

August 22, 2025

Intergovernmental Affairs – Internal Trade
Privy Council Office
85 Sparks Street, Room 1000
Ottawa, Ontario
K1A 0A3

Submitted via email: internaltrade-commerceinterieur@pco-bcp.gc.ca

Dear Intergovernmental Affairs,

Re: OFA Feedback on the Development of Regulations under the *Free Trade and Labour Mobility in Canada Act*

The Ontario Federation of Agriculture (OFA) is Ontario's largest general farm organization, proudly representing more than 38,000 farm families. We are a strong voice for our members and for Ontario's agri-food industry on issues, legislation, and regulations at all levels of government. Our priority is to ensure that the agri-food sector and rural communities are meaningfully considered and consulted on any legislative or regulatory changes that affect the sustainability and growth of farm businesses.

OFA appreciates the opportunity to provide input on the development of regulations under the *Free Trade and Labour Mobility in Canada Act*. We strongly support efforts to reduce interprovincial trade barriers while safeguarding the resilience and integrity of Canada's agri-food system. Canada's agriculture and agri-food industry contributes \$150 billion to national GDP each year and sustains 2.3 million jobs.

Key reform proposals—such as mutual recognition in trucking and consumer goods, national recognition of professional credentials, expedited certification, and expanded direct-to-consumer alcohol sales—represent meaningful opportunities to reduce unnecessary barriers. We also acknowledge Ontario's leadership through Bill 2 (*Protect Ontario Through Free Trade Within Canada Act, 2025*), which will help expand the freer movement of goods, services, and labour across the country.

In April 2025, OFA joined 22 other agricultural organizations in identifying five priority actions to safeguard the agri-food sector amid global trade uncertainty:

1. Reduce interprovincial trade barriers.
2. Provide targeted farmer support programs.
3. Invest in capacity and infrastructure.
4. Expand domestic and export markets.
5. Reinforce supply management.

We recommend that regulatory reforms be sector-specific, evidence-based, and guided by inclusive consultation with stakeholders. The four main approaches—mutual recognition, harmonization, nationalization, and deregulation—must be applied carefully to balance efficiency with risk management. For agriculture, blanket deregulation is not appropriate. Instead, targeted, practical solutions are needed to reduce barriers while upholding strong food safety standards.

Earlier this year, OFA's Policy Advisory Council identified three key priorities for reform:

1. **Trucking regulations:** Inconsistent logbook, licensing, inspection, and vehicle limit requirements.
2. **Interprovincial meat sales:** Restrictions on provincially inspected meat under the *Safe Food for Canadians Act*.
3. **Professional licensing:** Barriers for veterinarians, drainage contractors, and other skilled trades.

At the same time, OFA emphasizes the importance of preserving orderly marketing mechanisms, including Ministerial Exemptions (MEs) and the authority of commodity boards, particularly in supply-managed sectors.

Reducing barriers must not come at the expense of food safety or biosecurity. Risks such as pest and pathogen movement, animal disease transmission, and inconsistent enforcement require coordinated safeguards, including:

1. Cross-provincial inspection agreements.
2. Shared enforcement protocols.
3. Transparent accountability systems.

Ontario must retain jurisdiction over business practices within its borders, regardless of out-of-province licensing, to ensure fair and consistent enforcement.

OFA also strongly supports protecting commodity marketing boards and upholding producers' rights to orderly marketing. MEs remain a vital tool to prevent shortages and maintain interprovincial coordination. For example, Ontario's apple sector relies on MEs for bulk shipments across provinces. To ensure fairness, MEs must continue to apply equally to imports and interprovincial movement.

Similarly, the restriction of interprovincial trade to federally inspected meat prevents smaller provincially inspected abattoirs from accessing customers in other provinces. We acknowledge the high degree of complexity involved and that any solution must maintain both food safety and import/export standards. However, we are confident that safe, flexible models are possible. OFA recommends engaging processors in developing practical regulatory pathways and supporting facilities with public investment—building on initiatives such as OMAFA's *Ready to Grow Pilot*.

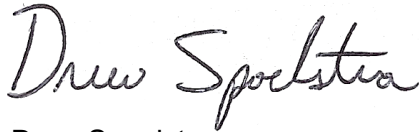
In moving forward, OFA urges governments to:

1. Ensure agriculture is included in all consultations on interprovincial trade reform.
2. Target unjustified barriers to competitiveness.
3. Protect supply management and commodity marketing systems.

A “Team Canada” approach is needed to strengthen agriculture, bolster food security, and grow the national economy. Thoughtful, inclusive reforms will both expand trade opportunities and protect the integrity of Canada’s food system.

OFA looks forward to continued dialogue and collaboration on this important initiative.

Sincerely,



Drew Spoelstra
President

cc: Agriculture and Agri-Food Canada – Sector Engagement
Keith Currie, President, Canadian Federation of Agriculture
OFA Board of Directors

This submission has been approved by OFA Board of Directors and will be posted to OFA’s website:
<https://ofa.on.ca/resources>