



LONG-TERM THINKING FOR TODAY'S ISSUES

January 18, 2019

Michael Helfinger  
Senior Policy Advisor  
Ministry of Economic Development, Job Creation and Trade  
Policy Coordination and Business Climate Branch  
900 Bay Street,  
Hearst Block, Floor 7  
Toronto ON, M6H 4L1

Dear Mr. Helfinger,

**RE: Proposed Amendments to Agricultural Employees Protection Act, 2002  
ERO 013-4293 Bill 66: Restoring Ontario's Competitiveness Act, 2018**

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

Cutting red tape can often speed up inefficient systems and economize on costly reporting. It is vital, however, to make sure that improved efficiency in one area does not cause undue harm in another. Within Bill 66, we see positive recommendations for reducing red tape but also ones that raise our concerns, including the amendment to the Agricultural Employees Protection Act (2002).

As stated within schedule 1 of Bill 66, silviculture will no longer fall under the definition of agriculture and, therefore, people employed in silviculture will not be protected under the Agricultural Employees Protection Act (2002). The CFFO believes that the operation of a woodlot, or silviculture, should continue to be classified as agriculture and, therefore, people working in silviculture should remain in the Agricultural Employees Protection Act (2002). Farmers who operate woodlots should be recognized as owners of legitimate agricultural businesses; it follows that their employees should be protected as agricultural workers.

We appreciate this opportunity to respond to these proposed amendments, and thank you for consideration of our comments.

Sincerely,

Clarence Nywening, President  
Christian Farmers Federation of Ontario

**CC:** Hon. Ernie Hardeman, MPP, Ministry of Agriculture, Food and Rural Affairs