



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 Farm Registration and Farm Organizations Funding Act, 1993
ERO 013-4293 Bill 66: Restoring Ontario's Competitiveness Act, 2018**

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization (AFO) 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, there are positive recommendations for reducing red tape, but there are also several recommendations that raise our concerns, including proposed amendments to the Farm Registration and Farm Organizations Funding Act, 1993.

According to Section 1 of the Bill, which treats the Farm Registration and Farm Organizations Funding Act, 1993, the Minister may regulate applications for farming business registration numbers, including the form and manner of such applications, the time at which they must be made, and the validity of farming business registration numbers, including their expiry and renewal dates.

For the sake of ministerial cohesion and effectiveness, the CFFO strongly discourages drastic changes to the current system of registration. For example, the introduction of a multiple-year renewal period for the Farm Business Registration Program would create an unstable administration system, thereby generating more red tape. Regarding the validity of farming business registration numbers, the ministry should consult with the province's AFOs concerning any proposed changes.

The concern of unintentionally increasing red tape for AFOs persists within the Ministry's ability to revoke an FBR number when payments are inadequate and to assign a new FBR number if that person makes the proper payments at a later date, or expire FBR numbers if payment is not made in the prescribed time. The CFFO is concerned that by revoking or expiring an FBR number solely due to

improper or untimely payment and issuing a new FBR number when the situation has been corrected will unintentionally add additional red tape to all parties involved in the FBR process. Efforts should therefore be made to restore the original FBR number rather than issue a new one.

Under the section of *Delegation of Administrative Authority*, Bill 66 would give the Minister the power to designate a corporation as a Farm Registration Administrator if it meets the prescribed conditions, such as being a not-for-profit without share capital. Over the years, Agricorp has been in the process of integrating all the programs that they administer to reduce red tape for farmers. The CFFO is concerned about the potential for segregation rather than amalgamation of farm services by allowing the Minister to terminate and assign farm administrators when they “consider it advisable to do so.” Where at all possible, cohesion between farmers, Agricorp and AFOs should be upheld to allow for efficient correspondence, procedure and a reduction in red tape.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Clarence Nywening', with a long horizontal flourish extending to the right.

Clarence Nywening, President
Christian Farmers Federation of Ontario
JK

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