

June 3, 2019

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

Dear Mr. Clark,

**RE: Regulatory Registry Posting #19-OMAFRA003
(Proposed amendments to O. Reg 440 and O. Reg. 441 under the *Farm Products Marketing Act*)**

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.

Although the Farm Products Marketing Commission (the Commission) does not delegate powers to or make regulations affecting our organization, we represent the interests of Ontario farmers, including those who grow processing vegetables.

As stated in the posting, the Ontario processing vegetable sector is a major contributor to Ontario's economy, with 16 processing facilities and 343 growers creating good jobs in Ontario communities.

OFA was a signatory to letters dated August 11, 2016 and July 31, 2017 with regards to previous proposed amendments affecting the Ontario Processing Vegetable Growers' Marketing Board (OPVG). As communicated earlier, OFA firmly holds the position that farmers should have a say about any changes to the marketing system of their regulated farm products. We therefore continue to insist that the 343 Ontario processing vegetable growers should be engaged and consulted regarding amendments affecting the marketing of their crops and their OPVG.

Some growers have mentioned that they would like to see the reinstatement of multi-year contracts. However, with respect to the current proposal, we have found no evidence that the growers have collectively called for the proposed regulatory amendments at this time.

We understand that O. Reg. 440 is a Commission regulation, which the Commission has the authority to amend and amendments to O. Reg. 441 can be made by the Commission and are subject to the Minister's approval.

OFA remains concerned by the Commission's repeated actions to amend O. Reg. 440 and O. Reg. 441. Such actions undermine attempts by the OPVG and processors to reach agreements by themselves.

Frequent regulatory proposals and amendments have caused uncertainty in the regulatory environment of this sector. This regulatory uncertainty threatens growth opportunities and puts jobs at risk.

OFA believes the sector would be best served by the Commission setting aside the proposed regulatory amendments at this time.

Sincerely,



Keith Currie
President

CC: The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
Mr. Kyle Kubatbekov, Ontario Farm Products Marketing Commission
OFA Board of Directors