

March 2, 2020

Ministry of Economic Development, Job Creation and Trade
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Submitted via Ontario's Regulatory Registry

RE: Registry Posting # 20-MEDJCT002: Proposed Amendments to Ontario Regulation 422/17 (General), a Minister's Regulation made under the Ontario Immigration Act, 2015

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to the Ministry of Economic Development, Job Creation and Trade (MEDJCT) on the Proposed Amendments to Ontario Regulation 422/17. OFA is Canada's largest voluntary general farm organization, representing over 38,000 farm families across the province. These farm businesses form the backbone of a robust food system; helping to drive the Ontario and national economies forward.

In its role as an advocate for Ontario's farm employers, OFA works closely with the Labour Issues Coordinating Committee (LICC). LICC is a farmer-driven coalition group representing the interests of Ontario employers in the agriculture and horticulture sector. Our position on changes to the Ontario Regulation 422/17 and the Ontario Immigrant Nomination Program (OINP) reflects that of the LICC.

In general, OFA supports the Ontario government's efforts to remove regulatory and administrative burden around the OINP. Furthermore, we support the support the changes proposed in this consultation. We are confident that the OINP has the potential to provide Ontario's farms and food processors who have year-round occupations with a more stable, skilled workforce, improve their international competitiveness, and continue to provide employment to Canadians.

Temporary Foreign Workers (TFWs) are a key to the success of the agriculture and agri-food sector and while OFA supports the principle of providing jobs to Canadians first, we recognize foreign labour will also be required to fill a significant and ever-increasing shortfall in farm labour. We invite MEDJCT to review the Labour Market Inventory (LMI) research completed by the Canadian Agricultural Human Resources Council (CAHRC) that details how severe this labour gap has become and the impact it has on the growth potential of the agriculture and agri-food sector.

While we support the government's efforts to better respond to the labour needs of rural areas, we are concerned about the growing number of eligible jobs being added to the list under the

OINP. We are concerned that these additions may serve to dilute the share of provincial nominees that agriculture can access and decreasing the program's utility.

A number of remaining barriers restrict the applicability of In-Demand Stream to the agricultural and agri-food sector and act as red tape getting between fully qualified workers and their farm and food processing employers who value and want to keep the practical experience and skills of their employees for the long-term.

OFA recommends reducing or eliminating these barriers by having the OINP In-Demand Stream adopt the same guidelines announced in the spring of 2019 for the Federal Agri-food Immigration Pilot (AFIP) program. This pilot program is expected to make the eligibility criteria for permanent residency more flexible and practical for year-round agri-food TFWs and their employers.

The Federal AFIP program provides a flexible approach to the education and language proficiency criteria that would increase the utility of the In-Demand Stream for workers and employers. We recommend that the In-Demand Stream update the education requirements to align with the AFIP by accepting a high school certificate and transcripts from the worker's home country with an educational credential assessment (ECA) report by an officially recognized agent. We believe this update is the single largest improvement the OINP can make to the In-Demand Stream to improve its ability to meet the critical and growing labour gap in rural Ontario.

Improving the OINP In-Demand Stream has the potential to address the growing gap for trained, permanent workers facing the agriculture and food-processing sector in Ontario. Improving long-term access to labour will significantly help Ontario's farm and food sector improve its international competitiveness and economic performance with no additional cost to the taxpayer.

OFA's Producing Prosperity in Ontario campaign calls for greater investment in Ontario's agri-food sector and rural communities as an effective strategy to deliver economic growth, enhance competitiveness and produce prosperity for all Ontarians. Creating jobs and supporting growth in the agri-food sector requires the availability of affordable energy, rural broadband internet, a skilled workforce, and more broadly, complete rural communities with modern infrastructure. Facilitating the immigration of trained, skilled workers to rural communities will help grow existing businesses and attract new opportunities for regional economic development.

Sincerely,



Keith Currie
President

cc: OFA Board of Directors