

January 30, 2023

Ministry of Municipal Affairs and Housing
Services Transformation Branch
777 Bay Street, 12th Floor
Toronto, ON
M7A 2J3

Submitted via email: buildingtransformation@ontario.ca

To Whom It May Concern:

RE: ERO #019-6433: Future Enhancements to the Qualification Program for Ontario's Building Practitioners

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 administered by all levels of government. OFA is passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

OFA appreciates this opportunity to provide input on ERO #019-6433: Future Enhancements to the Qualification Program for Ontario's Building Practitioners. Enhancing the Qualification Program for Ontario's Building Practitioners is a positive step to addressing the housing crisis in rural Ontario. Consulting with the farm business community is imperative to a thriving agricultural industry and economy in Ontario, to reduce red tape and achieve the priorities in the province's ambitious Grow Ontario agri-food strategy.

Ontario's diversity in agricultural production requires unique building forms to house livestock or poultry, to store various crops, to house the machinery used to grow and raise agricultural commodities, and to provide quality worker housing, each having their own distinctive structural requirements. OFA members often struggle with inconsistent interpretation and application of OBC conditions at the municipal level. Enhancing the qualification program for Ontario's building code practitioners could help address this issue.

The discussion paper identifies opportunities for mandatory training courses that provide Building Code foundation knowledge for new entrants to the field. OFA sees that mandatory training on farm buildings for practitioners would be an advantage to municipalities, the building industry, and the agricultural industry. It would be valuable for MMAH to develop training and examinations for Part 2 Large Farm Buildings for building officials and registered code agencies as well as a training and exam package for small farm buildings. OFA sees that enhancing the qualification and training programs for Ontario's building practitioners would help achieve consistent

interpretation and application of building requirements across jurisdictions to improve clarity and efficiency.

Further, OFA wants to make the Ministry aware that farm employers across different regions of Ontario have also experienced unique and unexpected obstacles when using existing houses, apartment buildings or other boarding, lodging, and rooming accommodations to provide safe and comfortable housing for international farm workers. The concern is about inconsistent and applied provisions in the Ontario Building Code by municipal building officials and inconsistent guidance by local public health officials. OFA would like to see an ongoing and constructive dialogue between farm employers and government agencies, including building practitioners, on addressing these obstacles to the responsible and safe use of existing housing and buildings to increase housing opportunities for international farm workers.

OFA appreciates this opportunity to provide its agricultural perspective on the discussion for ERO #019-6433: Future Enhancements to the Qualification Program for Ontario's Building Practitioners. We look forward to ongoing discussions with the MMAH to ensure that the OBC supports farm businesses and reflects OFA's advice and recommendations.

Sincerely,



Peggy Brekveld
President

cc: OFA Board of Directors