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LONG-TERM THINKING FOR TODAY'S ISSUES

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December 22, 2020

Attention: Temporary Foreign Worker Program  
Employment and Social Development Canada  
Via email: NC-TFWP-APT-PTET-EPA-GD@hrsdc-rhdcc.gc.ca

## Re: Stakeholder Consultations on Mandatory Requirements for Employer-Provided Accommodations in the Temporary Foreign Worker Program

Dear Ministers,

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 is concerned about the safety of workers across agricultural production, including farming families, local workers and workers from overseas, who are all vital to the ongoing sustainability of our local food supply and the vitality of our agri-food sector.

Workers who come to Ontario through the Temporary Foreign Worker Program are filling a significant need for on-farm labour. They themselves also benefit from the economic opportunity to find work here in Canada. Any changes to the accommodation standards for Temporary Foreign Workers need to find a suitable balance between protecting health and safety for workers while they are in Canada, while also limiting cost burdens on local farm businesses and protecting economic opportunities for workers to come to Canada.

### Principles for Establishing a Federal Standard

The CFFO supports the submission from the Foreign Agricultural Resource Management Services (F.A.R.M.S.) and Ontario Fruit and Vegetable Growers Association (OFVGA) to this consultation. We also wish to highlight the important principles they have outlined that should be considered in establishing a federal standard for employer-provided temporary foreign worker accommodations.

In particular, we support the call to:

- respect existing provincial standards and local jurisdiction as this relates to temporary foreign worker accommodations,
- include flexibility to allow for quick local responsiveness to future pandemics or similar crises, and
- provide a cost-share funding program to support farm businesses in making investments to modify or add accommodation for workers according to new federal guidelines or requirements.

We are also supportive of the call for a phased-in approach and for flexibility for each farm business, working with local health units, to achieve desired outcomes. The five-step approach F.A.R.M.S and

OFVGA described for implementing a federal standard, while respecting existing provincial standards (such as those in Ontario) and local health unit oversight, is a process we would also support.

## Conclusion

We recognize, today more than ever, the importance of protecting the health and safety of all farm workers as foundational to the success of our food system. It is important that changes to standards for employer-provided accommodations through the Temporary Foreign Worker Program are phased in and supported by cost-share funding. These steps are necessary to help farm businesses adapt accommodations to new federal requirements. Housing for farm workers is one important part of a whole system of protections and protocols that contribute to keeping workers safe. The CFFO wants to see the Temporary Foreign Worker Program continue to successfully fill Ontario's need for on-farm workers while providing safe economic opportunities for those who come to work in Canada.

We appreciate your consideration of our comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario