Ontario Federation of Agriculture

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Sharmila Uruthiranandasivam, Senior Policy Advisor
Ministry of Government and Consumer Services
Public Safety and Operations Policy Branch
56 Wellesley St. West, 6th floor
Toronto, ON M7A 1C1
Submitted online through Ontario's Regulatory Registry

Dear Ms. Uruthiranandasivam,

Re: Regulatory Registry # 21-MGCS006 - Proposed Amendments to Electrical Safety Code Regulation (O. Reg.164/99) under Part VIII of the Electricity Act, 1998

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.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over $47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

We are pleased to provide comments from an agricultural perspective on the adoption of the Canadian Electrical Code (CEC) with amendments, as the Ontario Electrical Safety Code (OESC). The agricultural sector has unique electricity concerns. Agriculture and the agri-food sector are energy intense industries. Greenhouses, perishable crop storage, grain drying, food processing, and livestock and poultry building HVAC systems have high demand for a combination of electricity, natural gas and propane. Agriculture is a rural industry challenged by electricity safety and reliability issues throughout the province.

As our sector and many other commercial and industrial sectors expand in rural Ontario, challenges including electricity quality, brownouts, grid terminal voltage drops and surges, and uncontrolled ground currents, become greater challenges for our rural farm communities.

OFA regularly consults with the Electrical Safety Authority (ESA), the Independent Electrical System Operator, the Ontario Energy Board, and Local Distribution Companies including Hydro One, to mitigate electricity system quality and safety issues.

We recommend the Ministry enable training for electricians to recognize and mitigate uncontrolled ground current issues that result both from wiring faults behind the meter, and grid system design characteristics. We also recommend the Ministry of Energy collaborate to enable a review of testing protocols in Appendix H of the Ontario Energy Board Distribution System Code related to Farm Stray Voltage - to ensure they reflect current farming practices. These steps will help ensure testing remains relevant, and that electricians and electrical technicians correctly recognize, test for, and consistently mitigate system caused issues for farm businesses experiencing safety and quality issues.

More relative to adopting CEC and enhanced OESC, some agriculture, specialized crop production, and food processing businesses are challenged with Ontario's typically more stringent codes compared to the corresponding Canadian codes. OFA cooperates with the Electrical Safety Authority related to agricultural machinery imported into North America to ensure compliance with CEC, OESC and ESA requirements. Most specialized farm equipment is imported into North America in sufficient quantities to make the cost to ensure compliance with our safety and electrical codes practical during manufacturing.

This becomes a challenge with some very specialized equipment, typically involving very few annual imports to North America. For example, Ontario may only have one or two units of very specialized horticulture packing machinery imported from Europe annually. While this equipment is adapted to North American electricity system voltages, and is very safely wired, a minor wiring difference, such as the colour of one wire, could conflict with Canadian codes, or more stringent Ontario Electrical Safety Codes. Because the imports to North America are so few, manufacturers cannot modify assembly lines to address this minor wiring colour discrepancy. Instead, the Ontario farmer importing the equipment must have it rewired and inspected by the Electrical Safety Authority to ensure compliance with OESC. Of further frustration, often the imported equipment would be approved for use in any other Canadian jurisdiction outside Ontario.

OFA recommends the Ministry develop guidelines to address these situations aimed to reduce the time and cost to make equipment compliant that is electrically safe. If this is not advised by the technical expertise available to the Ministry, we highly recommend the Ministry encourage the committees that review CEC and OESC to include representation by agricultural and other specialized industry expertise, to ensure their concerns are considered in code reviews

Our farm businesses rely on the work of Ministry staff and policymakers to advance our energy systems, while ensuring business and public safety, including the development and review of safely codes by dedicated and expert staff at the Technical Safety Standards Association, the Electrical Safety Authority and committees such as the Canadian Agricultural System Standards Association. Thank you for providing this opportunity to present an agricultural perspective to the review process. We look forward to continued collaboration with the Ministry and Ontario energy authorities.

Sincerely,

Peggy Brekveld,
President

CC The Honourable Lisa Thompson, Minister of Government and Consumer Services
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
David Collie, President and Chief Executive Officer, Electrical Safety Authority
Richard Dicerni, Chair of the Board of Directors, Ontario Energy Board
OFA Board of Directors

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