

November 26, 2019

Ministry of Government and Consumer Services
56 Wellesley St. W.
6th Floor
Toronto ON, M7A 1C1

Submitted online via Ontario's Regulatory Registry

Dear Sir/Madam,

**Re: 19-MGCS014 Business Law Modernization and Burden Reduction Council
Recommendations to Amend Ontario's Business Law Statutes**

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-MGCS014 which seeks feedback on the recommendations of the Business Law Modernization and Burden Reduction Council.

OFA applauds the establishment of this short-term advisory Council. We understand that the Council's mandate is to make recommendations to government on how to modernize Ontario's corporate and commercial statutes to support the government's commitment to reduce burden on business and foster a good business climate in Ontario.

OFA supports the Council's recommendation to examine opportunities to modernize the Personal Property Security Registry, as well as expanding the definition of "motor vehicle" to include additional types of vehicles such as trailers and farm equipment. Currently it is difficult for farmers purchasing farm equipment in a private transaction to determine as part of their due diligence whether the farm equipment is an encumbered asset. Enabling a Registry search of specifically identified farm equipment would assist farm equipment purchasers.

OFA appreciates the opportunity to provide our feedback on the proposed recommendations.

Sincerely,



Keith Currie
President

cc: The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors