

November 13, 2020

The Honourable Christine Elliott  
Deputy Premier and Minister of Health  
Ontario Ministry of Health  
5th Floor  
777 Bay Street  
Toronto, ON  
M7A 2J3

Dear Minister Elliot,

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

OFA appreciates the hard work and leadership the Ministry of Health and the Chief Medical Officer of Health has provided during the COVID-19 pandemic. We know that there remains considerable amount of work to do and many difficult decisions to make to stop the spread of COVID-19 and save lives.

Ontario's agri-food sector has been hit hard by the COVID-19 pandemic. Farmers across all commodities have been greatly impacted by this crisis and have experienced loss of market access, increased production costs, supply disruptions, processing challenges and revenue loss. Through this environment of uncertainty and instability for our province, Ontario farmers have been working hard to maintain production of the agri-food supply chain. The Ontario agri-food sector continued to employ over 837,000 people as an essential service to produce food for the people of Ontario and beyond. With the support of their farm organizations, our farm employers are fully committed to controlling the spread of COVID-19 and to protecting the health and safety of workers and their families.

We understand that Section 22 of the Health Protection and Promotion Act 2009 (HPPA) serves a vital purpose, allowing regional Medical Officers of Health to create Class Orders that target local health concerns and emerging issues in a more timely and accurate way. The Act rightly dictates that Orders issued under Section 22 may only be created under reasonable and probable grounds that there is an immediate risk of an outbreak of a communicable disease.

During this pandemic, the Ministry of Health has provided guidelines to regional Health Units on how to address COVID-19 and reduce the incidence of outbreaks on farms, including those that employ and house Temporary Foreign Workers. Some Health Units have issued Class Orders that go above these guidelines, placing significant restrictions on the housing of Temporary

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Foreign Workers residing at that farm workplace. We have seen these additional restrictions inflict unnecessary and long-term economic damage to farmers subject to the Orders, disproportionate to those in neighbouring jurisdictions.

OFA requests that the Ministry of Health develop a clear and consistent process for consultation that regional Health Units across Ontario are obligated to follow when they are considering implementing measures under Section 22 of the HPPA that impacts farm operations. Our goal is to have a meaningful consultation process that is robust and transparent, and that an Order issued under Section 22 is truly based on reasonable and probable grounds and not conjecture. Farming is complex, with countless nuances that are difficult to appreciate by non-farmers. It is vital that policy makers understand that small changes in our sector can have far-reaching unintended consequences. We believe that to avoid continued negative impacts, efforts must be taken to create mutually agreeable solutions that balance the health and safety of farm workers with the capacity of employers.

There is no doubt that our farmers highly value and appreciate the workers that travel to Canada every year to work in our sector. Without this essential workforce, our farms and livelihoods would be in jeopardy. We look forward to working with the Ministry of Health to stop the spread of COVID-19 and make sure our workers return safely to their families.

Sincerely,



Keith Currie  
President

cc: Hon. Ernie Hardeman, Minister of Agriculture, Food, and Rural Affairs  
Bill George, Chair, Ontario Fruit and Vegetable Growers' Association  
George Gilvesy, Chair, Ontario Greenhouse Vegetable Growers  
Henk Lise, President, Haldimand Federation of Agriculture  
Melissa McDonald, Secretary, Haldimand Federation of Agriculture  
Will Stoneman, Member Service Representative, Zone 3