

June 28, 2024

Katerina Downard
Environmental Policy Office
438 University Ave
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Toronto, ON
M7A 1N3

Via email to Katerina.Downard@ontario.ca and uploaded to the Environmental Registry of Ontario and Ontario's Regulatory Registry under 24-MTO010

Dear Katerina Downard,

RE: ER 019-8461 The Safer Roads and Communities Act, 2024

The Ontario Federation of Agriculture (OFA) welcomes the opportunity to provide comments from an agricultural perspective on proposed legislation to strengthen public safety, combat impaired driving, and enhance alternative and commercial vehicle safety. OFA is Ontario's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

As more traffic enters our rural areas for tourism, recreation, and for commuting, there are more instances of collisions with farm equipment. Speed is almost always a factor. For a vehicle travelling at high speed, the time to close a 100 metre gap to a slow moving farm vehicle is a few seconds, time needed to recognize the equipment, realize it is travelling slowly, and safely reduce vehicle speed. We support strengthening mandatory minimum licence suspensions and mandatory measures for stunt driving and impaired driving.

As the numbers of commercial vehicles travelling rural highways increases, OFA supports Ministry of Transportation (MTO) Enforcement Officers having enhanced authority to enforce commercial vehicle safety and to deliver the Commercial Vehicle Enforcement Program.

Similar to high rates of automobile thefts, farm communities are witnessing higher frequency of trespass, and equipment and vehicle thefts. OFA supports introducing an escalating licence suspension framework for vehicle theft that includes aggravating factors.

Related to e-bikes and cargo e-bikes, OFA supports classifying the different types of combined manual / power assist bikes to improve specific operator and vehicle safety requirements. In addition, this will help municipalities determine where each type can be safely used.

We recommend that, for all e-bike classes, the minimum operator age align with driver's licence requirements, and we support that all e-bike classes include a minimum age for passengers.

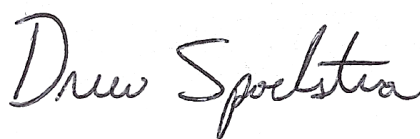
To ensure clarity and awareness of enforcement, we recommend e-bike regulations, requirements, and exemptions be applied as consistently as possible to the existing types of off-road vehicles that have on-road allowances. All classes of e-bikes should require liability insurance to provide access to statutory accident benefits.

OFA recommends all operators in control of e-bikes using the roadway, be required to have at minimum a G2 or M2 driver's licence, so they have a rudimentary knowledge of the proper rules for safe driving. Additionally, OFA recommends that the Official MTO Driver's Handbook include reference to the roadside slow-moving vehicle caution sign and an example of the distinctive triangular Slow-Moving Vehicle (SMV) placard. This would help drivers understand and remain alert for flashing amber lights and the SMV sign on farm equipment, indicating the vehicle can travel at maximum 40 kmph.

In addition to travelling more slowly than other vehicles, farm equipment is often wide and long. While not specific to the content of *The Safer Roads and Communities Act, 2024*, OFA continues to highlight safe driving practices related to farm machinery travelling between fields and farms. Farmers have a limited time to plant and harvest crops that feed our communities. Drivers incorrectly passing, and travelling at high speed results in serious accidents.

Ontario's agri-food sector is one of the province's leading industries. For Ontario farmers, these operations are their business, as well as where they live and raise their families. OFA looks forward to continuing to work with MTO to educate all drivers to safely operate their vehicles and ensure we all get home to our families.

Sincerely,



Drew Spoelstra
President

cc: Fazelah Ali, Road Safety Program Development Office
OFA Board of Directors