



November 28, 2019

The Honourable Jeff Yurek, MPP  
Minister of Environment, Conservation and Parks  
Queen's Park  
[jeff.yurek@pc.ola.org](mailto:jeff.yurek@pc.ola.org)

**Re: Environmental Registry of Ontario (ERO) Posting 019-0601**

Dear Minister Yurek,

The Ontario Fruit & Vegetable Growers Association (OFVGA) wishes to express its full support of the proposal to update Ontario's pesticides regulation as indicated under the Environmental Registry of Ontario (ERO) posting 019-0601. Removal of the duplicative process for pesticide classification in Ontario will enable timely access for farmers to the newest crop protection tools without compromising on protection of human health or the environment.

These federally registered products have undergone a full assessment of human health and environmental risks by the federal Pest Management Regulatory Agency (PMRA) and deemed to be acceptable for use. The federal classification system is a reasonable basis for regulation in Ontario – as is recognized by every other province in Canada.

As all federal regulatory decisions by PMRA require mandatory public consultation periods, the OFVGA wishes to confirm that classification of new products in Ontario under the proposed amendments will be automatic, and not require public consultation under the ERO. Such a requirement would be duplicative of the existing federal process as all stakeholders can comment through PMRA's existing review process.

The OFVGA agrees the proposed amendments will reduce regulatory complexity and modernize pesticide management in Ontario, streamline product access for farm businesses, while ensuring protection of human health and the environment.

We encourage the Ontario government to form an informal advisory committee if an issue emerges related to the Pesticide Act that requires stakeholder input. This approach would fill any potential gap if moving away from the formal Ontario Pesticide Advisory Committee structure.

Thank you for being committed to address this unnecessary regulatory burden in Ontario. The OFVGA is pleased to support this proposal and looks forward to seeing the changes finalized in regulation as quickly as possible.

Sincerely,

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Bill George Jr.,  
Chair, OFVGA Board

A handwritten signature in black ink, appearing to read "Charles Stevens", written over a light blue horizontal line.

Charles Stevens  
Chair, OFVGA Crop Protection Section



Cc: Hon. Minister Hardeman, Minister of Agriculture, Food and Rural Affairs  
Mike Chromczak, Chair, OFVGA Environment and Conservation Section

**About the OFVGA:**

The OFVGA is the leading voice for Ontario's fruit and vegetable farmers. Our sector includes more than 3,500 family run farms that employ over 30,000 people directly on-farm. For every on-farm job, it is estimated there are 2.2 jobs created downstream, or approximately 96,000 jobs combined. Fruit and vegetable production drives Ontario's rural and urban economies by generating more than \$4.2 billion in economic activity annually, along with \$600 million in combined tax revenues for all levels of government. Ontario fruit and vegetable farmers compete with global producers for domestic and export markets that demand low cost quality produce. Fruit and vegetable exports from Ontario total over \$1.6 billion, almost half of which originates from the greenhouse vegetable sector.