

July 8, 2020

Ministry of Agriculture, Food and Rural Affairs  
Business Services Branch  
2<sup>nd</sup> Floor  
1 Stone Road West  
Guelph, ON  
N1G 4Y2

Via email: [FOIaccess.omafra@ontario.ca](mailto:FOIaccess.omafra@ontario.ca)

To Whom It May Concern:

**Re: FOI Request #20-05 to the Ministry of Agriculture, Food and Rural Affairs**

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 has become aware that OMAFRA invited certain OFA members to make representations regarding the following access to information request under the *Freedom of Information and Protection of Privacy Act* ("FIPPA"):

*"List of all Ontario Businesses with a Farm Business Registration (FBR). If possible, I would like their FBR number as well, but at the very least, I just need the names of the businesses that are registered."*

OFA has been advised that many of our members intend to respond to the invitation for representations and to state their opposition to the requested disclosure of member information. Our members have also asked that OFA make submissions to OMAFRA on their behalf, which we have begun to prepare.

OFA and member submissions will include references to the mandatory exemptions under Sections 17(1) and 20 of FIPPA. In order to address why disclosure could reasonably be expected to threaten the health and safety of individuals, and result in undue financial loss or gain, OFA requires the name of the requester.

To this end, OFA recently submitted its own FOI request for the name of the requester in FOI Request #20-05. A copy of OFA's FOI request is attached for your reference.

OMAFRA's letters to members indicated that representations must be submitted by no later than July 17, 2020, in order that OMAFRA may issue a decision to the requester within thirty days of receiving the request in accordance with the statutory time limit. However, Section S.27(1)(b) of

FIPPA allows an institution to advise the requester of an extension where a large number of external consultations are required, such as in the present case.

OFA therefore respectfully requests that OMAFRA extend the deadline for OFA and OFA member submissions to twenty (20) days after the later of (a) the date that OFA has been provided with the name of the requester for FOI request #20-05; or (b) has exercised its right of appeal a denial of that FOI request.

Sincerely,



Keith Currie  
President

cc: The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs  
Mr. Greg Meredith, Deputy Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors