

November 14, 2019

Ms. Shain Cameron
Farm Finance Branch
1 Stone Rd W
Guelph, ON
N1G 4Y2

Shain.cameron@ontario.ca

Dear Ms. Cameron,

RE: Registry Posting 19-OMAFRA006 – Proposed changes to Ontario's Financial Protection Programs

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 is pleased to provide comments on OMAFRA's proposed changes to Ontario's Financial Protection Programs. We fully agree with the registry posting's background document's opening statement: "Ontario's farmers need to have access to stable risk management tools that provide the confidence to invest in their businesses to grow and complete in a constantly changing market".

OFA draws the same conclusion as OMAFRA that the Beef Cattle Protection Program and the Grain Financial Protection Program work well and that no major structure program changes are necessary. It is appropriate to consider the program enhancements suggested by the Financial Protection Boards and associated commodity groups. OFA is willing to help distribute the new program information for producers and dealers once it is available.

The two current programs protect producers of grain corn, soybeans, canola, wheat, and beef cattle (including veal calves and dairy cattle). OFA supports proposed amendments to make it easier to expand programming to cover agricultural products beyond these existing commodities.

OFA understands that assessing the need for new programs is within the scope of OMAFRA's Financial Protection Program Review. Therefore, OFA recommends that OMAFRA engage and assist other commodity groups, expressing interest in developing a financial protection program to protect their producers, with drafting the needed business plan referred to in the second footnote of the posting's background document.

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OFA supports investigating whether the legislative and regulatory framework can be streamlined. Consolidating all legislation governing farm financial protection programming into a single Act would result in a clear understanding of authorities, responsibilities and obligations.

OFA further recommends that OMAFRA also seek to transfer key protections contained in the Innkeeper's Act to the Farm Products Payment Act. Section 3(1) of the Innkeepers Act states:

3. (1) The keeper of a livery stable or a boarding stable has a lien on every horse or other animal boarded at or carriage left in the livery stable or boarding stable for reasonable charges for boarding and caring for the horse, animal or carriage. R.S.O. 1990, c. I.7, s. 3 (1).

This section provides a horse boarder or a custom livestock feeder the right to obtain payment through a possessory lien. However, it would be more appropriate to have a new section in the Farm Products Payment Act that sets out the possessory rights of unpaid custom livestock feeders and horse borders to hold animals until payment is received or to sell at public auction to recover payment.

OFA appreciates the opportunity to comment on this registry posting. We trust that our recommendations will be given due consideration.

Sincerely,



Keith Currie
President

cc: OFA Board of Directors