

July 28, 2021

Andrew Chase
Manager, Carrier Program Development Office
Commercial Safety & Compliance Branch
Ministry of Transportation
Garden City Tower, 3rd Floor,
301 St. Paul St,
St Catharines, ON
L2R 7R4

Via email: andrew.chase@ontario.ca

Dear Andrew Chase:

Re: Commercial Vehicle Operator Registration (CVOR)

I am writing you today on behalf of the Ontario Federation of Agriculture (OFA). We are 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.

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.

At our Annual General Meeting we passed a resolution to advocate on behalf of our membership to MTO to consider a modified CVOR for transporting farm production between fields and storage.

OFA formally requests you consider developing a Modified Farm Operator CVOR, restricting the use of the permit to within 50 km of the main farm residence on the CVOR registration. We are prepared to discuss the appropriateness of the 50 km range with your office. The proposed Modified Farm Operator CVOR would exclude border crossings. As such, we ask that the Modified Farm Operator CVOR exclude sections of the test on regulations relating to international

border crossings. The border crossing knowledge requirement is not necessary for farmers and their direct farm employees that are only moving inputs and farm production between their own farm and farm field locations.

Farmers do not typically cross borders to move production from an American-based operation to their main farm in Ontario. Because of this lack of border travel, it can be difficult to successfully study activities that do not pertain to their regular farming activities. We feel this has led to more frequent multiple test failures, and multiple transits between rural farm operations and often distant testing centres.

Easing the requirements for border crossing knowledge would help reduce the propensity of farmers to use SPIHs and wagons to move local production along our highways, instead of using a combined tractor trailer. With that objective in mind, we also recommend the Modified Farm Operator CVOR allow for the transport of grain and oilseed production between the farmer's own fields and a commercial dryer operation.

For clarity, we are not asking for an exemption to allow the modified CVOR to accommodate a combined tractor and trailer weighing more than 4,500 kg. We are not asking for a change to the \$51 annual and \$255 new CVOR registration fees. We are not asking for an exemption to existing logbooks requirements, weigh scale requirements, annual inspections, or daily driver pre-trip vehicle inspections. Finally, we are not asking for farm operators to be allowed to use a Modified Farm Operator CVOR to transport anything other than their own inputs and production, and endorse excluding the transport of any other materials under the modified CVOR.

Thank you for considering the request to allow Ontario farm operators transporting their own production between their own farms and storage facilities, to be excluded from the broader CVOR by registering for a Modified Farm Operator CVOR Permit.

Sincerely,



Peggy Brekveld
President

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