

December 17, 2020

Ministry of Transportation
301 St Paul St, 3rd Floor,
St Catharines ON
L2R 7R4
Via Document upload to Ontario's Regulatory Registry

Dear Sir or Madam:

Re: 20-MTO088 Electronic Logging Devices (ELD) for Intra-provincial Carriers

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

We appreciate the opportunity to comment on certain aspects of 20-MTO088. We support adding options to improve reporting however, we recommend that the Ministry retain paper-based reporting options for farm plated commercial motor vehicles.

OFA recommends Intra-provincial Carriers operating only within Ontario's borders retain the option to use paper Hours of Service logs. Ontario should also exempt all trucks with a registered gross weight of 4,500 kg or less and continue to exempt farm trucks as per section 3. (1) 1 of Regulation 555/06.

Thank you for your considerations in these matters.

Sincerely,



Peggy Brekveld
President

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