

July 13, 2023

Attention: Ontario Fire Code Consultation Ministry of the Solicitor General Office of the Fire Marshal and Emergency Management 25 Morton Shulman Ave. Toronto, ON M3M 0B1

Delivered via email: jon.pegg@ontario.ca

Re: Ontario Fire Code 23-SOLGEN011

Dear Ministry,

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.

The CFFO recognizes the importance of preventing barn fires and encouraging ongoing fire safety in barns. However, new regulations must take into consideration additional costs to farmers and how likely the new regulations are to increase overall safety.

Because of the conditions inside barns, it is challenging to keep equipment such as fire alarms or monitors working correctly, especially over long periods. The CFFO does not support regulations that will add significant costs to building new barns, as that will discourage new construction and expansion. It will also likely increase safety risk as older buildings are used for longer.

Education and incentives should be used to help farmers reduce fire risk in barns and implement and maintain early warning equipment, not regulation. The private sector, such as through insurance companies, should take responsibility for inspections and maintaining safe conditions in barns.

The CFFO recommends that all new barns built after 2024 continue to be exempt from the Ontario Fire Code in the same way that those barns built before 2024 are currently exempt.

We appreciate your consideration of our concerns.

Sincerely,

Ed Scharringa, President

Christian Farmers Federation of Ontario

cc: Hon. Lisa Thompson, MPP, Minister of Agriculture, Food and Rural Affairs, Ontario