

November 27, 2019

Laura Pisko, Director
Health Improvement Policy and Program Branch
Ministry of Health
393 University Avenue, Suite 2100
Toronto, ON M7A 2S1

Dear Ms. Pisko,

Re: 19-HLTC028 Proposed amendments to the Food Premises Regulation 493/17 under the Health Protection and Promotion 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 welcomes this opportunity to provide comments on proposal 19-HLTC028 to amend the Food Premises Regulation 493/17 under the Health Protection and Promotion Act. OFA supports stringent health and safety protocols to protect consumers. However, OFA applauds the provincial government for investigating ways to reduce the regulatory burden, particularly for smaller scale, low risk food service operations.

While farmers' markets are exempt, O. Reg 493/17 can cause undue hardships on those who run direct farm marketing operations on their farm, such as retail food markets, bakeries, cafes, etc. OFA supports the proposal to exempt food premises that serve low risk foods from certain structural and/or equipment requirements, similar to those who serve pre-packaged low risk foods and hot beverages.

OFA also supports the proposed changes to exempt food premises that serve low risk food from the requirement to have a trained food handler on-site during operation. This requirement can be prohibitive for smaller operations with low staff and training capacity.

OFA appreciates the opportunity to provide our feedback on the proposed changes to Food Premises Regulation 493/17 under the Health Protection and Promotion Act.

Sincerely,



Keith Currie
President

cc: OFA Board of Directors