



CHRISTIAN FARMERS FEDERATION OF ONTARIO

ACCREDITED FARM ORGANIZATION

April 3, 2023

Attention: Andrew Watt
Corporate Planning and Projects Unit
Business Services Branch
Ministry of Agriculture, Food and Rural Affairs
Ontario Government Building 2nd Floor NW
1 Stone Road West
Guelph, ON
N1G 4Y2
Delivered via email: andrew.watt@ontario.ca

Re: ERO 019-6674 Proposed Updates to the Rules of Practice and Procedure of the Normal Farm Practices Protection Board (NFPPB)

Dear Mr. Watt,

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 supports the need to update the rules of practice and procedure of the Normal Farm Practices Protection Board in order to ensure they keep pace with current practices and allows the Board to work efficiently and effectively.

In particular the CFFO supports changes that permit and/or support the practice of:

- Written and electronic hearings.
- The power to dismiss applications.
- The ability of parties to propose rationale for not proceeding with written or electronic hearings.
- Use of electronic communications.
- Streamlining proceedings.
- Reduced administrative burden for parties and the Board.

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Recommended changes:

- Under proposed Rule 37(5), other payment options should be included beyond payment by cheque.
- Further clarify that electronic hearings should be open to public participation, and outline what limited circumstances would qualify as making this “impractical.”
- Current rule #63 “Stays of Board Decisions” should remain in place to allow for time to seek review through the judicial courts.

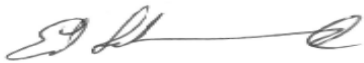
We also recommend requiring a deposit from applicants to the NFPPB, which would be refunded only if the applicant’s suit is successful. This would discourage frivolous applications.

Conclusion

It is important that the rules of practice and procedure for the Normal Farm Practices Protection Board keep pace with current practices and allows the Board to work efficiently and effectively. The CFFO supports many of the changes as proposed which will streamline proceedings and reduce administrative burden. We recommend a few changes to the draft proposals as outlined above.

We appreciate this opportunity to provide input and thank you for your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario

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