

August 8, 2023

Treasury Board Secretariat
Toronto, ON

Submitted online via Ontario's Regulatory Registry

To Whom It May Concern:

Re: Regulatory Registry #23-TBS002: Proposed Approach for Regulations under the Building Ontario Businesses Initiative Act, 2022

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are 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 the opportunity to provide input on regulatory registry #23-TBS002: Proposed Approach for Regulations under the *Building Ontario Businesses Initiative Act*. Consulting on this matter with Ontario's farm business community will support Ontario's existing agri-food strategy by providing OFA members greater levels of access to public sector procurement contract opportunities.

We are pleased to see the Ontario government providing Ontario businesses with preference as the providers of goods and services to public sector entities. Ontario's businesses and workers stand to benefit from the government's commendable efforts to support them.

OFA requests that Ontario-grown food products be included within the prescribed types of goods and services in the regulation. We believe our members and all of Ontario's agri-food sector would benefit greatly from their prioritization in the *Building Ontario Businesses Initiative Act, 2022* (BOBI Act). Ontario food producers and processors will benefit from increased demand for their products through this initiative. **Additionally, OFA requests provisions within the regulations under the BOBI Act that Ontario wholesale businesses must source Ontario-grown food to fulfill their public procurement contracts.** The aim of this initiative would not be realised if Ontario wholesale contracts were fulfilled with products sourced from outside Ontario.

OFA recommends the government allocate funding for public sector entities to purchase Ontario-grown foods which may sell at a higher price but offer more value compared to imported foods. Allocating funding to public sector entities to cover the pricing differential for Ontario-grown foods would create a beneficial economic multiplier effect within Ontario. This would protect and promote Ontario-grown food products from price undercutting by global competitors and support the long-term viability of Ontario agri-food markets.

OFA recommends the government monitor the value of all government procurement contracts to determine whether the prescribed threshold amounts remain appropriate. With public sector entities only required to give preference to Ontario suppliers when procurement contacts are for an amount under a specified threshold, some public sector entities may be inclined to consolidate tenders to purposely surpass threshold totals to circumvent the need to provide preference to Ontario businesses.

Why this Matters

Ontarians will benefit from prioritizing the agri-food sector for economic, social, health and wellness, and environmental reasons. The wider economy would see stimulus from growth in the agri-food sector due to its wide-reaching employment and commercial activity throughout the associated value-chain. While the greater demand for Ontario agri-food goods and services will lead toward the improvement of our province's food security and sovereignty. Furthermore, those in public sector care will benefit from improved health and wellbeing by consuming Ontario-grown food. Facilities such as hospitals and long-term care homes are more likely to serve fresh Ontario-grown produce under this initiative. Finally, lessening Ontario's reliance on outside sources of foods will greatly contribute to reducing our carbon footprint. Sourcing food from within Ontario will significantly reduce the need for shipping, lessening the distance our public sector's food travels. Ensuring that our food spends less time in transit will also reduce food waste and reduce our emissions.

With these province-wide benefits in mind, OFA would like to highlight how the BOBI Act's potential increase in public sector procurement of Ontario-grown food will contribute toward meeting the stated purposes of the *Local Food Act, 2013* and the *Made-in-Ontario Environmental Plan*.

Specifying Ontario-grown food in the BOBI Act's regulation would serve to further the stated purposes of Ontario's *Local Food Act, 2013* through aiding to foster a successful and resilient local agri-food economy. The *Made-in-Ontario Environment Plan* outlines reducing waste to landfills, protecting our air, and addressing climate change as key aspect to Ontario as a green leader in Canada. Sourcing more Ontario-grown food will contribute to Ontario's commitment to carbon reduction, while continuing to contract quality products from hard working Ontarians.

OFA would welcome a guidance document to help connect local Ontario-grown food sellers to public sector entities seeking to procure their products.

OFA appreciates this opportunity to provide its agricultural perspective on the proposed regulations under the BOBI Act. We look forward to the positive impact this Act will have on our membership and Ontario.

Sincerely,



Peggy Brekveld
President