

June 4, 2021

Skilled Trades and Apprenticeship legislation proposal
Apprenticeship Branch
Ministry of Labour, Training and Skills Development
315 Front Street West, 17th Floor
Toronto, ON M7A 0B8

Submitted online through Ontario's Regulatory Registry

Dear Ministry of Labour, Training and Skills Development officials,

Re: Regulatory Registry # 21-MLTSD010 (Proposed new legislation - Building Opportunities in the *Skilled Trades Act*)

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to the Ministry of Labour, Training, and Skills Development (MLTSD) regarding the proposed Building Opportunities in the *Skilled Trades Act*. 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.

As a general principal, the OFA supports government efforts to streamline and simplify legislative and regulatory requirements. Since the current system governing trades in Ontario is split between MLTSD and the Ontario College of Trades, we applaud the intention of this proposed legislation to create a simpler, integrated system through a new Crown agency.

The agricultural sector does not currently have any compulsory trades in Ontario requiring certification and registration under the current College of Trades. Registration is voluntary for the trades of Dairy Herdperson, Swine Herdperson, Fruit Grower, and Horticultural Technician. To our knowledge, there is no desire for any of these listed trades to change from voluntary registration to compulsory.

Our concerns over the regulation of trades in Ontario centres around the *scope of practice definitions* for various compulsory trades, namely plumbers and steamfitters. In the past, the scope of practice definitions were overly broad, encompassing activities that may not have been appropriate and causing negative unintended consequences to jobs and growth in the agricultural sector.

This was particularly evident in Ontario's greenhouse sector where the Ontario College of Trades began enforcing their very broad definition of plumber and steamfitter to those individuals installing irrigation equipment and CO₂ distribution systems in new greenhouse construction.

Modern greenhouses employ highly specialized equipment and structures to produce a crop that require a workforce possessing highly specialized skillsets. Installation and maintenance companies often invest heavily in the training of qualified staff to ensure that the finished product is reflective of the high capital investment. While we appreciate the need for oversight in the trades and construction

sector, simply put, installing irrigation equipment and CO₂ distribution systems requires a skillset that is not necessarily held by certified plumbers and steamfitters. We recommend that the scope of practice for trades recognize the potential unintended consequences of overly broad definitions and provide flexibility to allow for related activities.

While we do not have compulsory trades in the agricultural sector, our farmers often employ the services of certified tradespeople for routine maintenance of farm buildings and machinery used in the practice of farming. OFA appreciates that government expects there to be no anticipated additional costs associated with this proposal to businesses, apprentices, or skilled tradespeople. Farmers are price takers and therefore increased costs would result in an additional financial burden to the agricultural sector.

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors