

November 25, 2019

Ms. Susanne Edwards  
Program Management Branch  
Ministry of the Environment, Conservation and Parks  
40 St. Clair Avenue West  
Toronto, Ontario M4V 1M2

Dear Ms. Edwards;

**RE: Environmental Registry of Ontario (ERO) number 019-0646 Transfer of motor vehicle provisions from the Environmental Protection Act to the Highway Traffic 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.

OFA believes that owners of heavy duty diesel commercial motor vehicles will benefit from the proposal to obtain both an emissions and safety inspection at the same time and at the same location. We reiterate comments in ERO 019-0416, that there has been a decline in the number of Heavy Duty emissions testing facilities since the program began, forcing owners of these vehicles to travel further and further from home to obtain the necessary test. Enabling owners of heavy duty diesel commercial motor vehicles to obtain both an emissions test and an annual safety inspection at the same time and in the same facility, will hopefully address the shortage of emissions testing facilities experienced by farmers in Ontario's agricultural and rural areas.

On behalf of OFA's more than 38,000 farm family businesses across Ontario, please accept our perspective on the transfer of motor vehicle provisions from the Environmental Protection Act to the Highway Traffic Act.

Sincerely,



Keith Currie  
President

KC/pj

cc: The Honourable Jeff Yurek; Minister of the Environment, Conservation and Parks  
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors