March 12, 2022

Building and Development Branch
Ministry of Municipal Affairs and Housing
Sent via email to : buildingcode.consultation@ontario.ca

RE: Proposed Changes for the Next Edition of Ontario's Building Code (Winter Consultation)

The Ontario Fruit and Vegetable Growers' Association (OFVGA) appreciates the opportunity to share our perspectives related to the current consultation on Ontario's Building Code.

One of the consequences of the ongoing COVID pandemic has been a dramatic increase in demand and need for housing of farm workers in Ontario, in particular for international farm workers who come to work in Ontario through the federally regulated Seasonal Agricultural Worker Program (SAWP) and the Agricultural Stream of the federal Temporary Foreign Worker Program (TFWP).

One of the regulations of both programs is that farm employers must provide housing to the international guest workers while they are in Ontario. This housing is always subject to compliance with municipal building code and fire code requirements, and it must pass annual inspection and approval for its proposed occupancy by the local public health unit.

Given the increased awareness and government prescriptions around physical distancing, farm employers have made it a priority to add housing space where possible to enable the new distancing norms in the housing for their international workers.

An effective option for providing increased, safe and comfortable housing space for the international guest workers is the use of existing houses, apartment buildings or other boarding/lodging/rooming accommodations.

However, farm employers across different regions of Ontario have been experiencing unexpected obstacles when trying to do so. Specifically, they are encountering municipal officers who are using the current definition of "Camp for housing of workers" in the Ontario Building Code as a reason to not allow five or more employees to live in these other styles of accommodations.

The OFVGA urges MMAH to work with industry on addressing the current obstacles to the responsible and safe use of existing housing/buildings to increase living space for international guest workers working in Ontario under the SAWP and Agricultural Stream of the TFWP and whose housing accommodations are regularly inspected by federal inspectors and local health officers.

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ONTARIO FRUIT & VEGETABLE GROWERS' ASSOCIATION

The OFVGA welcomes an opportunity to work with MMAH on finding solutions to enable farm employers in Ontario in their efforts to provide increased and safe living space to their international guest workers.

Thank you for your consideration of this matter. Should you have any questions or wish to discuss, please contact me.

Sincerely,



Brian Gilroy
Chair, OFVGA Energy, Property & Infrastructure Section

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