

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-MTO089 Amendments to Highway Traffic Act (HTA) Regulations to remove paper-based barriers for the commercial vehicle industry**

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-MTO089. We support adding options to improve reporting however, we recommend that the Ministry retain paper-based reporting options for farm plated commercial motor vehicles.

We support MTO retaining the existing exemptions for trucks with a registered gross weight of 4,500 kg or less, and continuing the existing exemptions for farm trucks, under Regulation 555/06 (Hours of Service).

Thank you for your considerations in these matters.

Sincerely,



Peggy Brekveld  
President

PB/in

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