, whereas most jobs done by TFWs in Ontario are seasonal in nature. However, even for those TFWs who have full-time job offers, the eligibility criteria of the program are often not practical and cannot be met by the typical TFW in the agri-food sector. This current consultation on O. Reg 422/17 could address this gap in the program eligibility criteria.

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OFA supports the proposed change to the required amount of paid full-time work experience for an In-Demand Stream applicant from the current one year to nine months. This change begins to address the gap in eligibility criteria and will hopefully make it more practical for farm employers and TFWs working on one-year contracts to apply for permanent residency before the end of their contract.

We have identified a number of other barriers that restrict the applicability of In-Demand Stream to the agricultural and agri-food sector and act as red tape getting between fully qualified workers and their farm and food processing employers who value and want to retain the practical experience and skills of their employees over a longer job tenure.

OFA believes these barriers could be reduced or eliminated by having the OINP In-Demand Stream follow the same guidelines as the *Federal Agri-food Immigration Pilot Program* that was announced in spring 2019. This pilot program is expected to make the eligibility criteria for permanent residency more flexible and practical for year-round agri-food TFWs and their employers.

The Federal Agri-food Immigration Pilot Program provides a flexible approach to the education and language proficiency criteria that would increase the utility of the In-Demand Stream for workers and employers. We recommend that the In-Demand Stream update the education requirements to credit an applicant's work experience in Canada or abroad towards their education and/or accept high school in their home country as equivalent. We also recommend updating the language proficiency requirement to Canadian Language Benchmark Level 3 in situations where language training is offered by employers and/or there is a substantial period (e.g. six to nine months) work experience communicating with other workers.

OFA also recommends updating the range of agri-food related skill levels and occupational classifications that are eligible for the In-Demand Stream, since farms and food processors typically rely on a range of technical skills that span across multiple National Occupational Classifications (NOCs), including<sup>1</sup>:

- 0821 - Managers in agriculture (A)
- 0822 - Managers in horticulture (A)
- 8252 - Agricultural service contractors, farm supervisors and specialized livestock workers (B)
- 8255 - Contractors and supervisors, landscaping, grounds maintenance & horticulture services (B)
- 8431 - General farm workers (C)\*
- 8432 - Nursery and greenhouse workers (C)\*
- 8611 Harvesting labourers (D)\*
- 6331 Butchers, meat cutters and fishmongers – retail and wholesale (B) (2011 NOC)
- 9213 Supervisors, Food, Beverage and Tobacco Processing (B)
- 9462 Industrial Butchers and Meat Cutters, Poultry Preparers and Related Workers (C)\*
- 9617 Labourers in Food, Beverage and Tobacco Processing (meat products processing labourers) (D)

Improving the OINP In-Demand Stream has the potential to address the growing gap for trained, permanent workers facing the agriculture and food-processing sector in Ontario. Improving long-

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<sup>1</sup> Skill level associated with each NOC is indicated in parentheses; asterisk indicates NOC currently eligible for In-Demand Stream.

term access to labour will significantly help Ontario's farm and food sector improve its international competitiveness and economic performance and comes with no added cost to the taxpayer.

OFA's Producing Prosperity in Ontario campaign calls for greater investment in Ontario's agri-food sector and rural communities as an effective strategy to deliver economic growth, enhance competitiveness and produce prosperity for all Ontarians. Creating jobs and supporting growth in the agri-food sector requires the availability of affordable energy, rural broadband internet, a skilled workforce, and more broadly, complete rural communities with modern infrastructure. Facilitating the immigration of trained, skilled workers to rural communities will help grow existing businesses and attract new opportunities for regional economic development.

Sincerely,



Keith Currie  
President

cc: OFA Board of Directors