



January 18, 2019

Michael Helfinger
Intergovernmental Policy Coordination Unit
900 Bay Street, Hearst Block 7th Floor
Toronto ON M6H 4L1
michael.helfinger@ontario.ca

Re: Bill 66, Restoring Ontario's Competitiveness Act, 2018, Schedule 1

Dear Mr. Helfinger,

We are writing on behalf of the Ontario Fruit and Vegetable Growers' Association (OFVGA) to comment on the amendments proposed to the Agricultural Employees Protection Act (AEPA) within Bill 66, Restoring Ontario's Competitiveness Act, 2018. To note, OFVGA is also submitting separate comments with respect to other aspects of Bill 66, including proposed amendments to the Planning Act.

With respect to the proposed amendments to the AEPA, the OFVGA is not opposed to extending the Act to those employees who engage in ornamental horticulture. However, OFVGA would like to ensure that specifically referencing ornamental horticulture in the Act does not by default exclude edible horticulture as the Act is otherwise silent on specific examples that fall under the definition of agriculture.

To avoid possible pitfalls, the AEPA should contain wording around the production of fruits and vegetables or edible horticulture and include all primary agricultural activities required to grow and prepare product for market the marketplace. This would include, but not be limited to activities such as seeding, irrigating, maintaining plants/orchards, harvesting, grading, packing warehousing/storage, marketing and distribution.

It is important to the competitiveness of Ontario's fruit and vegetable farms that government account for these activities, which are increasingly required of modern farms that are looking to achieve economies of scale to compete in today's global context. Having flexible government policy that accounts for the structure of modern farm operations will support a competitive agricultural sector.

Thank you for the opportunity to provide comments on the changes proposed in Schedule 1 of Bill 66. Should you have any questions or would like to meet to discuss OFVGA's comments, don't hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jan VanderHout".

Jan VanderHout
Chair, OFVGA Board

A handwritten signature in blue ink, appearing to read "Ken Forth".

Ken Forth
Chair, OFVGA Labour Section
Chair, Labour Issues Coordinating
Committee

**About the OFVGA:**

The OFVGA is the leading voice for Ontario's fruit, vegetable and greenhouse vegetable farmers. Our sector includes more than 3,500 family run farms that employ over 30,000 people directly on-farm. For every on-farm job, it is estimated there are 2.2 jobs created downstream, or approximately 96,000 jobs combined. Fruit and vegetable production drives Ontario's rural and urban economies by generating more than \$4.2 billion in economic activity annually, along with \$600 million in combined tax revenues for all levels of government. Ontario fruit and vegetable farmers compete with global producers for domestic and export markets that demand low cost quality produce. Fruit and vegetable exports from Ontario total over \$1.5 billion, almost half of which originates from the greenhouse vegetable sector.