

November 22, 2025

Waterways Protection Office  
10 Floor, 40 St Clair Ave W  
Toronto, ON  
M4V 1M2

**Re: Proposal to amend the Ontario Water Resources Act to enable the regulation of additional sewage systems under the Building Code to support construction of on-farm worker housing (ERO 025-0900)**

To the Waterways Protection Office,

Ontario Greenhouse Vegetable Growers (OGVG) fully supports the Ministry's proposed amendments to the *Ontario Water Resources Act* to allow multiple Building Code sewage systems on a single agricultural property with on-farm worker housing, up to 50,000 L/day. Expanding this capacity and shifting approval of eligible systems into the scope of the *Building Code* will reduce unnecessary delays. Given the urgent need for safe, stable on-farm accommodation for agricultural workers, this change is a positive step toward removing a longstanding barrier to growth in the sector.

Ontario's greenhouse vegetable industry has grown at an average rate of 5% annually over the past decade, contributing approximately \$2.4 billion in Gross Domestic Product (GDP) to the provincial economy. OGVG represents 170 farming families managing over 4,300 acres of tomatoes, peppers, and cucumbers. This success has been supported by temporary foreign workers (TFWs), who remain essential to meeting the sector's labor demands. *Statistics Canada* reported that Ontario employed over 33,000 temporary foreign and seasonal agricultural workers in 2023, with a meaningful portion of these workers support OGVG member operations. The *Canadian Agricultural Human Resource Council* further projects that by 2030 Canada's labor gap in crop production will reach approximately 15,200 unfilled positions. As the number of agricultural roles not filled by Canadians continues to rise, expanding on-farm housing capacity becomes increasingly important to sustaining production and ensuring a reliable food supply.

Streamlining approvals for on-farm housing will ensure that farms can plan confidently for workforce needs and continue contributing to Ontario's food security. At a time of significant housing demand and rising costs, enabling efficient construction of worker housing on existing farm properties will also reduce pressure on rural and small-community housing markets. OGVG appreciates the Ministry's continued commitment to supporting agriculture and infrastructure modernization. We look forward to working together to sustain growth in the greenhouse sector and Ontario's broader economy.

Sincerely,



Richard Lee  
Executive Director