

September 19, 2019

Hon. Jeff Yurek
Minister of Environment, Conservation and Parks
College Park
5th Floor, 777 Bay Street
Toronto, ON M7A 2J3

Dear Minister Yurek,

The Ontario Federation of Agriculture (OFA) is the leading advocate and voice for 38,000 farm families and businesses across Ontario. These farm businesses and rural communities form the backbone of a robust food system with the potential to drive the Ontario economy forward.

OFA supports the Ontario government's efforts to remove unnecessary and burdensome red tape. We wish to draw your attention to the approval and classification process for agricultural crop protection products, which remains a significant issue for the agricultural community.

The previous government's move to place neonicotinoid-treated seed into Class 12 resulted in increased costs for Ontario grain farmers. Class 12 pesticides can only be used when there is a demonstrated pest problem. As a result, Ontario grain farmers must incur costs to prove their need for treated seed. OFA never endorsed the previous government's decision to classify neonic-treated seeds as Class 12 pesticides. OFA supports the removal of the regulations that restrict the use of neonicotinoid-treated seed in Ontario under the *Ontario Pesticides Act*.

The need for clarity and transparency with respect to Ontario's pesticide regulatory process cannot be overstated. OFA recommends the ministry provide a Process Document outlining the steps an application would undergo from when it is received to when final approval and classification is communicated. The Process Document should also outline the Ontario Pesticides Advisory Committee (OPAC)'s roles and responsibilities as well as the Ministry's roles and responsibilities.

OFA also recommends the Ministry set a service standard to improve the transparency and timeliness of the pesticide classification process. OFA believes that bottlenecks in the approval process could be best identified and addressed if each application's status was reported and service standards were established for each stage in the process.

Sincerely,



Keith Currie
President

cc: Hon. Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors